

Land West of Market St, Edenfield (H66)  
Masterplan submitted by Taylor Wimpey

## Responses Received

### Part 1 of 2 – Responses 1 – 139



H66 Masterplan (Taylor Wimpey, 2022)

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Good morning,

Please find below my objection to the proposed development:-

The proposal is being put through on the value of the houses which is ultimately in no way shape or form affordable for the average wage earner in the valley, it is all about developer greed. There are plenty of alternative brownfield sites, but they would not be as desirable / cheap to convert. The prime minister Rishi Sunak on the 22nd July pledged to stop building on greenfield land. I am sure all conservative members will be in full support of this new initiative.

The main issue is traffic. I commute daily beyond Manchester and have witnessed first-hand the pressure recently put on the road network by temporary lights near to park farm. Increased traffic will put further pressure on this road which already appears to be subsiding again. This resulted in traffic queuing on the slow lane of the M66 to come off at the Ramsbottom junction. This was/is a highly dangerous and will only become more congested with yet more commuters, which is whom Taylor Wimpey and expect to be selling to by their own acknowledgment. Closer to the village of Edenfield neither of the proposed access roads are sufficient to support the cars suggested (again on the basis these are to be sold to commuters not those living locally.)

Recent closures to the M66 mean that traffic is diverted through Edenfield at night. Traffic is diverted from Bury Road but in reality, it is a short cut and so traffic will continue to cut through as there is no viable way to enforce this.

The extension to Edenfield school would also require further green belt land to be built on. Again, unacceptable that habitats would be destroyed, whilst token parks are put in place to appease.

It has been suggested local jobs will be created. In reality Taylor Wimpey do not expect locals to do these jobs as they have confirmed they expect to use their skilled contractors. This will place further strain during the building phase.

I understand housing is required in order to house a growing population however, my argument is this development lacks the infrastructure to be effective and will place an unsustainable burden on the area in and around Edenfield.

Kind regards

Stephen World

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

Dear Sirs,

I am objecting most strongly to the proposed Edenfield Master Plan due to the fact that it will be changed from a pleasant village to a small town.

The infrastructure will be unable to cope with the construction of over 400 dwellings. There is inadequate school places available and the village roads are also difficult to navigate. With the possible increase of circa 800 vehicles then the village will be gridlocked.

One proposed entry onto the proposed construction site is along Exchange Street which is obviously not wide enough for regular two way traffic and as it runs adjacent to a childrens playground is obviously a Safety concern for children using this area.

Yours Sincerely

Trevor Boothman

[REDACTED]  
[REDACTED]  
[REDACTED]

Sent from my iPad



To whom it may concern.

We would like to object to the plan and the lack of consideration of the impact to the health and well being of the residents of both the village and the villagers.

The infrastructure of the village cannot accommodate 238 extra houses with hundreds of extra cars, the roads are already congested this will be intolerable and dangerous .

The allocated land was greenbelt and we object to the removal of this status. The impact on flora and fauna will be devastating.

The plan is flawed and inconsistent with agreements already made from developers. They are conflicted and so the plan is not robust.

It's just plain wrong and the council should be ashamed.

We are beyond worried and the impact on our health and wellbeing is significant.

Please log our concerns.

Regards

Paula and Lee Munro

████████████████████

██████████

Name Jan and Les Adams

Address [REDACTED]  
[REDACTED]  
[REDACTED]

We are writing this on behalf of our household to object to the above masterplan After reading all the extensive material we feel that one of the biggest problems will be the extra traffic on Market Street. The plan shows that they are expecting between 140 and 160 extra 2 way journeys will be generated as a result of the building. Due to the lack of amenities and poor public transport in the village we feel that this figure is grossly underestimated and that the extra traffic will make a massive impact to an already overused road.

Also in the design and access statement it talks about new schools, amenities and workplaces and none if this is mentioned in the application

Les and Jan Adams

Sent from my iPhone

My objection to this plan is that already there is too much traffic coming through Edenfield and the School would be overcrowded and could not support the additional intake. To cycle through from our house to Rawtenstall the only way is through Edenfield and it does not feel safe. No way would I undertake such a journey anywhere near peak times. Even in non peak times I am very very cautious as there are cars parked on both sides of the road and cars have to wait to pass through so you can imagine how unsafe a cyclist feels. Mrs. Anne Casey, [REDACTED]

To whom it may concern,

I would like to object to the above plans on the following points.

All brown field sites in the local area should be exhausted before greenfield sites are used. This is not the case.

All empty properties in the area should be occupied. This again is not the case.

The village transport network already struggles with then number of cars. The potential addition of up to 1000 additional cars will significantly increase this problem. It will also reduce air quality and increase noise pollution.

The loss of wildlife in the area will be significant.

Infrastructure consideration are inadequate.

The development is totally unsuitable for Edenfield.

Kind regards

Jamie Irwin

██████████  
██████████  
██████████

[Sent from Yahoo Mail on Android](#)

Hello,

I'm writing to you as a resident of 6 East Street, Edenfield, Ramsbottom, BL00JE to wholeheartedly object to the proposed plans to build 200 houses in edenfield. The infrastructure, in particularly market Street is I'll equipped to deal with the additional traffic.

The plans laid out so not show how this would be overcome. The additional 200 houses proposed would ruin what makes edenfield great, being surrounded by green fields, spectacular views and the great outdoors. Please consider this strong objection for the plans and do not ruin the village I call home.

Regards,  
Tom

Sent via BT Email App

Hi

I, Hannah Smith of [REDACTED] an emailing to OBJECT to the Masterplan proposed by Taylor Wimpey in association with planning application 2022/0451 - A Proposed Development For The Erection Of 238 No. Residential Dwellings And All Associated Works.

Edenfield CANNOT support this.

Please confirm receipt of this email.

Regards  
Hannah

2 names with the same postal address of [REDACTED] -

Mr John Whittle  
Mrs Jennifer Whittle

There is nothing right about this location to build this volume of houses.

Traffic and road access and size

Infrastructure (schools/amenities)

Danger of more surface run off adding to the force and peak flow of the Irwell at crucial times.

Loss of green space and pollution.

I would urge this to be wholeheartedly rejected. There is simply not enough infrastructure to support, it will be an absolute nightmare.

Sent from [Mail](#) for Windows

Good Morning Planning Officer,

Thankyou for consulting with the Lancashire Constabulary Designing Out Crime Team in respect of this proposal.


We would advocate that the installation be designed and constructed using the security principles and security rated products as stated in the attached SBD 'Homes 2019' Design Guide. Further details about Secured By Design, including application forms and security specifications can be found at [www.securedbydesign.com](http://www.securedbydesign.com).

It is positive to see that this proposal includes many of the SBD principles within its plans, such as back to back gardens, 1.8m high boundary treatments, and well overlooked public spaces which will help to mitigate against common neighbourhood crimes.

Should you require anything further on this proposal then please do not hesitate to contact me.




Kind Regards

Danii



**7263 Danii Wohler**  
Designing Out Crime Officer  
East Division

t: [REDACTED]







# SECURED BY DESIGN HOMES 2019

Version 2, March 2019

Secured by Design



Official Police Security Initiative

The changes to the English Planning and Building Control regulations following in-depth reviews by the Ministry for Housing, Communities and Local Government (MHCLG) have underlined the importance of the police advice delivered over the past 30 years; specifically in the form of the Secured by Design (SBD) initiative. The references within the National Planning Policy Framework (NPPF) and the accompanying National Planning Practice Guidance (NPPG) along with those in Scotland (Scottish Planning Policy – PAN 77) and Wales (Planning Policy Wales – TAN 12) have sought to reinforce the need and importance for a safe and secure external environment and to this end there are specific references to police service advice and the Police.uk website in particular.

Indeed, the government's Chief Planning Officer Steve Quartermain, wrote to all planning authorities reminding them of the important role the planning system plays in ensuring appropriate measures are in place in relation to crime prevention and security. Further information is available via [www.securedbydesign.com](http://www.securedbydesign.com)

The MHCLG has also followed Scotland's lead and introduced physical security standards for new homes within Building Regulations for the first time. The Welsh Government has also decided to include a new Building Regulation to address the security of new homes.

This edition of the SBD guidance for domestic properties has been designed to cater for the security of all new and refurbished homes including those for disabled and older people. It incorporates the latest security standards, developed to address emerging criminal methods of attack, and includes references to the Building Regulations and other statutory requirements across the United Kingdom.

SBD officers have become increasingly aware of the need to consider adapted, accessible and inclusive housing and neighbourhoods in their advice, so as not to create additional barriers for disabled and older residents. Such inclusive design aims to remove barriers that create undue effort and separation. It is defined as a process that ensures all buildings, places, and surrounding spaces can be easily and comfortably accessed and used by everyone.

The requirements and recommendations within this guide are based upon sound research findings that have proven SBD to deliver significant crime reductions and cost efficiency savings for a wide range of stakeholders including local authorities, housing associations, landlords, residents and the police service. The police service continually re-evaluates the effectiveness of Secured by Design and responds to emerging crime trends and independent research findings, in conjunction with industry partners, as and when it is considered necessary and to protect the public from crime.

The standards contained within this document are based upon those developed by SBD with various standards owners and trade associations.

The police service places great importance upon the need to build sustainable and inclusive communities and to raise awareness of the significant impact that low crime makes to the ongoing and long term sustainability of a development.

Should you wish to contribute to this or any of the SBD guides please contact Secured by Design by email at [sbdconsultations@police-cpi.co.uk](mailto:sbdconsultations@police-cpi.co.uk).

Secured by Design Homes 2019 is applicable to all new SBD applications made after 1st April 2019.

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# 1 Introduction

1.1 Secured by Design is a police initiative to guide and encourage those engaged within the specification, design and build of new homes, and those undertaking major or minor property refurbishment, to adopt crime prevention measures. The advice given in this guide has been proven to reduce the opportunity for crime and the fear of crime, creating safer, more secure and sustainable environments. Secured by Design is owned by the UK Police Service and is supported by the Home Office. Building Control Departments in England (Part Q Security – Dwellings), Scotland (Building Standard 4.13) and Wales (Part Q Security – Dwellings) all reference SBD. For simplicity, from this point onwards, the SBD Homes Guide will refer to the English, Scottish and Welsh building regulations collectively as UK Building Regulations.

NB. At this time, Northern Ireland does not have a Building Regulation for the physical security of dwellings.

1.2 The advice given by the police Crime Prevention Design Advisor (CPDA), Architectural Liaison Officer (ALO) or Designing Out Crime Officer (DOCO) will be provided directly from the content of this guide and will be dependent upon a crime risk analysis and an understanding of local crime occurrences. Where justified by the results of a crime risk analysis, some sections of this guide allow for commensurate enhanced measures to be specified by the DOCO, the details of which are contained within each relevant section.

NB. For the purposes of this document all contact with the police specialist will refer to the generic term 'DOCO'.

1.3 Research conservatively estimates the carbon cost of crime within the UK to be in the region of 6,000,000 tonnes of CO<sub>2</sub> per annum. This is roughly equivalent to the total CO<sub>2</sub> output of 6 million UK homes.

1.4 The environmental benefits of SBD are supported by independent academic research consistently proving that SBD housing developments experience up to 87% less burglary, 25% less vehicle crime and 25% less criminal damage (*Note 1.4*). It also has a significant impact on anti-social behaviour. Therefore there are substantial carbon cost savings associated with building new homes and refurbishing existing homes to the SBD standard i.e. less replacement of poor quality doors, windows and the stolen property from within the home as a result of criminal acts. This has been achieved through adherence to well researched and effective design solutions, innovative and creative product design coupled with robust manufacturing standards.

*Note 1.4: Research documentation can be found on the SBD website.*

1.5 If you would like to apply for the Secured by Design award, please use the 'SBD Homes' application form found on our website [www.securedbydesign.com](http://www.securedbydesign.com)

## 2 Scope

2.1 This edition of 'SBD Homes' addresses the community safety and security requirements for all types of dwellings including individual houses, housing estates, low and high rise apartment blocks (including assisted living and student accommodation).

2.2 The design, layout and physical security sections of this edition can be applied to both new and refurbished homes.

## 3 SBD Homes explained

### Who should read this document?

3.1 Secured by Design Homes can now fulfil the requirements of:

- Planning Authorities – Section 1 of this document provides guidance on

proven crime reduction methodologies for the external environment. Following the withdrawal of the 'Safer Places' document, there is now additional information available to all UK planning officers at [www.police.uk](http://www.police.uk)

- Building Control – Section 2 provides detailed information that may be utilised to measure and discharge developments against the security requirements of the relevant UK Building Regulations (see paragraph 1.1).
- Developers – Major and regional developers, small bespoke developers or individuals pursuing a self-build project can utilise SBD as a route to compliance with the security requirements of the relevant UK Building Regulations (see paragraph 1.1).
- Social Housing providers – Compliance with SBD Homes will continue to provide a 'police preferred specification' for all new developments (proving compliance with the security requirements of the UK Building Regulations – see paragraph 1.1) or refurbished developments. Reductions in dwelling maintenance, increased tenant retention and satisfaction, reduced vacancy levels and sustainable low crime environments being some of the proven benefits.
- Private rented sector – This document may be used by the private rented sector to provide a safe and secure environment, increase tenant satisfaction and occupancy, reduce maintenance and crime. The requirements within Section 2 provide guidance for landlords who wish to improve the level of security within new developments (proving compliance with the security requirements of the relevant UK Building Regulations – see paragraph 1.1) and the refurbishment or upgrading of existing properties.

- Home owners or occupiers – Section 1 of this document provides guidance on the external environment around the dwelling, whilst Section 2 provides detailed information regarding the physical requirements which may be applied to existing homes that will radically improve the security of the home.

## SBD format in detail

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3.2 This document is presented in three sections:

**Section 1:** Development layout and design. This section provides guidance on all aspects of design and layout that impact on the creation of a safe and secure environments, including road layout, footpath design, communal areas, dwelling boundaries, car parking and lighting.

**Section 2:** Physical security of the home. This section provides the 'Police Preferred Specification' for all physical security requirements for new or refurbished homes. It is separated into two sections; Section 2a reflects the requirements of the UK Building Regulations and Section 2b addresses bespoke new homes and existing homes.

**Section 3:** Additional features for the SBD Gold award. The essential security dwelling detail requirements in Section 2 are further enhanced by the requirements set out in this section. Section 3 addresses the requirements for a range of additional or optional residential features, such as enhanced glazing, bicycle storage, drying rooms, external bin stores, etc. If a development contains any of the features within Section 3, the physical security requirements within this section should be adhered to in order to achieve full SBD Gold compliance.

3.3 Compliance with any of the following SBD Awards satisfies the UK Building Regulations (see paragraph 1.1).

## SBD graded security levels

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- 3.4 Secured by Design has three differing levels of security award, starting at the highest level (SBD Gold) which incorporates the security of the external environment together with the physical security specification of the home. SBD Silver offers those involved in new developments, major refurbishment and the individual the opportunity to gain an award for the level of physical security provided. In addition, SBD Bronze offers a route to achieve a reasonable level of physical security for bespoke or refurbished properties where a traditional enhanced security product is not available, or cannot be utilised due to the listed building or other conservation status.

### SBD Gold

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- 3.5 The SBD Gold Award is awarded to new developments or refurbishment schemes that have achieved compliance with all the required security features particular to the development, contained within Section 1, Section 2a and Section 3 of this document.

## SBD Silver

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- 3.6 There are two routes to obtaining the SBD Silver Award:
- SBD Silver can be awarded to new developments or refurbishment schemes that meet the required security features particular to the development contained within Section 2a.  
  
The above is the minimum qualifying criteria for Secured by Design National Building Approval see paragraph 4.
  - SBD Silver can also be awarded to new bespoke developments or refurbishment schemes that meet the required security features particular to the development contained within Section 1, Section 2b and Section 3.

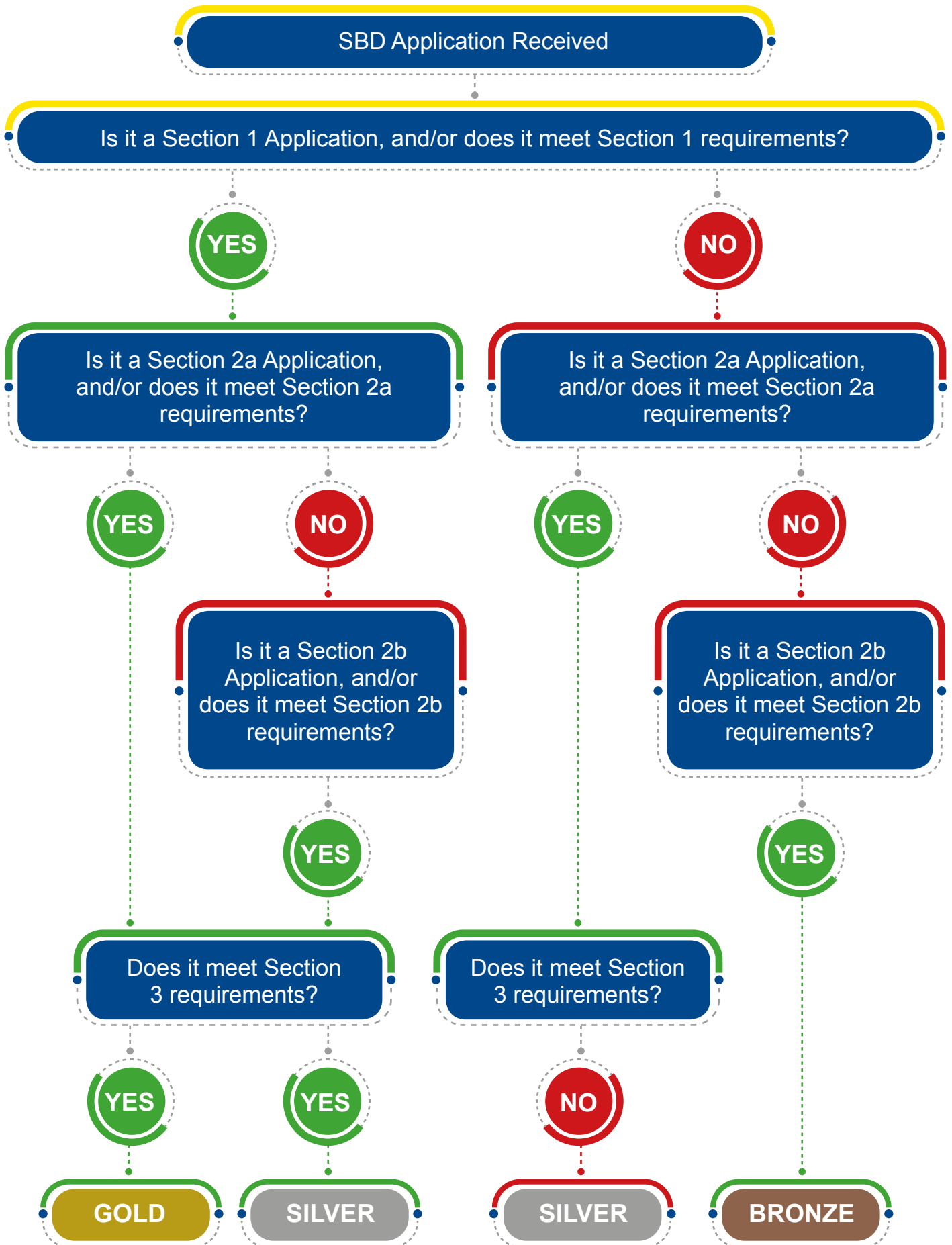
### SBD Bronze

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- 3.7 SBD Bronze can be awarded to new bespoke developments or refurbished properties that meet the required security features particular to the development contained within Section 2b.
- 3.8 Fig.1 overleaf depicts a flowchart of the new award structure.



# 2019 Award Flowchart



Notes:

1. No award for Section 1 or 3 only. 2. No other award combinations are available.



## 4 Secured by Design National Building Approval

- 4.1 Secured by Design has developed the *Secured by Design National Building Approval (SBD NBA)* which provides a structured approach to discharging the UK Building Regulations (see paragraph 1.1).
- 4.2 SBD NBA ensures that all suppliers of door, window and roof light products consistently meet the requirements of the regulations, this minimises the possibility of delays to the build process due to non-compliance issues. Secured by Design will conduct all relevant due diligence checks on behalf of the developer throughout the lifetime of the partnership and issue a certificate of conformity with the UK Building Regulations (see paragraph 1.1) and the Secured by Design Silver award. This police approval can be used for any future development built in accordance with the SBD NBA agreement to discharge the UK Building Regulations (see paragraph 1.1) and is acceptable to Building Control Officers and Approved Inspectors.
- 4.3 Housing Associations, social housing suppliers and client based specifiers can be confident that developers with SBD NBA membership are approved for the design of their homes and the level of physical security provided is robust and consistent.
- 4.4 The advantages for the developer are clear; increased Pre Qualification Questionnaire (PQQ) scoring, reduced bureaucracy and a reduction in the financial burden associated with standards compliance, faster discharge of Building Regulation/Standards obligations through the use of a UK police certificate of compliance. For more information about SBD NBA please contact us at [sbdnba@police-cpi.co.uk](mailto:sbdnba@police-cpi.co.uk)

## 5 How to apply for the SBD Award

- 5.1 Applicants should make themselves familiar with the relevant sections of the Secured by Design guidance contained within this document and are strongly advised to consult the Designing Out Crime Officer (DOCO) for site specific information at the earliest opportunity and follow the application process.
- 5.2 The application form must be read in conjunction with the full SBD Homes document to ensure that your application will comply.
- 5.3 If you are applying for Secured by Design Section 2 (SBD Silver or SBD Bronze Award) to demonstrate compliance with the UK Building regulations (see paragraph 1.1), please go to Section 2 of the application form.
- 5.4 The development will be measured against the requirements of the SBD award scheme current at the time the application was made. Developments that have not started on site within 3 years of the original SBD application shall be subject to a new application (to the current SBD standards).
- 5.5 Developers wishing to apply for Secured by Design National Building Approval should contact SBD directly at: [sbdnba@police-cpi.co.uk](mailto:sbdnba@police-cpi.co.uk)

## 6 Construction phase security – advisory note

- 6.1 Unfortunately there are many crimes which occur during the construction phase of a development; the most significant include theft of plant equipment, materials, tools and diesel fuel.
- 6.2 Secured by Design recommend that security should be in place prior and during the construction phase. This should include robust perimeter fencing of the site and a monitored alarm system (by a company or individual who can

provide a response) for site cabins and those structures facilitating the storage of materials and fuel.

- 6.3 The developer is advised that the name of the contractor and signage with an emergency contact telephone no. should be displayed at several places on the perimeter fencing. This would allow the public to report suspicious circumstances.
- 6.4 Mobile or part time CCTV systems can be used as an effective aid to the security of a site and can act as a deterrent to criminal activity.
- 6.5 Further advice can be obtained from your local Police DOCO and/or from the BSIA Construction Site Security Guide Document at: [www.bsia.co.uk](http://www.bsia.co.uk)
- 6.6 The developer should consult the DOCO regarding the impact that any perimeter fencing or hording may have on public safety. Particular attention should be paid to the nature and surveillance of adjoining footpaths and/or roads bordering the site.

## 7 UK Planning and strategic policies in support of Secured by Design

- 7.1 It is important to note that crime is a material planning consideration and is a determining factor in gaining planning consent.
- 7.2 The police service has worked in partnership with the governments, assemblies and Local Authorities throughout the United Kingdom to incorporate designing out crime principles within strategic policy and planning guidance documents. The following sections describe the strategic guidance in support of Secured by Design in England, Wales, Scotland and Northern Ireland.

### England (NPPF and NPPG)

- 7.3 The Government has recently

published the National Planning Policy Framework (NPPF) which defines three fundamental objectives to achieving a sustainable development: economic, social and environmental (NPPF, page 5, paragraph 8). Crime has a direct impact on all three objectives. This has been reinforced throughout the NPPF where the government makes clear its view of what sustainable development, in England, means in practice for the planning system. Specifically, Section 8 'Promoting healthy and safe communities', paragraph 91, states that 'planning policies and decisions should aim to achieve healthy, inclusive and safe places which... are safe and accessible so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion.'

- 7.4 Furthermore, Section 8, paragraph 95 states 'Planning policies and decisions should promote public safety and take into account wider security and defence requirements by:

- a) anticipating and addressing possible malicious threats and natural hazards, especially in locations where large numbers of people are expected to congregate. Policies for relevant areas (such as town centre and regeneration frameworks), and the layout and design of developments, should be informed by the most up-to-date information available from the police and other agencies about the nature of potential threats and their implications. This includes appropriate and proportionate steps that can be taken to reduce vulnerability, increase resilience and ensure public safety and security; and
- b) recognising and supporting development required for operational defence and security purposes, and ensuring that operational sites are not affected adversely by the impact of other development proposed in the area.'

7.5 With the publication of the accompanying National Planning Practice Guidance (NPPG) (Note 7.5) the government has reiterated that designing out crime and designing in community safety should be central to the planning and delivery of new development.

Specifically the Planning Practice Guidance on Design reminds practitioners that local authorities are duty bound to adhere to Section 17 of the Crime and Disorder Act 1998 and exercise their functions with due regard to their likely effect on crime and disorder, and do all that they reasonably can to prevent crime and disorder. Furthermore, practitioners are also reminded that the prevention of crime and the enhancement of community safety are matters that a local authority should consider when exercising its planning functions under the Town and Country Planning legislation.

*Note 7.5: The reference to Design within the NPPG can be found at: <https://www.gov.uk/guidance/design#the-importance-of-good-design>*

### Wales (PPW & TAN12)

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7.6 Planning Policy Wales (PPW) sets out the Welsh Government's national planning policy on promoting sustainability through good design. It categorises five key aspects (Access, Character, Community Safety, Environmental Sustainability and Movement) and provides guidance on how to respond to them following an appraisal of the context.

7.7 In relation to designing out crime, PPW states that crime and prevention and fear of crime are social considerations to which regard must be given by local planning authorities in the preparation of development plans. They should be reflected in any supplementary planning guidance, and may be material considerations in the determination of planning applications. The aim should be to produce safe environments through good design.

7.8 Technical Advice Note (TAN) 12: Design, provides advice for all those involved in the design of development on how good sustainable design can be facilitated through the planning system. TAN 12 reminds practitioners that local authorities (including National Park Authorities) are required to have due regard to crime and disorder prevention in the exercise of their functions under Section 17 of the Crime and Disorder Act 1998. TAN 12 recognises the Secured by Design initiative as a standard that has been shown to reduce crime (particularly residential burglary) and the impact of crime upon neighbourhoods.

### Development Quality Requirements (DQR) for social housing

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7.9 The Welsh Government has determined that all new social housing must be built to Secured by Design (Gold) standards.

### Welsh Housing Quality Standards (WHQS)

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7.10 All existing social housing stock must meet the requirements of the WHQS by 2020. Within the 'Safe and Secure' section of the WHQS there is a requirement for the physical security of dwellings to meet those within the Secured by Design scheme.

### Scotland (SPP & PAN77)

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7.11 Scottish Planning Policy's (SPP) Planning Policy Note 77 (PAN 77) highlights the positive role that planning can play in helping to create attractive well-managed environments which discourage antisocial and criminal behaviour. It comments that new development should be located and designed in such a way as to deter such behaviour and acknowledges that poorly designed surroundings can create feelings of hostility, anonymity and alienation which can have significant social, economic and environmental costs leading to environments that are desolate.

- 7.12 It identifies planning as an important mechanism to the creation of safer places that can make a significant contribution to reducing the fear and incidence of crime. It calls for a co-ordinated approach between local authorities, the police, the community, and any other relevant stakeholders, as being a vital factor in the successful delivery of safer places.

### Northern Ireland (DOE, PPS 7 & QD1)

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- 7.13 Planning Policy Statement 7 (PPS 7) from the Department of the Environment – Planning Service (DOE) makes it clear that the quality of a residential environment is crucial to the long-term sustainability of the development by helping it to reduce crime and anti-social behaviour.
- 7.14 It further comments that incorporating sensible security measures during the extension or refurbishment of buildings has been shown to reduce levels of crime and the fear of crime. By bringing the crime prevention experience of the police more fully into the planning and design process, a balance can be achieved between safety and security.
- 7.15 Policy QD1: Security from Crime, seeks to provide a feeling of security and a sense of vitality in all parts of the development. In particular it comments on the need to create private space to the rear of dwellings and the importance of natural surveillance of open spaces and pedestrian routes. It adopts a firm stand against any proposals that would introduce potentially unfrequented or unsupervised routes for pedestrians or cyclists.
- 7.16 It states that developers and their professional advisers should take account of the principles offered by SBD when preparing schemes.



# SECTION 1

CHARGER ROAD

## 8 Layout of roads and footpaths

8.1 Vehicular and pedestrian routes should be designed to ensure that they are visually open, direct, well used and should not undermine the defensible space of neighbourhoods. Design features can help to identify the acceptable routes through a development, thereby encouraging their use, and in doing so enhance the feeling of safety. Where it is desirable to limit access/use to residents and their legitimate visitors, features such as rumble strips, change of road surface (by colour or texture), pillars, brick piers or narrowing of the carriageway may be used. This helps to define the defensible space, psychologically giving the impression that the area beyond is private.

8.2 Defensible space has the simple aim of designing the physical environment in a way which enables the resident to control the areas around their home. This is achieved by organising all space in such a way that residents may exercise a degree of control over the activities that take place there.

### Through-roads and cul-de-sacs

8.3 There are advantages in some road layout patterns over others especially where the pattern frustrates the searching behaviour of the criminal and their need to escape. Whilst it is accepted that through routes will be included within development layouts, the designer must ensure that the security of the development is not compromised by excessive permeability, for instance by allowing the criminal legitimate access to the rear or side boundaries of dwellings, or by providing too many or unnecessary segregated footpaths (*Note 8.3*). Developments that promote intuitive wayfinding and enhance the passive surveillance of the street by residents within their homes and high levels of street activity are desirable as they have both been proven to deter criminal

behaviour, but they are no guarantee of lower crime, which evidence proves is achieved primarily through the control and limitation of permeability.

*Note 8.3: The Design Council's/ CABE's Case Study 6 of 2012 states that: "Permeability can be achieved in a scheme without creating separate movement paths" and notes that "paths and pavements run as part of the street to the front of dwellings reinforces movement in the right places to keep streets animated and does not open up rear access to properties."*

8.4 A review of available research in this area concluded that: "Neighbourhood permeability... is one of the community level design features most reliably linked to crime rates, and the connections operate consistently in the same direction across studies: more permeability, more crime. Several studies across several decades link neighbourhood property crime rates with permeability versus inaccessibility of neighbourhood layout. Neighbourhoods with smaller streets or more one-way streets, or fewer entrance streets or with more turnings have lower property crime rates..." Source: Taylor R B 2002 "Crime Prevention Through Environmental Design (CPTED): Yes, No, Maybe, Unknowable, and all of the above" in Bechtel RB (ed) "Handbook of Environmental Psychology", John Wiley, New York, Pages 413 – 426. Cited by Professor Ted Kitchen Sheffield Hallam University 2007.

8.5 Cul-de-sacs that are short in length and not linked by footpaths can be very safe environments in which residents benefit from lower crime.

8.6 However, research shows that the benefit of a cul-de-sac can be compromised if one or more of the following undesirable features exists:

- backing onto open land, railway lines, canal towpaths etc.;
- are very deep (long);



- linked to one another by footpaths (leaky cul-de-sacs);
- poorly lit

8.7 Cul-de-sacs that connect by footpaths to other parts of a development, often referred to as 'leaky cul-de-sacs', experience the highest levels of crime when compared to crime levels within a true cul-de-sac. Crime in this kind of design can be 110% higher than crime in a true cul-de-sac and therefore should be avoided.

### Footpath design

8.8 Routes for pedestrians, cyclists and vehicles should be integrated and assist easy, intuitive wayfinding through the application of inclusive design by increasing activity and therefore natural surveillance, a proven deterrent to crime and anti-social behaviour.

8.9 Public footpaths should not run to the rear of, and provide access to gardens, rear yards or dwellings as these have been proven to generate crime.

8.10 Where a segregated footpath is unavoidable, for example a public right of way, an ancient field path or heritage route, designers should consider making the footpath a focus of the development and ensure that they are:

- as straight as possible;

- wide;
- well lit (see paragraphs 8.19 to 8.21);
- devoid of potential hiding places;
- overlooked by surrounding buildings and activities;
- well maintained so as to enable natural surveillance along the path and its borders.

8.11 Physical barriers may also have to be put in place where 'desire' lines (unsanctioned direct routes) place users in danger, such as at busy road junctions. It is important that the user has good visibility along the route of the footpath. The footpath should be as much 'designed' as the buildings.

8.12 Where isolated footpaths are unavoidable, and where space permits, they should be at least 3 metres wide (to allow people to pass without infringing personal space and to accommodate passing wheelchairs, cycles and mobility vehicles). If footpaths are designated as an emergency access route they must be wide enough to allow the passage of emergency and service vehicles and have lockable barriers.

8.13 The creation of new pedestrian subways should be avoided. However, if the subway is already in existence and it is necessary to retain it, it should be well-lit with vandal resistant lighting

(see paragraph 8.19), be as wide and as short as possible, with a clear line of sight to the exit. Chamfering the access points can help reduce areas of concealment. Radius (convex) entrance/exit walls can reduce the length of the subway and the opportunity for inappropriate loitering. The designer should consider wall finishes that enable easy removal of graffiti.

### Planting next to a footpath

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- 8.14 In general, planting next to a footpath should be arranged with the lowest-growing specimens adjacent to the path, and larger shrubs and trees planted towards the rear. Planting immediately abutting the path should be avoided as shrubs and trees may grow over the path, creating pinch points, places of concealment and unnecessary maintenance.
- 8.15 Think carefully when selecting tree species to be used adjacent to a footpath or verge, and consider their whole-life growth characteristics. Many trees will grow tall, dense canopies as they reach maturity. If unmaintained, this broad canopy will spread many metres from the trunk of the tree, and overhang paths and may create difficulties in maintaining a clear, accessible route, in addition to creating a sense of enclosure for path users. Routes with overhanging branches can also be a particular issue for people with sight loss. A large canopy may also block natural light and restrict the effectiveness of street lighting.
- 8.16 Trees with slender or fastigate forms naturally grow a narrow, tall canopy, and are less likely to over-hang paths regardless of their maturity. Similarly, pleached trees have been trained to produce a narrow canopy above a very straight, clear stem. A variety of species are available with similar growth forms, which provide height and structure without the issue associated with large canopies.
- 8.17 Where footpaths run next to buildings or roads, the path should be open to

view. This does not prevent planting, but will influence the choice of species and the density of planting. Public footpaths should not run immediately next to doors and windows, therefore defensive space should be created to separate a path from a building elevation. This is particularly important in areas with a known graffiti or anti-social behaviour problem.

### Seating next to a footpath

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- 8.18 Seating can be a valuable amenity or a focus for anti-social behaviour. The following specific points should be considered:
  - 8.18.1 How long and wide is the footpath? Who is most likely to be using the footpath? For example, is it likely to be used by disabled and/or older people who may require resting places? Can it be made more/less attractive and inclusive to certain groups of users by the way it is designed?
  - 8.18.2 Is the footpath required simply as a means for travelling from one place to another without stopping?
  - 8.18.3 Is it the intention to encourage stopping and social interaction at particular points along the footpath, e.g. to encourage people with limited mobility who need to rest more frequently or to promote health and wellbeing through exercise and exposure to natural daylight?
  - 8.18.4 Would seating encourage or attract inappropriate loiterers such as drinkers or drug users?
  - 8.18.5 Is vandal resistant seating necessary?
  - 8.18.6 Should seating be placed right next to the path or set at the back of the verge (care should be taken to avoid creating a climbing aid)?
  - 8.18.7 Consider the use of single seats or stools set several metres apart to deter loitering.

### Lighting of footpaths

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- 8.19 If a footpath is to be used 24 hours a day it should have all the required attributes





as listed at paragraph 8.10 and be lit in accordance with BS 5489-1:2013. If the footpath does not have these attributes then its use should be deterred during the hours of darkness by not installing lighting.

8.20 It is important that the landscape architect and lighting designers co-ordinate their plans to avoid conflict between lighting and tree canopies. It is advisable that trees are planted at least 5 metres away from any light source. Please also see paragraph 18 regarding the technical requirements for public lighting, 'dark sky' policies and light pollution.

8.21 Secured by Design encourages, wherever possible, the use of the most environmentally friendly light sources. Moreover the Institute of Lighting Professionals (ILP) currently favours the use of good quality LED lighting and other energy effective light sources and advises against the use of fluorescent lighting which is environmentally unsustainable for a variety of reasons (*Note 59.5*). Further information is available at: [www.securedbydesign.com](http://www.securedbydesign.com)

### Footpaths on phased developments

8.22 Where the completion of a footpath will be delayed because of phased development or long term planning

policy, it may be best to safeguard the land required for the footpath link, but fence it off and not actually construct the path until such time as the full connection can be made. This will avoid in the short to medium term the creation of an underused and possibly isolated movement route.

## 9 Communal areas and play space

9.1 Communal areas, such as playgrounds, toddler play areas, seating facilities have the potential to generate crime, the fear of crime and anti-social behaviour. These may often be referred to as:

- Local Areas of Play (LAP) – primarily for the under 6 year olds;
- Local Equipped Area for Play (LEAP) – primarily for children who are starting to play independently;
- Neighbourhood Equipped Area of Play (NEAP) – primarily for older children;
- Multi-Use Games Areas (MUGA) – primarily for older children.

9.2 They should be designed to allow natural surveillance from nearby dwellings with safe and accessible routes for users to come and go. Boundaries between public and private

space should be clearly defined and open spaces must have features which prevent unauthorised vehicular access. Communal spaces as described above should not immediately abut residential buildings.

- 9.3 The provision of inclusively designed public open amenity space, as an integral part of residential developments, should make a valuable contribution towards the quality of the development and the character of the neighbourhood. In order to do this it must be carefully located to suit its intended purpose – mere residual space unwanted by the developer is very unlikely to be acceptable.
  - 9.3.1 The open space must be inclusively designed with due regard for wayfinding and natural surveillance, and;
  - 9.3.2 Adequate mechanisms and resources must be put in place to ensure its satisfactory future management and maintenance, and;
  - 9.3.3 Care should be taken to ensure that a lone dwelling will not be adversely affected by the location of the amenity space, and;
  - 9.3.4 It should be noted that positioning amenity/play space to the rear of dwellings can increase the potential for crime and complaints arising from increased noise and nuisance.
- 9.4 Play areas should ideally be designed so that they can be secured at night. This is to reduce the amount of damage and graffiti that occurs after dark. The type of fencing and security measures will need to vary to suit the particular area. However, consideration should be given to a single dedicated entry and exit point to enable parental/guardian control and supervision. Fencing at a minimum height of 1200mm can often discourage casual entry, provide a safe clean play area and reduce damage to the equipment. The specific requirements such as child safeguarding, preventing dogs entering, etc. should be discussed with the DOCO.

- 9.5 Consideration should be given to the provision of informal association spaces for members of the community, particularly young people. These must be subject to surveillance but sited so that local residents will not suffer from possible noise pollution. In addition, they should be sited in such a way that those using adjacent foot and cycle paths will not be subject to harassment or otherwise be put in fear.
- 9.6 External communal drying spaces should be enclosed and have secured access via a locked gate so that they are only accessible to residents. The DOCO will provide advice in respect to fencing, gate construction and locking.

## 10 Dwelling Boundaries

### Front boundaries

- 10.1 It is important that the boundary between public and private areas is clearly indicated. For the majority of housing developments, it will be desirable for dwelling frontages to be open to view, so walls, fences and hedges will need to be kept low or alternatively feature a combination of wall (maximum height 1 metre) and railings or timber picket fence if a more substantial front boundary is required by the DOCO.
- 10.2 Front garden planting of feature shrubs and suitable trees (e.g. open branched or light foliage or columnar fastigiate habit, etc.) will also be acceptable provided they are set back from paths and placed to avoid obstructing visibility of doors, windows and access gates to the rear of the property. Similarly, planting which allows a clear line of sight to the pavement and road is preferable.
- 10.3 Plant specimens may be used to discourage access to specific areas of the house frontage. For example, a specimen with thorns may be used to deter access to the base of a window.



### Access gates to rear gardens

- 10.4 Gates to the side of the dwelling that provide access to rear gardens or yards must be robustly constructed, be the same height as the fence (minimum height 1.8m) and be capable of being locked (operable by key from both sides of the gate). Such gates must be located on or as near to the front of the building line as possible (also see paragraph 26.1).

### Side and rear boundaries

- 10.5 Vulnerable areas, such as exposed side and rear gardens, need more robust defensive barriers by using walls or fencing to a minimum height of 1.8m. There may be circumstances where more open fencing is required to allow for greater surveillance. Trellis topped fencing can be useful in such circumstances.
- Additional deterrent features such as increasing the height of fencing or planting thorny shrubs may be considered as an alternative. A wide range of specimens can be planted along the boundary of a property, which offer attractive planting characteristics of colour and form, whilst containing sharp thorns to dissuade intruders. Many species are available which may be trained to any shape, size or height.

From within a garden, specimens such as Hawthorn may be trained to provide an additional physical barrier above the height of the fence with minimal impact on the garden below. Alternatively, ornamental specimens such as rose may be attached to a fence to deter climbing.

- 10.6 It is expected that developers will install fencing to a high standard to ensure the security and longevity of the boundary. A high quality fence that lasts for a long time will provide security and reduce overall maintenance costs for residents or landlords. A fence that has a long predicted life is also more sustainable. For this reason SBD suggests that fencing should be constructed as follows:
- 10.6.1 The method of fixing between panel/ rails and posts should create a secure mechanical bond so that panels/slats cannot be easily removed.
- 10.6.2 The fixings employed in the panel/pale to rail construction should be of galvanized steel or stainless steel with a design life to match the timber components.
- 10.6.3 Posts should be of a non-brittle material.
- 10.6.4 Where the fence panel is of a slatted design, they should be oriented vertically to avoid step-up points for climbing and be flush across the attack face to resist being pried off and should be no less than 15mm thick and securely affixed to the frame/rails.

- 10.6.5 Fencing panels or railings mounted on a wall should be located as close to the outer (external) face of the wall as possible to eliminate climbing opportunities or use as informal seating.
- 10.6.6 Fence heights should be of a minimum 1.8m overall and be capable of raking/stepping to maintain height over different terrain.
- 10.6.7 Pedestrian gates should be of a framed design and employ galvanised adjustable hinges and fixings mounted behind the attack face. On outward opening gates, where the hinges/brace is mounted on the attack face, fixings should be of a galvanised coach bolt design. Hinge systems must not allow the gate to be 'lifted off' and therefore should employ a method to restrict the removal of the gate from the fence post or wall. Gates must be capable of being locked (operable by key from both sides of the gate). The gate construction should have the same design and construction attributes as the fence.
- 10.6.8 Where entrance/driveway gates are required they should ideally be inward opening, of substantial framed construction and employ galvanised adjustable hinges and fixings mounted behind the attack face. Hinge systems must not allow the gate to be 'lifted off' and therefore should employ a method to restrict the removal of the gate from the adjoining fence post or wall. Gates should be fitted with a galvanised drop bolts and facility for dedicated gate locking systems, padlocking (manual gates) or electro-mechanical locking (automated gates) and employ mechanical/electro-mechanical devices as applicable to hold gate leaves in the open position.
- 10.6.9 The gate construction should have the same design and construction attributes as the fence.
- 10.6.10 Automated gates supplied and installed must meet the relevant statutory safety standards and be CE marked accordingly. Specifiers may wish to satisfy themselves that installers

of powered gates are appropriately qualified, trained and follow recognised industry guidance that also allows for accessibility and ease of operation. The following organisations provide guidance and training for installers:

- Door Hardware Federation – the DHF has a revised Code of Practice (DHF TS 011) designed to raise standards of powered gate safety. Gates installed to the new Code of Practice will be inspected by the NSI;
- Gate Safe – The Gate Safe organisation produces operational good practice guidance designed to raise standards in this industry sector.

- 10.6.11 The tops of fences should finish flush with their posts and a securely fixed capping rail run across the fence and posts to affect a continuous chain. The tops/top rail/capping of fencing and gates should be of a design able to accommodate a security topping to deter attempts to scale over the perimeter.
- 10.6.12 All timber employed in the manufacture of the fencing should be fit for purpose, from FSC certified sustainable sources and be treated to provide protection against all types of rot and insect infestation for a minimum of 25 years.

### Fencing in high crime/vulnerable areas

- 10.7 Where a development is to be located in an area of extremely high crime and the gardens abut open land, footpaths or other vulnerable areas, for example railway property, tow paths etc., an area of defensible planting to protect boundary fencing may be required. The specifier should give due consideration to the time taken for such areas to become established and therefore additional temporary protection may be required. Alternatively fencing certified to LPS 1175 Security Rating 1 (A1) may be specified.
- 10.8 Following consultation with the DOCO and local planning authority these requirements may be changed with agreed alternative measures.

## Sub-divisional boundaries

- 10.9 Sub-divisional fencing design should be agreed with the DOCO and the local planning authority and is dependent upon location and crime risks. All fencing should provide clear demarcation.
- If a crime risk assessment indicates a high level of domestic burglary, a more secure sub-divisional fence may be required. A suitable means of achieving security, demarcation and privacy might include the following design features
- 10.9.1 A privacy screen: a section of solid fencing (1.8m minimum) starting from the building and projecting along the fence line for approximately 2m to provide a private amenity area adjacent to the home;
- 10.9.2 Sub divisional fencing from the privacy screen to the end of the garden: provision of a minimum 1.8m high fence, which can consist of a minimum 1.5m solid fence with 300mm of trellis topping;
- 10.9.3 Trellis: the addition of a trellis topping can help to deter climbing. This is of particular use on exposed rear boundaries. Close liaison with the DOCO from the outset will enable the developer to understand the need for this additional requirement if there is an increased security risk due to location or crime levels;
- 10.9.4 Defensive planting: fencing security can be enhanced by using it as a framework to support deterrent planting (e.g. thorny shrubs), which if required, can be planted by the developer or the occupier.

## 11 Layout and orientation of dwellings

- 11.1 Dwellings should be positioned facing each other to allow neighbours to easily view their surroundings and thus making the potential offender feel vulnerable to detection.
- 11.2 Larger schemes should incorporate a mix of dwellings, enabling greater potential for homes to be occupied throughout the

day. This gives increased opportunity for natural surveillance, community interaction, engagement and participation and environmental control.

## 12 Gable end walls

- 12.1 It is important to avoid the creation of windowless elevations and blank walls immediately adjacent to public spaces; this type of elevation, commonly at the end of a terrace, tends to attract graffiti, inappropriate loitering and ball games. The provision of at least one window above ground floor level, where possible, will offer additional surveillance over the public area.
- 12.2 Where blank gable walls are unavoidable, one of the following methods should be used to protect them;
- 12.2.1 Provide a 1m buffer zone using either a 1.2 – 1.4m railing (with an access gate) or a 1m mature height hedge with high thorn content. Hedging will have to be protected with a fence until it becomes established. The hedge shall be contained within the boundary of the adjacent building to increase the likelihood that it will be maintained.
- 12.2.2 Where there is insufficient room to create defensible space between public and private space, an appropriate (non-destructive) climbing plant should be planted adjacent to the wall, or a finish applied to the wall that will allow easy removal of graffiti.

## 13 Rear access footpaths

- 13.1 Research studying the distribution of burglary in terraced housing with open rear access footpaths has shown that up to 85% of entries occurred at the back of the house.
- 13.2 It is preferable that footpaths are not placed to the back of properties. If they are essential to give access to the rear of properties they must be gated. The gates

must be placed at the entrance to the footpath, as near to the front building line as possible, so that attempts to climb them will be in full view of the street. Where possible the street lighting scheme should be designed to ensure that the gates are well illuminated. Gates must be capable of being locked (operable by key from both sides of the gate). The gates must not be easy to climb or remove from their hinges and serve the minimum number of homes, usually four or less.

- 13.3 Gates will generally be constructed of timber when allowing access to the rear of a small number of dwellings. However in larger developments where the rear footpath provides access to a large number of properties then a gate constructed of steel may be required by the DOCO. Substantial purpose made gates meeting LPS 1175 Security Rating 1 (A1) or Sold Secure Silver (minimum) standard are available and may be required by the DOCO. Any gate providing access to the rear of dwellings must be designed to resist climbing, forced entry and allow a high degree of surveillance of the footpath from the street.

## 14 Dwelling identification

- 14.1 Clear signage (naming and/or numbering) of properties is essential to assist residents, postal workers and the attendance of emergency services. Such signage should be present before an award is granted.

## 15 Climbing aids

- 15.1 Boundary walls, bins and fuel stores, street furniture, trees, low flat roofs, car ports or balconies should be designed to remove climbing aids to gain access into the property.

## 16 Vehicle parking

- 16.1 Vehicles should either be parked in

locked garages or on a hard standing within the dwelling boundary. In high crime areas the DOCO may require the addition of a gate or bollard to protect the hard standing parking area, however caution should be taken to ensure that this is not the fire service emergency access route.

- 16.2 Where communal parking areas are necessary, bays should be sited in small groups, close and adjacent to homes, be within view of active rooms (*Note 16.2*), and allocated to individual properties.

*Note 16.2: The word 'active' in this sense means rooms in building elevations from which there is direct and regular visual connection between the room and the street or parking court. Such visual connection can be expected from rooms such as kitchens and living rooms, but not from more private rooms, such as bedrooms and bathrooms.*

- 16.3 Rear parking courtyards are discouraged for the following reasons:

- They introduce access to the vulnerable rear elevations of dwellings where the majority of burglary is perpetrated;
- In private developments such areas are often left unlit and therefore increase the fear of crime;
- Un-gated courtyards provide areas of concealment which can encourage anti-social behaviour.

- 16.4 Where rear parking courtyards are considered absolutely necessary, they must be protected by a gate, the design of which shall be discussed with the DOCO at the earliest possible opportunity. Where gardens abut the parking area an appropriate boundary treatment (e.g. a 1.5m fence supplemented by trellis to a height of 1.8m) must be discussed and agreed by the DOCO (also see paragraph 10.5, 10.6 & 10.7 for further information).

- 16.5 Where dedicated garages are provided within the curtilage of the dwelling the entrance should be easily observed from the street and neighbouring dwellings. Locating garages forward of the building



line can obscure views to and from the dwelling. The security standards for vehicular garage doors can be found in Section 2, paragraph 21.3.

16.6 Where parking is designed to be adjacent to or between units, a gable end window should be considered to allow residents an unrestricted view over their vehicles.

16.7 Communal parking facilities must be lit to the relevant levels as recommended by BS 5489-1:2013 and a certificate of compliance provided. See paragraph 18 for adopted parking areas and paragraph 59 for private external communal lighting requirements.

16.8 Parking bays should ideally benefit from good 'natural surveillance'; for example being overlooked by the clear windows of public buildings and private dwellings. A location with good footfall is also desirable, to ensure there are sufficient people nearby who may notice suspicious activity and contact police. A bay in a secluded area or even one situated on its own within a traffic island site can be targeted heavily as there are no passing pedestrians who may notice a theft taking place. Surrounding buildings with opaque or transfer covered windows will also provide little benefit.

16.9 Lighting is required to meet the details contained within paragraphs 18 to 18.6 of this document. Luminaires should

be vandal resistant and not mounted below 2.5 metres from the ground and out of reach for those wishing to cause interference.

16.10 A parking bay surrounded by vegetation or other obstructions (such as utility boxes) may provide cover for suspects to interfere with vehicles. An encroaching or uncontrolled undergrowth can hinder natural surveillance, restrict access for the car user, impact on the fall of light from nearby columns and can also hinder any CCTV coverage. Shrubs should be selected to have a mature growth height no higher than 1 metre; trees should have no foliage, shoots or lower branches below 2 metres, thereby allowing a 1 metre clear field of vision.

16.11 If the bay is covered by CCTV, an identifiable facial image is a basic necessity. CCTV systems and signage should be General Data Protection Compliant (GDPR) compliant. Further advice can be obtained at: [www.ico.org.uk](http://www.ico.org.uk)

### Motorcycle, scooter and moped parking

16.12 The theft of motorcycles, scooters and mopeds (the term motorcycle will refer to all powered two wheelers) is a major problem in many parts of the country,

especially in urban areas. When stolen, the vehicles are either broken up for the value of their parts or alternatively are used in further crimes, such as snatch theft of personal property or robbery. This secondary use is causing a rise in crime.

### Dedicated motorcycle parking facilities

- 16.13 Parking for motorcycles is often provided in small on street bays, delineated by a simple painted line. These bays often attract high rates of theft owing to the opportunities they offer criminals. Ground anchors and/or metal support stands provide a primary point for securing motorcycles, around which other secondary measures can be added by the rider, such as disc locks, grip locks, bike covers to one of the following security standards:
- Sold Secure Gold;
  - STS 501
- 16.14 Motorcycle parking bays can be made more secure by the installation of ground anchors, or robust metal support stands running at the side of adjacent paving. They provide a firm and immovable object to affix the rear wheel of a motorcycle. Ground anchors should be installed at the rear of motorcycle parking bays near to the kerb line and relatively flush to the road surface to prevent them being a trip hazard and meet one of the following security standards:
- Sold Secure Gold;
  - STS 503
- 16.15 If metal support stands are provided, these should consist of galvanised steel bars (minimum thickness 3mm), filled with concrete, with minimum foundation depths of 300mm with welded anchor bars.
- 16.16 Signage should be used to alert riders and advise them to use the ground anchors or support stands provided along with their own security hardware. All of the above issues could also be considered at dedicated parking facilities if a motorcycle bay is installed into an existing site.

### British Parking Association – Park Mark Award

- 16.17 The British Parking Association operates the Safer Parking Scheme, working in partnership with public and private sector parking facility managers and DOCOs to reduce the opportunity for crime. A site that successfully meets the required standards can apply to join, and if successful, receive a Park Mark award. This will be reassessed over time to ensure standards are maintained after consideration of crime rates. Membership of the scheme is not a requirement but should be considered for larger parking facilities. For more information contact: <http://www.britishparking.co.uk/>

### Underground car parking

- 16.18 Many blocks of flats are now being developed with underground (basement or undercroft) car parking. Early consultation with the DOCO is essential to ensure that criminal opportunity is minimised and that the day to day access and emergency egress do not undermine the security of the residential building above. The standards required for underground car parks can be found in Section 2, paragraphs 31.2 to 31.8 (inclusive) and Section 3, paragraph 55.3.

## 17 Planting in new developments

- 17.1 The planting of trees and shrubs in new developments to create attractive residential environments will be supported provided that:
- 17.1.1 The layout provides sufficient space to accommodate specimens once they have reached maturity, clear of access routes and required circulation areas;
- 17.1.2 Future maintenance requirements and budgets are considered at the planting design stage and management programmes are put in place to ensure the landscape fulfils the aims of the original design;



- 17.1.3 The planting design takes full account of all other opportunities for crime.
- 17.2 The correct uses of certain species of plants such as spiny or thorny shrubs can help prevent graffiti and loitering and create or enhance perimeter security. Defensive planting is not just about prickly shrubs, it is about selecting the right type of plant for the right aspect and environment, for example, open branched and columnar fastigiated trees can be used in a landscape scheme where natural and formal surveillance is required. Climbing plants can be used to cover walls to deter graffiti. Carefully selected trees and shrubs can be used to 'green up' the most hostile of environments providing both horizontal and vertical interest without adding to crime risks.
- 17.3 Planting should not impede the opportunity for natural surveillance and wayfinding, and must avoid the creation of potential hiding places. As a general recommendation, where good visibility is needed, shrubs should be selected to have a mature growth height no higher than 1 metre, and trees should have no foliage, epicormic growth or lower branches below 2 metres, thereby allowing a 1 metre clear field of vision. Trees on appropriate root stock can provide a more reliable means of reducing the likelihood of impeding natural surveillance. As a general rule, building frontages should be open to view except, for example, houses standing in their own private grounds. Attention should be given to the location of walls and hedges so that they do not obscure doors or windows, and the position of trees that may become climbing aids into property or obscure lights or CCTV cameras.

comply with BS 5489-1:2013. Where conflict with other statutory provisions occurs, such as developments within conservation areas, requirements should be discussed with the DOCO and the local authority lighting designers.

- 18.2 It is recognised that some local authorities have 'dark sky' policies and deliberately light some of their rural, low crime areas to very low levels of illumination. Some are currently experimenting with switching off street lamps in low crime areas between certain hours of the night in order to save energy costs and reduce CO2 emissions. If such policies exist then these must be brought to the attention of the DOCO at the time of application. Secured by Design supports the Institution of Lighting Professionals (ILP) in discouraging 'switch off' unless a full risk assessment has been carried out, and the ILP also recommends that 'switch off' never be implemented purely for cost saving. A variable controlled lighting level is always the preferred option in addition to one which does not disadvantage disabled and older people who may have a sensory impairment and require well-lit routes to enable easy wayfinding and to make other users more easily visible. Attention to position and location of lighting to improve illuminance at ground level can avoid user casting shadows onto the surface whilst minimising light pollution.
- 18.3 Bollard lighting is purely for wayfinding and can be easily obscured. It does not project sufficient light at the right height making it difficult to recognise facial features and as a result causes an increase in the fear of crime. It should be avoided.
- 18.4 Trees may restrict the performance of street lighting by blocking light or causing damage through collision with branches and should not be located within 5 metres of a lighting source. Account must be taken of the effects of seasonal variations on planting when designing such schemes.

## 18 Street lighting

- 18.1 All street lighting for adopted highways and footpaths, private estate roads and footpaths and car parks must

- 18.5 To demonstrate compliance with this section the DOCO shall be provided with a declaration of conformity to BS 5489-1:2013 by a competent independent designer. Competency shall be demonstrated by achievement to at least ILP competency level 3 or 4, i.e. the designer will be a Member of the ILP (MILP) and either IEng or CEng qualified to be deemed competent to be able to design under CDM regulations. Additionally a risk and environmental assessment (EMS) for the CDM designer compliance requirements must be included. Manufacturer designed schemes without risk or environmental assessments should not be accepted as they do not cover the CDM designer risk elements that are required.
- 18.6 Secured by Design encourages, wherever possible, the use of the most environmentally friendly light sources. Moreover the Institute of Lighting Professionals (ILP) currently favours the use of good quality LED lighting and other energy effective light sources and advises against the use of fluorescent lighting which is environmentally unsustainable for a variety of reasons (*Note 59.5*). Further information is available at: [www.securedbydesign.com](http://www.securedbydesign.com)



# SECTION 2

## 19 Introduction

- 19.1 The recent recognition that security forms part of a sustainable and vibrant development has been demonstrated by the inclusion of a Building Regulation in England and Wales. Part Q of Schedule 1 to the Building Regulations in both countries specifically states that ‘Reasonable provision must be made to resist unauthorised access...’ The importance of security within new housing developments has also been recognised by the Scottish Government since 2010 within the Scottish Building Standard 4.13 – Security, which at clauses 4.13.1 and 4.13.2 outline the requirement for door and window security. This section of SBD Homes should therefore be read in conjunction with the above documents.
- 19.2 The physical security standards outlined within this section of Secured by Design, together with those of Sections 1 and 3 of this document, also indicate the requirements needed in order for a development to achieve the SBD Gold Award.
- 19.3 The experience gained by the UK police service over the past 30 years in this specific subject area has led to the provision of a physical security requirement considered to be more consistent than that set out within UK Building Regulations; specifically the recognition of products that have been tested to the relevant security standards but crucially are also fully certificated by an independent third party, accredited by a United Kingdom Accreditation Service (UKAS) Notified Body. This provides assurance that products have been produced under a controlled manufacturing environment in accordance with the specifier’s aims and minimises misrepresentation of the products by unscrupulous manufacturers/suppliers and leads to the delivery, on site, of a more secure product.
- 19.4 All standards quoted within Section 2 of this document are assumed to be the latest version, revision or amendment. Earlier standards/versions will not be valid or acceptable 12 months from the publication date of the succeeding amendment, revision or standard unless otherwise stated within this document.
- 19.5 At several points within this document a requirement is made for products to be ‘Certificated’ to relevant standards. It is advisable that specifiers confirm with the DOCO that their preferred product(s) meets the required SBD standards before purchasing. It should be understood that any documentation submitted for SBD accreditation should clearly show the certification body name, scope of certification and the manufacturer/fabricator of the product to be installed within the development. Documentation that is provided bearing the name of a component or system manufacturer will only be acceptable within Section 2b of this guidance document.
- 19.6 Section 2 is divided into two parts (Section 2a and Section 2b). Section 2a provides the ‘Police Preferred Specification’ for new build homes and major refurbishments and Section 2b provides a specification for new bespoke homes and the upgrading of existing homes.

# SECTION 2a

## 20 Introduction

- 20.1 This section provides technical guidance on the 'Police Preferred Specification' for new dwellings including those dwellings formed by a material change of use and extensions to existing homes. If adhered to, this will ensure compliance with the UK Building Regulations (see paragraph 1.1). Please note: the Building Regulations (England and Wales) do not address the security of extensions to existing buildings or replacement doors or windows, however the standards contained within this document can be utilised by builders or individuals who wish to ensure that good security is incorporated within the home.
- 20.2 Compliance with the Scottish Building Standard 4.13 is applicable to all dwellings and includes extensions to existing dwellings and can be demonstrated through the application of the standards contained within this section.
- 20.3 Whilst this guidance document primarily concentrates on security (UK Building Regulations – see paragraph 1.1), it should be noted that the design and specification may impact on other Building Regulations. It is imperative that products utilised within a Secured by Design development comply with all relevant Building Regulations in full. It should be noted that the Building Regulations in all four UK nations are considered equal to one another, i.e. no one Building Regulation takes precedence over another, for example fire rated doorsets (Part B) in England must also meet all other relevant Building Regulations e.g. Parts E, L, M and Q in one product.
- 20.4 Whilst Designing Out Crime Officers will not require evidence that a product

meets all of the specified Building Regulations, specifiers are reminded that they have an obligation to ensure compliance.

- 20.5 Where there is a client led requirement for SBD accreditation, compliance with this section alone will result in a Secured by Design Silver Award, however when combined with compliance to Section 1, and where applicable the relevant parts of Section 3, a Secured by Design Gold Award can be achieved.
- 20.6 This section may also be used by organisations or individuals that are undertaking both major and minor refurbishment of one or more dwellings.
- 20.7 Section 2a of this guidance document is further separated into two areas:
- Houses, bungalows and flats or maisonettes accessed via a private dedicated entrance doorset;
  - Buildings containing multiple dwellings or bedrooms accessed from a semi-private area and served by a shared or communal entrance doorset.

**Houses, bungalows and flats, apartments or maisonettes accessed via a private dedicated entrance doorset**

## 21 Dwelling entrance doorsets

- 21.1 The term “doorset” refers to a door, frame, locks, fittings and glazing as one combined unit.
- 21.2 Door frames must be securely fixed to the building fabric in accordance with the manufacturer’s instructions and specifications. These should be made available to the DOCO upon request if the need for visual confirmation is felt necessary.



21.3 All doorsets allowing direct access into to the home, e.g. front and rear doors, interconnecting garage doorsets, French doors, bi-fold or sliding patio doorsets, dedicated private flat or apartment entrance doorsets, easily accessible balcony doorsets (*Note 21.3a*), etc., shall be certificated to one of the following standards:

- PAS 24:2016 (*Note 21.3b*); or
- STS 201 Issue 7:2015 (*Note 21.3c*); or
- LPS 1175 Issue 7.2:2014 Security Rating 2+ (*Note 21.3d*); or
- LPS 1175 Issue 8:2018 Security Rating A3+; or
- STS 202 Issue 6:2015 Burglary Rating 2 (*Note 21.3d*); or
- LPS 2081 Issue 1.1:2016 Security Rating B (*Notes 21.3d and 21.3e*)

*Note 21.3a: Easily accessible is defined within Approved Document Q Appendix A:*

- A window or doorset, any part of which is within 2 metres vertically of an accessible level surface such as a ground or basement level, or an access balcony; or
- A window within 2 metres vertically of a flat roof or sloping roof (with a pitch of less than 30°) that is within 3.5 metres of ground level.

*Note 21.3b: PAS 24:2016 embodies two routes to compliance:*

- The traditional UK PAS 24 test methodology; or
- Via BS EN 1627:2011 Resistance Class 3 (which references BS EN 1628, 1629 & 1630), with additional test criteria to address known criminal methods of entry within the UK (which are not sufficiently catered for within the European Standards).

*NB: If manufacturers wish to use the European Standards as a route to compliance to PAS 24:2016, then all testing must be conducted in accordance with the latest published version of the 'UK Police Service Secured by Design (SBD) Interpretation Document for BS EN 1627:2011, BS EN 1628:2011, BS EN 1629:2011 and BS EN 1630:2011.'* This document can be found on the Secured by Design website within the SBD Standards Explained section.

*Note 21.3c: STS 201 is the unique reference number for Element's published standard replicating the requirements of PAS 24:2016.*

*Note 21.3d: LPS 1175, LPS 2081 and STS 202 are unique to the respective certification bodies and incorporate a physical attack on the glazed areas within doors and windows. Specifiers should satisfy themselves that the*



*glazing incorporated within products certified to these standards meets the required thermal performance and durability requirements for the specified application.*

*Note 21.3e: LPS 2081 is a standard that utilises a similar methodology to that used in LPS 1175, but the attacks are designed to use stealth (low noise levels). It may therefore be more applicable to residential applications.*

- 21.4 The benefits of third party certification are recognised within the UK Building Regulations (see paragraph 1.1). Any test evidence used to confirm the security of a construction should be carefully checked to ensure that it demonstrates compliance that is adequate and that applies to the intended use. Evidence passed from one organisation to another can become unreliable if important details are lost. Small differences in construction can significantly affect the performance of a doorset or window.

### **Fire rated doorsets including those with adjacent glazing**

- 21.5 Where there is a requirement for a doorset to be both fire and security rated, e.g. flat or apartment entrance doorsets, interconnecting garage doorsets and some doorsets aiding security compartmentation, the manufacturer or

fabricator supplying the finished product to site is required to present independent third party dual certification from a single UKAS accredited certification body for both elements. This is in order to minimise the likelihood of a doorset being presented in two differing configurations for separate fire and security tests and then later being misrepresented as one product meeting both requirements. All door styles and components, will need to be adequately described within the scope of certification and accompanying Technical Schedule. (Note 21.5).

*Note 21.5: Any component part of the doorset that is changed for any reason must be assessed by the certification body to ensure compliance with both fire and security.*

- 21.6 Any adjacent side panel (glazed or non-glazed) to a fire rated doorset must be included within the dual scope of certification for that doorset.
- 21.7 The responsibility for the specification and location of fire rated security doorsets lies with the developer or the developer's agent.
- 21.8 The role of the flat or apartment entrance doorset (the final doorset providing access to the dwelling) should not be underestimated in the event of a fire. It is therefore imperative that fire resistance

is professionally assessed/measured. Part B of the current Building Regulations and the associated guidance in Approved Document B state such doorsets should achieve at least 30 minutes fire resistance. Additional requirements are also listed for smoke leakage.

### Garage doorsets, vehicular and pedestrian

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- 21.9 Approved Document Q, Section 1 (General), clause 1.1, states that where access to the dwelling can be gained via an interconnecting doorset from the garage, then either the garage doorset/s (vehicular and pedestrian) or the interconnecting doorset can be designated as the secure doorset. Pedestrian doorsets (interconnecting or garage access doorsets) shall meet the requirements in paragraph 21.
- 21.10 Where a vehicular access doorset provides the primary security in this area of the building it should be certificated to:
- LPS 1175 Issue 7.2:2014 Security Rating 1+ (or above); or
  - LPS 1175 Issue 8:2018 Security Rating 1+/A1+ (or above); or
  - STS 202, Burglary Rating 1+ (or above); or
  - LPS 2081 Issue 1 (2015) Security Rating A.
- 21.11 It is recommended that if the primary security is provided by the vehicular doorset, together with any external pedestrian doorsets, that the interconnecting doorset is fitted with a Kitemarked or alternatively certificated lock to BS 3621/BS 8621 (single point locking), or PAS 3621/PAS 8621 (multipoint locking).

### Further requirements for all pedestrian doorsets

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- 21.12 Doorsets shall also be certificated to the following relevant material specific standards:
- BS 7412:2007 (PVC-U)
  - BS 4873: 2016 (Aluminium)

- BS 6510: 2010 (Steel)
- BS 644: 2012 (Timber)
- BS 8529: 2017 (Composite)

21.13 There have been numerous examples of doorsets failing in use due to poor general performance leading to properties becoming insecure therefore doorsets should also be certificated to BS 6375 Part 1, 2 and the relevant sections of Part 3. Specifiers are reminded that there are numerous classifications within BS 6375 and therefore it is not possible for this document to be prescriptive. It is therefore important that the correct duty, weather and performance levels are selected to address the intended use and location of the doorset (*with particular attention to features that can create barriers, including thresholds and opening forces*).

21.14 Suitably qualified and recognised third party Certification Authorities (*Note 21.14a*) for all the standards in this guidance document can be found within the SBD website:

[www.securedbydesign.com](http://www.securedbydesign.com)

Alternative compliance may be possible in certain circumstances (*Note 21.14b*).

*Note 21.14a: Certificated products undergo continuous assessment, including factory production controls and audits and regular audit testing, to ensure product standards and product consistencies are maintained.*

*Note 21.14b: Alternative compliance can either be demonstrated by SBD Licence holders that have reached an advanced stage of the certification process with one or more of the bodies listed within the Secured by Design website. All such cases must be verified by Secured by Design staff. Alternatively, third party accreditation via a suitably qualified and accredited certification body that has signed the EA MLA (European co-operation for Accreditation Multi-lateral Agreement) may be acceptable. The DOCO may refer such cases to SBD management for verification.*



21.15 Unless the developer has been awarded Secured by Design National Building Approval (SBD NBA) the DOCO shall be supplied with proof of certification by the developer or the developer's agent, this must also include the 'Scope of Certification' (a technical schedule listing all of component parts of the certificated doorset range), unless the supplier is a member of the Secured by Design Licensing Scheme and the doorset can be identified on the SBD website. Specifiers are reminded that this information must be supplied to the DOCO prior to the SBD certificate being awarded and must be in the name of the manufacturer or fabricator supplying the finished product to site.

21.16 Specifiers are reminded that products tested to PAS 24:2016 (Clause 5) and subsequently claiming compliance with this standard shall be permanently marked in a position that is visible and readily accessible when the product is open and not visible when the product is closed, with the following information:

- Number and date of the standard;
- The date of manufacture of the product (at least the year and quarter);
- The name or trademark of the manufacturer or other means of identifying the manufacturer;
- The classification of the doorset e.g. D or W.

**Important: If a doorset claiming to meet these standards is not marked in accordance with PAS 24 (Clause 5), it does not meet the standard.**

21.17 Secured by Design recommends doorsets are marked on the head (top) of the door to avoid any identifying labels/data being removed during the final site cleaning process. Please note that this is a requirement within PAS 24 (Clause 5) and STS 201 and is an additional requirement to CE marking.

## Locking systems

21.18 To ensure that the end user of the door

understands how to operate the locking system, clear operating instructions must be attached to the inner face of the door (*Note 21.18*). The instructions should be easily removable by the end user.

*Note 21.18: The purpose of providing the end user with operating instructions is to reduce the number of burglaries through otherwise secure doorsets, because the full locking system has not been engaged. This is particularly problematic with split spindle multi-point locking systems, where, for example, the occupier goes to bed at night without engaging the locks in the mistaken belief that leaving the door closed only on the latch (live bolt) is sufficient. The instructions should point out that the doorset is not totally secure unless the locking system is fully engaged. The method of attachment of these operating instructions and the medium used to carry them is for the door manufacturer to decide but are not intended to be permanent.*

## Glazing in and adjacent to doorsets

21.19 Any glazing within PAS 24:2016 or STS 201 Issue 4: 2012 certificated doorsets, including glazed panels/side lights adjacent to doors installed within an integral door frame and windows adjacent to doorsets (within 400mm), must incorporate one pane of laminated glass meeting, or exceeding, the requirements of BS EN 356:2000 class P1A (*Note 21.19*). NB. This is a specific requirement within PAS 24:2016, which is referenced within the UK Building Regulations (see paragraph 1.1).

*Note 21.19: There is no specific requirement to install laminated glazing on the inner or outer face of a double glazed unit. However specifiers may wish to take into consideration the fact that toughened glass is usually more resistant to accidental damage by blunt objects such as a football and therefore may be best placed on the external face of the double glazed unit. It is*

*recognised however that there are many other factors that may also need to be considered such as thermal efficiency, aesthetics and the requirement for privacy or obscured glazing, which will influence the specifier's decision.*

- 21.20 The above requirement is not necessary for doorsets certificated to LPS 2081, LPS 1175 or STS 202 as glazing security requirements are significantly more stringent within these standards, even at the lowest levels. However if there is an adjacent window then the glazing must meet the requirements of BS EN 356:2000 class P1A.
- 21.21 If glazed panels/windows adjacent to doors are installed as an integral part of the door frame then they must be shown to be part of the manufacturer's certificated range of doorsets and be specifically referenced within the Scope of Certification. Alternatively, where they are manufactured separately from the door frame, they must meet the requirements of a 'window' see paragraph 22. In such cases the window shall be securely fixed to the doorset (in accordance with the manufacturer's specifications).

### Outward opening doorsets

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- 21.22 Outward opening doorsets installed within SBD developments must specifically form part of the certificated product range.

### Door limitation and caller identification

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- 21.23 A door chain or opening limiter meeting the requirements of the Door and Hardware Federation Technical Specification 003 (TS 003) must be installed on the doorset to which a caller can be expected, normally the front door (see Approved Document Q, Section 1: Doors, paragraph 1.4). All such devices should be suitable for the door material to which they are fitted and be installed in accordance with the manufacturer's recommendations.

- 21.24 A door viewer meeting the requirements with the Door & Hardware Federation Technical Specification 002 (TS 002) standard must be fitted between 1200mm and 1500mm (in addition to 1050mm for wheelchair accessible dwellings) from the bottom of the door, this is not required if the doorset is installed with clear glazing or if there is a side panel with clear glazing (see Approved Document Q, Section 1: Doors, paragraph 1.4).

### Doorset Installation

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- 21.25 Door frames must be securely fixed to the building fabric in accordance with the manufacturer's instructions and specifications. These should be made available to the DOCO upon request if the need for a visual confirmation is felt necessary.
- 21.26 Doorsets that are hidden from public view, typically side or back doors, should not be recessed more than 600mm. This requirement is not applicable to doorsets located in wide recesses that are located within public view (*Note 21.26*). However, no doorset should be recessed by more than 1000mm.

*Note 21.26: For the purposes of this guidance document a doorset is considered to be within 'public view' when it can be seen from the street.*

### Secure Mail Delivery to houses, bungalows and flats, apartments or maisonettes accessed via a private dedicated entrance doorset

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- 21.27 There are increasing crime problems associated with letter plate apertures, such as identity theft, arson, hate crime, lock manipulation and 'fishing' for personal items (which may include post, vehicle and house keys, credit cards, etc). In order to address such problems SBD strongly recommends, where possible, mail delivery via a secure external letter box meeting the requirements of the Door and Hardware Federation standard Technical Standard 009 (TS 009) or delivery 'through the



wall' into a secure area of the dwelling. These should be easily accessible i.e. at a suitable height for a range of users.

### Letter plate apertures in doors

- 21.28 Where a letter plate aperture is required to be installed within a doorset it must form part of the certificated doorset range.
- 21.29 Specifiers and doorset manufacturers are advised that if a letter plate was not present in the doorset when it was tested to any of the standards in paragraph 21.3, or has not been independently assessed by a certification authority and included within the Scope of Certification of the doorset, then the subsequent installation of a letter plate will invalidate the certificated doorset.
- 21.30 Doorsets certificated to LPS 2081, LPS 1175 and STS 202, with a letter plate tested to the requirements of the Door Hardware Federation's Technical Standard 008 (TS 008) will be acceptable when included within the Scope of Certification for the doorset.
- 21.31 Where there is a concern for arson attacks, or repeat arson attacks, SBD recommends either the omission of a letter plate within a door, which is then replaced by an external letter box mounted on a wall or similar, or the installation of an 'anti-arson' container.

It is important that such products are installed strictly in accordance with the manufacturer's instructions.

- 21.32 Specifiers attention is drawn to the Door Hardware Federation's Technical Standard 008 (TS 008) which is also referenced within Approved Document Q (Section 1, paragraph 1.3). Additionally, BS EN 13724 which is referenced within TS 008 provides details regarding the test methods and requirements for private letter boxes and letter plates. One of its stipulated criteria is that the lowest mailbox aperture should be no lower 700mm from delivery floor level and the height of the highest mailbox aperture should be no higher than 1700mm from delivery floor level.

### External surface mounted letter boxes

- 21.33 Where a surface mounted letter box is to be used it must be robust in construction. TS 009 letter boxes offer reassurance that all of the above attributes have been met. In high crime areas TS 009 provides the safest means by which mail can be delivered whilst eliminating the risks associated with letter plate apertures. The letter box must be securely fixed to the face of the building in accordance with the manufacturers specifications and be located in a position that benefits from natural surveillance.

## Through-the-wall delivery

- 21.34 Where there are design constraints that prevent a letter plate with a security cowl being installed within a door e.g. narrow hallway, or where it is undesirable to install a surface mounted secure mail box e.g. in a corridor, it may be preferable to provide 'through-the-wall' mail delivery into a secure internal letter box. Such a box must incorporate the same design features as described above for a surface mounted box. Anti-arson design features may also be advised if such crime risks are present.
- 21.35 Products meeting the requirements of the Door & Hardware Federation Technical Specification 008 (TS 008) provide reassurance that 'through the wall' letter boxes offer similar security attributes as secure letter plates and many of the attributes that an external letter box conforming with TS 009 would provide (also see paragraph 21.32).

## 22 Windows, roof windows and roof lights

- 22.1 Window frames must be securely fixed to the building fabric in accordance with the manufacturer's instructions and specifications. These should be made available to the DOCO upon request if the need for a visual confirmation is felt necessary.
- 22.2 All easily accessible (*Note 22.2a*) windows (including easily accessible roof lights and roof windows) shall be certificated to one of the following standards:
- PAS 24:2016 (*Note 22.2b*); or
  - STS 204 Issue 6:2016 (*Note 22.2c*); or
  - LPS 1175 Issue 7.2:2014 Security Rating 1 (*Note 22.2d*); or
  - LPS 1175 Issue 8:2018 Security Rating 1/A1; or
  - STS 202 Issue 7:2016 Burglary Rating 1; or

- LPS 2081 Issue 1.1:2016 Security Rating A.

*Note 22.2a: Easily accessible is defined within Approved Document Q Appendix A as:*

- A window or doorset, any part of which is within 2 metres vertically of an accessible level surface such as a ground or basement level, or an access balcony, or
- A window within 2 metres vertically of a flat roof or sloping roof (with a pitch of less than 30°) that is within 3.5 metres of ground level.

*Note 22.2b: PAS 24:2016 embodies two routes to compliance:*

- The traditional UK PAS 24 test methodology; or
- Via BS EN 1627:2011 Resistance Class 2N (which references BS EN 1628, 1629 & 1630), with additional test criteria to address known criminal methods of entry within the UK (which are not sufficiently catered for within the European Standards). Please note: whilst the UK have selected Class 2N (and hence there is no performance requirements required under the European standard), there is still a requirement for all emergency egress windows without locking hardware to be installed with laminated glass conforming to BS EN 356 Class P1A (min).

*Note 22.2c: STS 204 is the unique reference number for Element's published standard replicating the requirements of PAS 24:2016.*

*Note 22.2d: Specifiers and DOCOs are reminded that a requirement for windows to meet LPS 1175 or STS 202 in a residential situation will be exceptionally rare and can only be justified by a detailed crime risk analysis indicating that the resident is at extreme risk. Please also note that some products may be acceptable when tested to an earlier version of the standard.*



- 22.3 All easily accessible windows should incorporate key lockable hardware unless designated as emergency egress routes within the Building Regulations.
- 22.4 Windows that form part of a designated fire escape route, as determined by the Fire Safety Officer, may require non-key locking hardware. In these circumstances laminated glass to BS EN 356:2000 class P1A will be required.
- 22.5 If however the Fire Safety Officer accepts locking hardware as part of the designated fire escape route, then fire resistant glass may be required.
- 22.6 Windows that are not easily accessible will require either lockable hardware or an opening restrictor in the interests of child safety.
- 22.7 Windows must also be fit for purpose and shall be certificated to the relevant material standard i.e.:
- BS 7412:2007 (PVC-U)
  - BS 4873: 2016 (Aluminium)
  - BS 6510: 2010 (Steel)
  - BS 644: 2012 (Timber)
  - BS 8529: 2017 (Composite)
- 22.8 The following performance requirements are also required:
- BS 6375 parts 1 & 2 (Note 22.8)
- Note 22.8: Specifiers are reminded that there are numerous classifications*

*within BS EN 6375 and therefore it is not possible for this document to be prescriptive. It is therefore important that the correct duty, weather and performance levels are selected to address the need/location of the window.*

- 22.9 Suitably qualified and recognised third party Certification Authorities (Note 22.9a) for all the standards in this guidance document can be found within the Secured by Design website; [www.securedbydesign.com](http://www.securedbydesign.com)

*Note: 22.9a: Certified products undergo continuous assessment, including factory production controls and audits and regular audit testing, to ensure product standards and production consistencies are maintained.*

*Note: 22.9b: Alternative compliance can either be demonstrated by SBD licence holders that have reached an advanced stage of the certification process with one of the above bodies. All such cases must be verified with PCPI. Alternatively third party accreditation via a Notified Certification Body that has signed the EA MLA (European co-operation for Accreditation Multilateral Agreement) may be acceptable if such a body is also accredited to conduct such activities. The DOCO may refer such cases to PCPI for verification.*

22.10 Unless the developer has been awarded Secured by Design National Building Approval (SBD NBA), the DOCO shall be supplied with proof of certification by the developer or the developer's agent (from one of the bodies listed within the Secured by Design website, [www.securedbydesign.com](http://www.securedbydesign.com)), this must also include the 'Scope of Certification' (a technical schedule listing all of component parts of the certificated window range), unless the supplier is a member of the Secured by Design Licensing Scheme and the window can be identified on the SBD website. Specifiers are reminded that this information must be supplied to the DOCO prior to the SBD certificate being awarded.

22.11 Windows falling outside the scope of the British Standard or STS Standard must be assessed by a UKAS accredited organisation accredited to perform such an assessment against the principles of PAS 24:2016 or STS 204 Issue 6:2016. Any such assessment shall include the appropriate fitness for purpose standard (paragraph 22.7). The DOCO shall be supplied with proof of certification by one of the UKAS Accredited Certification Bodies, including the technical schedule, prior to the SBD certificate being awarded; unless the supplier is a member of the Secured by Design Licensing Scheme and the window can be identified on the SBD website.

22.12 Laminated glass meeting the requirements of BS EN 356:2000 class P1A is required in the following areas:

- any window located within 400mm of a doorset (to ensure the integrity of the locking system);
- easily accessible emergency egress windows with non-lockable hardware (a requirement of PAS 24:2016);
- easily accessible roof lights with non-lockable hardware.

Alternatively, if the window is tested and accredited to LPS 1175, then laminated glass meeting the requirements of LPS 1270 Issue 1.1 Security Rating 001 (minimum) may be used.

22.13 Where automatic opening window and venting systems controlled by sensors and computers are used, for example in some eco homes or flat developments, such opening windows or vents should be independently certificated to one of the aforementioned security standards but in situations where they are not, then additional security measures are required such as grilles meeting one of the security standards below, to prevent the security of the building being compromised in the event of a system failure. In these circumstances, a Smoke Control Contractor or Fire Safety Professional should be consulted to ensure that any additional security measures do not compromise the smoke ventilation requirements expected under Approved Document B.

- LPS 1175 Issue 7.2:2014 Security Rating 1 (Note 22.2d); or
- LPS 1175 Issue 8:2018 Security Rating 1/A1; or
- STS 202 Issue 7:2016 Burglary Rating 1; or
- LPS 2081 Issue 1.1:2016 Security Rating A.

### Windows, roof windows and roof lights in buildings containing multiple dwellings or bedrooms

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22.14 All easily accessible windows, roof windows and roof lights in building containing multiple dwellings or bedrooms shall meet the requirements of paragraphs 22.1 to 22.16 (inclusive).

### Fire rated windows

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22.15 Where there is a requirement for a window to be both fire and security rated, the manufacturer or fabricator supplying the finished product to site is required to present independent third party dual certification from a single UKAS accredited certification body for both elements. This is in order to minimise the likelihood of a window being presented in two differing configurations for separate fire and security tests and then later



being misrepresented as one product meeting both requirements. All window styles and components, will need to be adequately described within the scope of certification and accompanying Technical Schedule. (Note 22.15)

*Note 22.15: Any component part of the window that is changed for any reason must be assessed by the certification body to ensure compliance with both fire and security.*

- 22.16 The responsibility for the specification and location of fire rated security windows lies with the developer or the developer's agent.

## 23 Conservatories and sun rooms

- 23.1 Where a conservatory or sun room is installed then the doors and windows must meet the same physical security standards as paragraphs 21.1 to 21.17, and 21.19 to 21.22 (doors), and paragraphs 22.1 to 22.16 (windows). If a conservatory is installed with polycarbonate glazing system then a doorset shall be installed separating the conservatory from the rest of the dwelling, unless the roofing system has been certificated to one of the standards referenced within paragraph 22.3. The doorset shall comply with the

requirements within paragraph 21.1 to 21.17 and 21.19 to 21.22.

## 24 Lightweight framed walls in houses and buildings containing multiple dwellings or bedrooms

- 24.1 The security of a development can be severely compromised if lightweight framed walls do not offer sufficient resilience to withstand a criminal attack; this is recognised within Approved Document Q (Note 24.1). The SBD requirements are primarily based upon products that have been tested and proven to provide additional security.

*Note: 24.1: See – The Building Regulations 2010, Security-Dwellings, Q1: Unauthorised access, Section 1: Doors, paragraph 1.6.*

- 24.2 Lightweight framed walls installed either side of a secure doorset (600mm for the full height of the doorset to restrict access to door hardware) or walls providing a partition between two dwellings, or a dwelling and shared communal space, shall meet the requirements below:
- 24.2.1 Wall systems proven to meet the requirements of the following standards are preferred:

- LPS 1175 Issue 7.2:2014 Security Rating 1; or
- LPS 1175 Issue 8:2018 Security Rating 1/A1; or
- STS 202 Issue 7:2016 Burglary Rating 1.

Specifiers and DOCOs are advised that the correct installation of lightweight framed walling systems is crucial to the level of security ultimately provided, it is therefore recommended that they are installed by approved installers who have received appropriate training.

24.2.2 As an alternative, although not originally intended to enhance security, the following 'Robust Details' have shown to offer some resistance to intrusion:

- E-WT-2 (timber wall construction);
- E-WS-3 (light steel construction);
- E-WM-20 (masonry wall construction).

24.2.3 A further alternative to the either one of the requirements above is the installation of 9mm (min) timber sheathing or expanded metal in the areas concerned.

## 25 External lighting for dwellings

25.1 Lighting is required to each dwelling elevation that contains a doorset (*Note 25.1*) and can also assist in identifying the door and operating locking mechanisms.

*Note 25.1: Secured by Design has not specified PIR activated security lighting for a number of years following advice from the ILP and police concern regarding the increase in the fear of crime (particularly amongst older people) due to repeated PIR lamp activations. Research has proven that a constant level of illumination is more effective at controlling the night environment.*

25.2 The use of LED light sources is recommended with a colour temperature of no more than 4000 Kelvin and ideally below. This reduces blue light content and therefore the effects on human and ecology receptors.

## Lighting in communal areas within flats/apartments

25.3 24 hour lighting (switched using a photoelectric cell) to communal parts of blocks of flats will be required. It is acceptable if this is dimmed during hours of low occupation to save energy. This will normally include the communal entrance hall, lobbies, landings, corridors and stairwells and underground garaging facilities and all entrance/exit points. Other areas requiring lighting will be indicated by the DOCO in writing. To reduce energy consumption this may be provided by a dimming system which leaves luminaires on at a lower level during quieter periods.

25.4 Secured by Design encourages, wherever possible, the use of the most environmentally friendly light sources. Moreover the Institute of Lighting Professionals (ILP) currently favours the use of good quality LED lighting and other energy effective light sources and advises against the use of fluorescent lighting which is environmentally unsustainable for a variety of reasons (*Note 59.5*). Further information is available at: [www.securedbydesign.com](http://www.securedbydesign.com)

## 26 Utility meters

26.1 There is no requirement for the location of the utility meters if 'smart meters' are utilised (remote signalling). Otherwise utility meters should be located outside the dwelling at the front or as close to the front of the building line as possible (to ensure they are visible in order to deter vandalism). If located to the side of the dwelling they must be as near to the front of the building line as possible and to the front on any fencing or gates (care should be taken not to provide a climbing aid). When installed in a building containing a number of residencies such as flats, apartments or maisonettes, the meters should be installed in a location that access does not introduce security risks to residential areas.





## 27 Access control and additional security requirements for buildings containing multiple dwellings or bedrooms

### Definition

- 27.1 A building containing multiple dwellings, for the purposes of this document, may include flats, apartments, bedsits or individual bedrooms accessed from a semi-private area and served by a shared or communal entrance doorset including Houses in Multiple Occupation (HMO) and student accommodation.

### Visitor door entry system

### Definition

- 27.2 A door entry system is a visitor system that is able to call a dwelling, whether individual or served from a communal entrance. It shall allow a visitor to ring any selected dwelling within the particular system and/or building, and hold a two-way simultaneous conversation between the visitor and occupant of the dwelling. It will allow the occupant to see and identify the visitor and their location, and will enable the occupant of the dwelling to remotely operate the electric locking device from their room terminal, thereby unlocking the communal entrance door(s) associated with the action and allowing

the visitor access. This should be repeated at any subsequent communal entrance and landing if compartmentation of the building is required.

- 27.3 Visitor door entry systems shall be easy to operate and understand and have the ability to display the image of the caller before the call is answered, so the resident can choose whether to answer the call or not.

### Access control system

### Definition

- 27.4 A proximity access control system provides electronic access through communal entrance doorsets. This is generally by use of a card or key fob issued to an occupant or person such as staff member, contractor or postal delivery service. It grants access to required areas via locked doors when the valid card or key fob is presented to a proximity reader fitted to the communal entrance doorset. Authorised access can be restricted to certain times of the day for some users.

The access control system will have the facility to record and identify the location, user, type, time and date of every system event. Sufficient memory storage must be available for a period of not less than 30 days. The system will be fully programmable, with access restricted to

the nominated system controller(s) who will be able to manage the system via remote access in order to expeditiously delete lost or stolen proximity cards or key fobs and any enrolled radio transmitters. Radio transmitters must have individual codes, such as those used by access cards or key fobs. Common code radio transmitters shall not be acceptable as they cannot be managed.

- 27.5 Electronic keys must be security encrypted to protect against unauthorised copying, and be sufficiently robust to avoid constant replacement during everyday use by the residents.

### Communal and shared entrance doorset – physical security standards

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#### Definition

- 27.6 A communal or shared entrance doorset, including integral adjacent panels and side screens, can be defined as an external doorset leading from the street or otherwise public area to an internal semi-private communal area providing access to segregated flats, bedsit or individual bedrooms. They can be further categorized by use as follows:

### Physical security requirements for communal entrance doorsets with no electronic visitor door entry system – 4 dwellings or less

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- 27.7 Communal entrance doorsets in blocks serving 4 dwellings or less, over no more than two floors, are not required to be connected to a visitor door entry system and access control system, and can be controlled by non-electronic keys only i.e. requiring residents to meet and greet visitors at the communal door. Doorsets shall comply with the physical security requirements of paragraph 21.1 to 21.17 and 21.19 to 21.22.
- 27.8 Communal entrance doorsets in blocks serving 4 dwellings or less, over more than two floors, are required to have a visitor door entry system and access control system (regardless of the

number of flats/apartments, bedsits or bedrooms) and therefore specifiers are again referred to the content of paragraph 21.1 to 21.17 and 21.19 to 21.22. for the requisite physical security standards.

- 27.9 Tradesperson or timed release mechanisms are not permitted as they have been proven to be the cause of anti-social behaviour and unlawful access to communal developments.

### Physical security requirements for communal entrance doorsets with an electronic visitor door entry system – 5 dwellings or more but less than 10

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- 27.10 Communal entrance doorsets serving 5 dwellings or more, but less than 10 falling within this category shall meet the following (in accordance with Section 2A paragraph 21):

- PAS 24:2016;
- STS 201;
- LPS 2081 Security Rating B+.

- 27.11 Where a communal entrance doorset serves 5 dwellings or more, but less than 10, it is required to have a visitor door entry system and access control system to enable management oversight of the security of the building.

- 27.12 Tradesperson or timed release mechanisms are not permitted as they have been proven to be the cause of anti-social behaviour and unlawful access to communal developments.

- 27.13 Developments with more than two floors are required to have a visitor door entry system and access control system (regardless of the number of flats/apartments, bedsits or bedrooms) and therefore specifiers are again referred to the content of paragraph 21.1 to 21.17 and 21.19 to 21.22.

### Physical security requirements for communal entrance doorsets with an electronic visitor door entry system serving 10 dwellings or more

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27.14 Communal entrance doorsets serving 10 dwellings or more, controlled by visitor door entry systems, can enable residents to gain access without the use of a key and grant entry to visitors by means of an electronic door release system. An increased number of dwellings results in doorsets being used more frequently. Likewise the proximity of the development to a high crime area can subject doorsets to more abuse. Therefore specifiers should satisfy the DOCO that the doorset is fit for its intended purpose and environment. Certification to PAS 24:2016 or STS 201 may be acceptable for some developments, but full third party certification to one of the following standards can demonstrate the doorset is of a more robust construction and is able to withstand the day to day use in a communal application:

- STS 202 Issue 6:2015 Burglary Rating 2; or
- LPS 1175 Issue 7.2:2014 Security Rating 2+; or
- LPS 1175 Issue 8:2018 Security Rating A3+; or
- LPS 2081 Issue 1.1:2016 Security Rating B; or
- PAS 24:2016, paragraph 4.4.3 i.e. tested to BS EN 1627 Resistance Class 3 (*Note 27.14*).

*Note 27.14: Specifiers are reminded that doorsets utilising non-mechanical magnetic locks fall within the scope of PAS 24:2016 but outside the scope of EN 1627. All testing to this standard utilising a mechanical lock shall be conducted in accordance with the 'UK Police Service (Secured by Design) Interpretation document for BS EN 1627, BS EN 1628, BS EN 1629 & BS EN 1630'. This is a requirement within the UK national forward of BS EN 1627.*

27.15 There have been numerous examples of sub-standard doorsets failing, due to poor general performance, leading to insecure properties. In some cases,

particularly heavy communal entrance/exit doors have become detached from the frame, which could have resulted in serious injury or worse. Certification to BS 6375 (Parts 1, 2 and 3) provides reassurance that the doorset is fit for purpose and safe in use. Specifiers should be satisfied that the following attributes are addressed:

- Duty level – this is the number of door operations (opening and closing actions) that it has been tested to. In simple terms the more dwellings that are served the higher the duty level should be (BS 6375 Part 2 provides further guidance);
- Weather performance - which may be influenced by the geographical location, temperature and climate (BS 6375 Part 1 provides further guidance);
- Wind resistance – also influenced by the location of the building (BS 6375 Part 1 provides further guidance);
- And relevant sections of BS 6375 Part 3 (applicable to the installation).

### Door entry and access control systems

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27.16 All communal dwellings (see paragraph 27) with 10 flats, apartments, bedsits or individual bedrooms, or more should have a visitor door entry system and access control system to enable management oversight of the security of the building i.e. to control access to the building via the management of a recognised electronic key system.

27.17 Visitor door entry systems that utilise CCTV must comply with the requirements of paragraph 29.

### Small developments (up to 25 flats/apartments, bedsits or bedrooms)

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27.18 Visitor door entry systems and access control systems are not normally required for communal developments with 4 or less flats, apartments, bedsits or bedrooms or less spread over no more

than two floors, or where the accommodation is not intended for use by the older or disabled people.

It should be noted however, that regardless of the size of any development where dwellings are inclusively designed to provide accessible housing, consideration should be given to disabled and older residents who may require additional access features such as full automation via remote key fob to enable independent entry through all doors required to gain access e.g. from the building entrance/ exit/car park, through any additional communal or lift doors required to gain access to their dwelling entrance. This may be required due to an inability to operate heavy doors and/or reach and operate controls or wall mounted fobs.

27.19 Developments containing up to and including 9 flats, apartments, bedsits or bedrooms spread over more than two floors (three floors or more including basement level accommodation) shall comply with the requirements of paragraph 27.8.

27.20 Smaller developments containing up to and including 25 flats, apartments, bedsits or bedrooms shall have a visitor door entry system and access control system. The technology by which the visitor door entry system operates is a matter of consumer choice, however it should provide the following attributes:

- Access to the building via the use of a security encrypted electronic key (e.g. fob, card, mobile device, key, etc.);
- Vandal resistant external door entry panel with a linked camera;
- Ability to release the primary entrance doorset from the dwelling or bedroom (in the case of student accommodation or House in Multiple Occupation);
- Live audio and visual communication between the occupant and the visitor;
- Ability to recover from power failure instantaneously;

- Unrestricted egress from the building in the event of an emergency or power failure;
- Control equipment to be located in a secure area within the premises covered by the CCTV system and contained in a lockable steel cabinet to LPS 1175 Security Rating 1 or STS 202 Burglary Rating 1.

27.21 Developers and installers of visitor door entry systems and access control systems should be aware that UL 293 provides reassurance that a system has been assessed against a prescribed security test regime.

27.22 Tradesperson release mechanisms are not permitted as they have been proven to be the cause of anti-social behaviour and unlawful access to communal developments.

27.23 Specifiers are reminded that the installed electronic release hardware must form part of the certificated doorset range.

### Developments with more than 25 flats, apartments, bedsits or bedrooms

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27.24 Larger developments containing more than 25 flats, apartments, bedsits or bedrooms shall have a visitor door entry system and access control system. The technology by which the access control system operates is outlined within UL 293, however it must provide the following attributes:

- Access to the building via the use of a security encrypted electronic key (e.g. fob, card, mobile device, key etc.);
- Vandal resistant external door entry panel with a linked camera;
- Ability to release the primary entrance doorset from the dwelling or bedroom (in the case of student accommodation or House in Multiple Occupation);
- Live audio/visual communication between the occupant and the visitor;
- Ability to recover from power failure instantaneously;



- Unrestricted egress from the building in the event of an emergency or power failure;
- Capture (record) images in colour of people using the door entry panel and store for those for at least 30 days. If the visitor door entry system is not capable of capturing images, then it should be linked to a CCTV system or a dedicated CCTV camera should be installed for this purpose. This information should be made available to police within 3 days upon request;
- All visitor and resident activity on the visitor door entry system should be recorded and stored for at least 30 days. This information should be made available to police within 3 days upon request.
- Systems must comply with General Data Protection Regulations (GDPR).

27.25 SBD recommends the use of colour monitors to enable the occupier of the dwelling or bedroom with the identification of visitors or to assist the occupier to accurately describe the colour of clothing to the police of the perpetrators of antisocial behaviour or those otherwise misusing the system.

27.26 Specifiers are reminded that the installed electronic release hardware must form part of the certificated doorset range.

27.27 In the event of a power failure door locks shall revert to a safe (unlocked) mode unless there is a fire evacuation policy in place that requires doors to remain locked, such as that operated within some care homes.

27.28 Tradesperson release mechanisms are not permitted as they have been proven to be the cause of anti-social behaviour and unlawful access to communal developments.

### Security compartmentation of developments incorporating 25 or more flats, apartments, bedsits or bedrooms

27.29 Developments of over 25 flats, apartments, bedsits or bedrooms can suffer adversely from anti-social behaviour due to unrestricted access to all areas and floors of the building. SBD therefore seeks to prevent unlawful free movement throughout the building through the use of an access control system. How this is achieved is a matter for the specifier, the following two methods are acceptable:

1. Lift and stairwell access controlled separately:

- To prevent the lift and stairwell providing unrestricted access onto a residential landing, each resident should be assigned access to their

floor only via the use of a security encrypted electronic key (e.g. fob, card, mobile device, key etc.) both on the stairwell/landing door and lift;

- Access to stairwells from the communal lobby should be restricted to residents to reduce the risk of anti-social behaviour or criminal activities;
- Unrestricted egress from a landing into the stairwell and from the stairwell to the communal lobby/emergency fire exit should be provided at all times.

2. Lift and stairwell access jointly controlled via an additional secure doorset:

- An additional secure doorset prevents access to each landing from both the lift and stairwell. Each resident should be assigned access to their floor only via the use of a security encrypted electronic key (e.g. fob, card, mobile device, key etc.) for this doorset;
- Access to stairwells from the communal lobby should be restricted to residents to reduce the risk of anti-social behaviour or criminal activities;
- Unrestricted egress from a landing into the stairwell and from the stairwell to the communal lobby/emergency fire exit should be provided at all times.

27.30 In the event that a lift opens directly into an apartment a security protocol must be agreed between the occupiers and the lift maintenance company to ensure access cannot be gained without the proper authority.

27.31 Alternative methods of creating compartmentation within the building may be discussed with the DOCO.

27.32 Whether access at these locations is provided to legitimate visitors as well as residents via additional call points, is a matter for the overall access control strategy. It is not the intention of Secured by Design to restrict legitimate free flow of residents through the building, this will be at the discretion of the management company concerned.

27.33 It is imperative that the fire service should have unrestricted access to all floors in the event of an emergency so the internal access control system utilised should incorporate the following features:

27.33.1 Where unlawful free internal movement is restricted via the lift then the fire service must be afforded access via a 'firefighter's mode' or an evacuation lift in 'evacuation mode'.

27.33.2 If unlawful free internal movement has been restricted via an access control system acting on dedicated external doorsets and any additional doorsets providing access to individual floors/landings then an electronic release must be incorporated within the system to allow the fire service free access to all of the communal areas of the building. The electronic release system must be weatherproof, easily identifiable and located close to the entrance that Fire and Rescue Teams would use in the event of an emergency. It has been agreed between the police and fire and rescue services that the most practical means of achieving this aim is to install a switch within an Access Control Box (ACB). The key system for the ACB should be of a restricted type acceptable to the local fire and rescue service. An ACB must be secure for obvious reasons and therefore shall be tested and certificated to one of the following standards:

- LPS 1175 Issue 7.2:2014 Security Rating 2; or
- LPS 1175 Issue 8:2018 Security Rating A3+; or
- STS 205 Issue 1:2011 Burglary Rating 2.

27.33.3 The use of an ACB is in addition to the installation of a Premises Information Box (PIB), which are recommended by the fire and rescue service and are referenced within clauses of BS 9991:2015. The ACB should be clearly marked with a photo-luminescent identification sign in the same way as the PIB. The exact location of an ACB should be specified following

consultation with the local Fire and Rescue Service.

### Emergency door release devices

- 27.34 Break glass emergency door exit release devices (often green in colour) on communal external doors that provide an important aid to egress in the event of an emergency have proven to be abused rendering some buildings insecure for long periods of time. SBD recommends vandal resistant stainless steel self-resetting emergency exit systems are installed as an alternative. The installation and system type must be in full compliance with the Building Regulations and achieve final 'sign-off' by local Building Control or Approved Inspector.
- 27.35 If the break glass emergency door release device provides access to residential areas as part of the emergency egress route, additional security must be provided to restrict access to the fire egress route only to maintain the security of the building line. This is also a requirement of Part Q of the Building Regulations (England and Wales).

## 28 Telephone and Internet Protocol (IP) based visitor door entry systems with or without remote unlocking

- 28.1 To ensure that the viewed image is of appropriate quality, systems of this kind shall be demonstrated to the DOCO on equipment similar to that used by residents (e.g. TV smart phone or tablet), prior to receiving Secured by Design accreditation.
- 28.2 All systems shall comply with UL293 and the Internet Protocol security shall be tested and certificated to British Standard's Institute Kitemark for the Internet of Things (IoT) Devices, by 1st October 2019.
- 28.3 The system must be capable of catering for a minimum of 2 and a maximum of 6 devices being activated as controllers per dwelling.

- 28.4 Only the management body shall be permitted to add a device to the system, however the principal resident(s) shall be permitted to remove a device from the system.
- 28.3 Remote unlocking (e.g. when operated from outside the boundary of the residence utilising mobile equipment such as smart phones and tablets) should only be permitted when there is both a live audio and visual feed. Systems should not permit users to remotely release the door lock where there is audio only communication, e.g. poor signal area, loss of signal, etc.
- 28.4 If the facility of remote unlocking is abused by a resident, the system shall be capable of restricting their ability to unlock a door by way of a land-line in the residence linked to a visual monitor only.
- 28.5 If residents do not possess the required equipment to use the system, a dedicated device should be installed inside the dwelling to give audio and visual communication.
- 28.6 Specifiers are reminded that if telephone and/or IP based visitor door entry systems are utilised there should be no usage charge incurred by the resident as a result of a system activation.
- 28.7 Specifiers are reminded that if telephone and/or IP based visitor door entry systems are utilised, they shall also comply with the requirements of paragraph 27.

## 29 CCTV and Recording

- 29.1 CCTV is not a universal solution to security problems, it forms part of an overall security plan. It can help deter crime and criminal behaviour, assist with the identification of offenders, promote personal safety and provide reassurance for residents and visitors. Even the smallest development will benefit from the installation of a good quality CCTV system, which does not need to be expensive.

- 29.2 Images of people are covered by the General Data Protection Regulation (GDPR), and so is information about people which is derived from images – for example, vehicle registration numbers. Most uses of CCTV will be covered by the Act, regardless of the number of cameras or how sophisticated the equipment is.
- 29.3 Specifiers are reminded that there will be a requirement for a data controller to ensure compliance with the GDPR. The data controller must ensure that all CCTV images that can be used to identify individuals are used, stored and disclosed in line with the GDPR principles.
- 29.4 It is important that signs are displayed explaining that CCTV is in operation.
- 29.5 A CCTV system should:
- have CCTV cameras contained in vandal resistant housings with the facility for ceiling or wall mounting;
  - record images in colour HD quality;
  - not be affected by concentrated white light sources directed at the camera, such as car head lights and street lighting;
  - ‘on-site’ recording equipment or other hard drive unit will be contained in a lockable steel cabinet to LPS 1175 Security Rating 1 (A1) or STS 202 Burglary Rating 1;
  - identify each camera’s location and record this information along with time and date stamping;
  - provide suitable methods of export and incorporate the required software to view the exported footage.
- 29.6 CCTV cameras associated with visitor door entry systems covering communal entrances and internal lobby areas should be installed and be capable of providing images of persons that are clearly identifiable on smaller devices such as smart phones.
- 29.7 Ideally, CCTV systems should be monitored live 24/7 giving the ability to react to a situation as it occurs. However, this is not a requirement of Secured by

Design for residential developments. Most CCTV systems are designed for recording images and for the post event investigation only, in which case nobody is required to monitor the activities live. Police recommend that images are stored for a minimum of 31 days.

- 29.8 Early discussions with an independent CCTV expert and potential installers can resolve a number of matters, including:
- monitoring and recording requirements;
  - activation in association with the intruder alarm;
  - requirements for observation, facial recognition/identification and automatic number plate recognition (ANPR);
  - areas to be monitored and field of view;
  - activities to be monitored;
  - the use of recorded images;
  - maintenance of equipment and the management of recording;
  - subsequent on-going training of operatives.
- 29.9 Further advice, including the ICO CCTV Code of Practice is available at: [www.ico.org.uk](http://www.ico.org.uk)
- 29.10 The system will be fully operational and demonstrated to the DOCO upon final inspection, prior to receiving Secured by Design accreditation.

## 30 CCTV management and maintenance protocols

- 30.1 The data controller must facilitate the availability of images at all times to the police upon reasonable request. Contact details for the data controller must be clearly displayed in accordance with the requirements of the GDPR.
- 30.2 An ‘As Installed’ system specification and schematic, site specific drawing and logbook will be provided to the system controller(s) and available to be viewed at all times.
- 30.3 It is recommended that the system receives a minimum of two maintenance



inspections per year. Each camera will be cleaned and a test recording completed and compared with the previous recording, to ascertain any deterioration in quality and performance. The contractor should issue a certificate of operational safety and security.

- 30.4 The contractor will provide system-operating manuals to the system controller(s), which will include the method of reviewing and archiving recorded images and will be available for use at all times.
- 30.5 The contractor will issue a certificate to confirm that the CCTV installation is compliant with BS 7958: 2015 Closed circuit television (CCTV. Management and operation. Code of practice), and the requirements of the GDPR.
- 30.6 The contractor will issue an NSI or SSAIB (or equivalent) certificate of compliance for the CCTV system.
- 30.7 The contractor will issue a certificate to confirm that the systems and installations are in compliance with SBD guidelines.

## 31 Doorsets providing alternative access to communal areas (other than the primary shared or communal access doorset) including emergency egress doorsets

- 31.1 Alternative access doorsets, emergency egress and fire doorsets that may be used by residents to access communal parts of the building are also required to be 'secure doorsets', see Approved Document Q, Section 1, paragraph 1.1. Doorsets shall meet the requirements within paragraphs 21.1 to 21.17, and 21.19 to 21.22.

### Emergency egress doorsets from underground car parks

- 31.2 Doorsets providing access to and

emergency egress from underground car parking areas must meet the requirements of both Part B and Part Q of the Building Regulations (England). In practice this provides a dilemma as the performance requirements for the two Building Regulations can be diametrically opposed to one another and problematic if not dealt with appropriately at the design stage. As a result of detailed discussions with the fire service we have agreed the following requirements (see paragraphs 31.3 to 31.8) as an alternative design solution for just such a scenario.

- 31.3 Doorsets allowing emergency egress directly from the car park to the street, or any area that allows for the rapid dispersal of persons from the vicinity of the building, other than into common internal areas, are not required by the Building Regulations (England and Wales) to be secure doorsets. However, SBD requires all such doorsets shall meet the requirements within Section 2a, paragraphs 21.1 to 21.17, and 21.19 to 21.22.
- 31.4 Emergency egress from the car park should be facilitated via the use of a 'break glass' unit and all such doors should be equipped with an audible warning which should also form part of a security alarm system.
- 31.5 Doorsets providing exit from underground car parking facilities (including emergency egress doorsets) into common or shared stairwells which rely on egress via communal areas of a development are required to meet all relevant Building Regulations. Due to the fact that emergency egress doorsets from such facilities must also be provided with 'break glass' to exit hardware, there is potential for such doorsets to be detrimental to the security of the building and at odds with the performance requirements with Part Q of the Building Regulations in England and Wales (Performance requirement 'b'). Therefore such doorsets shall be isolated from common or shared stairwells and preferably provide egress directly from the underground car parking area on

to the street, or any area that allows for the rapid dispersal of persons from the vicinity of the building.

- 31.6 If this is not possible due to the design constraints of the building then emergency egress shall be afforded at the earliest possible opportunity and provision shall be made to restrict access to the common or shared stairwell beyond the ground floor, or first available floor level. Access must also be restricted to any other communal area of the building. All doorsets affording restricted access into the communal areas of the building, and all emergency egress doorsets exiting on to the street, shall meet the requirements within paragraphs 21.1 to 21.17, and 21.19 to 21.22.
- 31.7 Where there is an underground car parking facility and emergency egress afforded via a route which utilises a common or shared stairwell or other communal areas it is required that an access control box (ACB) is installed. This is in addition to a premises information box (PIB) in accordance with BS 9991:2015 to provide the fire service the appropriate information about the building.
- 31.8 Access control systems on all doors allowing access to communal areas of the building shall meet the requirements within paragraph 27 – 28.7 (inclusive).

### Glazing in communal entrance doorsets

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- 31.9 Where a glazed vision panel is installed it must form part of the manufacturers certificated doorset range.
- 31.10 Specifiers should note that Part Q of the Building Regulations (England and Wales) and Building Standards 4.13 (Scotland) both reference PAS 24:2012. Therefore the minimum specification for any glazing within shared or communal entrance doorsets is BS EN 356:2000 Class P1A (minimum). It should be noted that PAS 24:2016 makes exactly the same requirement. NB This is a security performance criteria rather than a glazing thickness specification, so

glazing thicknesses may vary between manufacturers/suppliers.

## 32 Mail delivery in buildings containing multiple dwellings or bedrooms

- 32.1 There are increasing crime problems associated with the delivery of post to buildings containing multiple dwellings or bedrooms. Therefore mail delivery that compromises the security of residential areas of a multi-occupied building in order to deliver individually to each residence is not permitted. Facilities should be provided that enable mail to be delivered to safe and secure areas such as described below.

### Communal mail delivery

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- 32.2 Communal mail delivery facilities within building entrances serving multiple flats or rooms (such as student accommodation) should be designed to incorporate the following:
- Located at the primary entrance/exit point of the building within view, within an internal area covered by CCTV or located within a secure access controlled entrance hall, or externally at the front of the building within view of those using the building;
  - Be of robust construction;
  - The individual letter boxes shall have a maximum aperture size of 260mm x 40mm;
  - Have anti-fishing properties;
  - Have fire resistance where considered necessary;
  - Installed in accordance with the manufacturers specification.
- 32.3 Internal communal mail delivery facilities serving multiple flats or rooms (such as student accommodation) should be designed to incorporate the following:
- Located in view, within a secure area at the primary building entrance point/ exit point;

- Be of robust construction;
- The individual letter boxes shall have a maximum aperture size of 260mm x 40mm;
- Have anti-fishing properties;
- Have fire resistance where considered necessary;
- Installed in accordance with the manufacturers specification.
- Building access strategy to account for residents who will rely on others to collect their mail.

32.4 Letter boxes certificated to Door & Hardware Federation Technical Specification 009 (TS 009) offer reassurance that all of the above attributes have been met. In high crime areas TS 009 provides the safest means by which mail can be delivered whilst eliminating the risks associated with letter mail delivery i.e. arson, 'fishing' for personal mail.

## 33 Lighting for buildings containing multiple dwellings

### External lighting

33.1 Lighting is required to each elevation that contains a doorset where the public, visitors or occupants of the building are expected to use (*Note 33.1*).

*Note 33.1: Secured by Design has not specified PIR activated security lighting for a number of years following advice from the ILP and police concern regarding the increase in the fear of crime (particularly amongst the elderly) due to repeated PIR lamp activations. Research has proven that a constant level of illumination is more effective at controlling the night environment.*

### Internal lighting

33.2 24 hour lighting (switched using a photoelectric cell) to communal parts of blocks of flats will be required. It is

acceptable if this is dimmed during hours of low occupation to save energy. This will normally include the communal entrance hall, lobbies, landings, corridors and stairwells and underground garaging facilities and all entrance/exit points. To reduce energy consumption, lighting systems that reduce light levels during quieter periods may be utilised. Further information is available at [www.securedbydesign.com](http://www.securedbydesign.com)

## 34 Loft hatches in communal areas

34.1 Loft hatches located in communal areas, such as over landings in blocks of flats, must be locked to prevent access into a dwelling via the loft space. This may still be required even where the loft space has been compartmented to prevent the spread of fire and smoke (products meeting the requirements of published fire safety standards are available). There are currently no 'hinged' or 'lift out' loft hatches being manufactured to recognised security standards, but where padlocks, hasps and staples are used to secure the hatch the products must be certificated to BS EN 12320:2012, Sold Secure 'Silver' or LPS 1654 Issue 1.1:2014 Security Rating 1 and fitted in accordance with the manufacturer's instructions.

34.2 The responsibility for the specification and location of fire rated security products lies with the developer or the developer's agent.

# SECTION 2b

## 35 Introduction

35.1 This section provides technical guidance for bespoke new homes and the refurbishment of existing homes. It is expected, in order to gain SBD approval, that new homes and existing homes with standard door and window products will follow the requirements within Section 2a, where possible. However, Approved Document Q (English and Wales Building Regulations) and Scottish Building Regulation 4.13 both allow an alternative route to compliance, which utilises a door or window specification incorporating components that have been tested to published security standards and therefore SBD has responded by providing additional guidance in these areas.

35.2 Approved Document Q, Appendix B, does not provide a definition of what is a 'bespoke' doorset or window. For the purposes of Secured by Design it is considered beneficial for all parties, and in the interests of clarity, to provide a definition. Secured by Design therefore has defined a bespoke doorset or window to be:

***A single or small number of doorsets or windows installed within a development (normally no more than 4 homes) of unique design with non-standard features which preclude the use of conventional enhanced security door and window products. Doorsets or windows installed within buildings of specific architectural value, constrained by listed building or other conservation status may also be considered to be bespoke.***

35.3 Where there is a client led requirement for Secured by Design accreditation, compliance with this section alone will lead to the issue of a Secured by Design Bronze Award, however when combined

with compliance to Section 1, and where applicable the relevant parts of Section 3, a Secured by Design Silver Award may also be achieved.

35.4 Major refurbishment schemes should meet the requirements within Section 2a.

35.5 Section 2b of this guidance document is further separated into two areas:

35.5.1 Houses, bungalows, flats, apartments or maisonettes accessed via a private dedicated entrance doorset;

35.5.2 Buildings containing multiple dwellings or bedrooms accessed from a semi-private area and served by a shared or communal entrance doorset.

## 36 New 'bespoke' houses, bungalows, flats, apartments or maisonettes accessed via a private dedicated entrance doorset

36.1 The term "doorset" refers to a door, frame, locks, fittings and glazing as one combined unit.

36.2 All new bespoke doorsets allowing direct access into to the home e.g. front and rear doors, interconnecting garage doorsets, French doors, Bi-fold or sliding patio doorsets, dedicated private flat or apartment entrance doorsets, easily accessible balcony doorsets (Note 36.2) etc., are required to be secure doorsets within the UK Building Regulations (see paragraph 1.1).

*Note 36.2: Easily accessible is defined within Approved Document Q Appendix A as:*

- *A window or doorset, any part of which is within 2 metres vertically of an accessible level surface such as*



*a ground or basement level, or an access balcony, or*

- *A window within 2 metres vertically of a flat roof or sloping roof (with a pitch of less than 30°) that is within 3.5 metres of ground level.*

36.3 Where there is a requirement for a doorset to be both fire and security rated, e.g. flat or apartment entrance doorsets, interconnecting garage doorsets and some doorsets aiding security compartmentation, it is the responsibility of the developer or the developer's agent to ensure compliance with all applicable Building Regulations.

### Door and window materials

36.4 All bespoke window and doorsets constructed from materials commonly utilised for such purposes such as timber, PVCu, aluminium, steel and composite shall meet the minimum material specific requirements as follows:

#### Timber products

36.5 Approved Document Q of the Building Regulations sets out specific requirements for the material (Appendix B, clause B.2) and dimensions (Appendix B, clause B.3, B.4 & B.5) for bespoke timber doorsets. Secured by Design supports these requirements for both doors and windows, for clarity these are:

36.5.1 Material – doorsets and windows should be manufactured from solid or laminated timber with a minimum density of 600kg/m<sup>3</sup>.

36.5.2 Dimensions (doorsets):

- Door rails, stiles and muntins should be at least 44mm thick. After rebating, frame components should retain at least 32mm of timber;
- Any panel within the doorset should be at least 15mm thick. The panel should be securely held in place. Beading should be mechanically fixed and glued in position;
- The smaller dimension of each panel, which can be either the width or height of the panel, should be 230mm or less.

36.5.3 Dimensions (windows):

- Casement window frame components (head, sill, jamb, transom & mullion) should be a minimum of 67mm deep and 56 mm wide, rebated and moulded to retain a minimum section of 25mm;
- Casement and sash components (stiles and rails) should be a minimum of 56mm deep, rebated and moulded to retain a minimum section of 25mm.

36.5.4 Maximum length and height dimensions by window type:

- Casement Windows - maximum mullion length 1350mm, maximum transom length 1200mm;

- Side hung casement (hinged and fully reversible) open out - 700mm wide by 1350mm high;
- Top hung casement (hinged and fully reversible) - 1200mm wide by 1200mm high;
- Tilt and turn casement, open in - 900mm wide by 1350mm high;
- Vertical sliding sash - maximum mullion length 1500mm, maximum transom length 900mm, maximum sash size 750mm high by 900mm wide.

36.6 Further guidance for the construction of good quality timber windows and doorsets can be sought from BS 644:2012 *'Timber windows and doorsets. Fully finished factory-assembled windows and doorsets of various types. Specification.'*

### PVCu products

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- 36.7 All windows and doorsets should be constructed from profile meeting the requirements of BS EN 12608-1:2016 *Unplasticized polyvinylchloride (PVC-U) profiles for the fabrication of windows and doors. Classification, requirements and test methods.*
- 36.8 Bespoke PVCu products e.g. those falling outside the scope of PAS 24:2016, would benefit from being constructed from a profile that has already been proven by test to meet the security requirements of PAS 24:2016 in other window styles within the profile manufacturers or fabricators range.
- 36.9 All window and door profiles should incorporate reinforcement to cater for the secure fixing of hardware and to provide additional strength to the profile.
- 36.10 Further guidance for the construction of good quality bespoke PVCu windows and doorsets can be sought from BS 7412:2007 *'Specification for windows and doorsets made from unplasticized polyvinyl chloride (PVC-U) extruded hollow profiles.'*

### Aluminium products

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- 36.11 All windows and doorsets should be constructed from aluminium profile fabricated from designated alloys 6060 or 6063 in tempers T5 or T6 conforming to BS EN 12020-2:2016 or equivalent standard.
- 36.12 Aluminium profiles used in the construction of the frames excluding glazing beads, nibs, interlocks and similar features shall be not less than 1.2 mm thick.
- 36.13 Bespoke aluminium products e.g. those falling outside the scope of PAS 24:2016, would benefit from being constructed from a profile that has already been proven by test to meet the security requirements of PAS 24:2016 in other window styles within the profile manufacturers or fabricators range.
- 36.14 Further guidance for the construction of good quality bespoke aluminium windows and doorsets can be sought from BS 4873:2016 *'Aluminium alloy windows and doorsets. Specification.'*

### Composite products

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- 36.15 The Association of Composite Door Manufacturers has advised SBD that it is unwise to produce a specification for a 'bespoke' application. This is because of the myriad of differing materials used and indeed the numerous combinations of composite products found in doorset products in more recent times. Therefore it is not possible to create a bespoke composite doorset that complies with Section 2b of this guide.
- 36.16 Although the material standard, BS 8529:2017 *'Composite doorsets. Domestic external doorsets. Specification'* was developed for composite doorset products, it may be used to provide further guidance for the construction of good quality bespoke composite window that could therefore be acceptable within Section 2b of this guide.

### Steel products

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- 36.17 Guidance for the construction of



good quality bespoke steel windows and doorsets can be sought from BS 6510:2010 'Steel-framed windows and glazed doors. Specification'

### Doorset hardware and locking systems

- 36.18 The primary entrance doorset should be fitted with a multipoint locking system that meets the requirements of:
- PAS 3621:2011 (key locking both sides); or
  - PAS 8621:2011 (non-key locking on the internal face); or
  - PAS 10621:2011 (non-key locking on the internal face – with an external locking override facility).
- 36.19 Alternative lock configuration for a primary dwelling doorsets (usually the front doorset) can be achieved by the installation of a mortice or surface mounted lock conforming to the below standards and fitted one third of the way up the lock stile:
- BS 3621:2017 (key locking both sides); or
  - BS 8621:2017 (non-key locking on the internal face); or
  - BS 10621:2017 (non-key locking on the internal door face, but with an external locking override facility).
- 36.20 The above mortice locks should be supplemented with a surface mounted rim lock conforming to the same standard, fitted one third of the way down the lock stile.
- 36.21 Non-primary doorsets (back or garage interconnecting doorsets) may be fitted with a multi-point locking system conforming to the standards in paragraph 36.18 above, alternatively single point locks conforming to the standards in paragraph 36.19 above are acceptable when supplemented with two mortised bolts with a minimum projection of 20mm (located a minimum of 100mm from the top and bottom corners of the door, avoiding any door construction joints).
- 36.22 All bespoke doorsets shall be installed with hinge bolts or specialist interlocking hinges. Hinges accessible from outside the building should not have removable pins.
- 36.23 To ensure that the end user of the door understands how to operate the locking system, clear operating instructions must be attached to the inner face of the door (*Note 36.23*). The instructions should be easily removable by the end user.
- Note 36.23: The purpose of providing the end user with operating instructions is to reduce the number of burglaries through otherwise secure doorsets, because the full locking system has*

*not been engaged. This is particularly problematic with split spindle multi-point locking systems, where, for example, the occupier goes to bed at night without engaging the locks in the mistaken belief that leaving the door closed only on the latch (live bolt) is sufficient. The instructions should point out that the doorset is not totally secure unless the locking system is fully engaged. The method of attachment of these operating instructions and the medium used to carry them is for the door manufacturer to decide but are not intended to be permanent.*

### Glazing in and adjacent to doorsets

- 36.24 Any glazing within bespoke doorsets, including glazed panels/side lights adjacent to doors installed within an integral door frame and windows adjacent to doorsets (within 400mm), must incorporate one pane of laminated glass meeting, or exceeding, the requirements of BS EN 356:2000 class P1A (*Note 36.24*). Specifiers are reminded that this is also a requirement within ADQ, Annex B, paragraph B.11.

*Note 36.24: There is no specific requirement to install laminated glazing on the inner or outer face of a double glazed unit. However specifiers may wish to take into consideration the fact that toughened glass is usually more resistant to accidental damage by blunt objects such as a football and therefore may be best placed on the external face of the double glazed unit. It is recognised however that there are many other factors that may also need to be considered such as thermal efficiency, aesthetics and the requirement for privacy or obscured glazing, which will influence the specifier's decision.*

### Door limitation and caller identification

- 36.25 A door chain or opening limiter meeting the requirements of the Door and Hardware Federation Technical Specification 003 (DHF TS 003) must be

installed on the doorset to which a caller can be expected, normally the front door (see Approved Document Q, Section 1: Doors, paragraph 1.4). All such devices should be suitable for the door material to which they are fitted and be installed in accordance with the manufacturer's recommendations.

- 36.26 A door viewer meeting the requirements with the Door & Hardware Federation Technical Specification 002 (DHF TS 002) standard must be fitted between 1200mm and 1500mm from the bottom of the door, this is not required if the doorset is installed with clear glazing or if there is a side panel with clear glazing (see Approved Document Q, Section 1: Doors, paragraph 1.4).

### Doorset Installation

- 36.27 Door frames must be securely fixed to the building fabric in accordance with the manufacturer's specifications.
- 36.28 Due to the dynamic forces experienced when doorsets are opened and closed, frame installation packers should be used. This will limit outer frame distortion during installation and use, ensuring that the frame remains centralised, level and square and allows for thermal movement of the frame.
- 36.29 Doorsets that are hidden from public view, typically side or back doors, should not be recessed more than 600mm. This requirement is not applicable to doorsets that are located within public view (*Note 36.29*). However, no doorset should be recessed by more than 1000mm.

*Note 36.29: For the purposes of this guidance document a doorset is considered to be within 'public view' when it can be seen from the street.*

## 37 Security of existing (refurbished) doorsets

- 37.1 The term "doorset" refers to a door, frame, locks, fittings and glazing as one combined unit.





37.2 It is difficult to provide a definitive requirement for each doorset type and material, therefore if the existing doorsets are to be retained during a refurbishment scheme the DOCO should be consulted before embarking on any improvements. However some areas for improvement may include:

- The existing doorset should be thoroughly inspected to ensure that it is in a good state of repair, free from rot and damage. The material and dimensional requirements within paragraph 36 to 36.17 (inclusive) should be observed as a guide to the suitability of the existing doorset;
- Locking systems can be replaced with those referenced within paragraphs 36.18 to 36.23;
- Europrofile cylinders should be replaced with products certificated to Door Hardware Federation Technical Standard 007 (DHF TS 007) - 3-Star rating, or a DHF TS 007 1-star cylinder may be utilised if accompanied by DHF TS 007 2-star external hardware (handle set or secure escutcheon) or cylinder protection, or Sold Secure SS312 (Diamond) standard cylinders;
- Sliding patio doorsets should have a minimum of three locking points, which can be achieved by fitting additional surface mounted patio locks. Anti-lift hardware should also be used to prevent the doorset being lifted off its track;
- The 'slave' door leaf of French or double doorsets should be securely fixed during the normal operation of the primary opening leaf, this can be achieved through the use of surface mounted or mortised bolts with a minimum engagement of 20mm into the head and sill of the door frame;
- Timber doorsets can be enhanced if necessary by the installation of a deadlock guard, or an anti-thrust plate, and the installation of a London and/or Birmingham bar to provide additional strength to the frame;
- Doorsets should be installed with hinge bolts or specialist interlocking hinges. Hinges accessible from outside the building should not have removable pins;
- Doorsets incorporating 'panels' typically timber or PVCu should be reinforced. Any panel installed within a timber doorset should be at least 15mm thick, securely held in place with beading that is mechanically fixed and glued into position. PVCu panels can be replaced with new panels that have been shown by test to meet the security requirements of PAS 24:2016 (as a component part of a full test);

- Glazing in existing doorsets should be upgraded to meet the requirements in paragraph 21.19. Glazing in aluminium and PVCu doorsets can be secured through the use of glazing security clips or glazing security tape to reduce the likelihood of glazing beads being removed to gain entry.

## 38 Secure Mail Delivery to bespoke houses, bungalows, flats, apartments or maisonettes accessed via a private dedicated entrance doorset

38.1 A letterplate tested to the requirements of the Door and Hardware Federation's Technical Standard 008 (DHF TS 008) will provide reassurance that the likelihood of the letter plate aperture being used to gain access to the home will be substantially reduced. Specifier's attention is drawn to the fact that DHF TS 008 is referenced within Approved Document Q as a proven method of protecting the dwelling from attacks known to be committed via the letter plate. Additionally, BS EN 13724 which is referenced within TS 008 provides details regarding the test methods and requirements for private letter boxes and letter plates. One of its stipulated criteria is that the lowest mailbox aperture should be no lower 700mm from delivery floor level and the height of the highest mailbox aperture should be no higher than 1700mm from delivery floor level.

38.2 Alternative compliance can be demonstrated by utilising letter plates meeting the following requirements (*Note 38.2a*):

- Maximum aperture size of 260mm x 40mm;
- The fixing shall not be removable from the exterior side of the doorset;
- Letter plates must achieve the requirements of the removal test from

BS EN 13724:2002 (conducted during the PAS 24 or STS 201 test);

- Doorsets installed with non-key lockable internal hardware (*Note 38.2b*) shall either be installed with a suitable internal security deflector plate to restrict access to the hardware or the letter plate must be installed no less than 400mm from the internal locking point (measured in plane from the centre point of thumb turn to the nearest edge or corner of the letter plate aperture).

*Note 38.2a: This specification is the minimum requirement within PAS 24:2016 and STS 201.*

*Note 38.2b: Specifiers should be aware that the National House-Building Council (NHBC) currently requires a thumb turn release mechanism to be installed on the doorset designated as the primary fire exit route.*

### External surface mounted letter boxes

38.3 There are increasing crime problems associated with letter plate apertures, such as identity theft, arson, hate crime, lock manipulation and 'fishing' for personal items (which may include post, vehicle and house keys, credit cards, etc.). In order to address such problems SBD strongly recommends, where possible, mail delivery via a secure external letter box meeting the requirements of the Door and Hardware Federation's Technical Standard 009 (DHF TS 009) or delivery 'through the wall' into a secure area of the dwelling. DHF TS 009 letter boxes offer reassurance that all of the above attributes have been met. In high crime areas DHF TS 009 provides the safest means by which mail can be delivered whilst eliminating the risks associated with letter plate apertures. The letter box must be securely fixed to the face of the building in accordance with the manufacturers specifications and be located in a position that benefits from natural surveillance.

## Through-the-wall delivery

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- 38.4 Where there are design constraints that prevent a letter plate with a security cowl being installed within a door e.g. narrow hallway, or where it is undesirable to install a surface mounted secure mail box e.g. in a corridor, it may be preferable to provide 'through-the-wall' mail delivery into a secure internal letter box. Such a box must incorporate the same design features as described above for a surface mounted box. Anti-arson design features may also be advised if such crime risks are present.
- 38.5 Products meeting the requirements of the Door and Hardware Federation's Technical Specification 008 (DHF TS 008) provide reassurance that 'through the wall' letter boxes offer similar security attributes as secure letter plates and many of the attributes that an external letter box conforming with DHF TS 009 would provide (also see paragraph 38.1).

## 39 New 'bespoke' windows, roof windows and roof lights

- 39.1 All new bespoke windows should comply with the applicable material and dimensions requirements within paragraph at 36.4 to 36.17 above.

### Window hardware

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- 39.2 Windows should be installed with multipoint espagnolette locking systems that have been shown by test to meet the security requirements of PAS 24:2016 as a component part of a window of the same material. There should be locking points within 100mm from the corner of the casement.
- 39.3 Where a multipoint espagnolette locking system is not compatible or desirable e.g. listed building application, then there should be a minimum of two locking points per opening light.
- 39.4 All hinges and pivots installed within bespoke windows should incorporate an interlocking detail and be shown by test

to meet the security requirements of PAS 24:2016 as a component part of a window of the same material.

- 39.5 Heritage hinges (untested as a component part of PAS 24) should be supplemented with hinge bolts.
- 39.6 Tilting window pivots and top retaining bolts should be enhanced to resist increased loads.
- 39.7 Sash fasteners (fitch catches) should also be enhanced to resist increased loads.

### Glazing in windows

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- 39.8 All glazing in bespoke windows installed within 400mm of an adjacent doorset shall incorporate one pane of laminated glass meeting, or exceeding, the requirements of BS EN 356:2000 class P1A (*Note 39.8*). NB This is a specific requirement within PAS 24:2016, which is referenced within the Building Regulations (England and Wales) and the Scottish Building Standards.

*Note 39.8: There is no specific requirement to install laminated glazing on the inner or outer face of a double glazed unit. However specifiers may wish to take into consideration the fact that toughened glass is usually more resistant to accidental damage by blunt objects such as a football and therefore may be best placed on the external face of the double glazed unit. It is recognised however that there are many other factors that may also need to be considered such as thermal efficiency, aesthetics and the requirement for privacy or obscured glazing, which will influence the specifier's decision.*

- 39.9 SBD requires all easily accessible emergency egress windows without locking hardware to incorporate at least one pane of laminated glass meeting the requirements of BS EN 356:2000 class P1A.

### Window installation

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- 39.10 Windows must be securely fixed to the building fabric in accordance with the manufacturer's specifications.

39.11 Due to the dynamic forces experienced when windows are opened and closed, frame installation packers should be used. This will limit outer frame distortion during installation and use, ensure that the frame remains centralised, level and square and allow for thermal movement of the frame.

39.12 Vertical Sliding sash windows should be securely retained in the frame by the face lining, parting bead and staff bead.

## 40 Security of existing (refurbished) windows

40.1 It is difficult to provide a definitive requirement for each window type and material, therefore if the existing windows are to be retained during a refurbishment scheme the DOCO should be consulted before embarking on any improvements. However some areas for improvement may include:

- Unless the window is a designated emergency egress route, it should have three points of locking consisting of a key operated locking handle and two surface mounted locks, one fitted to the end of each opener to prevent leverage;
- The security of existing PVCu and aluminium windows can be improved through the use of hardware that has been shown by test to meet the security requirements of PAS 24:2016 as a component part of a window of the same material;
- Glazing in existing windows should be upgraded to meet the requirements in paragraph 22.12. Glazing in aluminium windows can be secured through the use of glazing security clips or glazing security tape.

## 41 Conservatories and sun rooms

41.1 Where a conservatory or sun room is installed in a bespoke home and it is not possible to utilise PAS 24:2016 doorsets and windows for the reasons previously mentioned, then the doors and

windows must meet the same material, dimensional (where applicable), and physical security standards within Section 2b.

41.2 If a conservatory is installed with an untested roofing system e.g. polycarbonate glazing system, then where possible a doorset shall be installed separating the conservatory from the rest of the home. The doorset should either meet the requirements of Section 2a or comply with the relevant material, dimensional and physical requirements within Section 2b.

## 42 External lighting for dwellings

42.1 Lighting is required to each dwelling elevation that contains a doorset (*Note 42.1*).

*Note 42.1: Secured by Design has not specified PIR activated security lighting for a number of years following advice from the ILP and police concern regarding the increase in the fear of crime (particularly amongst the elderly) due to repeated PIR lamp activations. Research has proven that a constant level of illumination is more effective at controlling the night environment.*

### Lighting in communal areas within flats/apartments

42.2 24 hour lighting (switched using a photoelectric cell) to communal parts of blocks of flats will be required. It is acceptable if this is dimmed during hours of low occupation to save energy. This will normally include the communal entrance hall, lobbies, landings, corridors and stairwells and underground garaging facilities and all entrance/exit points. Other areas requiring lighting will be indicated by the DOCO in writing. To reduce energy consumption this may be provided by a dimming system which leaves luminaires on at a lower level during quieter period. Further information is available at: [www.securedbydesign.com](http://www.securedbydesign.com)

## 43 Utility meters

- 43.1 There is no requirement for the location of the utility meters if 'smart meters' are utilised (remote signalling). Otherwise utility meters should, wherever possible noting the possible planning constraints on listed buildings and dwellings in conservation areas, be located outside the dwelling at the front or as close to the front of the building line as possible (to ensure they are visible). If located to the side of the dwelling they must be as near to the front of the building line as possible and to the front on any fencing or gates (care should be taken not to provide a climbing aid). When installed in a building containing a number of residencies such as flats, apartments or maisonettes, the metres should be installed in a location that access does not introduce security risks to residential areas.

## 44 Additional or alternative requirements for new bespoke buildings containing multiple dwellings or bedrooms

- 44.1 A building containing multiple dwellings for the purposes of this document may include flats, bedsits or individual bedrooms accessed from a semi-private area and served by a shared or communal entrance doorset (including HMO's and student accommodation).
- 44.2 In these circumstances there may be a requirement for a doorset to be both fire and security rated. It is the responsibility of the developer or the developer's agent to ensure compliance with all applicable Building Regulations.

### Communal and shared doorset standards

- 44.3 Please refer to Section 2a, paragraph 27.6 for the SBD definition of a communal and shared doorset.

- 44.4 Specifiers should, where possible, specify a shared or communal doorset that has been tested and certificated to a recognised security standard (see paragraph 21) and has also been tested and certificated to BS 6375 to ensure that it is fit for purpose (see paragraph 27.15).

- 44.5 New bespoke shared or communal entrance doorsets that are constructed for a development of specific architectural value, constrained by listed building or other conservation status should be designed to be a secure. In such cases the DOCO should be contacted at the earliest possible opportunity to discuss the technical specification of the doorset, however general security features may include:

- Glazing within bespoke shared or communal doorsets, including glazed panels/side lights adjacent to doors installed within an integral door frame and windows adjacent to doorsets (within 400mm), must incorporate one pane of laminated glass meeting, or exceeding, the requirements of BS EN 356:2000 class P1A (*Note 44.5*). Specifiers are reminded that this is also a requirement within ADQ, Annex B, paragraph B.11.

*Note 44.5: There is no specific requirement to install laminated glazing on the inner or outer face of a double glazed unit. However specifiers may wish to take into consideration the fact that toughened glass is usually more resistant to accidental damage by blunt objects such as a football and therefore may be best placed on the external face of the double glazed unit. It is recognised however that there are many other factors that may also need to be considered such as thermal efficiency, aesthetics and the requirement for privacy or obscured glazing, which will influence the specifier's decision.*

- Mechanical locking systems used should meet the physical security requirements within paragraphs 36.18 or 36.19. Magnetic doorset locking systems should be shown by test to meet the security requirements of PAS

24:2016, or equivalent standard, as a component part of a doorset of the same material.

- All bespoke doorsets shall be installed with hinge bolts or specialist interlocking hinges. Hinges accessible from outside the building should not have removable pins. Specifiers are reminded that hinges should also be correctly rated to support the weight of the doorset.
- Timber doorsets can be enhanced if necessary by the installation of a deadlock guard or an anti-thrust plate, and the installation of a London and/or Birmingham bar to provide additional strength to the frame.
- Door entry and access control systems should comply with the same standards within Section 2a, paragraphs 27.1 to 27.13.

#### 45 Mail delivery in bespoke buildings containing multiple dwellings or bedrooms

- 45.1 There are increasing crime problems associated with the delivery of post to buildings containing multiple dwellings or bedrooms. Communal mail delivery should therefore adhere to the requirements within Section 2a, paragraph 32.

#### 46 Bespoke doorsets providing alternative access to communal areas (other than the primary shared or communal access doorset) including emergency egress doorsets

- 46.1 Alternative access doorsets, emergency egress and fire doorsets that may be used by residents to access communal parts of the building are also required to be 'secure doorsets', see Building Regulations (England and Wales) Section

1, paragraph 1.1. Bespoke doorsets shall meet the requirements within paragraphs 36 to 36.17.

- 46.2 In these circumstances where there is a requirement for a doorset to be both fire and security rated, it is the responsibility of the developer or the developer's agent to ensure compliance with all applicable UK Building Regulations.

#### 47 New windows, roof windows and roof lights in bespoke buildings containing multiple dwellings or bedrooms

- 47.1 All easily accessible bespoke windows, roof windows and roof lights in buildings containing multiple dwellings or bedrooms shall, where possible, meet the material and dimensional requirements within paragraphs 39 to 39.12.

#### 48 Lightweight framed walls in bespoke dwellings

- 48.1 The security of a development can be severely compromised if lightweight framed walls do not offer sufficient resilience to withstand a criminal attack; this is recognised within Approved Document Q (*Note 48.1*). The SBD requirements are primarily based upon products that have been tested and proven to provide additional security and are outlined in Paragraph 24 of this document.

*Note 48.1: See – The Building Regulations 2010, Security-Dwellings, Q1: Unauthorised access, Section 1: Doors, paragraph 1.6 (England) and paragraph 1.5 (Wales).*

## 49 Lighting for buildings containing multiple bespoke dwellings

### External lighting

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- 49.1 Lighting is required to each elevation that contains a doorset where the public, visitors or occupants of the building are expected to use (*Note 49.1*).

*Note 49.1: Secured by Design has not specified PIR activated security lighting for a number of years following advice from the ILP and police concern regarding the increase in the fear of crime (particularly amongst the elderly) due to repeated PIR lamp activations. Research has proven that a constant level of illumination is more effective at controlling the night environment.*

### Internal lighting

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- 49.2 24 hour lighting (switched using a photoelectric cell) to communal parts of blocks of flats will be required. It is acceptable if this is dimmed during hours of low occupation to save energy. This will normally include the communal entrance hall, lobbies, landings, corridors and stairwells and underground garaging facilities and all entrance/exit points. To reduce energy consumption, lighting systems that reduce light levels during quieter periods may be utilised. Further information is available at: [www.securedbydesign.com](http://www.securedbydesign.com)

## 50 Loft hatches in communal areas

- 50.1 Loft hatches located in communal areas, such as over landings in blocks of flats, must be locked to prevent access into a dwelling via the loft space. This may still be required even where the loft space has been compartmented to prevent the spread of fire and smoke. There are currently no 'hinged' or 'lift out' loft hatches being manufactured

to recognised security standards, but where padlocks, hasps and staples are used to secure the hatch the products must be certificated to BS EN 12320:2012, Sold Secure 'Silver' or LPS 1654 Issue 1.1:2014 Security Rating 1 and fitted in accordance with the manufacturer's instructions.



# SECTION 3

ROSEMARY  
COURT  
← 1-24 APARTMENTS



## 51 Additional features for the SBD Gold Award or for a SBD Silver Award for a bespoke development

- 51.1 This section of Secured by Design is intended to be used by those seeking to achieve the full SBD Gold Award or a SBD Silver Award for a bespoke development. The SBD Gold Award is awarded to new developments or refurbishment schemes that have achieved compliance with the external security features within Section 1 of this document, together with the physical security requirements in Section 2a (applicable to the majority of developments), supplemented by any discretionary or ancillary requirements within Section 3 where applicable. Ancillary requirements are not compulsory features e.g. bicycle stores, underground car parking, etc., but where installed they should meet the requirements within this section to ensure that the full award is achieved. Bespoke developments cannot achieve a full SBD Gold Award due to the fact that either/or both doors and windows have not been proven to resist an attack, however this section of SBD Homes may be used to ensure that the security of the supplementary or ancillary requirements are also catered for.
- 51.2 This section also addresses an additional glazing requirement that the DOCO may invoke for SBD Gold applications if the area crime profile indicates an increased level of risk.
- 51.3 This section may also be utilised when seeking to increase security in an existing development.
- 51.4 Developers wishing to apply for the SBD Gold Award shall adhere to Sections 1 and 2 in full together with the relevant features contained within this section.

## 52 Doorsets providing access/egress from communal areas, houses and buildings containing multiple dwellings or bedrooms

- 52.1 All doorsets providing access to communal areas of a building containing multiple dwellings (e.g. flats) or bedrooms (e.g. student accommodation), together with communal facility areas such as bicycle stores, bin stores (with external access), underground car parks (including fire egress doorsets) shall meet the security requirements of Section 2a, paragraph 21.

## 53 Additional window requirements for the SBD Gold Award

- 53.1 In certain high crime locations only, to ensure that security is commensurate with the risk, the DOCO may require laminated glass meeting the requirements of BS EN 356:2000 class 1A (*Note 53.1a*) to be installed on all ground floor and basement windows and those easily accessible above ground floor (*Note 53.1b*). Such a requirement will be justified and evidenced by the DOCO and will be communicated to the developer, or the developer's agent, in writing prior to commencement of building construction. Developers are advised that a late SBD Gold application for a development in a high crime area may require glazing to be replaced if it does not meet the standard required.

*Note 53.1a: There is no specific requirement to install laminated glazing on the inner or outer face of a double glazed unit. However specifiers may wish to take into consideration the fact that toughened glass is usually more resistant to accidental damage by blunt objects such as a football and therefore may be best placed on the external*

face of the double glazed unit. It is recognised however that there are many other factors that may also need to be considered such as thermal efficiency, aesthetics and the requirement for privacy or obscured glazing, which will influence the specifier's decision.

*Note 53.1b: Easily accessible is defined within Approved Document Q Appendix A as:*

- A window or doorset, any part of which is within 2 metres vertically of an accessible level surface such as a ground or basement level, or an access balcony; or
- A window within 2 metres vertically of a flat roof or sloping roof (with a pitch of less than 30°) that is within 3.5 metres of ground level.

## 54 External garage doorsets

- 54.1 If a development incorporates garages and the developer wishes to gain the full SBD Gold Award then the security of both the dwelling and the garage must be considered. If a garage is not secured as part of the security of the dwelling, or it is detached from the dwelling, then external pedestrian access doors must meet the same physical, locking and fixing specification, as 'Dwelling entrance doorsets' (Section 2a paragraphs 21.1 to 21.21).
- 54.2 Vehicle access doorsets shall be certificated to one of the following standards (*Note 54.2*):
- LPS 1175: Issue 7.2:2014 Security Rating 1+ (or above); or
  - LPS 1175 Issue 8:2018 A1 Security Rating 1+/A1+ (or above); or
  - STS 202, Issue 7:2016 Burglary Rating 1+ (or above); or
  - LPS 2081 Issue 1:2015 Security Rating A.

*Note 54.2: Where a manufacturer has demonstrated, to the satisfaction of SBD,*

*that compliance with a similar alternative standard from another supplier or country has been achieved this may be accepted as an alternative to the above standards.*

- 54.3 Specifiers are reminded of the requirements within the English Building Regulations (Part Q), see Section 2a, paragraph 20.1.
- 54.4 The DOCO must be supplied with proof of certification including the technical schedule (sometimes referred to as 'Scope of Certification') prior to the SBD certificate being awarded, unless the supplier is a member of the Secured by Design Licensing Scheme and the doorset can be identified on the SBD website.
- 54.5 Alternatively a vehicle access door that is not certificated to one of the above standards, and not subject to the requirements within the English and Welsh Building Regulations (Part Q), may be deemed satisfactory if an external 'garage door defender' type security product is also fitted. Such products must be certificated to Sold Secure Bronze level or above.

## 55 Car parking

### Communal car parking areas

- 55.1 Where communal car parking areas are necessary they should be in small groups, close and adjacent to homes and must be within view of the active rooms within these homes (*Note 55.1*). It may be necessary to provide additional windows to facilitate overlooking of the parking facility.

*Note 55.1: The word 'active' in this sense means rooms in building elevations from which there is direct and regular visual connection between the room and the street or parking court. Such visual connection can be expected from rooms such as kitchens and living rooms, but not from more private rooms, such as bedrooms and bathrooms.*

55.2 Lighting must be at the levels recommended by BS 5489-1:2013. The DOCO shall be provided with a declaration of conformity to BS 5489-1:2013 by a 'competent' independent designer. Competency shall be demonstrated by achievement to at least ILP competency level 3 or 4, i.e. the designer will be a member of the ILP (MILP) and either IEng or CEng qualified to be deemed competent to be able to design under Construction Design and Maintenance (CDM) Regulations. Further information is available at: [www.securedbydesign.com](http://www.securedbydesign.com)

### Underground car parking

55.3 Where a development incorporates an underground car parking facility the following security enhancement is required (please also note the requirements for emergency egress within Section 2a, paragraphs 32.2 to 31.8):

55.3.1 An access control system must be applied to all vehicular and pedestrian entrances to prevent unauthorised access into the car park;

55.3.2 Inward opening automatic gates or roller grilles must be located at the building line or at the top of ramps to avoid the creation of a recess. They must be capable of being operated remotely by the driver whilst sitting in the vehicle, the operation speed of the gates or shutters shall be as quick as possible to avoid tailgating by other vehicles. This will allow easy access by a disabled driver, and should satisfy the requirements of the Highways Department who under normal circumstances do not permit vehicles to obstruct the pedestrian footway whilst the driver is unlocking a gate. Automatic roller shutters must be certificated to one of the following minimum security standards:

- LPS 1175 Issue 7.2:2014 Security Rating 1; or
- LPS 1175 Issue 8:2018 Security Rating 1 (A1); or

- STS 202 Issue 7:2016 Burglary Rating 1; or
- LPS 2081 Issue 1.1:2016 Security Rating A.

55.3.3 Automated gates supplied and installed must meet the relevant statutory safety standards and be CE marked accordingly. Specifiers may wish to satisfy themselves that installers of powered gates are appropriately qualified, trained and follow recognised industry guidance. The following organisations provide guidance and training for installers:

- Door Hardware Federation – the DHF has a revised Code of Practice (DHF TS 011) designed to raise standards of powered gate safety. Gates installed to the new Code of Practice will be inspected by the NSI;
- Gate Safe – The Gate Safe organisation produces operational good practice guidance designed to raise standards in this industry sector.

55.3.4 Lighting must be at the levels recommended by BS 5489-1:2013. The DOCO shall be provided with a declaration of conformity to BS 5489-1:2013 by a 'competent' independent designer. Competency shall be demonstrated by achievement to at least ILP competency level 3 or 4, i.e. the designer will be a member of the ILP (MILP) and either IEng or CEng qualified to be deemed competent to be able to design under CDM regulations. Additionally a risk and environmental assessment (EMS) for the CDM designer compliance requirements must be included. Manufacturer designed schemes without risk or environmental assessments should not be accepted as they do not cover the CDM designer risk elements which are required.

55.3.5 Walls and ceilings must have light colour finishes to maximise the effectiveness of the lighting as this will reduce the luminaires required to achieve an acceptable light level (*Note 55.3.5*).

*Note 55.3.5: Reflective paint can reduce the number of luminaires needed to achieve the desired lighting level and reduce long term running costs.*

55.3.6 Any internal door that gives access to the residential floors must have an access control system.

55.3.7 In developments where closed circuit television (CCTV) is required by the client or by the DOCO, such systems shall comply with the requirements of BS EN 62676: 2014 *Video surveillance systems for use in security applications* and where applicable BS 7958:2015 *CCTV management and operation Code of Practice*, and the requirements of the *Data Protection Act*. Developers are reminded that if images of public space are visible and recorded then there may be a legal responsibility to register the system with the Information Commissioner's Office - [www.ico.org.uk](http://www.ico.org.uk). Such a system would only be practical if there is a planned management service for the development.

## 56 Secure external storage facilities and bicycle security

56.1 External containers specifically designed for the secure storage of bicycles and other property must be certificated to one of the following minimum security standards:

- LPS 1175 Issue 7.2:2014 Security Rating 1 (or above); or
- LPS 1175 Issue 8:2018 Security Rating 1/A1 (or above); or
- STS 202 Issue 7:2016 Burglary Rating 1 (or above); or
- LPS 2081 Issue 1.1:2016 Security Rating A; or
- Sold Secure (Bronze, Silver or Gold).

56.2 Where bicycle storage is provided in a robust shed, the minimum requirements for the shed construction and security are as follows:

- 38x50mm (min) planed timber frame;
- Floor and roof constructed from 11mm boards (minimum);
- 11x125mm (min) Tongue & Grooved board walls and door;
- No window to be present;
- Door hinges should be coach-bolted through the shed structure or secured with security or non-return screws;
- Two hasp and staples that meet 'Sold Secure' Silver should be used. One positioned 200mm - 300mm down from the top of the door, and one positioned 200mm - 300mm up from the bottom of the door. Additionally, hasp and staples should be coach-bolted through the shed structure or secured with either security or non-return screws;
- Both padlocks should meet 'Sold Secure' Silver or LPS 1654 Issue 1.1:2014 Security Rating 1 standard padlocks to be used;
- Shall be securely fixed to a suitable substrate foundation;
- If mopeds, scooters, motorcycles or bicycles are to be stored within the shed then a security anchor shall also be certificated to 'Sold Secure' Silver Standard LPS 1175 Issue 7.2:2014 Security Rating 1 or LPS 1175 Issue 8:2018 Security Rating A1 and securely fixed to suitable foundations in accordance with the manufacturer's specifications. This also includes wall-mounted anchoring systems.

### External communal bicycle storage

56.3 External, open communal bicycle stores with individual stands or multiple storage racks for securing bicycles will be as close to the building as possible, but in any event within 50 metres of the primary entrance to a block of flats and located in view of active rooms (*Note 56.3*) of dwellings. The store must be lit at night using vandal resistant, light fittings and energy efficient LED lights.

NB Vertical cycle racks can be difficult for some sections of the community to use.

*Note 56.3: The word 'active' in this sense means rooms in building elevations from which there is direct and regular visual connection between the room and the street or parking court. Such visual connection can be expected from rooms such as kitchens and living rooms, but not from more private rooms, such as bedrooms and bathrooms.*

56.4 Research by the 'Design against Crime Centre' suggests that cyclists should be encouraged to lock both wheels and the crossbar to a stand rather than just the crossbar and therefore a design of cycle stand that enables this method of locking to be used is recommended. Minimum requirements for such equipment:

- Galvanised steel bar construction (minimum thickness 3mm), filled with concrete;
- Minimum foundation depth of 300mm with welded 'anchor bar'.

Compliance can be demonstrated by products certificated to one of the following minimum security standards:

- LPS 1175 Issue 7.2:2014 Security Rating 1; or
- LPS 1175 Issue 8:2018 Security Rating 1 (A1); or
- Sold Secure (Bronze, Silver or Gold); or
- STS 502.

## 57 Integral communal bin, mobility vehicles and bicycle stores

57.1 Integral communal bin, mobility vehicles and bicycle stores within blocks of flats should be easily accessible, with floor to ceiling dividing walls, no windows and be fitted with a secure doorset that meets the same physical specification

as 'front door' and specifically Section 2a, paragraphs 21.1 to 21.21. This will ensure that such stores are only accessible to residents. The locking system must be easily operable from the inner face by use of a thumb turn to ensure that residents are not accidentally locked in by another person. A bicycle store must also be provided with stands with secure anchor points or secure cycle stands (see paragraph 56).

57.2 In England and Wales, doorsets providing access from the storage facility into communal parts of the building (including emergency egress doorsets) are required to meet Part B, Part M and Part Q of Building Regulations.

57.3 Any doorset that provides access to the communal areas shall also be controlled via an access control system.

## 58 Internal communal drying rooms

58.1 Where dedicated communal internal drying rooms are located in blocks of flats, they must be fitted with doorsets that meet the same physical specification as 'front door' and specifically Section 2a, paragraphs 21.1 to 21.21. This is to ensure that they are only accessible to the residents. The locking system must be operable from the inner face by use of a thumb turn to ensure that residents are not accidentally locked in by another person.

## 59 Private external lighting and dwelling lighting

### Private external lighting to common areas

59.1 Where possible the lighting requirements within BS 5489-1:2013 should be applied (see paragraph 18) (*Note 59.1*).

*Note 59.1: Developers are advised that there is further guidance available from the Chartered Institute of Building*

*Services Engineers (CIBSE) and the Society of Light and Lighting (SLL).*

- 59.2 SBD requires that only luminaires with suitable photometry serving to reduce light spill and light pollution may be used. Reducing light spill from inefficient luminaires into areas where lighting is not required is extremely important (Note 59.2).

*Note 59.2: Developers are reminded that intrusive lighting from the private lighting schemes into public areas may constitute a statutory nuisance and is wasteful and costly.*

- 59.3 External public lighting must be switched using a photo electric cell (dusk to dawn) with a manual override or via a Central Management System (CMS) for large scale developments. If LED light sources are used then shorter burning hours can be programmed as no warm up time is required for the lamp.

### Dwelling lighting

- 59.4 Lighting is required to illuminate all elevations containing a doorset, car parking and garage areas and footpaths leading to dwellings and blocks of flats. Bollard lighting is not appropriate as it does not project sufficient light at the right height making it difficult to recognise facial features and as a result causes an increase in the fear of crime.

- 59.5 Secured by Design encourages, wherever possible, the use of the most environmentally friendly light sources. Moreover the Institute of Lighting Professionals (ILP) currently favours the use of good quality LED lighting and other energy effective light sources and advises against the use of fluorescent lighting which is environmentally unsustainable for a variety of reasons (Note 59.5). Further information is available at: [www.securedbydesign.com](http://www.securedbydesign.com)

*Note 59.5: Secured by Design has not specified PIR activated security lighting for a number of years following advice from the ILP and police concern regarding the increase in the fear of crime*

*(particularly amongst the elderly) due to repeated PIR lamp activations. Research has proven that a constant level of illumination is more effective at controlling the night environment.*

## 60 Intruder alarms

- 60.1 Where an intruder alarm system is installed then it shall meet the requirements of BS EN 50131 (wired and wire free systems). All installations shall be in accordance with the current electrical regulations. If an immediate police response is required then installers must meet the requirements of the National Police Chiefs' Council (NPCC) policy document – *Guidelines on Police Requirements & Response to Security Systems* which can be obtained from [www.securedbydesign.com](http://www.securedbydesign.com)

## Revisions to text

Paragraph 5 of the	27.13
Preface	27.14
10.6.7	27.20
10.7	27.28
13.2	27.31
13.3	27.33.2
16.15	29.5
21.3 + Notes 21.3a -	34.1
21.3e	36.3
21.5	50.1
21.10	54.2
22.2 + Note 22.2d	55.3.2
22.12	56.1
22.13	56.2
24.2.1	56.4

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We trust that by the application of the design principles and security standards described within this guide, that communities will be protected from crime for years to come.

We would like to thank in particular:

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Erith Park, South West London



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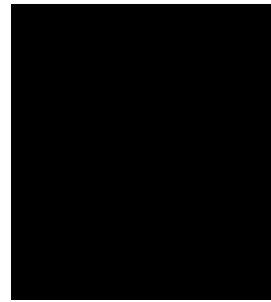
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Received 07/12/2022



3<sup>rd</sup>. December 2022.

Your Reference: Taylor Wimpey Masterplan & Design.

Planning Application 2022/0451 Land West of Market Street, Edenfield, Lancashire.

Dear Forward Planning Team.

Thank you for your letter 21<sup>st</sup>. November 2022.

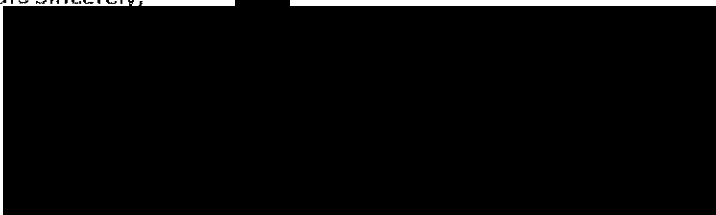
Has the Masterplan, which appears to have come from Taylor Wimpey, taken into account all other stakeholders; that being the other developers and especially the Edenfield Village Residents Forum. We all know that we need more houses but these need to be affordable houses and just as importantly houses that could be rented out by the local authority rather than private landlords. Further to that total of 400 plus houses eventually, 286 being the first phase, is just too many for a small place such as Edenfield under any circumstances. The information sent out by Taylor Wimpey earlier this year implied that this would be an exciting new vision for Edenfield; that view is not shared by an overwhelming majority of residents.

The impact on local schools, in Edenfield and Stubbins, would be enormous and if planning permission is granted then any extensions to these schools to accommodate the extra pupils should be in place before any houses are built. Two other schools seem to have been mentioned, Emmanuel Holcombe and Peel Brow; both these schools are under a different Education Authority. They are not accessible for anyone who does not drive, not everyone does.

The extra traffic generated by this first phase would also impact on an already very busy Market Street (B6527). Edenfield Primary School is on this road and will experience a deterioration of air quality as a consequence of an increased volume of traffic. The proposed access road from the development onto Market Street would also restrict the parking for existing residents as it would almost certainly require double yellow lines along the Western side of Market Street. The lack of parked cars here would also encourage people to exceed the speed limit even more than is the case at the moment.

You will have realised that this letter is in objection to this Masterplan which seeks to impose too many of the wrong type of houses on a small village on what was once green belt land. The impact of traffic, deterioration of air quality and local schools together with the views of residents really should be sufficient to refuse planning permission.

Yours Sincerely,



Dear Sir/Madam

I am writing as resident of Edenfield village for the past 15 years to voice my objection to the construction of 238 new houses on land to the west of Market St.

Can I affirm from the outset that I am not basing my objection on any kind of 'nimbyism' as I am well aware of the need to create new and affordable homes up and down the country to both satisfy the demand and to prevent unscrupulous landlords hiking up rents without due cause.

My objection lies simply with the scope of the proposed development and its impact on the village, its identity, its limited infrastructure and its existing facilities.

To create the proposed number of dwellings would firstly create intolerable pressures on the very basic road structure, as it seems inevitable the 238 houses would generate at least that number of new vehicles, but possibly many more, all of which would need access onto Market St which as I can affirm is often gridlocked with rush hour traffic, made even worse when the bypass is out of action. It beggars belief how the existing street will cope with the influx of another 300 plus vehicles on a daily basis, and that is discounting deliveries!

The idea that you can simply create a no parking zone to one side of the street completely disregards the needs of existing homeowners who already experience parking problems at key times of the day. Where are the new parking spaces to be located for these residents?

Secondly I believe the pressure on the two local schools would be unbearable despite the nod in planning arrangements to extend Edenfield and Stubbins Primary Schools.

Having been to both schools it is not simply a matter of adding a portacabin or building an extra classroom as this does not take into account the number or ages of the new intake. How can you predict the number of additional staff that would be required and at what ongoing cost the school long after the developers have moved on?

As I indicated at the beginning of my response I fully appreciate the pressures each local council is under to release land to developers but could we not proceed more sustainably with an initial permission of say 100 new homes on the existing land with a designated green space at its heart? This, I feel, would go some way to retaining the identity of Edenfield as a village and limit the impact on schools and infrastructure.

I sincerely hope it is not too late to rescue this plan and deliver both on the council's responsibility to create new and affordable homes whilst preserving some of the essential characteristics that make Edenfield a desirable place to live.

Thank you for your time,

Sincerely,

Ken Parkes

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

Sent from my iPad

Please consider my objection to the planning application and the Edenfield masterplan

I will be submitting my Taylor Wimpey objection separately.

I object to the lack of inclusion of major factors that should be included that were submitted by the neighbourhood forum in July 2022.

There is insufficient parking outside of both local schools already without the increased traffic when proposed expansion of schools take place.

Traffic on Market street is already a problem without extra construction traffic and traffic of vehicles supplying materials. This is without the addition of all the cars that over 400 homes will have on the proposed site, Obviously a traffic assessment needs to be carried out to identify problems that may arise with the increased proposed traffic.

On the plan I could not see the provision for a medical centre,, the nearest surgeries are in Rawtenstall and Ramsbottom, I can not see provisions of extra staff of GP's and nurses to cover the new residents that will live on the development.

If there is a defined plan to protect wildlife and identify the effect on wildlife within the village, I was unable to find this on the masterplan.

I hope that when the council complete their Rossendale local plan these items will all be considered.

The design plan and the masterplan need to be agreed before a planning application is considered therefore I hope these items will be considered.

Reagrds

Anna Webster

[REDACTED]  
[REDACTED]  
[REDACTED]

## Objection

Anna Webster



- The Taylor Wimpey plan and planning application does not consider the views of the community and does not address any local needs or concerns.
- Flooding is already a problem in the village, the investigations into the floods need to be extremely thorough, there seems to have been little recent through investigations into these already flooded areas.
- The schools in the local area would not be able to accommodate extra pupils without changing the schools and there is not infrastructure for dropping off and picking up of children from the schools which already causes problems with traffic. There is little to address these issues in the master plan.
- There is little information in the plan to cover the primary and secondary school places needed, local schools are already overstretched.
- There is no transport assessment submitted.
- The roads in Edenfield can not cope with the traffic passing through the village on a daily basis now and this is without the cars that will be using the proposed development
- The pollution caused by the traffic from cars from the proposed development would put extra pressure on local health services that are already stretched. Children would be walking to school from the development to school on one road alongside the traffic that will be on the one road out and in of the proposed development, they will be breathing in these fumes when walking to school.
- The public transport is already inadequate for the residents of Edenfield, there is no information about an expansion of bus services through Edenfield.
- Access to local health care will be compromised as there are not enough staff to care for extra people on a proposed development of over 400 houses, I have noted the money requested from East Lancashire NHS Trust, Taylor Wimpey would need to provide that money every year to cover the costs.

The council needs to consider the needs of the local community, this Taylor Wimpey plan does not consider the community, we understand the need for houses but not with a plan that is not considerate and is just to make money for a housing company.

Hello

My name is Julie Fortune and I live at [REDACTED]

I am writing to object to the the **masterplan** that has been put forward by Taylor Wimpey / Rossendale borough Council.

If you would like me to discuss this further please to contact me.

Regards  
Julie Fortune

Dear Sir/Madam,

We are residents in Edenfield and have been since 1982, in that time we have seen the village develop and grow all within the context of local facilities and the road network

The current proposal for initially over 200 new homes (eventually 400) would completely overwhelm the road network and the village. Edenfield is a linear village and therefore there are pinch points throughout the village main road. The proposal to bring traffic through the avenue onto Bolton Rd would make a very busy, fast road worse.

As regards the two local schools the expansion of those to accommodate huge new numbers will, no doubt, be at the expense of selling playing fields any garden areas that they have.

There is obviously a need in the borough for housing but there are plenty of brown field sites where mills once stood that could be developed for housing instead of destroying several beautiful fields and completely changing Edenfield.

Yours faithfully,

Mr and Mrs Britton

██████████  
██████████  
██████████

Sent from my iPad

From: Geoff Blow, [REDACTED] (The Gardening Angel)

Dear Rossendale Borough council, I wish to lodge the following objections to this plan and it's planning application.

1. The revised masterplan still does not address adequately the principal problem of access and increased vehicular movements consequent to the proposed development. The proposed junction in Market St will not address the added traffic congestion, nor will it ease the already difficult problem of parking at peak times. Moreover it would greatly decrease the availability of parking for current residents on that stretch of Market St. It would also cause significant change, and possible removal, of the dry stone wall which currently separates the road and the field.
2. The use of Exchange St as access to part of the development is still not addressed in the masterplan, and still presents severe overuse of the street at peak times. Exchange street already has parking either side, which currently reduces flow to one lane, making it impossible for two cars to pass throughout most of the day. The masterplan makes no provision to improve this situation.
3. The section of the development titled Edenfield North envisages the removal of a large number of mature trees, in direct contravention of the requirement to protect the natural environment and rural character of the village.
4. The masterplan offers no indication of heating and insulation requirements for the development. To meet Net Zero Carbon targets, the proposed houses should be heated by heat- source pumps and/or solar panels, yet no mention is made of this. The assumption is that yet more fossil fuel-burning heating systems will be installed, making it far less sustainable than required to heat the dwellings. This may make them more affordable IN THE SHORT TERM to first-time buyers and young families, but will ultimately require major renovation and investment by buyers to make them sustainable.
5. The masterplan makes no enduring commitment to including affordable housing, only that it aims to include a certain number "subject to viability". This is totally unacceptable given the current crisis in affordable housing, and needs to be rectified.
6. The masterplan states that it intends to provide homes for local families yet make no statement about how this will be achieved. Indeed, points 4&5 above indicate that local families will be least likely to benefit from the development.
7. The masterplan includes a notional number of dwellings for "Buy-to-let". This is an iniquitous, though sadly still legal, operation which sees wealthier people able to obtain a mortgage, outbid first-time buyers for a property, then rent it out to the very would-be buyers at a huge profit. There is at least one parliamentary bill aimed at eliminating this unfair practice, and it certainly should not be included in any development whose stated aim is to enhance the community.
8. The masterplan estimates that only one of the local primary schools will need increased numbers, and that by merely half a class per year. This seems to be further evidence that the proposed development is aimed overwhelmingly at older, more affluent families, at the expense of younger ones. The revised plan does not even mention the school provision, nor does it address a means of deciding which of the two schools might have to accommodate the excess children, nor whether this excess number would occur only once or every year for the foreseeable future.
9. Planting: TREES: Among the proposed planting are trees such as *quercus robur* (oak) which can grow to 20 metres. While our native oak tree is marvellous for wildlife, it is not a tree for small domestic gardens. Likewise, *Acer campestre* and *amelanchier lamarckii* can grow to 7 metres, which requires sensitive planting to avoid obstruction of sightlines, particularly on narrow roads and curves.  
SHRUBS: these include *Hydrangea macrophylla*, which can grow to 7 feet, again presenting a potential difficulty with sightlines; *hypericum moserianum* and *Alchemilla mollis* are both

attractive shrubs, but are well known among gardeners as plants which self-seed prolifically and need to be controlled. These plants could become very dominant unless controlled by the householder, and, as a professional gardener, I would not recommend them to people who were not aware of this fact.

Please acknowledge receipt of this email. Yours faithfully, Geoff Blow

Sent from [Mail](#) for Windows



Kathryn Clucas

[REDACTED]

Please accept this email as my strongest objection to the planning application for the building of an additional 238 houses (400 in total in the next 15 years) in Edenfield village. This proposed building works on our precious green belt land will cause utter chaos for the rest of my lifetime in my home village of Edenfield. We already struggle daily with parking problems and traffic congestion in Edenfield village on Bolton Road North, Market St and Bury Road along with numerous regular accidents on the bypass without the additional traffic this would bring. I ask you please to reconsider the safety and wellbeing of our residents in Edenfield village. Please also reflect on the impact this will have on our schools which cannot possibly accommodate for such an influx without extending further into precious green belt land.

Sent from my iPhone as

To whom it May concern,

As a resident of Edenfield I would like to object to the above plans on the following points;

Village transport network not properly assessed, traffic through the village is already gridlocked and there is not the infrastructure to support more houses in the area. Air pollution will greatly increase, impacting on residents.

Wildlife will be lost which will have a significant impact on the environment.

Building on brownfield sites should be done first before building on greenfield sites in a small village without the infrastructure to support this.

I feel that the development is not suitable for Edenfield and the residents have not been properly consulted on the matter - our opinions have been ignored and this is not acceptable.

Regards

Beth Dyson

[REDACTED]  
[REDACTED]  
[REDACTED]

Sent from  
David Clucas

[REDACTED]  
[REDACTED]  
[REDACTED]

To whom it may concern

Please accept this email as my strongest objection to the planning application for the proposed building of an initial 238 houses rising to 400 houses over the next 15 years.

One of my major concerns is the total disregard for the green belt status of the land that is to be used for these properties. Green belt areas are left and act as the lungs for our society. Abuse of this is a total disregard for our future generations.

The current situation on the roads in Edenfield are to say at the least, very busy at various key times during the day, which regularly becomes ridiculous and potentially dangerous.

If the proposed building of this application is approved, I question that the current schools and medical facilities in the area will cope because trying to get an appointment to see a GP is no easy matter and I understand from family and friends that trying to get school placements in the area is again very difficult because of lack of classroom places.

I would strongly ask Rossendale Borough Council to reconsider this application because I fear that this will bring total chaos and upset to the community.

Regards  
David Clucas

Sent from my iPhone

To whom it may concern

I would like to object to the so called Master Plan under the planning application 2022/0451 submitted by Taylor Wimpey. On the grounds that no consideration has been given to the problem of either the increased traffic flow caused from the proposed site nor the addition public services /needed in the village to support the 238 houses planned in stage 1 of the application. As a council tax payer in the village for over 45 years at the highest rate, I believe residents deserve better treatment than the planning department has shown us in that it is over 3 years since they promised the resident of Edenfield how they intended to provide additional Road facilities/ schooling /traffic flow control through Market Street which without the additional housing proposed is at congestion point already with health and safety issue of the highest nature.

The above plan is negligent in answering non of the points raised in previous meeting over the last several years and it would appear that RBC is trying to Railroad this application through without any Public consultation whatsoever.

I await your valued comments

Concerned Regards

Mr Stuart Dearden

[REDACTED]

[REDACTED]

[REDACTED]

Sent from my iPad

Major anxieties and concerns that Eden Avenue will be used even more than it is currently, as a cut through for the increase in traffic expected.

Cars cut through now from Bolton rd nth to gain access (via Exchange st or Highfield rd) to Bury Rd.

in the 10 years we have been here it has already become increasingly difficult to get onto Bolton rd north from Eden AVE due to volume of traffic. We cannot imagine how much more difficult that will become!

Major concerns that the infrastructure cannot support all these new dwellings. Schools, GP's, (ramsbottom surgery near impossible to get appointments currently).

Deeply saddened that our daily walk past Chatterton Hey and onward past Mushroom house ( from our home on Eden AVE) will be impacted if not impossible, once the works start.

Torn between moving and staying ( though we are nearing retirement and thought this would be our forever home) as we dread the expected disruption and noise from the build when it starts.

Suggest Taylor Wimpy consider building HALF the proposed number of houses, maybe bigger and better quality?

Julie munro

██████████  
██████████

[Sent from the all-new AOL app for Android](#)

I fully object to the preposterous plans by Taylor Wimpey to destroy our Village. The council should be ashamed to even take the plans into consideration. I object to the planning application and the master plan .

Mr Dominic Rathmill

[REDACTED]

[REDACTED]

[REDACTED]

Sent from my iPhone

Hi there

I would like to object to the master plan and planning application by Taylor Wimpey to destroy Edenfield village.

---

I fully object To Taylor wimpeys plan to destroy Edenfield village. I object to the proposed master plan and the planning application Kim roberts

[REDACTED]  
[REDACTED]  
[REDACTED]

Sent from my iPhone

Hi there

I would like to formally lodge my objection to the Edenfield Masterplan as proposed by Taylor Wimpey.

The proposal of additional housing and the loss of green land is insufficient in providing answers to the Edenfield community, and will only provide both an eyesore and an increase in the strain on local resources.

This objection can be logged from both myself and my husband, details below:

Elizabeth Edwards [REDACTED]

Chay Edwards [REDACTED]

I hope this will go some way in preventing this awful housing development taking place,

Elizabeth Edwards

Get [Outlook for Android](#)



Hi there

I would like to formally lodge my objection to the Edenfield Masterplan as proposed by Taylor Wimpey.

The proposal of additional housing and the loss of green land is insufficient in providing answers to the Edenfield community, and will only provide both an eyesore and an increase in the strain on local resources.

This objection can be logged from both myself and my husband, details below:

Elizabeth Edwards [REDACTED]

Chay Edwards [REDACTED]

I hope this will go some way in preventing this awful housing development taking place,

Elizabeth Edwards

Get [Outlook for Android](#)

Application no 2022/0451

Dear sirs

I wish to strongly object to the proposed application of the master plan above in the village of Edenfield.

I have been a resident for over 6 years and the changes I have seen in that short time are huge.

The traffic has increased dramatically - when I first moved here I could cross the road easily, now it takes much more care, and that is without the massive increase in housing that is proposed. That is a real concern, the safety of residents. Also my car has been damaged on two occasions - once written off! Again that's without increased traffic - by many more households. I do not have off road parking. On the webinar it was mentioned about widening market st - the only way I can see that is to stop residents parking - that is unacceptable.

My second point is - where I live the development would be directly behind my garden. I am very concerned that I would be overlooked and that the views will be obliterated, can I be assured otherwise? Would any screening be offered? This green space is used very regularly and in this age of mental health concerns for many, to take this away is a real worry and could be instrumental in preventing a tragedy.

Could you answer this question please - what is the point of giving the status of 'green belt' if that can be used for building... the title was given for a reason ... makes no sense.

My last point of objection relates to the proposed access roads.

Exchange street is a narrow road and difficult to turn left into coming from the mini roundabout, that cannot be widened with houses both sides - would not work as an access point which would mean a rat run developing through the surrounding houses.

Yours faithfully  
Angela Ashworth

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

Sent from my iPad

BY email: [forwardplanning@rossendalebc.gov.uk](mailto:forwardplanning@rossendalebc.gov.uk)

Our ref: PL00791790  
Your ref:

Date: 12 December  
2022

Dear Forward Planning Team

### **EDENFIELD MASTERPLAN CONSULTATION (H66)**

Thank you for your email dated 21 November 2022 regarding the proposed Masterplan and Design Code

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.

The site is allocated within the adopted Rossendale Local Plan. The heritage impact assessment and site policy sets out some requirements in the development of the site with regards the Historic Environment. In addition, we have provided a response to a planning application for the site (Ref:2022/0451). Providing the content of the masterplan and design code appropriately considers the historic environment and mitigates for any harm in line with the Local Plan and our response to the planning application, then we have no additional comments to make on these documents.

Historic England strongly advises that you engage conservation, archaeology and urban design colleagues at the local and county level to ensure you are aware of all the relevant features of the historic environment and that the historic environment is effectively and efficiently considered as part of the masterplanning of the site. They are also best placed to advise on local historic environment issues and priorities, including access to data held in the HER (formerly SMR). They will be able to provide you with the Historic Environment Records for the area including any relevant studies, and ensure a joined-up and robust approach is undertaken.

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



Historic England, Suite 3.3, Canada House, 3 Chepstow Street, Manchester M1 5FW  
Telephone 0161 242 1416 [HistoricEngland.org.uk](http://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.



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](http://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.



This email is from Anne and Brian Livesey home owners from [REDACTED] We object to the Masterplan for Market Street, Edenfield.

We strongly object to the proposed developments ear marked for Market Street and Edenfield village generally.

Our main objections are the already current difficulties with parking being further impacted by the additional large number of additional residents, most homes are two car families these days. The additional vehicles travelling through the village will be a health and safety issue for the children in the village and older residents, and to all the residents generally.

Traffic at certain parts of the day is already very, very busy. When the children are being dropped off and picked up for school for example it is a nightmare already without any additional parked cars dropping children off to school increasing road danger by obscuring the view of the road both for pedestrians and drivers.

The addition, noise, dust and fumes from the extra cars will impact on health. The level of pollution will increase in the village. An increase in people walking through the village will also be difficult on parts of Market Street as already the pavements are not wide enough for people and you have to side step to allow prams, and people with dogs etc, room to get pass and you have to walk in single file or go onto the road. The idea of so many additional people is madness.

I have had 3 close calls over recent weeks on the only roundabout in the village with traffic going straight across it without taking enough care and attention and that is without all the extra traffic. We really do not want this to happen and wish the local council would concentrate more on what the village and its community want. We do not want this Masterplan to go ahead and thing it is wrong to put our village and its residents through this unwanted stress and worry.

Regards

Anne and Brian Livesey

Hello James

I wish to place an objection to the document put forward by Taylor Wimpey in connection to application 2022/0451 for the construction of 238 houses on land off Market Street Edenfield.

As I understand Taylor Wimpey have misrepresented our ownership of land on Blackburn Road Edenfield and have shown some of this as being Peel L&P ownership !  
Any checks on the Land Registry will clearly show the correct field boundaries!

On a separate note Taylor Wimpey have proposed a Local Area for Play on our land off Blackburn Road!

Just to clarify we have never been approached by Taylor Wimpey or have we approached them as to be part of their planning application !

Could you please ask them to amend their documents so that our land has no connection to their proposals or benefits their scheme in any way?

Thanks for your help

Regards  
Richard Nuttall

Sent from my iPhone

**Contact:** [REDACTED]

**Date:** 12 December 2022

Dear Rossendale Local Planning Authority,

### **Edenfield Masterplan and Design Code Consultation Response**

Thank you for inviting Lancashire County Council's Flood Risk Management Team to comment on the above consultation. 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 Lead Local Flood Authority to manage 'local' flood risk (flooding from surface water, groundwater, and ordinary watercourses) within their area. In the planning process, the Lead Local Flood Authority is a statutory consultee for major developments with surface water drainage, under the Town and Country Planning (Development Management Procedure) (England) Order 2015.

The Lead Local Flood Authority have reviewed the Land West of Market Street, Edenfield (Allocation H66) – Masterplan and Design Code (October 2022, Taylor Wimpey, Anwyl Land and Peel L&P), and has the following comments:

#### **Summary**

The submitted masterplan does not meet the expectations of the Lead Local Flood Authority or constitute water-sensitive urban design. The Lead Local Flood Authority does not believe the submitted masterplan complies with Policy ENV9 of the adopted Rossendale Local Plan, the National Planning Policy Framework, the Flood Risk and Coastal Change section of the Planning Practice Guidance or the National Model Design Code.

The detail contained within the masterplan is inadequate and will not enable development that is resistant and resilient to flooding, both now and in the future, nor will it enable the provision of high-quality multifunctional sustainable drainage systems.

#### **Lead Local Flood Authority Expectations**

Strategic masterplan sites present significant opportunities to support sustainable flood-resilient development that better protects both businesses and communities from flooding. When considered from the beginning, they present opportunities for the implementation of high-quality, multifunctional sustainable drainage systems, contributing to the wider

#### **Lancashire County Council**

PO Box 100, County Hall, Preston, PR1 0LD



blue-green infrastructure of a site and wider environmental targets including biodiversity net gain, as well as enabling flood resistant and flood resilient design.

Early engagement with the Lead Local Flood Authority during the master planning process through our [Planning Advice Service](#) is critical in ensuring these overarching expectations are met.

The Lead Local Flood Authority require relevant policies, guidance and standards for managing surface water flood risk and the design of SuDS, or any future replacements of the following, to be complied with when designing for and managing surface water during the masterplan process:

- [Lancashire SuDS Pro-forma and associated guidance](#) (sets out the requirements and expectations of the Lead Local Flood Authority for SuDS in Lancashire)
- Rossendale Local Plan, relevant Neighbourhood Plans and Supplementary Planning Documents
- [National Planning Policy Framework](#)
- [Planning Practice Guidance](#)
- The [National Model Design Code](#)
- [The SuDS Manual](#) (C753)
- Defra [Technical Standards for Sustainable Drainage Systems](#)
- [The natural flood management manual](#) (C802)

Chapter 7 of the SuDS Manual (C753) provides a conceptual overview of the implementation of SuDS during master planning. The masterplan process should take a 'SuDS first' approach, ensuring the protection of existing flow paths, preventing surface water runoff by maximising planting and permeable surfaces, utilising source control to manage runoff close to its source, site-control SuDS to manage surface water across a site through a series of SuDS components and regional control, managing runoff across the whole masterplan area.

Early design consideration is critical to building SuDS into multi-functional spaces and creating a network of SuDS components that manage runoff close to its source, avoiding the need for large storage areas. Designing green spaces with SuDS that work well when both wet and dry can provide valuable community recreational space and blue-green infrastructure. Sports pitches, squares, courtyards, playgrounds, landscapes around buildings, urban parks, green corridors and woodlands are all popular types of open space that can be integrated with SuDS. This has not been achieved in the submitted masterplan, with landscape design principles regarding multifunctional public spaces conflicting with the provision of end-of-pipe attenuation ponds, which are not integrated with the wider development.

The National Model Design Code (N.2.i, N.2.ii and N.2.iii) should also be taken into account in the preparation of the masterplan and sets out how working with water, sustainable drainage and flood risk should be considered early in the master planning process. In addition, paragraph 019 of the Planning Practice Guidance sets out how flood risk should be considered in the preparation of local design codes. The design code should consider how flood risk from all sources, both now and in the future, will affect the design





considerations, adopting an avoid–control–mitigate hierarchical approach to addressing flood risk.

### **Surface Water Flood Risk**

With regards to flood risk, Policy ENV9 of the adopted Rossendale Local Plan States:

*All development proposals will be required to consider and address flood risk from all sources. A sequential approach will be taken and planning permission will only be granted for proposals which would not be subject to unacceptable flood risk, or materially increase the risks elsewhere, and where it is a type of development that is acceptable in a Flood Risk location. Assessment should be informed by consideration of the most up-to-date information on Flood Risk available from the Environment Agency, the Strategic Flood Risk Assessment (SFRA), the Lead Local Flood Risk Authority and the sewage undertaker. Developers will be expected to provide appropriate supporting information to the satisfaction of the Local Planning Authority, such as Flood Risk Assessments for all developments in Flood Zones 2 and 3 and as required by national policy and any local validation requirements. Site-specific mitigation measures should be clearly identified.*

Paragraph 161 of the National Planning Policy Framework requires plans to take "a sequential, risk-based approach to the location of development – taking into account all sources of flood risk and the current and future impacts of climate change – so as to avoid, where possible, flood risk to people and property. They should do this, and manage any residual risk, by:

- a) *applying the sequential test and then, if necessary, the exception test as set out below;*
- b) *safeguarding land from development that is required, or likely to be required, for current or future flood management;*
- c) *using opportunities provided by new development and improvements in green and other infrastructure to reduce the causes and impacts of flooding, (making as much use as possible of natural flood management techniques as part of an integrated approach to flood risk management); and*
- d) *where climate change is expected to increase flood risk so that some existing development may not be sustainable in the long-term, seeking opportunities to relocate development, including housing, to more sustainable locations."*

The submitted masterplan provides no assessment of existing and future flood risks and does not seek to direct development to areas at the lowest flood risk, contrary to the National Planning Policy Framework and Planning Practice Guidance. In addition, it does not identify any opportunities to reduce the causes and impacts of flooding, contrary to the National Planning Policy Framework and Planning Practice Guidance. This has not previously been considered within Rossendale's Strategic Flood Risk Assessment as this pre-dates recent and significant updates to the National Planning Policy Framework and Planning Practice Guidance with regard to flood risk and sustainable drainage. All sources of flooding, including from ordinary watercourses, surface water and groundwater must be



considered throughout the master planning process to ensure compliance with the above policies.

Specifically, the sloping topography of the allocation results in the generation of multiple surface water flow paths, as shown on the Environment Agencies [Long Term Flood Risk Map](#). The surface water flood risks resulting from these flow paths, both now and in the future taking into account climate change, must be considered in the masterplan as these could affect, or be affected by design considerations, so as not to increase flood risk on or off-site in line with paragraph 167 of the National Planning Policy Framework.

The masterplan fails to provide a clear design code demonstrating how existing and future flood risks have been and will be, considered throughout the allocation. There is no provision of routes to safely manage such flows within the allocation, contrary to paragraph 049 of the Planning Practice Guidance.

The Lead Local Flood Authority strongly advise that the masterplan is revised to include a section on 'water management', examining the natural flow paths, watercourses, flood risks and catchments, ensuring these are protected throughout the masterplan process to ensure no increase in flood risk and that multi-functional SuDS and opportunities to utilise Natural Flood Management techniques are maximised.

### **Watercourses**

Existing watercourses should be protected and, where appropriate, enhanced through the site layout, for example, naturalization, de-culverting, and the creation of riparian habitats. The culverting of any ordinary watercourses should be avoided. [Consent](#) applications to culvert an existing open ordinary watercourse will generally be refused by the Lead Local Flood Authority.

Throughout the masterplan process, it is critical to consider the future ownership of and access to any on-site watercourses. The site layout must provide safe access to all on-site watercourses for maintenance purposes. No development should occur within 8 metres from the bank top of any ordinary watercourse to achieve this. This includes the construction of structures such as walls and fences and any activity during the construction phases of development.

It will not be acceptable for watercourses to be subject to maintenance regimes associated with fragmented riparian ownership. Applicants must demonstrate that on-site watercourses are subject to a clear and coordinated management and maintenance regime after development is completed, with riparian owners clearly notified of their ordinary watercourse responsibilities. Opportunities should be taken throughout the master planning process to integrate ordinary watercourses into the urban design, creating multifunctional open spaces where riparian owners feel connected to the water environment.

Failure to provide appropriate access and maintenance arrangements for both riparian owners and future maintenance contractors for ordinary watercourses can increase flood risk over the lifetime of the development, contrary to the National Planning Policy Framework.



## Surface Water Sustainable Drainage Systems

With regards to sustainable drainage systems, Policy ENV9 of the adopted Rossendale Local Plan States:

*All development proposals will be required to manage surface water as part of the development in the following order of priority:*

- *An adequate soakaway or some other form of infiltration system.*
- *An attenuated discharge to surface water body.*
- *An attenuated discharge to public surface water sewer, highway drain or another drainage system.*
- *An attenuated discharge to public combined sewer.*

*Applicants wishing to discharge surface water to a public sewer will need to submit clear evidence demonstrating why alternative options are not available. The expectation will be for only foul flows to communicate with the public sewer.*

*On greenfield sites, applicants will be expected to demonstrate that the current natural discharge solution from a site is at least mimicked...*

*Development proposals will be required to incorporate sustainable drainage systems and consider surface water management early in the design process. Applicants will need to consider what contribution landscaping proposals (hard and soft) can make to reducing surface water discharge. Development proposals will be expected to maximise the use of permeable surfaces / areas of soft landscaping, and the use of Green Infrastructure as potential sources of storage for surface water run-off. The proposed drainage measures should fully integrate with the design of the development and priority should be given to multi-functional sustainable drainage systems SuDS (as opposed to underground tanked storage systems), which contribute to amenity, biodiversity and water quality, as well as overall climate change mitigation.*

*Alternatives to multi-functional level SuDS will only be permitted where it is demonstrated that they are impractical or there are other exceptional circumstances. Applicants will need to submit clear evidence when multi-functional sustainable drainage features are not proposed.*

SuDS are defined by paragraph 055 of the Planning Practice Guidance as systems that are designed to control surface water run-off close to where it falls, combining a mixture of built and nature-based techniques to mimic natural drainage as closely as possible, and accounting for the predicted impacts of climate change. They provide benefits for water quantity, water quality, biodiversity and amenity. Multifunctional SuDS, as required by the above Policy ENV9, are defined by paragraph 055 as delivering a wider range of additional biodiversity net gains beyond water quantity, water quality, amenity and biodiversity. The [SuDS Pro-forma](#) assists with providing appropriate evidence to ensure compliance with these policies and guidance.



## **SuDS Design Principles**

The submitted masterplan fails to define clear design principles for the provision of SuDS. It does, however, set out the provision of indicative SuDS basins/ponds along the western boundary of the site and the associated landscape design principle *"Create sustainable drainage pond/s at appropriate locations at the western edge of the site. Pond/attenuation areas should be naturalistic in character with appropriately varied bank profiles, providing opportunities for habitat creation"*. These end-of-pipe solutions do not deliver source control or multifunctional benefits, and, while managing surface water quantity at a site scale, are not part of a wider, multifunctional SuDS and, therefore, can be considered contrary to Policy ENV9. The SuDS must be integrated throughout the development to promote biodiversity and wider environmental net gains, generating the wider multifunctional benefits required through Policy ENV9.

The masterplan should set out clear design codes for the provision of high-quality, multifunctional sustainable drainage systems which integrate with the wider blue-green infrastructure of the allocation, in line with Policy ENV9 and the Planning Practice Guidance. For example, in line with Policy ENV9, maximising opportunities for infiltration of surface water through the replacement of impermeable surfaces with permeable surfaces and maximising opportunities for planting and vegetated areas, in preference to engineered surfaces, to increase evapotranspiration and provide improvements for biodiversity and wider natural capital benefits. Above-ground conveyance SuDS such as swales should also be used to convey surface water to the attenuation components while providing a treatment train to provide benefits for water quality in line with Policy ENV9. Reliance on underground piped solutions should be minimised to maximise these multifunctional benefits and reduce future maintenance costs. Chapter 8.4 of the SuDS Manual (C753) provides guidance on designing SuDS for steep sites. The Lead Local Flood Authority do not consider topography, or lack of space, as sufficient reasons for discounting the use of above-ground multifunctional SuDS components on sloping sites.

The masterplan should set out a source control > site control > regional control approach to managing surface water, with clear design codes setting out the SuDS components, deemed acceptable for the allocation. This will also ensure the continuity of SuDS design and place-making across the different sites in the allocation. In addition, the 'surface materials' should promote permeable paving for all private driveways to deliver source control, in line with the Planning Practice Guidance and Policy ENV9.

## **Discharge Points**

In line with Policy ENV9, the [SuDS Pro-forma](#), building regulations and the Planning Practice Guidance, the Lead Local Flood Authority require surface water to be managed according to the following hierarchy:

1. into the ground (infiltration);
2. to a surface water body;
3. to a surface water sewer, highway drain, or another drainage system;
4. to a combined sewer.

Developments are expected to incorporate interception and source control as part of the SuDS design throughout the hierarchy, with minimal surface water discharged from the



site for the 100% (1 in 1 year) annual exceedance probability event. For many developments, a hybrid approach will be appropriate, with rainwater harvesting and infiltration incorporated into the SuDS design wherever possible and used alongside or in addition to other SuDS components, for example, to deliver Interception and source control.

Highway drainage is also an important consideration and early engagement with the highway authorities (Lancashire County Council and National Highways) is critical to ensuring compliance with adoption standards as well as flood risk and water management requirements.

The submitted masterplan does not identify discharge points for surface water, and, therefore, it cannot be assumed that the SuDS ponds have been located appropriately. In addition, the location of such large volumes of water next to the highway presents a significant residual risk that must be addressed through any associated planning application. While it is unlikely at this stage that the on-site ground conditions have been established for infiltration, the masterplan should provide provision for this to ensure all development is in accordance with the above hierarchy.

### ***Existing Hydrological Characteristics***

As discussed in 'Surface Water Flood Risks' above, the submitted masterplan provides no assessment of the existing hydrological characteristics, including existing flood risks, catchments and flow paths. It is critical that these existing characteristics are identified and mapped so that they are protected throughout the masterplan process, as per section 7.5.1 of the SuDS Manual (C753) and integrated with the SuDS and wider blue-green infrastructure of the site to provide multifunctional benefits and reduce the causes and impacts of flooding, in line with the National Planning Policy Framework and Policy ENV9. Opportunities should also be taken to utilise Natural Flood Management techniques wherever appropriate, in line with the Planning Practice Guidance.

As the allocation contains multiple catchments and flow paths from outside of the boundary, it is critical that these are protected. This will help ensure flood risk is not increased, in line with the National Planning Policy Framework.

### ***Maintenance & Adoption***

The submitted masterplan fails to consider future maintenance and adoption of the proposed SuDS, contrary to the National Planning Policy Framework. It is critical that in-perpetuity maintenance of the SuDS is considered from the outset, to ensure the SuDS are subject to a clear maintenance regime with appropriate easements and to ensure components are designed to the standards of adopting bodies, including those of the Water and Sewerage Company and Local Highway Authority. Where the SuDS is not offered for adoption, or only partly adopted, a Section 106 agreement secured in agreement with the Local Planning Authority, should be entered into prior to the grant of any planning permission.



## Phasing

With regards to phasing, Policy ENV9 of the adopted Rossendale Local Plan States:

*Any development proposal which is part of a wider development / allocation will be required to demonstrate how the site delivers foul and surface water drainage as part of a wider, holistic strategy which co-ordinates development and infrastructure between phases, whilst having regard to interconnecting phases. Infrastructure should be sized to accommodate flows from interconnecting phases and drainage strategies should ensure a proliferation of pumping stations is avoided on a phased development.*

The masterplan contains no detail on the phasing of the proposed SuDS and, therefore, it cannot be assumed that Policy ENV9 has been complied with. The masterplan should identify any coordination of SuDS that is required between parcels as part of a regional system and ensure the SuDS remains integrated with the wider blue-green infrastructure of the allocation. It is important that phasing is also considered for the construction phase, to ensure the construction of the development does not pose an undue surface water flood risk on-site or elsewhere.

The phasing arrangements should allow for an overall and integrated approach to SuDS across the separate parcels in the allocation. However, should an integrated approach between individual developers not be successful, individual parcels must meet the requirements of relevant national and local policies, guidance and standards and any agreed masterplan.

### What This Response Does Not Cover

This response does not cover highway drainage, matters pertaining to highway adoption (s38 Highways Act 1980) and/or off-site highway works (s278 Highways Act 1980). Should the applicant intend to install any sustainable drainage systems under or within close proximity to a public road network (existing or proposed), then they would need to separately discuss the use and suitability of those systems with the relevant highway authority.

I hope that you find these comments valuable. Should you wish for further information or clarification on the contents of this letter please contact us at the email address provided.

Yours faithfully,

**Phil Wadley**

Lead Local Flood Authority



Dear Sir, Madam,

I write to object to the Edenfield Master Plan and the Planning Application your ref 2022 / 0451.

Taylor Wimpey are using trick in the book to maximise their advantage and despoil our village, and you as our local council need to take immediate action. The so-called masterplan is not comprehensive and does not address major issues, as we were previously promised. The plan was submitted one month before Christmas during the World Cup, notification letters were received one week *after* the submission, and the time and date for the Public Consultation was laughably held during the day when I and many other villagers were at work. The transport assessment deals only with 238 houses and *not* the 400 plus we fear are coming.

Doubling the size of our village, without a detailed plan to deal with infrastructure, is a recipe for disaster. Your role in this is to ensure the rules are followed and at the moment Rossendale Council appear to be the servant to TW's Masterplan.

Yours faithfully,

Paul Garner

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

Sent from [Mail](#) for Windows

Good afternoon,

As a resident of [REDACTED] Edenfield I wish to communicate my reservations regarding the aim and execution of the plan. I am acutely aware of the need for more housing but would assert that there are several equally suitable brownfield sites in the local area. The single biggest reservation I have if the plan proceeds is the additional pressure on the infrastructure in the local area. You need more roads, amenities and services, and these don't appear by magic. I would recommend you drive down Market Street or Exchange Street at morning or evening rush hour to see what it is like now. Imagine the volume doubling post - plan and the entire village will grind to a halt. Yo can't just increase the amount of homes by the proposed amount and expect current infrastructure to cope.

I love living in this village: I don't want to see it ruined.

Kind Regards

Gerry Murray

[REDACTED]  
[REDACTED]  
[REDACTED]

Sent from my HONOR phone



Hi

Thank you for consulting the GMEU

Note I have already made comments on pre-application associated with various phases of the masterplan and planning application 2022/0451. I was unaware that these were being made prior to an agreement of a masterplan.

I have restricted my response to section five titled nature.

- I agree that building on the woodland either side of the church and along the watercourses and A56 boundary is appropriate. Whilst the A56 is a significant barrier, the watercourse within the development feed in to a BHS woodland west of the A56 known as Great Hey Clough. Historic maps indicate the woodland extended further along the Brooks but was presumably lost when the A56 dual carriageway was constructed.
- I note there is no mention of the likely requirement, particularly for later phases to achieve 10% biodiversity net gain. I have already expressed my concern that application 2022/0451 is likely to result in a net loss even though the developers own consultant have estimated a 9% net gain. I believe that the masterplan should require a minimum of 10% net gain as or include a receptor site for biodiversity net gain eg an additional farm field that can be managed as lowland hay meadow or other neutral grassland by a farmer with 30 years funding for income lost from managing the field extensively.
- There is no mention of the potential of the development to benefit wildlife, specifically nesting birds a number of declining colonial breeders such as house sparrow, starling, house martin and swift capable of benefitting from residential developments if the eaves are constructed in such a way that nesting is possible or suitable next boxes provided. Any such strategy should however be based around species still present in the locality to ensure colonisation is likely. Housing is also an opportunity to provide opportunities for bats.
- The proposed tree species list includes field maple. This is inappropriate to the locality if utilised in the native woodland planting as whilst native to the UK it is not locally native. Amelankier is not native. Neither is inappropriate as a street tree or within gardens but locally native species would still be better, both silver birch and rowan capable of providing well formed and attractive garden specimens

For the native tree planting to maximised the biodiversity benefits you should be looking a oaks (either native species); birches (either native species), Rowan, holly, hazel, crab apple, hawthorn and elder in the drier locations, with willows (goat and grey); alder, guelder rose and bird cherry in damper locations. Alder buckthorn is also suitable in wetter areas, though relatively rare in the locality. I think it is important that you split the tree species list in to those suitable for street trees and gardens and those for the native tree planting. The use of non-native urban trees will compromise the maximum condition within the biodiversity metric as one of the criteria is having the majority of trees native. It is notable that the submitted planning application has included a significant number of species that are not appropriate locally.

**David Dutton**  
**Ecologist**

Planning  
Planning and Transportation  
Place

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***This email was sent at a time & date convenient to the sender; please do not feel under any pressure to respond immediately if this is outside your normal working hours.***

Email Disclaimer <http://www.tameside.gov.uk/disclaimer>



Dear Sir /Madam

I am writing to you to show my objection to the Edenfield Master Plan and also the Planning Application 2022/0451

I am totally against the proposed development of any land west of Market Street , I have lived here 60 years, I was born at [REDACTED] and all I can see from your proposed plans is absolute grid lock of the village. No parking for the cars on Market Street, the roads over congested and reduced to one way traffic . The foundation of the houses are already being shaken everyday with the heavy vehicles. There are no amenities for such an increase of housing and population . No doctors, no Dentist, lack of room in the 2 schools, no adequate play area , pre war community centre with no parking area . I really think the council were all drunk or taking bribes to actually agree to any planning in this area . Go and build 400 houses in your back yard ,or on Scout Moor .

Michael Sixsmith

[REDACTED]

[REDACTED]

[Sent from Yahoo Mail on Android](#)

Edenfield is a village and as such does not have the capacity to support 400 extra houses. We have no Post Office, or doctors surgery, only one village store and our schools are full to capacity.

An extra 400 houses will mean at least that amount of extra vehicles on the road, and most likely the actual amount will be doubled to 800 vehicles.

The stretch of road that covers the two entrances to this development is already heavily congested and at most times of the day is down to single line traffic.

At one end is Edenfield junior school which is an obvious danger to the young children crossing this road twice a day. The other end coming out of Exchange Street has a zebra crossing immediately to the right followed by a mini-roundabout to add to the congestion.

Apart from the extra air pollution these extra vehicles will create, how can anyone justify the congestion that will be caused.

The road will be constantly at a standstill, not to mention the chaos when the by-pass is closed and the traffic is re-routed through the village.

I do not believe that this traffic situation can possibly have been monitored.

This whole development will completely destroy our beautiful village.

Mrs Norma Hewitt

[REDACTED]

Sent from my iPad

Dear Sir/Madam

I would like to object to the above application and subsequent master plan due to the lack of facilities available in the neighbourhood for such a significant increase in resident numbers. This includes, but is not limited to, lack of adequate school places, NHS dentists/doctors and the catastrophic effect this development will have on local traffic (particularly on market street Edenfield).

If approved I'm am confident this development will be an unmitigated disaster.

James Lythgow

[REDACTED]  
[REDACTED]  
[REDACTED]

Sent from my iPhone

Good Morning,

As a long time resident of Edenfield, I wish to make my objections known regarding the Edenfield Masterplan.

The Masterplan indicates that a total of over 400 new houses could be built within Edenfield over the next few years. I think it a probability that the majority of these houses will be "two car families", with a number of the larger dwellings consisting of maybe 3 or even possibly 4 vehicles.

I would ask therefore how Market Street in Edenfield, which could not even be described as a main road, could cope with having between approximately **between 800 and 1000 extra vehicles** using it on a daily basis ?

I believe that the outcome of the Edenfield Masterplan would cause gridlock on an already busy road, in addition to causing extra pollution and would have a significant impact on the quality of life of local residents.

There also seems to have been little thought as to how all these potential extra residents will gain access to medical facilities and the extra school places required ?

I believe that all local schools are already full and it is has become almost impossible to see a doctor when needed.

Regards,

[REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED]

[REDACTED]

No trees were harmed in the production of this message; a few electrons were temporarily inconvenienced.



The Coal  
Authority

## Edenfield Masterplan and Design Codes Consultation

### Contact Details

Planning and Development Team  
The Coal Authority

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

Date

29<sup>th</sup> December 2022

Dear Forward Planning Team

### **Edenfield Masterplan and Design Codes Consultation**

Thank you for your notification received on the 21<sup>st</sup> November 2022 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.

Our records do not indicate the presence of any recorded coal mining features at surface or shallow depth within the Edenfield Masterplan area. On this basis the Planning team at the Coal Authority have no specific comments to make on this consultation.

Yours faithfully

[Redacted Signature]

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

From: Barbara Dewar, [REDACTED]

I wish to lodge the following objections to this plan and its planning application:

1. The revised masterplan still does not address adequately the principal problem of access and increased vehicular movements consequent to the proposed development. The proposed junction in Market St will not address the added traffic congestion, nor will it ease the already difficult problem of parking at peak times. Moreover it would greatly decrease the availability of parking for current residents on that stretch of Market St. It would also cause significant change, and possible removal of the dry stone wall which currently separates the road and the field.
2. The use of Exchange St as access to part of the development is still not addressed in the masterplan and still presents severe overuse of the street at peak times. Exchange St already has parking either side, which currently reduces flow to one lane.
3. The section of the development titled Edenfield North envisages the removal of a large number of mature trees, in direct contravention of the requirement to protect the natural environment and rural character of the village.
4. The size of the development suggested in the masterplan will change the character of the village, losing the supportive community of the rural village and making just another dormitory space for the cities of Manchester, Preston, Salford etc. A small, considered, development would enhance the natural evolution of the village providing a stimulus for further economic growth of this area.
5. The provision of facilities such as GP and school place provision needs to be addressed and agreed in detail before the building work begins.

Please acknowledge the receipt of this email.

Yours faithfully  
Barbara Dewar



The Taylor Wimpey Masterplan states that there are 3 access points to the H66 Policy. As there is not a joined up Masterplan for the whole of the site, I presume the access point on Exchange St would refer to the Anwyl development and the access point on Blackburn Road refers to the Peel and Richard Nuttall developments. This would result in the Market St as being the Taylor Wimpey access point. There is no comment on the plan to suggest that the whole H66 site would be connected via a through road.

My main concern is that all of the 238 dwellings would only be accessed via Market St. As you are aware, the traffic problem on Market St is already a problem, particularly at peak times. As there are no Doctor or Dentist surgeries within the village and local Hospitals are some miles away, it is inevitable that residents will use cars rather than public transport (current bus services do not provide a direct route to Hospitals in particular) to keep appointments with these services. The ideology of Taylor Wimpey that providing cycle paths to access surrounding services is somewhat dreamland.

I appreciate that the remit of the Council does not include parking facilities on roads. However I would ask that some priority is considered for the current residents of Market St on the parking front (most of whom have lived here for 20,30,40 and some for over 50years and during that time the properties have been well maintained and Rates and subsequently Council Tax has been duly paid) As the existing properties were built in the mid 19<sup>th</sup> century (when priority was given to the horse and cart) no provision was made for vehicles. As there is no rear access to the properties and no side streets are available for parking, any restrictions on Market St would mean parking outside of the village. I am sure you would be aware of the anger and frustration this would cause. I understand that LCC are responsible for making the decisions on the access points, but would hope that there would be some liason between you.

I note that there will be "green spaces" for recreational purposes. Who will be responsible for the maintenance of these areas? Will they become adopted by the Council or allowed to become overgrown or even become dumping grounds.

Margaret Filkins

██████████  
██████████  
██████████

Sent from [Mail](#) for Windows

Hello,

I wish to file an objection to the Edenfield Masterplan. Please consider;

Destruction of greenfield sites

Approx another 500 cars in the village or passing through.

Not enough schooling/hospital/dental/health services to accommodate another 1000+ people

Massive issues to communities from areas such as Townsend Fold & Ewood Bridge when there are very frequent incidents on the A56 bypass. Vehicles already clog these village roads & all these new potential properties cars will compound the problem.

Parking already a huge problem in Edenfield & this should be addressed before anymore building of new houses is allowed.

Surrounding road infrastructure already poor & should be prioritised over new builds.

Brownfield could be used rather than greenbelt.

Popular walking areas & paths will be destroyed.

Destruction & impact on nature.

The beauty of the area will be totally destroyed by this monstrous new eyesore.

Local residents will be pushed out of their areas in favour of City Commuters & massive property prices.

Character of the area will be ruined.

Kind regards,

Mrs Eilean Aindow

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

Sent from [Outlook for Android](#)

Regarding Planning reference: 2022/0451 - Application for 238 houses off Market Street Edenfield

I object to the plans to build 238+ houses in Edenfield.

#### Traffic and Parking Issues:

This is the main reason for my objection – no councillor or planner can have properly assessed Market Street or the surrounding roads to see that one access point to the housing estate would be acceptable. This would not only cause additional problems for the residents living here but for the many years of construction site vehicles. It seems to me purely idiotic to think that the number of extra cars on the roads here would not cause further serious traffic issues in Edenfield. What plans are being put in place to address this issue? Why is the council not considering southbound access to the M66 from the Edenfield roundabout in this plan? When the bypass is closed the whole village comes to a standstill. Market Street does not have the capacity for this level of traffic as cars can only pass single file. I am also aware that it will not just be '283' houses, as the Masterplan states 400+ houses in total so this cannot be considered in isolation.

#### Highway Safety:

The highways in Edenfield are just about managing with the scale of traffic currently. The roads are extremely narrow in places, potholed and busy, not to mention the heavy traffic with lorries using Ramsbottom for access to industrial units and the quarry. Additional traffic on the scale which is expected will only damage the highways further and add increased danger to the roads here, specifically around Edenfield Primary School on Market Street which is already a bottleneck.

#### Scale and Dominance:

The scale and dominance of this plan is not in proportion to the size of Edenfield Village and its community. 30-40 houses may be acceptable but an extra 283 houses is damaging to the greenbelt area.

#### Economic Impact and Sustainability:

This land is greenbelt. It is inconceivable that such a large scale proposal has been allowed here. Why have brownfield sites not been considered? Why are the masses of empty houses not being renovated? Edenfield cannot sustain this additional number of houses with the local impact it would have on schools, doctors, dentists etc.

Jennifer Pilling  
[REDACTED]

To whom it may concern

I wish to object to the development plan for Edenfield.

I feel that the proposal for the number of new homes will overload an already congested village.

A number of roads in the village are already bottlenecks. Any increase in traffic would impact on the movement of traffic in the area. Crossing the road as a pedestrian can already be hazardous - and when the by-pass is closed (which happens frequently) it can be impossible to cross the roads. Traffic at these times almost comes to a standstill,

Access to the proposed development would also increase traffic near to the playground and recreation ground, causing hazards (both physical and health) for children and families playing there.

Removal of the green belt land removes public access to areas frequently used by walkers and dog walkers and would limit the amount of open/green space accessible to the local people having a negative impact on their health.

The proposed plans for the houses to be built are out of keeping with most of the village changing its nature and any new build should have sympathy with the surroundings.

I also feel that Taylor Wimpey is totally disregarding the views of local residents.

Yours faithfully

Christine Petterson  
[REDACTED]

Dear Sirs

NOELLE DUNKERLEY

[REDACTED]

[REDACTED]

[REDACTED]

I strongly object to the Planning application for Taylor Wimpey to erect 235 houses on land west of Edenfield Village, reference 2022/0451 and for which I have submitted my objections.

I also disagree strongly with the Masterplan which I believe was submitted at the same time and alongside the Planning Application and at a time when families were extremely busy organising Christmas. I am directly affected by these plans and wasn't sent any literature either but had to rely on local social media to find out about it.

I live down the lane past Mushroom House, through the field and over the motorway bridge and I have seen nothing which suggests this right of way will be protected. Also that we will not be affected by additional traffic on our daily access.

Firstly Edenfield Village, as it is, will not be able to cope with the additional traffic these houses will bring. The road near the school (our only primary school) narrows at the entrance and where two major roads, Blackburn and Burnley Rds join, this is dangerous as it is now. The majority of houses in Edenfield need to park on the only main road (Market St) and also in the side streets, these new houses will add to the congestion and thus to the safety of pedestrians and other road users.

Exchange St is too busy to take vehicles onto the new proposed housing estate and again adds more danger to the children using the park. The street is congested now before all the houses go ahead with cars regularly double parked.

Drainage and water off the new development will be too much. I live in the bottom of the valley below this planned estate and the water erosion down here is already very significant. The River Irwell floods its banks compromising the villages of Irwell Vale and Strongstry. My fields, including the existing public right of way, and garden already flood. The council cannot keep this footpath in a 'fit for purpose' condition now so how do they propose it can take more use?

The public right of way over the bypass bridge leading down passed Chatterton Hey is a public FOOTPATH right of way only. The public right of way over the next bridge leading from Church Lane is a bridleway and I hope these are going to be kept as such. I appreciate that PROW (public rights of way) need to be kept open providing access to the countryside for residents HOWEVER, consideration must also be given to the eroding land and the landowner. We have terrible problems with cyclists (who should not be using the footpath), they break fences and gates to make their access easier, they speed down the lane which is hazardous to other walkers and to be frank, the footpath network here at the bottom of the valley simply cannot take any more footfall. The council would have to make up the surface of these footpaths to stop further erosion, this has already been promised 3 years ago but still

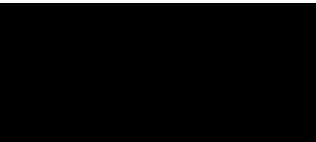
hasn't been done.

These are just a few of many, many objections I have but are the most pressing.

Sincerely  
Noelle Dunkerley

--

**Noelle**



27<sup>th</sup> December, 2022.

Dear Sirs,

*Edenfield development planning issues*

*I have been a resident and property owner in Edenfield all my life – 73 years and many changes have taken place including small estates and new properties in pockets of this area. All have enhanced the context of a village with a younger, active generation being involved in the community both physically and socially.*

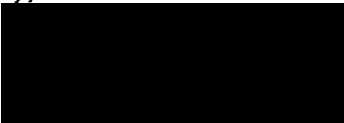
*There are now many reasons why this excessive development in some of our Green Belt area should be rejected.*

*The number of additional houses will overload the highway and the side roads. Parking on the main road outside our shops and schools is now at a maximum capacity at peak times.*

*The Master Plan does not include meeting Net Zero carbon targets and no mention was made of affordable housing, so I would presume housing with three/four bedrooms and two/five children will swamp this village. With in excess of 400 new houses the areas of green pasture land will be obliterated.*

*I suggest the Council re-consider their priorities and give this village of Edenfield their fair share of housing – the rest being spread throughout the Valley.*

Yours faithfully,



(Mrs. S.E. Wallwork)

I wish to lodge an objection to the Taylor Wimpey Masterplan.

Primarily this objection relates to the size of this development and the attendant problems that will be felt throughout the village.

This presented plan, whilst purporting to encompass the whole of the site, centres around the initial build of 238 of 400 proposed houses (just less than 60%) and not the whole site. Therefore in my view it does not constitute, even without other issues factored, as a 'Masterplan' at all.

Numerous points become obvious when reading through the associated documents. Here are several:

1. There is no overall Traffic Plan – whether before, during or after build.
2. There is no constructive plan re local schools – see LLC School Planning Team Objection.
3. Initial site access is to be funnelled through one route only – the 'ghost right turn' access point on B6527 Market Street – this is totally inadequate and would result in c. 28 cars from the immediate area being dispersed (only 10 spaces are allocated on site as a compensatory measure).
4. LLFA also object and state plans for water run-off are inadequate, both initially and with no future planning put forward – a direct flooding risk to the adjacent A56 by-pass is the logical conclusion to this.

In view of the above I submit that there is in fact no 'Masterplan' in existence and therefore, under the terms and conditions stipulated for this development, no planning application can be considered until this matter is first dealt with.

Joanne Ash







As a resident of Edenfield I wish to register my strong opposition to this masterplan.

The current road network cannot support the volume of traffic it current has let alone the extra traffic that 238 more houses would bring. Nowhere in the masterplan do I see how this is addressed at all. The proposed routes of access and traffic handling are ludicrous.

It has taken 500 years for Edenfield to grow from a few hoses to the village it is today. The scale and speed of the masterplan would destroy a village community and create yet another dead commuter town.

Edenfield cannot cope with this scale of development.

Ian Bailey

[Redacted]  
[Redacted]  
[Redacted]  
[Redacted]

Ian Bailey  
Manufacturing Director

[Redacted]  
[Redacted]



To watch a short animated video on Pi's Chlorine Probe, click on the picture.



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Christine Ash



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Peter Ash



I'm at a loss as to why the council thinks it's okay to build on greenbelt land. There are brownfield sites in Rossendale so why are they not the first priority. I can only assume money is the key factor here. It's shameful and typical. There are no doctors or dentists in Edenfield also the local schools are full. The road is a disgrace and it doesn't take much for long queues to form especially if there has been a minor incident on the bypass. The planning is a poor choice for Edenfield.

Not impressed.

Mrs Susan Hilton Brooks, [REDACTED]

[REDACTED]

Mr B Newton

[REDACTED]  
[REDACTED]  
[REDACTED]

I strongly object to this so called master plan. This is a small village with a narrow main road passing through it. You have to stop now and let oncoming traffic pass. Assuming there are two cars per house,that's almost five hundred more cars in the village trying to get in and out increasing to eight hundred if and when the masterplan is completed. No consideration has been given to the existing road infrastructure, Medical facilities are non existent.The schools are also full with no room for more children.

It's going to be way to busy and spoil the village community and the country side surrounding it. This must not happen for the sake of everyone living here now and future generations.

B Newton.

Sent from my iPad. I do not agree to the planning Application of the houses in Edenfield the access is not very good . We already have parking problems and when the buy pass is shut it is impossible to get on to Maine road from the side street I strongly disagree with what you are trying to do plus are green space will be lost for ever Plus the houses are not in keeping with Edenfield awful design think again planners  
Mrs j Griffiths

I am writing to formally object to the council's master plan for Edenfield which is misconceived, not rational and environmentally destructive.

The master plan is outdated as Government has moved away from allowing deregulation of Green belt land when brown field sites should be considered instead. This flawed plan to destroy Edenfield must be scrapped.

Simon Archer

[REDACTED]

[REDACTED]

[REDACTED]

Sent from my iPhone



Hello

I would like to object to this plan. The plan is imbalanced. The benefits of new housing do not outweigh the impact to the community of Edenfield.

The plan basically doubles the size of Edenfield with no benefit to the local community, only further congested roads, pressure on local amenities, and loss of the green and village character of the area.

Roads in all directions from Edenfield particularly the route through Shuttleworth are already overwhelmed by traffic in the morning trying to reach the M66. This alongside other developments occurring in Shuttleworth will make things far worst.

The land to the south adjacent to the community playing fields is not currently grazed and is an insect and wild flower haven in the summer.

Further I would question the potential hazards downhill to the storm water run off once this green belt is gone.

If the plan was 1/3 to 1/2 the size I might accept it was balanced and reasonably considered. This is just a land grab for the building sector to build yet more over priced housing for an out of town commuter market. I doubt it will even provide any seriously affordable and sustainable housing.

Please reconsider this disasterous proposal for our community.

Regards

Matthew Whittaker

██████████  
██████████  
██████████

I Object to the houses on the grounds of we already don't have enough doctors for the area.  
The traffic is awful now without the addition of more cars. There are not enough places in the  
primary school.

No more room for extra cars in local shopping precinct.Lavinia Tod.Stubbins.

Sent from [Outlook for Android](#)

N pearson

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

I'm writing to object to the proposal to build 238 new houses in the centre of edenfield on green belt land. I find it unacceptable that the local council (one which I voted for) is considering building this application when there is so much brownfield land available in the wider area. Edenfield is already a busy village with frequent traffic issues through the village, too many cars, not enough medical or school places. Our green belts needs protecting

Additionally, the impact yo the local infrastructure that would happen building this many houses would be a completer nightmare. Building less than ten houses on Rochdale road (near the Rostropovich arms) is causing significant traffic and, more importantly, safety issues, as those working on the site result in the road being single lane.

I will be following this up objection to the Taylor wimpy plan, but I sincerely hope you listen to the people you work for

Nikki pearson

Sent from my iPad

Where to begin?

As I don't have the spare time needed to address this outrageous and disgusting plan, I am going to have to keep this brief.

1. Firstly, his is NOT a plan for 238 homes, this is only half the plan in the eyes of TW and the other developers! It's deceptive and sly to attempt to successfully gain planning permission on a smaller number of homes (the irony of "smaller" as this number of houses would still crush Edenfield!).
2. Traffic. Have TW even visited the location? Market Street is effectively a single lane road closer to the roundabout. It's busy at normal hours, what do they expect to happen adding another 800 cars? When the A road shuts and traffic is diverted through Edenfield it is a nightmare. The road cannot sustain that level of traffic, it can't cope now!
3. Pollution. The council are intending to give greenbelt land away, and potentially steal a school's playing field to allow for a LOT more pollution. 800 cars if not more.
4. Access to the estate? Even though the space on Market Street is the widest, it will still be a hazardous and inconvenient entrance because residents of Market Street need the road to park, as there are no driveways. And again, this will heavily increase traffic and cause chaos.
5. Danger on the roads. Pulling out onto Market Street is already quite difficult. Increasing the car flow by a ridiculous amount will not help this inconvenience. But also, children from the local primary school will have no safe spaces to cross. Nor will I! And if TW suggest traffic lights, they will cause further chaos for another 800 cars. So there is no solution apart from not to build!
6. I moved to this area so my children could live in a village and play out safely and enjoy walks, enjoying the beautiful scenery nature has to offer. TW will destroy that and I will have to DRIVE to then go on walks. Makes no sense. No need to build on green belt land. Speaking of which...
7. There is no demand! I live in new builds in Edenfield, part of a ten house development. Myself, along with ONE other neighbour, lived on our street alone for over a year because the houses did not sell. They dramatically reduced the prices in order for them to sell. There is another street down the road that is having new builds and they are not sold. There is a bigger development close to The Duckworth Arms and they have not yet sold either! But TW seem to think we need close to 500?!?!
8. I don't have a dentist. There are no dentists in the area taking on NHS patients. Not even children. And you want to add another 1000 people to compete?
9. No doctors. There isn't a local doctors in Edenfield.
10. No shops. We only have one small corner shop in the village. We are not cut out to feed the 5000.
11. No space for children. I imagine TW advertise they sell family homes. Well where are the children going to go to school? There's no space in the two local primary schools (Edenfield only having one). And the extension mentioned in the plan not only steals even more green land from the community, but it's not enough!
12. No secondary schools. There are no local secondary schools. None. I don't even know where I'm sending my kids when they reach that age, let alone with a few more hundred kids with no local school needing a place too.
13. My privacy. I look directly on to one of the fields and my home is on a slope. The homes will look directly into my home. This is not mentioned and TW's plan suggests

there will be houses directly behind mine. What will be done about my privacy if this ridiculous plan goes forward?

14. The houses are out of character for the area. I originally saw a plan by TW with all these white brick homes that looked quite pleasant! Now it actually comes down to it, much like their development past Rawtenstall, it's the front row of houses that are white stone, then the rest are brown brick and basic unattractive houses.
15. There will be so much noise pollution from the years of building that will happen. They'll then also be so much more traffic and thus noise constantly.
16. No access. I mentioned this earlier but the other suggestions for roads to enter the estate on is simply laughable. Tight cramped roads with no easy access and again will cause chaos. It's also by the local playground making it very unsafe for the local children. As well as the pollution by a playground now.
17. Increase danger of flooding for the A56.
18. The plan doesn't address major issues outlined above. How can TW get planning permission without an actual plan for anything?
19. There is no public transport besides the odd bus to take anyone anywhere. It's advertised for commuters but there's no links? No trains. No trams.
20. You would kill the village.

Please do not turn our village into a town where vehicle levels become chaotic and dangerous. Yes a lot of houses can fit on to these fields technically, but the village simply cannot sustain those numbers. The council should be focusing on improving our roads now as they are already problematic, not encouraging the situation to be much, much worse. There isn't space for that many new humans or vehicles.

I would like to submit my objection to the planning application by Taylor Wimpey for site H66 and my reasons are as follows:-

The village & the area can barely cope with the volume of traffic now never mind with the issue of additional houses which brings with it numerous additional vehicles The infrastructure in the area in addition to the roads is completely inadequate with a lack of schools and health facilities Given the industrial landscape of the Rossendale valley why are we utilising green belt when there are numerous brown field sites in the area?

Stuart Barrie

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

Hello,

I am writing to formally complain against and place my objections against the planning application as submitted by Taylor Wimpey (Reference: 2022/0451) with regards to the Land West of Market Street, Edenfield, Lancashire.

Firstly I would like to object against the use of the term 'master plan' as this plan currently only includes plans for one developer rather than the complete plan for Edenfield as a whole. And as such I question the legitimacy of this 'master plan' at all.

I, alongside many other residents of Edenfield, believe that this planning application and suggestion of such a huge development in the small village of Edenfield will cause complete chaos.

Due to the fact that there is only one road (Market Street) through Edenfield, there is NO convenient, or adequate way of enabling safe and swift passage of traffic through the village, especially at peak times. It is clear for all to see that there are already issues with congestion in the village at peak times, and this will only become worse if the planning application is successful.

This causes noise, pollution, and frustration to all of the residents of the village.

Not only will this potential new development cause huge problems with traffic, noise, and pollution. But it will also make accessing the village for the current residents much more difficult.

It hardly needs to be said that the disruption and noise caused by the building works themselves will be of huge frustration and stress to the current residents of Edenfield, especially for those who live close to the site and work from home, or have young children who will want to play outside in their gardens.

I really do hope that you read through these objections thoroughly, and take into consideration what is said, as any person thinking properly can see that the building of so many houses in a small village without any proper infrastructure to support this is a terrible idea, and will certainly lead to chaos.

Please think carefully about this and try to have empathy for those residents living in the village rather than putting money and greed first. Once the feel, and utility of the village itself is destroyed by huge new development there is no going back.

Thank you for your time,

Dr Joel Watkinson



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Thank you for your time,

Mrs Jennifer Watkinson  
[REDACTED]



Elizabeth Brooks  
[REDACTED]  
[REDACTED]  
[REDACTED]

Walter Stephen Brooks  
[REDACTED]  
[REDACTED]  
[REDACTED]

We wish to submit our objections for the above plan to build 238 dwellings within the village of Edenfield.

On attending the consultation meeting in December, Having viewed the plans in place for this now not so small village.

How have Taylor Wimpey been able to submit a master plan when in the original plan for the build of 400 houses plus, the master plan was to be submitted as a whole and not just one developer thus making it look like there will only be 238 properties being built . Is this not against the council's own criteria and should the council planning not already have rejected this proposal until all parties have put the masterplan in together as originally stated. I feel this is important as everyone involved needs to see the whole plan it's in entirety to see what impact such a largescale development will have on this village.

Building on this land could potentially have an impact with flooding as the area proposed is one of the main area's that drains water coming off the hills and stops it from flooding down into the village of Chatterton, Irwell vale and the potential to cause untold flooding to Edenfield Bypass which already struggles with standing water , so this can only impact this already hazardous situation.

The plan to build so many dwellings within a village that has no infrastructure in any way at all to accommodate such large undertaking.

Schools (both Junior schools and senior schools are already at capacity)

GP

Dentist

The roads in and out of Edenfield cannot possibly withstand the amount of traffic this build is going to create in regards to the build it self and the volume of traffic this amount of housing is going to cause, The traffic already travelling through the village is overwhelming on any normal day without taking into consideration incidents that happen on the bypass sending tremendous amounts of traffic through the already congested roads. This is a village which has a road structure for a Village not a Town.

These roads were built for a village, with terraced houses all the way through, surely everyone living on Market St and Bury Rd in these Terraced houses should be entitled to park at least a single car outside their own home which is going to be unlikely if this build goes ahead, just because someone decides they want to build a small village within a village it is justly unfair to penalize the residents of Edenfield and the surrounding areas

Entrances into the new site using roads like Exchange street and Highfield road, again completely unrealistic and surely the planning committee at RBC has to consider the concerns of residents

already living here and the untold stress and disruption they will have to endure. It is not all about the big companies with big money it should also be about supporting the village residents who have very valid reasons for this master plan not to go ahead in its current form.

No one is saying do not build, all we are asking for is for RBC planning committee to consider the size of the build and the impact this will have on the village and surrounding area but also on the environment and also to consider the way Taylor Wimpy are also being duplicitous in the way they are trying to force this plan through without going through the correct procedure, everyone should be held to account and follow correct protocol Builders and RBC included

Many thanks

Elizabeth and Walter Brooks



Elizabeth Brooks  
[REDACTED]  
[REDACTED]  
[REDACTED]

Walter Stephen Brooks  
[REDACTED]  
[REDACTED]  
[REDACTED]

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Many thanks

Elizabeth and Walter Brooks

I am putting in our formal objections against the plan to build hundreds of homes in Edenfield.  
Please register our names voting against this development.  
Mrs Elizabeth Brooks  
Mr Walter Stephen Brooks.



Contact number

Dear Forward Planning Team

I am writing a response to the consultation around the proposal to build 238 new residential dwellings within housing allocation H66 of the Rossendale Local Plan, in the land between Edenfield and the A56/M66 motorway

I object to the proposals on a number of grounds 1. The plans have not considered the potential health impacts on families purchasing houses in the areas closest to the A56/M66 motorway or to existing local residents. It is well documented that car emissions and air pollution from cars and motorways can have serious negative health impacts and lead to up to 36,000 deaths annually. In addition to the risks associated with building houses close to a busy motorway, adding extra housing and cars into the area will add additional air pollution impacting both new and existing residents, particularly those living on or close to the main roads into/out of Edenfield and to the proposed new houses closest to the M66. I cannot see evidence that the plans follow the National Institute for Health and Care Excellence (2019) guidelines on Air pollution: outdoor air quality and health - in particular quality statements 1 and 2

- how the current plans for additional houses have local transport plans to accompany them that will reduce rather than increase the numbers of cars on the road and seek to reduce air pollution

- how the plans seek to minimise and mitigate road traffic related air pollution that will be undoubtedly generated through introducing at least 238 news homes and associated cars into a valley area. The guidance specifically states planning authorities should consider minimisation and mitigation of air pollution.

I note that one of the proposed locations of a children's play area is sited close to the motorway.

I would like to see further detailed analysis conducted of the anticipated increases in traffic on all roads surrounding the site and modelling of impacts of this on air pollution levels - this should be undertaken for both the new build houses located on different areas of the site, the children's playground areas and the existing residential properties in Edenfield. A full assessment of potential impact on health of residents needs to be undertaken.

2. Market Street in Edenfield is already a busy street that is too narrow in places and cannot take additional traffic to the volumes that will be created by 238 additional homes each potentially with 1-2 cars.

3. There is inadequate consideration given to the impact of this many new houses on local amenities including school places, doctors and dentists - which are already over subscribed.

4. The nature section of the plan does not give any consideration to impacts of building 238 new homes on existing wildlife on the proposed site, which is currently open fields

5. The impact of adding concrete roads, paved driveways and hard garden surfaces over a large area of what is currently open fields raises risks for drainage and flooding.

Overall I strongly believe the plans to build so many houses in this space are unsuitable and should be rejected.

Claire Kirk

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

Hi there

I am writing for formally object to the plans to further develop Edenfield under the 'Edenfield Masterplan' project.

Adam Hawthorne

[REDACTED]  
[REDACTED]  
[REDACTED]

Kind regards

Adam.



Steve Woodburn

Dear sir or madam,  
re masterplan. Where are the plans from all the developers? I thought a masterplan, by its very nature, included everything.

I'm struggling to see how this plan is feasible. Transport through the village is already bad so creating more traffic can only make things worse and bring the village to a standstill. I'm already worried about the traffic and pollution and parking, at both ends of the village (the school and the zebra crossing), and this is without the occasional bypass diversions. The construction phase alone will cause monumental problems. Why build new houses in such a fashion if the people the houses are targeted at cannot travel/commute? Why build houses in a desirable area if the build will make the area less desirable?

I'm also concerned the plan doesn't have sufficient wide emergency access for the new development which makes it dangerous.

There doesn't seem to be any provision for any extra facilities which the many new houses would require - eg. doctors, schooling, transport, recreation. I would like to see the plan as a whole, with all the developers included rather in pieces. The fact it is on green belt is in itself a mistake as there is plenty of brown field sites to develop on. I strongly object to this development/plan.

Kind regards,  
Steve Woodburn

I wish to lodge an objection to the Taylor Wimpey Masterplan.

Primarily this objection relates to the size of this development and the attendant problems that will be felt throughout the village.

This presented plan, whilst purporting to encompass the whole of the site, centres around the initial build of 238 of 400 proposed houses (just less than 60%) and not the whole site. Therefore in my view it does not constitute, even without other issues factored, as a 'Masterplan' at all.

Numerous points become obvious when reading through the associated documents. Here are several:

1. There is no overall Traffic Plan – whether before, during or after build.
2. There is no constructive plan re local schools – see LLC School Planning Team Objection.
3. Initial site access is to be funnelled through one route only – the 'ghost right turn' access point on B6527 Market Street – this is totally inadequate and would result in c. 28 cars from the immediate area being dispersed (only 10 spaces are allocated on site as a compensatory measure).
4. LLFA object and state plans for water run-off are inadequate, both initially and with no future planning put forward – a direct flooding risk to the adjacent A56 by-pass is the logical conclusion to this.

In view of the above I submit that there is in fact no 'Masterplan' in existence and therefore, under the terms and conditions stipulated for this development, no planning application can be considered until this matter is first dealt with.

Mr Lee Ash

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

r.e Planning application 2022/0451 - A Proposed Development For The Erection Of 238 No. Residential Dwellings And All Associated Works, Including New Access, Landscaping And Public Open Space Within Housing Allocation H66 Of The Adopted Rossendale Local Plan

To Whom It May Concern

I am writing as a former resident of over 30years of the picturesque village of Edenfield and the proposed development of hundreds of new houses to be built on the open field near to Mushroom house.

The village in my opinion does not have the infrastructure to cope and the land to be lost forever would be a crying shame taking away the rural beauty and obviously the effect on nature this will have, not to mention the amount of traffic this will bring to an area which doesn't have many roads of access when the local bypass is experiencing issues then the village and surrounding areas will be gridlocked for hours no doubt.

New build homes would look unsightly in my humble opinion, the amount is taking away an area enjoyed by many walkers and many generations of local residents.  
Will these homes be blended into the landscape or has that been considered?  
Surely money spent on improving the current local business opportunities should be considered.

I am objecting to the proposal and would appreciate any further correspondence.

Yours Sincerely.

To whom it may concern,

I would like to register my objection to the proposed plan as I believe it would destroy the village and place too much pressure on roads, the local school and NHS services.

I have lived in Edenfield for 75 of my 90 years during which time I have worked in shops in the village and at the local school for nearly A decade.

The countryside is so precious and should not be destroyed in this way.

I understand more houses are needed but this is not the site.

With best wishes,

Theresa McGowan

Resident

--

Sent from Gmail Mobile

Dear sir/madam

I write in to object to this proposed development.

To increase the size of Edenfield by roughly 25% and not think its going to have much of an effect on the village is beyond ridiculous.

The 2 local schools are already full, yet Taylor Wimpey's answer- just take some of the schools playing area to build new class rooms. So increase the school population, but give the children less room to play and at the same time introduce even more buildings into the village, on top of their own proposed monstrosity.

On to the traffic - anyone with a jot of common sense, if they saw the situation with local traffic during the day, especially during the school/work rush hours would see that trying to get somewhere around 400 cars every morning, out of a junction into an already busy, yet narrow road, should appreciate the plan is ridiculous - and thats only Taylor Wimpey's part of the development. As soon as anything happens on the Edenfield bypass, the village becomes gridlocked. Even the other developers acknowledge there's no way to overcome the traffic congestion in Edenfield, yet Taylor Wimpey skim over this and think it will be fine.

The village has no dentist or doctors surgeries as it stands, and it is already exceptionally difficult to get an appointment for these services in the surrounding areas. Are the already busy surrounding surgeries expected take the additional numbers with open arms?

The scale of this combined development and the various impacts it will have would be very difficult for a town like Haslingden or Rawtenstall to absorb, yet a small village is supposed to take without problem?

I find it hard to understand how the plan has got this far, I urge you to reconsider the approval for a development of this scale.

Sincerely,  
Daniel Giles

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

Dear Sir / Madam

Please note my objection to Edenfield master plan.

It still appears to be a easy win line council coffers exercise with no strategic investment in building an infrastructure to support a 45% increase in the size of Edenfield village through expansion on to local green belt. Meanwhile local brown belt locations are still under developed WHY?.

Please remind me of the government target for green belt expansion as I believe 45% is not it. Please inform me of correct figure?

As per the reasons flagged by ECNF I totally support them as you have made no sensible steps to providing a sustainable infrastructure to meet the increase, in fact the reality is you haven't got the infrastructure to meet the needs of the village now with its present capacity.

Perhaps you should get your backsides down here from 6pm in morning and see how bad traffic is now let alone an extra 900 cars. Madness.

I await your response, will keep myself busy as I don't expect one addressing the above.

Regards

John Burns

Sent from my iPhone

From  
Paula Bridge

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

Particular ref to 2022/0451  
Land west of Market Street, Edenfield

I believe that brown field sites should be built upon before green field sites are even given consideration. This should be a principle.

I particularly object to the above proposed development.

The scale is not in keeping with the current size of Edenfield. It is much too big.  
It will have a huge impact upon local infrastructure, which is already strained.

The mini roundabout is already a problem at peak times.

General road condition is poor.

Traffic flow through Edenfield is not good.

This is obviously many times worse if the bypass is shut.

Bus services are not adequate, with no service at all to Rochdale.

There is no Drs in Edenfield and local practises are already struggling.

The number and type of shops is very limited.

Additional strain will also be placed on the two local schools at Edenfield itself and also Stubbins School.

Please consider these comments and endeavour to use brown field sites for future development.  
Paula Bridge

Sent from my iPad

Henry Botham

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

I'm writing to voice my objection to the Edenfield master plan. There are so many reasons to object that it's hard to articulate them all.

1. The village is already overcrowded
2. The village could not cope with the extra traffic that would result
3. The green belt should be protected
4. The primary school is already full
5. The upheaval of construction would destroy the village
6. The development would add to the flooding problem in irwell vale
7. The value of everybody's house would be impacted
8. The implications for the wildlife that uses the land
9. There are many brownfield sites in rossendale that would be better suited to development

Why should the residents of Edenfield pay the price for the greed of developers and help line the pockets of all those involved in this development? The council are supposed to represent the people not exploit them

Sent from my iPhone



## Feedback on Masterplan and Design Code for Edenfield/Market Street

8<sup>th</sup> January 2022

**Name:** Helen McVey

**Address:**

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

### **Below is my feedback on the Masterplan and Design Code for Edenfield:**

This is not a Masterplan and Design Code for the village of Edenfield it is a masterplan for Taylor Wimpey's (TW) planning application and does not meet the requirements of Rossendale Borough Council (RBC) local plan and on this basis should be rejected.

The inspectors who agreed to the release of greenbelt identified 11 principles which had to be met for the greenbelt to be released, subsequently RBC adopted these in the local plan. The masterplan and design code proposed does not adequately address these principles and consequently should be rejected on this basis.

In summary the reasons for this are: -

- The initial inclusion of Peel logo was dishonest by TW and hence it should have been rejected immediately until all developers had input to the masterplan
- The fact that the developers Peel or Richard Nuttall had no input into the masterplan means that it is not a comprehensive masterplan for Edenfield as was promised in RBC local plan
- It is merely a tick box exercise quoting documents with no substance about how traffic, road infrastructure, facilities, schools etc. are going to be addressed
- Concerns of existing residents are not being adequately addressed – TW quoted having a consultation however this was rushed in the height of summer with no feedback to emails or social media enquiries. I raised questions with them on both email, Facebook and Facebook messenger but with no response
- The masterplan/design code refers to the plan relating to the comprehensive development of the whole site but as mentioned this cannot be the case as all developers have not been involved
- The phasing proposal is inadequate and does not meet the requirement of RBC local plan. The phasing proposal is that TW and Anwyl proceed first with their development with Peel and Richard Nuttall second. This makes assumptions that Peel and Richard Nuttall would be happy to wait, which would seem unlikely with Richard Nuttall already having planning approved, however a judgement cannot be made as they have not been involved in the phasing, Peel particularly stating how they had no involvement in the writing of. Until all developers are involved in the phasing process the masterplan should be rejected otherwise there will be no suitable phasing and Edenfield will be subject to years of chaos, noise and traffic disruption which will have a negative effect on the whole of the village and those that neighbour and commute within the village
- RBC in their local plan promise a traffic assessment for the whole site which demonstrates how all users can safely and suitably access the 4 sites planned for development, the masterplan does not adequately address this and on this basis should be rejected until a safe traffic plan for the whole site is produced and agreed

- As a resident who lives just off Market Street and has to cross daily the flow of traffic to exit my cul-de-sac, it is already dangerous as visibility is restricted, the increase in traffic will only make this more dangerous
- The masterplan states that improvements to market street need to be made for development of 400 plus houses but does not address what this should be, until this is adequately addressed, presented and agreed the masterplan should be rejected
- The masterplan states that compensatory improvements need to be made but does not adequately address what these are, until these included in the masterplan with sufficient detail the plan should be rejected
- The proposed green play space is inadequate and unsafe. Being at the lower end of the development next to the A56 it will be subject to waterlogging and hence unlikely to be accessible for a significant part of the year. It is also unsafe for young children being directly next to the A56
- The fact that the greenspace is at the edge of the development means that the development is dense rather than broken up by green space, the masterplan should ensure adequate useable green space that reduces density of houses to meet the requirement of RBC local plan and hence until this can be suitably addressed the masterplan should be rejected
- The design code is not in keeping with the current village, it ignores the design code produced by Edenfield Community Neighbourhood Forum in conjunction with RBC, particularly the inclusion of 2.5 storey houses, and should be rejected on this basis
- The masterplan states that there needs to be provision for schools but does not adequately address what this should be, hence until this can be presented and agreed in a more comprehensive masterplan for the whole site involving Lancashire County Council and including all the developers the current masterplan should be rejected

Overall the masterplan omits any mention of arrangements for current residents of Edenfield something that you would expect RBC would require it to take account of.

From an overarching point of view it is expected that masterplan addresses the issues of transport, parking, facilities, noise, pollution, green space, ecology and schools for existing residents as well as the development and hence would ask that RBC take this into account by rejecting the current Masterplan which appears to be done in a tick box approach with no substance and only TW's needs considered until a full comprehensive masterplan can be developed and approved that would go some way to meeting the promises set out by RBC in their local plan and providing reassurance and suitable arrangements for existing residents as well as the development, ensuring that the 11 points upon which the release of Greenbelt was agreed are adequately addressed.

Furthermore it is proposed that on this basis, until a comprehensive masterplan adequately addressing the 11 points detailed in the local plan is produced and agreed, that any planning applications are rejected.

In addition the response above, I would ask that in further considering the future comprehensive masterplan for Edenfield and in deed Rossendale as a whole, consideration be given to the new more recent planning proposals put forward by government and ask that the council reconsider its plans completely for the H66 site and seriously consider Brownfield site development and/or significantly reducing the number of houses proposed on the site, particularly as it is clear from the proposed masterplan that the road and facilities are not sufficient for the size of development being proposed.

From a local resident of 24 years at [REDACTED] Despite raising concerns many times it seems the planning department and counsellors are not prepared to listen to genuine concerns.

It is clear and obvious they do not commute through or live in the village.

My concerns relate to:

Traffic Congestion on Market Street when the Edenfield By-Pass has a problem Edenfield becomes a very congested and dangerous street. Damage to resident cars is apparent as is damage to commuters vehicles. Wagon and Buses have even more difficulty due to the narrowness of market street.

Traffic Congestion on Exchange Street is already causing major local problems with the resident and visitor parking. Deliveries or Refuse collections have not taken place. I am sure emergency vehicles (ambulances and fire tenders) would need to rethink its routing.

Noise Pollution is a problem today but tomorrow would become even a greater problem especially those thundering large wagons already using the village roads.

Environmental Pollution would far exceed village levels but this plan will turn our green environment into a disaster for air quality not just at construction timescales but the minimum 1000 extra permanent vehicles plus the deliveries for those new house holders.

The investment suggested by the developers is just an inducement to turn a blind eye.

The loss of open space to not only its residents but to visitors is just not acceptable as is the opinion by the developers they would create new open space from where?

We do not have the infrastructure for schools (nursery, primary or secondary) to cope with adding school age or younger to the village. Children generally have more accidents on the roads so our solution seems to be put more traffic on the roads with more children is a recipe for disaster assuming of course our emergency response vehicles can get to the incident.

We have no viable health cover in the village today so why don't we make it 100 times worse by just flooding the village with new properties.

Our local traders already loose business to passing customers due to the lack on parking on Market and Exchange Street. Of course the plan to build the amount of new houses will benefit our local tradesman but will it really improve their quality of lives due to reasons given previously.

Other local roads are suffering as well.

The Edenfield Masterplan is a nothing more than a plan putting our village into a Disaster Plan for its residents of today.

DLB

Sent from [Mail](#) for Windows

TO:  
Economic Development Directorate  
The Business Centre,  
Futures Park,  
Newchurch Road,  
Bacup  
OL13 0BB  
[forwardplanning@rossendalebc.gov.uk](mailto:forwardplanning@rossendalebc.gov.uk)

Your Reference: Taylor Wimpey Masterplan & Design Codes

Location: Land West of Market Street, Edenfield, Bury Lancashire

Consultation in respect of a Masterplan & Design Codes submitted by Taylor Wimpey in association with planning application reference number 2022/0451 - A proposed development for the erection of 238 No. residential dwellings (Use Class C3) and all associated works, including new access, landscaping, and public open space within housing allocation H66 of the Adopted Rossendale Local Plan.

Dear Sir / Madam

I write in connection with the above Masterplan application. I have examined the submitted masterplan, and I know the H66 site well. I wish to object strongly to the adoption of this masterplan on the following basis:

- The submitted and subsequently amended masterplan by Randall Thorp on behalf of Taylor Wimpey and Anwyl Land accompanying Taylor Wimpey's planning application falls far short of the necessary requirements in that it does not include all developers or **comprehensive plans for the entire H66 site**, as stipulated clearly in the current Adopted Rossendale Borough Council Local Plan ([SEE BELOW](#))

**EXCERPT FROM [Appendix\\_1\\_Adopted\\_Local\\_Plan\\_Final\\_10\\_Dec\\_2021.pdf](#)  
H66 – Land West of Market Street, Edenfield**

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 Rostron 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 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
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.**

#### Explanation

120 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.

121 **Rossendale Council therefore requires a Masterplan and will work in partnership with key landowners and key stakeholders, including the Edenfield Community Neighbourhood Forum, to ensure a Masterplan is prepared.**

122 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.

123 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.

124 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 and Edenfield and Stubbins Schools. Compensatory measures could also be directed towards footpath and cycleway improvements in the vicinity as set out in the Council's Green Belt Compensation Document.

125 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 northsouth or north east – south west axis, and building heights restricted.**

126 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.

127 **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.

128 **A Health Impact Assessment** will be required to maximise the overall benefits of the scheme to intended residents.

129 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.

130 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 National Highways consider that storing water on site may not be advisable. National Highways may wish to widen the A56 and further discussions with National Highways are advised and if this is possible, this should be addressed by a suitable site layout plan to address this.

131 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.

In short :

- The submitted 'masterplan' does not include the whole site as all landowners are not represented
- The submitted 'masterplan' does not meet the requirements of the local plan (as above), and does not adequately address issues like traffic and flood risk.
- The submitted 'masterplan' does not include the entire site and does not address concerns about phasing and development timescales.
- The submitted 'masterplan' is not in keeping with the character of the village and does not address concerns about ecology, drainage, and the impact on the environment
- The submitted 'masterplan' does not address the fact that there are not enough school places or local services to support development.

Edenfield is a village settlement where development proposals should be considered very carefully. The protection of Edenfield's visual, historic, and archaeological qualities needs to be maintained, and the revised National Planning Policy Framework states that permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions.

An alternative Masterplan for H66 is being developed in consultation with the community (Edenfield Community Neighbourhood Forum) and until such time as this is finalised AND APPROVED, I believe any masterplan application or planning application on H66 should be recommended for refusal.

A recent statement (5<sup>th</sup> Dec 2022) from Rt Hon Michael Gove MP – Secretary of State for the Department for Levelling up, Housing & Communities sets out new measures in the Levelling Up and Regeneration Bill to place local communities at the heart of the planning system. It states (amongst other things) that Community control should be at the heart of planning decisions and in terms of character ... 'Local Authorities will not be expected to build developments at densities that would be wholly out of character with existing areas, or which would lead to a significant change of character, for example, new blocks of high rise flats which are entirely inappropriate in a low rise neighbourhood. .... we must pursue 'gentle densities' as championed by the *Building Better, Building Beautiful* Commission.

I understand that the Edenfield Community Neighbourhood Forum as well as many of my neighbours living in the village of Edenfield share my concerns.

In its current form, this masterplan or any planning application associated with it should not proceed to a planning committee meeting, however if this application is to be decided by councillors in its current form, please take this as notice that I would like to speak at the meeting of the committee at which this application is expected to be decided. Please let me know as soon as possible the date of the meeting.

Yours faithfully

Jason Straccia

[Redacted signature]

[Redacted signature]

[Redacted signature]

[Redacted signature]

5<sup>th</sup> January, 2023.

Dear Sir/Madam,

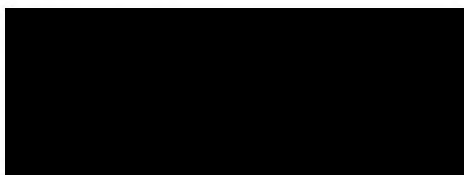
Market Street Masterplan/Design Code and Taylor Wimpey's Planning Application No. 2022/0451 for Edenfield.

I refer to the above application and give below my reasons why the application should be rejected:-

1. Neither the Masterplan nor Planning Application meets the requirements of the RBC Local Plan.
2. The Masterplan does not include the whole site as all developers are not represented.
3. Concerns over the phasing/how the development will be built have not been adequately addressed.
4. There is no comprehensive traffic assessment for the whole of Edenfield.
5. The road infra structure required for development of the whole site is not sufficiently addressed.
6. The Design Code produced by ECNF with support from RBC has not been considered.
7. The scale, density and character of the development is not in keeping with the village.
8. Concerns on ecology, drainage and flood risk are not adequately addressed.
9. There is no detail on the provision of local services required to supplement the development.
10. Sufficient school places to support the development are not adequately addressed.
11. Concerns regarding the environmental impact are not adequately addressed.

I would be grateful if you would consider all these points before coming to a decision.

Yours faithfully,



Jenifer M. Mead (Mrs.)

The Forward Planning Department,

Futures Park,

BACUP, Lancs.



I wish to lodge an objection to the Taylor Wimpey Masterplan.

Primarily this objection relates to the size of this development and the attendant problems that will be felt throughout the village.

This presented plan, whilst purporting to encompass the whole of the site, centres around the initial build of 238 of 400 proposed houses (just less than 60%) and not the whole site. Therefore in my view it does not constitute, even without other issues factored, as a 'Masterplan' at all.

Numerous points become obvious when reading through the associated documents. Here are several:

1. There is no overall Traffic Plan – whether before, during or after build.
2. There is no constructive plan re local schools – see LLC School Planning Team Objection.
3. Initial site access is to be funnelled through one route only – the 'ghost right turn' access point on B6527 Market Street – this is totally inadequate and would result in c. 28 cars from the immediate area being dispersed (only 10 spaces are allocated on site as a compensatory measure).
4. LLFA object and state plans for water run-off are inadequate, both initially and with no future planning put forward – a direct flooding risk to the adjacent A56 by-pass is the logical conclusion to this.

In view of the above I submit that there is in fact no 'Masterplan' in existence and therefore, under the terms and conditions stipulated for this development, no planning application can be considered until this matter is first dealt with.

Ms L. McGlynn

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

I would like to register my opposition to the master plans for the village of Edenfield. This amount of housing planned in an area already struggling with schools doctors and traffic is just not viable. We live in Chatterton and have a lot of run off from the motorway/bypass and building this amount of houses on what is now greenbelt would only exacerbate this problem. There are so many other areas within Rossendale that would be more suitable and allow the numbers of houses built to be spread between a few areas. Such a massive amount in one area is just not viable in this small village

Heather Dodd

[REDACTED]

[REDACTED]

[REDACTED]

Sent from my iPhone

Michael Dewar

[REDACTED]

[REDACTED]

I would like to register my objection to Taylor Wimpey's Masterplan for Edenfield.

400 homes vastly exceed the house growth rate required by the village. It reflects the fact other local communities are not asked to share anything like the same burden of development.

I object to the lack of a risk assessment for the increased risk borne by cyclists travelling through the village, especially those cycling at rush hour. So many houses will vastly increase motor vehicle traffic on already tight roads, with on street parking and existing traffic already posing a dangerous threat. What are the expected increases in mortality and morbidity of vulnerable road users, such as cyclists and horse riders? Why is it considered acceptable to inflict more impatient and thoughtless motor vehicle drivers on vulnerable road users?

If a green field site is chosen, why not develop new additional transport infrastructure, including roads, paths and bridleways away from already congested roads where there is insufficient room for road widening or cycle lanes because of existing buildings.

If a green field site is chosen, please start a new village, so we have 2 villages, rather than one dangerously congested small town.

Edenfield has accepted the Scout Moor Windfarm, even though it amounted to a taxpayer subsidised for profit venture by Peel Holdings, why has paid dividends for Peel Holdings, though certainly not taxpayers, though the recent electricity supply cost spike.

Scout Moor Windfarm represented a generous of all residents around the moor, sacrificing much of the ground nesting bird life they would previously have encountered and enjoyed on walks, runs, bike or horse rides to Waugh's Well and the surrounding moorland.

That sacrifice, made for the good of the planet and Peel Holding's investors has been forgotten, and a still greater sacrifice of green belt land demanded.

Finally, the homes built will be too expensive for many village residents to afford.

Please acknowledge receipt of *this* e-mail by replying via e-mail.

Yours sincerely,

Michael.

This Masterplan should be rejected for many reasons. I would like to highlight the following:

**1.** It does not meet the requirements for such a development as described in the NPPF and the NPPG, for example:

- A development of this size, doubling the size of Edenfield, WILL cause "significant impact".
- The size of our existing village, its character, and its infrastructure has NOT been fully considered
- A largely brick built housing estate on such a scale, with no real "network of green spaces" will NOT be "visually attractive"

**2.** The Masterplan does not adequately address traffic concerns.

- Edenfield has a limited road network often congested by existing traffic, a problem which can also be exacerbated by diverted traffic from the bypass.
- Vehicles from an extra 400 houses requiring access to and from Market Street, at one pinch point, particularly during rush hour, will result in gridlock.
- There is vague reference in the Masterplan to "mitigating measures" to encourage flow, but no actual description of what they will be. This cannot be sorted out sometime in the future, after the houses have been built!
- Exchange Street cannot be widened. Market Street must have on street parking. There are no feasible or acceptable measures that CAN be taken to encourage flow or avoid massive congestion
- What about increased air and noise pollution? The damaging effect of air pollution, particularly on children walking to school, leaving the site at the same time as all the traffic, has been overlooked or ignored.
- I also have concerns for occupants living so close to the bypass who will, even with buffering measures in place, still have to put up with air pollution and the constant drone of traffic day and night.

**3.** Lack of adequate infrastructure has not been adequately addressed.

- Schools are at capacity and can only be extended by taking more greenbelt!
- Doctors/ Dentists are full. Water pressure in an old antiquated system is poor.
- Concerns about drainage and flood risk are huge in Edenfield, re the bypass, and certainly in neighbouring villages lower down the valley.

**5.** The Masterplan should include all the developments and take account of how they will all affect the whole of Edenfield. One site in isolation as in this "Masterplan and Design Code" should not be considered.

- A Masterplan/Design Code must be drawn up in consultation with Edenfield Community Neighbourhood Forum.

**6.** Lastly, I want to make clear I am not anti-development. Villages do and should evolve. There has always been housing development in Edenfield. Pubs have become flats. A garage is now a row of rentals. A strip of land overlooking the cricket pitch now has a row of large five bed properties on it. Pockets of housing have been built without massive disruption, without fifteen years of building work or the need to

extend the school! There has always been enough housing on the market to meet all requirements of people wishing to live in a smallish village out in the sticks! Please reject Taylor Wimpey's Masterplan/Design Code.

My Name is Elizabeth Stooke

Address: [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Janet Campbell  
[REDACTED]  
[REDACTED]  
[REDACTED]

Here is my objection to the Edenfield Masterplan:

Market St will become even more of a bottle neck than it already is, this will increase; Car fumes and pollution and be detrimental to health.

One way in and out for all those houses, outcome as point made above.

No infrastructure:

Our doctors and dentists are already full to capacity and we don't even have any in the village.

Police, Edenfield on the greater Manchester/Bury border and although Edenfield is Rossendale have a Bury postcode, previously both GMP and Lancs police dispute who should attend - this will increase, not good if an emergency!

Schools are already oversubscribed.

More pollution and noise and disruption whilst builds are being constructed will create mental health issues.

Not enough public transport as it is so people won't use it which will increase traffic volume further.

Flooding a major issue. Water down to the bypass and beyond into the valley and on to Strongstry, Chatterton and beyond and already flood areas, this will increase their flood risk.

Pollution = increased respiratory disease increasing demand on an already crippled NHS.

Very few facilities in the village so people will need to travel out toward the bigger towns = more noise and pollution and clog our roads in and out of Edenfield even more.

The motorway/bypass network is already clogged up and makes travelling in rush hour very stressful, add an accident and Edenfield becomes gridlocked. Residents can't then Fermin or out add all these extra homes and it will only compound it further.

Janet Campbell

Sent from my iPhone

Dear Sirs,

I would like to register the following comments, with regard to the above registered Planning Application.

It would appear to me, granting the Planning Application for the building of over 400 hundred new houses, on previously Green Belt land, is an imposition upon the residents of Edenfield. There is clearly a lack of clarity; is the proposed Masterplan going to be adhered to, or are, the rules being side stepped, or indeed made up as we go along, to favour the largest developer of this site?

When I have tackled projects in the past, I soon realise, I have to prepare well in order to execute a successful outcome. Why is this planned development so different, surely infrastructure needs to be carefully thought through, the traffic is a realistic problem today, it will be more so in the future, as a result of this development?

The environment, so important in today's world, is also an important consideration with both ground and air pollution relevant for such a large development. Where is the consideration in the planning, for these points to be factored into the equation?

There are eleven points the council agreed are important criteria for the development of this land into housing. The construction companies do have a responsibility to ensure these are adhered to, as do the Planning Department of Rossendale Council.

At the moment, I see little consideration for the views of the residents of Edenfield, these need to be taken into account, after all, those of us who choose to live here, have to suffer the consequences of those decisions, that affect our lives in the future.

Yours sincerely,

Vincent Brady

## I object to the Taylor Wimpey Masterplan - Land West of Market Street, Edenfield (Allocation H66)

Taylor Wimpey are calling this a 'Masterplan' but in reality it's not as it only relates to one Developer rather than including all of the other Edenfield Key landowners. Rossendale Council therefore requires a Masterplan that will work in partnership with key landowners and key stakeholders, including the Edenfield Community Neighbourhood Forum, to ensure a comprehensive Masterplan is prepared and abides by the criteria as set out in the councils 'Local Plan'.

In order for 400 plus houses to be developed there must be a plan that will satisfy the local community in all aspects of community life and this so-called 'Masterplan' does not.

The lay of the land and the infrastructure of the roads in and out of the village is challenging at the best of times, with excess water emanating from bad weather running off the hillside and more importantly travel chaos. Parking is also a serious issue. Myself and my neighbours are so frustrated by the amount of people who come to park up in our small cul-de-sac for hours on end. This will only get worse for the village as a whole given the time scale of the imposed construction works. We have been led to believe this could possibly be for up to 10 years. With the burden of traffic that we have to endure at the moment one can only imagine what it will be like when construction traffic is thrown into the mix.

Taylor Wimpey implied in their 'Statement of Community Involvement' that a masterplan and design code should be agreed before planning applications can be made and that planning applications should be supported by transport assessments including traffic mitigation measures. Taylor Wimpeys' Masterplan in its current form should not be approved until the local community is totally satisfied with all the underlying concerns that remain at the heart of the resistance to this development. I believe that TW actions have not been transparent and misleading. The first TW Masterplan was the size of a postcard and pushed through our letterbox. Most residents didn't even get one.

I object to the Masterplan and therefore will be objecting to the Planning Application also.

Mrs Gill Hillel, [REDACTED]



Hi there,

I wish to lodge an objection to the Taylor Wimpey Masterplan.

Primarily this objection relates to the size of this development and the attendant problems that will be felt throughout the village.

This presented plan, whilst purporting to encompass the whole of the site, centres around the initial build of 238 of 400 proposed houses (just less than 60%) and not the whole site. Therefore in my view it does not constitute, even without other issues factored, as a 'Masterplan' at all.

Numerous points become obvious when reading through the associated documents. Here are several:

1. There is no overall Traffic Plan – whether before, during or after build.
2. There is no constructive plan re local schools – see LLC School Planning Team Objection.
3. Initial site access is to be funnelled through one route only – the 'ghost right turn' access point on B6527 Market Street – this is totally inadequate and would result in c. 28 cars from the immediate area being dispersed (only 10 spaces are allocated on site as a compensatory measure).
4. LLFA object and state plans for water run-off are inadequate, both initially and with no future planning put forward – a direct flooding risk to the adjacent A56 by-pass is the logical conclusion to this.

In view of the above I submit that there is in fact no 'Masterplan' in existence and therefore, under the terms and conditions stipulated for this development, no planning application can be considered until this matter is first dealt with.

Regards,

Victoria Stanley

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Karl Stanley

[REDACTED]  
[REDACTED]  
[REDACTED]

12 January 2023

### **Objection to Edenfield Masterplan**

- Neither the Masterplan/Design Code or Planning application meet the stated requirements of the RBC Local Plan
- The Masterplan clearly does not include the whole site as all developers are not represented
- Concerns over the phasing/how the development will be built have not been adequately addressed
- There is no comprehensive traffic assessment for the whole of Edenfield - within the Masterplan by definition, it should involve all developers and include an overall Transport Assessment alongside the planning application. Market Street is used as the M66/A56 relief road and is already congested, any additional vehicles entering Market Street will exacerbate the problem and increase the safety risks.
- Has consideration been given to the impact of the increased traffic levels, not only on Edenfield, but also Helmshore, Haslingden and Rawtenstall, for example the roundabout in Rawtenstall?
- The Design Code produced by ECNF with support of RBC has not been considered
- The scale, density and character of the development is not in keeping with the village - in a village of approx. 800 houses, how can an increase of over 400 houses be proportionate and/or reasonable?
- Concerns on ecology, drainage and flood risk are not adequately addressed. Where is the water, currently slowed by the fields going to go? The A56 is already prone to a lot of surface water, draining down from Edenfield via the current fields to slow the rate, what will the impact of this Masterplan be? The A56 is a main access point, not only for Edenfield, but for Rossendale. Putting a few cycle paths doesn't seem to balance the carbon footprint of building a further 400+ houses. Have the residents of Irwell Vale been advised of any increased flood risk?
- There is no detail on the provision of local services required to supplement the development. What about doctors/dentists/shopping? There is no provision within walking distance.
- Sufficient school places to support the development are not adequately addressed.
- Sufficient school parking, if you increase the capacity of the school, where will the teachers/staff park? Where will existing staff who park on Manchester Road park?

- Concerns regarding the environmental impact are not adequately addressed. Given the children clearly cannot be accommodated at Edenfield school, where is the assessment of the environment impact of all the car journeys for transporting the children twice a day, each school day? Where is the environmental information re the increase in pollution, not only by a further 800 vehicles, but also the standing traffic that will result in delays?
- Generally parking is an issue throughout the village.

Clearly, the current Masterplan, is not a Masterplan and should be rejected.

Yours faithfully

**Graham Jewell**

I object to these plans because, I believe there is no infrastructure such as schools, doctors road system to deal with all these new properties Lavinia.

12 January 2023

## **To Whom It May Concern**

### **Objection to Edenfield Masterplan**

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- Generally parking is an issue throughout the village.

Clearly, the current Masterplan, is not a Masterplan and should be rejected.

Yours faithfully

**Claire Jewell**

[REDACTED]

[REDACTED]

[REDACTED]

Victoria strachan

[REDACTED]  
[REDACTED]  
[REDACTED]

I object to the building of 400 houses in Edenfield. I lived in edenfield growing up and the village was at capacity then. There are no school places available and parking is a nightmare. Travelling to see my parents takes far longer than it should and the village is regularly grid locked. There is a lack of access to the proposed sites.

I don't understand how planning can be granted for these homes when if an individual puts in for planning permission to even get render then we are refused.

There is already a serious risk of flooding in the area, building g more homes to an already inadequate sewage system is a recipe for disaster. The building work will change the water table and lead to widespread flooding which will be pushed into areas that already suffer from floods.

A tiny village which has over the years seen development of land to create more housing being subjected to generic poorly built shoe boxes crammed into a space with no access and amenities.

Traffics a nightmare already!

Sent from my iPhone



Mr Jacob Landers  
Rossendale Borough Council  
Forward Planning  
Futures Park  
BACUP  
Lancashire  
OL13 0BB

**Our ref:** NO/2022/114944/01-L01

**Date:** 13 January 2023

Dear Mr Landers

**MASTERPLAN AND DESIGN CODE (NOVEMBER 2022)**

**LAND WEST OF MARKET STREET, EDENFIELD (ALLOCATION H66)**

Thank you for consulting us on the following document:-

- *Land West of Market Street, Edenfield (Allocation H66) – Masterplan & Design Code November 2022*

We have considered the above document in relation to our remit and the National Model Design Code and [associated guidance](#). We consider that in relation to the environment and climate change, the code could be more ambitious.

1. There is no consideration of the following matters (as identified in the national design code guidance) in the context of the relevant policies within the adopted Rossendale Local Plan:

*Energy*

- Energy efficiency standards and whether /how they apply to all or part of the area, if exceeding building regulations
- Neighbourhood energy design including passive design, orientation and form factor
- Renewable energy strategy
- Local low energy networks

*Sustainable Construction*

- Embodied Energy targets
- Whole life carbon targets
- BREEAM or other best practice targets as appropriate

Environment Agency  
PO Box 519, South Preston, Lancashire, PR5 8GD.  
Customer services line: 03708 506 506  
[www.gov.uk/environment-agency](http://www.gov.uk/environment-agency)

Cont/d..



## **OBJECTION TO THE 'MASTERPLAN': PROPOSED DEVELOPMENT – LAND TO THE WEST OF MARKET STREET, EDENFIELD (H66)**

### **Overview**

The Planning Application (2022/0451 to which the 'Master Plan' relates), logically and in accordance with Rossendale Borough Council's own procedure, should be judged against a previously submitted Master Plan, not one presented concurrently as is the case in this instance. Furthermore the document described as a 'Master Plan' is self-evidently no such thing. Rather it is a supporting document for the planning application by Taylor Wimpey, is limited to their aspirations as the main developer and does not include the contributions of other developers. It therefore contravenes the first principle of Local Planning Policy H66 :

'The comprehensive development of the entire site is demonstrated through a master plan with an agreed programme of implementation and phasing'

(It should be noted that the legality or otherwise of such attempts to subvert the correct course of action may be the subject of a separate adjudication.)

### **The Plan**

The *Vision* of the document is described as seeking to:

Create a vibrant, sustainable residential scheme on this strategically important site

Create a safe and legible development which respects existing landscape and heritage features

Provide an appropriate range, form and density of housing to meet local needs

Provide areas of safe and attractive public greenspace which will provide for non-vehicular movement, recreational greenspace and ecology

Protect and enhance the setting of the locally valued heritage assets

Maximise opportunities for improved pedestrian and cycle connectivity through the Site

These extremely limited objectives have no local relevance or indeed connection and could be applicable to anywhere in the country (or even the continent). Moreover 'plan' does not meet even these uninspiring ambitions.

### **The Context**

The document purports to be a 'masterplan' which "sets out a transparent and methodical approach to the masterplanning process that responds to planning policy and best practice in urban design" (page 4). This guidance sets out standards and criteria which need to be followed and observed in order to comply with requirements. The 'masterplan' does neither. It is primarily an inward looking document concerned with describing vague generalities, applicable to almost any construction (apart from a passing acknowledgement of significant features within or immediately adjacent to the site), paying lip service to national and local specifications but in reality doing little or nothing to address the issues raised – either by national/local standards or the disastrous effect on the local environment.

This is apparent in both the approach to, and description of, the site, its location, its content and its impact. The document is frequently illustrated with stunning photographs of local beauty spots and attractions which the proposed development will either destroy or seriously impede. Equally, much is made of the added value the development will provide in terms of play and green areas, completely ignoring the irony that in so doing it will destroy existing amenities, replacing them with a fraction of current capacity.

While from a planners' perspective and as paper exercise, the proposed plan may appear to be a logical infill development, the reality – as the maps and plans of the area show vividly – is a gross distortion of the current infrastructure. A village of a little over 2,000 people will be dwarfed by the almost instant addition of another 1,200+ via an urban intrusion into a rural setting, in total contrast to Edenfield's long and gradual growth.

As an example of a 'roadside village', one of the five recognised village types, its developed character is therefore linear rather than grouped. The proposed layout of this development is in complete contrast, being rounded and finite and of alien urban character. This has resulted in an urban layout being 'cut and pasted' into a rural environment to which it is totally unsuited.

Moreover simplicity is a key factor in village character and is a distinguishing feature from small towns. The rural feeling of a village depends upon small and subtle elements, modesty and lack of smooth and mechanical finish such as are found in the town and, above all, on the harmony of the construction materials with the countryside.

The English village tradition is both informal and orderly combining the unitarian with charm and pleasantness. The qualities of a village are usually accidental and arise from long and slow periodic processes of natural growth in response to perceived local needs. These qualities cannot be recreated in a large and overpowering wave of instant development the scale, density and character of which are patently at odds with that of the village and its environs.

The proposed housing itself while professing to be bespoke and unique to the village is clearly nothing of the kind, for instance the house types listed include terraces but none are visible on the plans. The development claims to reflect the local environment but illustrations shown indicate typical urban housing with its limitations, density and 'economic' construction materials providing a dull and unimaginative environment. Nor does there seem to any attention paid to the latest innovations in energy efficiency and/or options that almost eliminate heating and running costs.

### **Wider environment**

Though the question of school capacity is raised by local planners, it is completely ignored as are the associated capital and revenue costs of the acknowledged need for primary school expansion.

Similarly the need for additional primary and secondary health care facilities which will be required, both in Rossendale and at acute trusts in Lancashire and Greater Manchester is not mentioned.

Meanwhile the fundamental and crucial issue of travel from the site to all destinations, but primarily commuting to the south, is the elephant in the room. The single most important feature of the entire development merits one paragraph and refers only to accessing the site, i.e. an introspective viewpoint. No mention is made of the chaos that will ensure as

hundreds of vehicles attempt to leave the site in the morning rush hour or return in the evening. The brief reference to the need for transport assessment is just – a brief reference. The flawed document that has been produced for the planning application does nothing to resolve any of these concerns, despite 100s of tables and diagrams all based on NINE hours of traffic observation.

More specifically with reference to transport assessment the document states they will be required to provide an assessment ‘demonstrating that the site can be safely and suitably accessed by all users’ and that a number of access points will be needed. The plan shown in the document lists primary access from Market Street and, supposedly from Exchange Street, with the latter also providing proposed emergency vehicle connection. Without drastic parking restrictions on Exchange Street this will simply not be possible.

Local planning policy also tasks the developers with agreeing suitable mitigation measures for Market Street ‘to accommodate additional traffic’ and making improvements from Blackburn Road to the mini-roundabout. TW response appears to be to suggest double yellow lines around the Market Street access and offer 10 parking places within the site (which would be immediately occupied by additional residents’ and visitors vehicles). What happens to the other 50+ cars and vans parked daily along the length of the road is unclear. Vague reference is made to off-site parking but never explained.

Meanwhile much is made of non-vehicular and public transport and how the development will improve connectivity. This cynical attempt to wrap the proposal in green credentials is shameful. The idea of public rights of way generally envisages a stroll through the welcoming countryside, not urban housing, which will destroy the existing visual amenity associated with the current rights of way. Meanwhile we are supposed to be thankful for this prospect! Similarly the ‘encouragement’ of cycling is laughable. A few cycle sheds will be little compensation for the reduced safety and hostile environment engendered by a huge increase in motorised traffic on the surrounding road network. (Though may provide safe storage for bikes that cannot be used!)

Public transport also merits one paragraph which is probably a fair indicator of its usefulness! The village is poorly served but as the roads will be gridlocked it is probably not of great relevance. No mention, of course, is made of rail links as there are none that are accessible without travel by other means

The whole tenure of the plan shows no interest in the impact on local amenities outwith the site and appears to contravene current national guidelines on housing by the insensitive imposition of urban character in a rural setting (appearing to contradict the recently quoted aspirations of the Secretary of State for Communities calling for development to be created with ‘heart and soul’).

**Finally the plan, initially for 238 houses in Edenfield, is not justified by local demand, and is not required by national policy. Why then is the application being made?**

Dr Ann-Marie Coyne PhD, MSc, BA (Jt Hons) Michael J Coyne Dipl.Arch.(Dist).RIBA



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Public transport also merits one paragraph which is probably a fair indicator of its usefulness! The village is poorly served but as the roads will be gridlocked it is probably not of great relevance. No mention, of course, is made of rail links as there are none that are accessible without travel by other means

The whole tenure of the plan shows no interest in the impact on local amenities outwith the site and appears to contravene current national guidelines on housing by the insensitive imposition of urban character in a rural setting (appearing to contradict the recently quoted aspirations of the Secretary of State for Communities calling for development to be created with ‘heart and soul’).

**Finally the plan, initially for 238 houses in Edenfield, is not justified by local demand, and is not required by national policy. Why then is the application being made?**

Dr Ann-Marie Coyne PhD, MSc, BA (Jt Hons) Michael J Coyne Dipl.Arch.(Dist).RIBA





From: Mrs Heidi Moran [REDACTED]

Re: Objection to Edenfield Masterplan

Re: Objection to Taylor Wimpey Planning Application Ref No. 2022/0451 Address and Site: Land West of Market Street Edenfield, Lancashire

There are several valid reasons why this Planning Application should be turned down:

1)

New homes should be built on Brownfield Sites of which there are ample examples within Rossendale. They should NOT be built on Green Belt Land.

2)

The Council should implement a holistic approach to Planning Applications for Edenfield by looking at the various plans from ALL Developers in Edenfield. An individual approach by Taylor Wimpey in isolation is short sighted and excludes access to the full impact on the Local Community.

3)

As it stands, the Edenfield Infrastructure is unable to support these additional homes due to

- Existing traffic bottleneck along Market Street
- Serious danger to primary school children attending Edenfield Primary School on Market Street

a) from parked cars on both sides of a narrow Market Street plus

b) lack of stopping/parking possibilities for parental access

c) already existing traffic bottleneck of "flowing" traffic in addition to the above.

4)

Lack of Community Support Facilities and Services and amenities such as shops, doctors, play areas, green sites, parks etc. Schools are already FULL and appointments to further afield doctors/dentists are near impossible for the existing residents. Neither are doctors/dentists in nearby surgeries accepting new patients. What are we doing to our children? Please consider!

5)

FLOODING

A huge problem already for the communities of Irwell Vale, Strongstry and Chatterton lower down the valley. The effects of new developments with consequential effects on additional surface and ground water into the River Irwell are immense as the ongoing efforts of the Environment Agency outlined in their Report for "Irwell Vale, Chatterton and Strongstry Flood Risk Management Scheme are demonstrated. This is also documented in more recent large impact flooding in 2008, 2012 twice, 2015, 2017, two very near misses in October 2020 and January 2021 (Storm Christoph).

As a personal plea from a resident of Irwell Vale:

Will the Council on this occasion have the foresight and understanding to OBJECT and TURN DOWN this Wimpey Planning Application (remembering the then Lancashire Council granting building applications in 1970 on the FLOOD PLANES in Irwell Vale which are now Meadow Park, thus causing flooding and misery to those residents over and over again ).

Respectfully Yours,  
Heidi Moran

[REDACTED]  
Sent from my iPad



13 January 2023

Forward Planning Team  
Rossendale Borough Council  
Business Centre  
Newchurch Road  
Bacup  
OL13 0BB

**Letter sent by email only to: [forwardplanning@rossendalebc.gov.uk](mailto:forwardplanning@rossendalebc.gov.uk)**

Dear Sirs

**Edenfield Market Street Master Plan/Design Code**

The Rossendale Local Plan (RLP) sets out various criteria for the development of a Master Plan and on this we comment as follows.

Having considered some of the key elements of the RLP it is clear that the following matters needed to be addressed in the production of this Master Plan

1. The site needed to be considered in its entirety.
2. There needs to be an agreed programme of implementation and phasing.
3. A Transport Assessment is needed that looks at the whole of the site known as HS66.
4. Implementation of development must be in accordance with an agreed Design Code/Master Plan across the whole development.
5. The exceptional circumstances that enabled this land to be released from green belt were intrinsically linked to the need for it to be a well designed scheme taking full cognisance of the surrounding hills etc. – a scenario only achievable by adopting a “total site view” perspective.
6. Rossendale Council requires there to be a Master Plan.
7. The term Master Plan is defined as being a comprehensive plan of action at all levels and with all parties being involved.

The above points are a “snapshot” of what we see as key issues but the one common thread that runs through these points is that the Master Plan must look at the whole site and the fact this is not the case is very much “the elephant in the room”

Given that the Master Plan that was called for in the RLP has on the face of it not been produced to the RLP requirements must by definition mean that there is no adequate Master Plan in place.

A further issue is that the RLP stipulated that no individual Planning Application could be considered in advance of a fully agreed Master Plan being in place that was in itself fully comprehensive and in accordance with the requirement of the RLP and any other matters required by Rossendale Council.

Based on the above we are bound to conclude that the Market Street Master Plan/Design Code fails to be the comprehensive document that is the very essence of its title and accordingly it fails in its purpose and should be rejected

By way of further comment we confirm that we fully support the views and objections more comprehensively put forward by the Edenfield Community Neighbourhood Forum (ECNF).

Yours faithfully

David Fisher and Sandra Fisher

Dave Clark



Here is my objection to the Edenfield Masterplan, Reference 2022/0451 Land West of Market Street, Edenfield, Lancashire:

As a resident of the village currently, I would like to voice my concerns about the current Masterplan for Edenfield. The process used so far has NOT been community led, and has in fact ignored community concerns and valid comments about the impact of a mass programme of house building in regards to its impact on current residents, pollution, infrastructure and the environment.

However, despite these concerns, Rossendale Council and Taylor Wimpey, have pushed forward with their plans, ignoring the community (despite claiming its a 'community led' initiative). At its heart, this is a programme based upon greed and short-sightedness. Greed on behalf of Taylor Wimpey, who are putting shareholder profits ahead of any community, and a local council blinkered by Government targets and opting for the quick fix offered by Taylor Wimpey to show they are towing the line.

So, we are now at the stage where this 'community led' programme is happening (even though the community has objected) and is claiming to want to engage with the community they are looking to undermine and damage, offering us, as residents, the opportunity to put forward our views (probably for them to AGAIN ignore). I include below a summary of points that need to be considered (and have not, so far, seemed to have been considered by the local council).

Market Street (B6527) is barely suitable for the current volume of traffic that uses it today (there are already times where the road is a bottleneck in the village centre), the addition of over 400 new houses directly opening onto Market Street (and the additional 400 plus vehicles) is unsustainable, will lead to greater congestion at rush hours (commuters and school journeys), will increase pollution (there is a primary school on the same road, car emissions will affect young children adversely), will affect local wildlife (including bat populations) and lead to greater flooding of the Irwell (situated in the valley directly below the Masterplan location).

Where is the consideration for infrastructure? 400 new houses, presumably family homes, as well as increasing traffic, will require investment in infrastructure. Edenfield Primary has limited capacity to expand. Stubbins Primary, is again limited in space to expand. Both schools are at capacity - adding 400 new houses, will add about 20% to the number of school age children (based upon the current number of houses in the catchment area). Where will the children from these new houses be schooled? Does the council (and Taylor Wimpey) have plans to build a school as part of the Masterplan? Has the long term viability of this plan been considered beyond Taylor Wimpey's "let's make a quick profit" and the Council's "let's just get some houses built to meet a quota"? For secondary school, children are reliant upon bus services or parent's cars. The current bus services are barely sufficient for current use during peak times, has consideration been provided to include additional bus services to help children get to school, and has thought been given to the increased traffic buses and parent drop-off will have on local roads?

Beyond schooling, where is the planning in this 'Masterplan' for local doctors, or dentists - these services are already oversubscribed locally (and locals already have to leave the area to access these services) - is the Masterplan including provision for a GP practice of some kind?

Where will the new residents shop? Again, the infrastructure within the village is limited, a small butcher, baker and convenience store. 400 new households will be required to add more cars to the road to obtain their weekly groceries, again adding to the pollution and congestion.

Edenfield is on the border of Greater Manchester and Lancashire - Police, Fire and Ambulance services are all stretched to service this location, impacting response times for emergencies and crime - with another 400 plus houses this will become even more acute - especially with increased traffic on the local (unsuitable) 'main road' running through the village.

Air and noise pollution will increase, we understand the need to increase housing to meet a growing population, but choosing greenfield sites (because they deliver greater profit to the builder) is just another indication of the short-sightedness of the Masterplan to deliver profit for the builder and to damage the local community. Pollution increases will negatively affect local residents, both their physical (respiratory) and mental health (negatively affecting sleep and wellbeing) - has this been factored into the Masterplan and are there provisions to assist local people with greater access to healthcare services as a direct result of the planned programme?

Flooding of the Irwell is a major issue. Housing in Irwell Vale, Chatterton, Strongstry and Stubbins (all supposedly communities that the Council is here to support) already have regular concerns about flooding every winter - despite efforts to prevent flooding. Adding 400 plus houses, which will reduce natural drainage and increase storm surges into the Irwell will see the preventative measures completely undermined. Has efforts to mitigate this been included in the planning? Or is it a case of waiting for the inevitable damage to property in those communities on the flood plain and then trying to figure out a solution?

Has a full impact on local wildlife been investigated? There are a number of native species who live in and around the village, or which use the green spaces as safe corridors for their movements. Animals such as bats, owls, and deer are common locally - what will the impact be on these populations?

For all of these reasons I am objecting to the current Masterplan and I am requesting the council pause, to look at the impacts detailed above, and provide suitable solutions to the detrimental effect the Masterplan will have.

I did start this email with the thought of just listing 'objections', but as I began writing I realised that simply listing objections isn't enough - the impacts are real, the impacts are likely to be dreadful for the local community, and therefore I have written what my wife refers to as 'a novel'. But this is the level of my disgust with both the Council (those we elect to do the right thing for us, to represent us, to support us, to assist us) and with Taylor Wimpey (an organisation who has repeatedly pressured the national government to reduce the 'red tape' around planning so that they can take advantage of local councils and communities -

damaging our trust in those we elect and damaging our communities and environments - just to make a quick profit).

It would be nice to think you will respond to this, but I have my doubts, as I have my doubts that my concerns, and those of all others who object, will be even considered.

Kind Regards,  
Dave Clark

Amy Clark



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Kind Regards,  
Amy Clark



Erena Pillitteri

15 January 2023

Dear Sir/Madam

**Land West of Market Street, Edenfield, Lancashire**

I am writing in respect of the above planned development and wanted to make you aware of my strong objection to this.

I have several concerns regarding the development which I do not believe have been adequately considered by the council or developers. Firstly, neither the Masterplan nor the Planning application meets the requirement of the Rossendale Borough Council's Local Plan. I also note that the Masterplan does not include the whole site as all developers are not represented. There are a number of concerns about how the development will be built and I do not believe these have been adequately addressed.

I am also deeply concerned about the infrastructure of the village and how development of so many houses will affect this. We do not have a doctors' surgery, dentist, or many amenities which will be required for a development of this size. Surgeries and dentists in Ramsbottom are already overrun, this will just add extra pressure which I do not believe they can cope with. Schools are again another concern and I do not believe there's any real consideration here either.

One of my most prominent concerns are the road issues in the village. Market Street is the only road in and out of the village. It is a narrow road which is very very busy during rush hour and during school pick/up drop off times. As a Market Street resident, our only parking option is on the main road. I have two young children (2 year old and an 8 month old) and getting my children in and out of the car is already very challenging and dangerous at times. I fear the development will only exacerbate this and put the safety of my children at risk. I am very very worried about how I will manage safely getting my children in/out the car once the development starts.

Another big worry I have is parking. As mentioned above, our only parking option is on Market Street. I've already had my car damaged numerous times due to the busy road, this is only likely to increase with the development. Like many other residents, we have two cars, this means we need to park one car on the opposite side of the road. I imagine we will lose this parking if the development starts and I am concerned about where we will park our second car. Again, concerns about tramping my children across an even busier road springs to mind here.

I do not understand why the green belt land needs to be used. There's plenty of other land available which is not green belt. I imagine the reason for this is the desirable location which means higher prices which can be charged for housing – this is not a good enough reason.

To myself, and many other Edenfield residents, this planned development is just another example of the council cashing in on a big development and not properly considering the impact on the local community. The developers too are only concerned about the money involved and residents' concerns are pushed to the bottom of the pile and disregarded. I am asking you, whoever is reading this, if this was your village, on the road where you lived, would you lie back and let this happen? No probably not. So why should we?

I really do hope you listen to our concerns.

Regards

Erena Pillitteri

David Dewhurst  
[REDACTED]  
[REDACTED]  
[REDACTED]

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I really do hope you listen to our concerns.

Regards

David Dewhurst

I would like to make the following comments on the Masterplan submitted relative to H66 land west of Market Street, Edenfield.

Until recently the H66 land had the benefit of Green Belt protection. The benefits of Green Belt status are generally accepted in terms of preventing urban sprawl, providing a green space for all to enjoy, clean air, flood mitigation, the environment, climate change and wildlife. Green Belt status should only be withdrawn in “exceptional circumstances”.

When it was originally proposed by Rossendale Borough Council (RBC) that the H66 land be removed from the Green Belt there was almost universal opposition from local residents who were not only in principle against the taking of land out of Green Belt but also extremely concerned about the practicalities of such a large area being turned over to housing in what is a small village with existing traffic issues, schools already oversubscribed and little in the way of local amenities able to cope with a significant influx of new residents. Sadly, the views of local residents were considered of little importance by a Council frightened of the consequences of failing to have a Local Plan in place, a Central Government, and its policies continually in disarray and national house builders motivated by profit. No reasons were forthcoming from RBC as to the exceptional circumstances for removing the H66 land from the Green Belt. The plan was considered by the independent Planning Inspectorate who also failed to identify the exceptional circumstances but did recognise some of the concerns of residents as to the many practical difficulties faced.

Following on from the above the Planning Inspectorate felt that RBC should modify its draft Local Plan in respect of Edenfield such that *“development of approximately 400 houses would be supported provided that”* certain conditions were satisfied number 1 of which was *“the comprehensive development of the entire site is demonstrated through a masterplan with an agreed programme of implementation and phasing”*. Number 2 condition was that *“the development is implemented in accordance with an agreed design code”*. Number 3 condition was that there is a Transport Assessment for *“the site”*. A further eight conditions were also detailed relating to Heritage, Design and Layout. Ecology, Compensatory improvements, Geotechnical issues, Schooling, Noise and Air quality and Potential Road widening of the A56. All these modifications were fully accepted by RBC and incorporated into the final version of the RBC Local Plan formally adopted in December 2021.

Furthermore, the Planning Inspectorate put forward the following explanatory wording for inclusion in the Local Plan *“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, this was accepted by RBC and incorporated into the final version of its Local Plan formally adopted in December 2021.

There is a strong feeling amongst the residents of Edenfield that their views and contentions about the difficulties of developing H66 have so far been ignored. However, the wording of the Local Plan at least gave some hope that before any development commenced on any part of the site the matters identified by the Planning Inspectorate would be properly and fully

addressed. As a result, it was hoped that areas of concern would be dealt with and satisfactorily resolved and that, whilst not welcoming the loss of Green Belt land, residents might, at least, find that any development would be undertaken in the best possible manner. The Masterplan submitted totally fails to do this in that; -

- It clearly does not even attempt to cover the entire site. Indeed, it seems the input from landowners other than Taylor Wimpey is almost non-existent. Two landowners are identified but seem to have had no involvement and one party seems not to be a landowner but an agent thereof potentially with insufficient authority to bind the landowner.
- There is no agreed programme of implementation and phasing. Indeed, quite the opposite in that it is suggested all landowners proceed independently of each other and potentially simultaneously with each other.
- There is no agreed design code. Again, quite the opposite in that it is suggested that all landowners will effectively proceed independently of each other. The design code prepared by ECNF in conjunction with RBC has been ignored.
- Its stated purpose (paragraph 1 on what is thought to be page 8) is to deal only with points 1 and 2 of the H66 policy conditions in the Local Plan. It needs to deal with all 11 conditions and for the entire site. Once this has been achieved they would not need to be dealt with again in individual planning applications which should simplify the process for all concerned and lead to an overall better outcome.
- It is barely a plan of any sort. The section “A landscape-led Masterplan” (on what is thought to be page 38) includes in the key “Land to come forward as later phase” and various “indicative” locations. A few pages along (on what is thought to be page 42) it includes some “general” principles for Build Form and Urban Design and on the following pages (thought to be 44, 45 and 47) some “indicative” character for Edenfield Core, Chatterton Fringe, Chatterton South and Edenfield North.
- The proposed layout for the Taylor Wimpey owned land appears to be the opposite of a “*well designed scheme that responds to the site’s context*”. Indeed, it seems to be the opposite being a site consisting of the maximum number of houses possible without any regard for the fact that Edenfield, and in particular Market Street, is a ribbon development
- Using the limited information supplied it can be seen that the number of houses proposed (238 for part of the H66 site) is excessive and the proposed design is out of character with the existing properties on Market Street which are a variety of stone-built houses/terraces/cottages in a rural setting.

The Masterplan as produced falls considerably short in satisfying the criteria in the RBC Local Plan and considerably short of the legitimate expectations of existing Edenfield residents. As such it should be rejected as being not fit for purpose. It follows that in the absence of a satisfactory Masterplan any applications for planning permission on the H66 site should be similarly rejected.

Mervyn MacDonald (15 January 2023)

Dear Forward Planning and Planning departments,

I am writing to express my objection to the Master Plan and Planning Application 2022/0451 submitted by Taylor Wimpey. By ignoring both the council's Local Plan and Design Code, Taylor Wimpey has demonstrated its inability to provide developments that meet local needs or address local concerns. I believe that both the Master Plan and the associated planning application should be rejected until these issues are addressed.

I have detailed reasons for my objection which include:

- Neither the Master Plan or Planning Application meet the requirements of Rossendale Council's Local Plan and Site-Specific Policy (SSP) for development of site H66.
- A comprehensive Master Plan for the entire site, including all developers, has not been presented.
- The Site-Specific Policy (SSP) issued by Rossendale Council for development on site H66 includes numerous provisos such as requirements for a full biodiversity assessment, sensitive landscaping, compensatory measures for loss of green belt, a transport and travel plan as well as increases in school capacity. None of these conditions have been met.
- Traffic congestion in Edenfield is a problem for residents and those passing through. The Master Plan submitted by Taylor Wimpey does not include detailed plans for traffic mitigation agreed with residents and the council highways department.
- Flood risk has not been fully addressed in the Master Plan and Planning Application and the use of SuDS has the potential to cause landslips which could adversely affect the A56..

I urge the council to reject this planning application until these issues are addressed in full.

Thank you for your time and consideration.

Yours sincerely  
Richard Bishop  
47 Market Street  
Edenfield  
BLO OJQ

Sent from [Mail](#) for Windows

### **OBJECTION TO MASTER PLAN AND PLANNING APPLICATION 2022/0451**

When the council agreed to release green belt land for development, against the wishes of the people of Edenfield, residents were at least able to take solace in council's assertion that development could only occur when a Master Plan was agreed to address issues such as traffic congestion, access to medical care, schools and concerns about local infrastructure.

By submitting a Master Plan ignoring both the council's Local Plan and Design Code, Taylor Wimpey has shown that it is incapable of providing anything other than banal, copy-cat housing estates which fail to meet local needs or address local concerns. Both the Master Plan and the associated planning application should therefore be rejected by the council until these issues are addressed in full.

Edenfield residents are aware that there is an acute housing shortage in the country. New houses are undoubtedly needed, but they should be at a lower density in villages such as Edenfield. Local services need to be improved before any large-scale plans such as this can be approved.

More detailed reasons for my objection are outlined below:

**Neither the Master Plan or Planning Application meet the requirements of Rossendale Council's Local Plan and in the Site-Specific Policy (SSP) for development of site H66**

A comprehensive Master Plan for the entire site, including all developers, has not been presented. The use of the Peel Land and Property logo in the first version of the Master Plan provided by Taylor Wimpey was misleading, it gave the impression of a comprehensive plan from multiple developers which is not the case. A Master Plan should include input from all landowners/developers including Anwyl Land, Peel Land and Property, Richard Nuttall and Taylor Wimpey. I also have concerns about the lack of detail provided regarding the phasing and implementation of the development.

The Site-Specific Policy (SSP) issued by Rossendale Council for development on site H66 includes numerous provisos including Requirements for a full biodiversity assessment, sensitive landscaping, compensatory measures for loss of green belt, a transport and travel plan as well as increases in school capacity. The SSP asserts that the layout should allow glimpses of local scenery and the church, building heights should be restricted and that development should be in line with the agreed design code.

None of the council's conditions outlined in the Site-Specific Policy (SSP) have been met and as a result, that the application is not in line with the Local Plan. There are no reasons to approving the Master Plan or Planning Application so this application should be rejected.

**Traffic**

The traffic in Edenfield is a problem for residents and those passing through. There are traffic bottlenecks in the North at the junction of Blackburn Road, Burnley Road and Market Street. Another bottleneck is in the South at the mini roundabout of Rochdale Road, Bury Road and Market Street, which is made worse by poor visibility for drivers. Congestion is also frequently seen on Bury Road. Congestion is exacerbated by limited parking opportunities for residents on Bury Road and Market Street.

In the Statement of Community Involvement (SCI), Taylor Wimpey and Anwyl Land claim that mitigating traffic congestion is a key aspect of their Master Plan and that each developer will have separate access points to allow traffic flow. However, this Master Plan does not include all developers and all planned phases of development and the full details of access have not yet been determined. The SCI also suggests that a comprehensive Master



Plan from all developers, with detailed plans for traffic mitigation agreed with residents and the council highways department, should be in place before planning permission can be considered.

Taylor Wimpey has not provided a Transport Assessment demonstrating that the whole site can be safely and suitably accessed by all users, including disabled people, and containing agreed mitigation measures in respect of the capacity of Market Street to accommodate additional traffic and measures to assist pedestrian and vulnerable road users. Taylor Wimpey appears to have used a standard methodology when making assumptions about traffic, they estimate that 50% of households will use a car to access the highway during peak times, leading to an additional 200 journeys per hour. This estimate is likely to be too low due to the lack of amenities and alternative transportation options in Edenfield. The true number of journeys is likely to exceed the 200 mentioned in the report, making the proposed development unsustainable for the small village.

Those travelling south (as many residents of these proposed “commuter houses”) will be forced to drive through Shuttleworth to join the M66 at junction 1. Bury MBC has already approved two large developments, one in Shuttleworth and one at the junction of Manchester Road and Bury New Road near to Park Farm. The daily tailbacks and associated pollution on roads towards Bury will worsen if these plans are approved.

The Master Plan states that improvements to Market Street are necessary for the development but does not provide any concrete details on what these improvements should entail. Additionally, the Master Plan mentions that compensatory improvements are needed, but again fails to provide any specific information. I strongly urge that the Master Plan be rejected until these issues are adequately addressed by all developers and interested parties.

### **Inappropriate Development**

By ignoring the Design Code, Taylor Wimpey has produced plans which are not in keeping with the character of Edenfield. The Market Street area of Edenfield is predominantly built using traditional materials such as local stone and slate. The pictures on the Taylor Wimpey leaflet during their consultation period in Summer 2021 showed wide tree-lined streets and houses built using what appeared to be local stone. The plans submitted in December 2022 show buildings made of brick in numerous contrasting colours and styles which are not “in-keeping” with the character of the village and will damage the visual appeal of Edenfield.

The village is long and narrow and has developed over time on either side of Market Street, Manchester Road and Bury Road. A large development such as this is completely incongruous in such a setting and will destroy the character of the village. A smaller development in Edenfield would be much more appropriate alongside smaller developments throughout Rossendale.

The sloping profile of the land is clearly a problem at this site and Taylor Wimpey has

proposed a series of retaining walls running across the site. These walls are unsightly, out of character and potentially dangerous to children who may fall from them.

### **Drainage and flood risk**

The main sewer for Edenfield runs under Market Street and the local waste water treatment plant is at Irwell Vale. Sewage from houses in Edenfield below the level of the main sewer, such as those at Alderwood Grove, is pumped up to the main sewer. Over recent years there have been several instances of pump failure, allowing sewage to flow onto the proposed development site. The proximity of the A56 means that it is not possible to install sewers flowing directly to the local treatment plant. The planning application states that the development will connect to the existing sewers and refers readers to the "Flood Risk and Drainage Assessment".

I was unable to find this document in the plans submitted by Taylor Wimpey.

In the plans submitted by Taylor Wimpey a SuDS (Sustainable Drainage System) is proposed to store run-off water. This will be at the lower end of their site close to the A56 embankment and bridge over the A56 bypass. This poses a risk of landslip onto the A56 which should be investigated before this type of drainage can be considered. Edenfield Community Forum has a letter from Highways England, written in 2020 in response to their concerns about development on the site. In the final paragraph of this letter, which is available on the ECNF website, Warren Hilton, Assistant Spatial Planner at Highways England says, *"culvert and drainage design associated with the development proposals would need to be considered, along with the need to avoid the use of SuDS within the site, due to the risk of affecting the stability of A56 slopes"*. He went on to say that *"In our view, the ground material within the site above and along the A56 boundary is not suitable for the use of SuDS, and also likely across the site in general."*

Recent photographs shared on Edenfield Resident's Facebook page show that the proposed building land is already waterlogged and run-off from this site is already causing flooding on the land downhill from the site. Strongstry, Chatterton and Irwell Vale are already prone to flooding and the Local Flood Authority has objected to the current plans.

The Master Plan and Planning Application should be rejected due to the increased flood risk and concerns related to the use of SuDS on unstable land.

### **Schools**

Education - The Master Plan states that there needs to be provision for schools but does not adequately address what this provision should be, until this can be presented and agreed in a more comprehensive Master Plan for the whole site involving Lancashire County Council and including all the developers the current Master Plan should be rejected.

### **Green space**

The proposed green play space is inadequate. By placing it at the lower end of the development it is likely to be inaccessible for most of the year since it is likely to become waterlogged. Placing the space at the edge of the development may be desirable for the

developer, but results in a dense layout rather than one broken up by green space. It is not desirable to have either houses or play areas next to a busy road such as the A56, the negative effects of noise and air pollution on health and well-being have not been addressed in the Master Plan.

For the reasons outline above, the Master Plan and Planning application do not meet the requirements of the council's Local Plan and Design Code. Taylor Wimpey has shown itself to be incapable of providing anything other than generic housing developments which fail to meet local needs or address local concerns. There are already traffic congestion and flooding problems in Edenfield and surrounding areas and the proposed development will exacerbate these issues. Local services need to be improved before any large-scale development plans can be approved.

Richard Bishop

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██████████  
██████████

## Objection to the Masterplan, proposed development of land west of Market Street, Edenfield (H66)

The Masterplan submitted to date is a Taylor Wimpey Masterplan, it does not include any contribution for any of the other developers and therefore contravenes the first principle of Local Planning Policy H66. The document itself is vague and generalised with references that could be applicable to any construction site. It is also disingenuous, illustrated with photos of local beauty spots that the very development will destroy.

As the development is removing green belt, the development is required to be well designed, make a positive contribution to the local environment, considering the character of the area and in accordance with the agreed design code. This proposal fails on all counts. This proposed development is overpowering, and with scale, density and character at total odds with the village and its environment. The illustrations appear to be a cut and paste of typical urban housing, which is dull and unimaginative and Taylor Wimpey's planning application ignores many aspects of the design code, particularly in relation to building materials and style and character.

The plan to build 400 houses is a more than 40% increase on the existing village, an instant increase rather than a long and natural growth in line with local needs, and an urban layout being forced into a rural setting. Edenfield cannot cope with the proposed scale of this development allowing this to go ahead at this scale will have a significant detrimental effect on the village and its residents.

The impact on traffic will be significant. The village is poorly serviced by public transport forcing a reliance on cars. Currently at peak times there is already a significant amount of congestion in the village with Market Street generally being single file traffic due to residents needing to park their cars on this road. Double yellow lines on Market Street is not the solution, where are residents of 140 houses supposed to park their cars, it will just move the problem to other areas of the village.

Whenever there is an issue or change to road access in the surrounding area, the impact is immediately felt in Edenfield, only this week Haslingden Road joining Rawtenstall to Haslingden was closed due to a burst water main, so all commuters needing to get between these locations were coming through Edenfield. The tailbacks were significant at peak travel time. The same can be said when there is an issue on the bypass, the congestion and delays for travellers and residents, and in addition noise pollution for the village residents is unacceptable. Adding c800 cars to the village will mean these conditions will be a daily occurrence, and I dread to think what would happen should an emergency vehicle need to access the village at these times.

The other developers with land elsewhere in Edenfield acknowledge there is no way to resolve the traffic problem but Taylor Wimpey seem oblivious to this. The local plan advises that the development for 400 houses would be supported provided that it can be demonstrated that the site can be safely and suitably accessed by all users, prior to development taking place. Edenfield can not cope with the level of traffic this development will generate, and therefore there is absolutely no way the above requirement can be satisfied.

With regards to other considerations, the 2 schools in the immediate area are already full with more demand than capacity. The proposed solution to this is to remove some of the playing

areas for the children to provide more buildings to accommodate more children. Not only will this cause significant disruption for the children currently attending these schools, but in the future would mean less outdoor space to accommodate more children, and add even more buildings to the village. In addition, the village does not have its own doctors surgery anymore nor a dentist and therefore would have to pull on these services from the surrounding areas. It is already increasingly difficult to get a doctor or dentist appointment for the existing residents of Edenfield, never mind before you add 400 additional houses with c1200 additional residents.

Finally, this development contravenes the National Planning Policy Framework, which states that developments will function well and add to the overall quality of the area, are visually attractive as a result of good architecture and are sympathetic to local character and history. The Taylor Wimpey proposed development fails on all 3 points, with its intrusive housing design that will dominate village infrastructure, destroying green spaces and the rural environment, whilst at the same time causing an unsolvable traffic problem. Paragraph 134 of the National Planning Policy states that development that is not well designed should be refused.

The plan for 400 additional houses is not justified by local demand and as the Government directive to increase the volume of available housing has been withdrawn, it is not required by national policy either, therefore why is this planning application being made?

Victoria Giles

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

To whom it may concern,

I wish to object to the master plan proposed for the village of Edenfield, as a resident, with the following reasons -

I have concerns about the master plan only including the first phase of a proposed, much bigger plan.

I don't believe that a formal transport assessment has taken place to support the plan. There is detail advising that a predicted 50% of the new houses would need to access the local highway at peak times, with 200 additional journeys based on a two car household, yet some bigger houses are likely to have three cars per household, leading to a larger number of predicted journeys.

Given that there are few local amenities available to reach by foot, this could lead to another increase of predicted journeys, as there are only two local primary schools, one local shop, one cafe, no banks or GP surgery in the village of Edenfield.

I don't believe that it meets the requirements of the 'local plan'.

I have concerns about drainage, and the increased risk of subsidence onto the nearby A56. I believe that a previous SuDS drainage systems report was deemed to advise against this kind of development.

I don't believe that the proposed style and look of the new houses is inkeeping with the character of the existing housing in the village.

Relating to the increased traffic predicted, which I believe will be higher than estimated (as detailed earlier), I have concerns about access points to the proposed development from Market Street. I travel along this road at least twice daily and there is usually double-parking occurring along the majority of the road, particularly from the mini-roundabout in the centre of the village, travelling northbound past the shops, up to the proposed junction for the development and beyond.

Traffic 'bottlenecks' frequently in this area now, before the addition of a high number of additional houses and cars.

Another access point to another part of the plan is on Exchange Street, which is usually double-parked, but a much narrower road than Market Street. There is a play area on one side and a recreation ground on the other, where children often play. An increase in traffic will lead to an increased risk of accidents, and slow traffic down considerably. Currently, only one car is passable on Exchange Street where double parking occurs - I witness this many times a day. Cars stopping and starting where children cross the road to either play on the park or rec leads to an increased risk of accidents.

Please could my points be considered as an objection to the Edenfield Master Plan.

Kind regards,

Fiona Keir

[REDACTED]

From:  
Alistair Green

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

I would like to object to the Edenfield Masterplan as I believe there a number of issues with the plan.

Traffic is a major concern. The plan and this application have made no attempt to address the problem. A survey on a single day in June does not give a clear picture. As mentioned in the suurvey there are currently pinch points both ends of Market Street (by mini roundabout at one end and outside Edenfield Church at the other) The traffic currently struggles here and the increased volumes from the build will only make this worse. Further afield, traffic volumes heading to the M66 south at rush hour in the morning frequently backs up, and in the evening the queue is almost filling the slip road and backing on to the motorway. Adding more housing without addressing this is ignoring the increased likelihood of a major accident. Heading north into Rawtenstall is already a nightmare on the roundabout. The survey hasn't considered either of these issues, and with no plans to sort this, more housing seems illogical as this will just add to the problem. The area is also not well served for public transport - once an hour is not a realistic alternative in many cases - and the traffic profile creates high risk to cyclists, both of which will encourage further car usage.

Parking doesn't look to have been well thought out either. With the size of the properties being proposed many will have two or three cars. Given the majority have single drives this will inevitably cause on road parking, instantly creating a dangerous road situation from reduced visibility. This will be compounded by existing parking issues in the village that will undoubtedly use the new road space for overflow parking.

The local telecoms networks are already under strain and there doesn't appear to be any plans for Openreach to upgrade so adding more usage will make this worse.

Schools are already at capacity (in Lancashire and in Bury) and this plan goes no further than suggesting that the school could be expanded to 1.5 class entry - a move which would fundamentally change the school.

Doctors are hard to get appointments with current patient levels

I believe Government policy requires plans to cope with the increase prior to planning consent being granted.

The masterplan is supposed to be a submission for the entire site. This appears to only be a submission for Taylor Wimpey. My understanding was that it was removed from Greenbelt with the view that the masterpla would be a single submission.

My final issue is with the branding of 'Community Led.' The local community has been well organised and local with alternative solutions to the masterplan, and these have been disregarded. I believe that suggesting it is 'Community Led' is misleading any potential buyers and could raise concerns over what other statements are misleading.

## Objections to the Edenfield Masterplan

We reject the application on the following points below:

- the approved masterplan and planning application do not meet some of the requirements of the Rossendale Borough Council Local Plan.
- Not all developer proposals have been included in the masterplan.
- Market street is already gridlocked at peak times and worse when there are works happening on the A56
- The design code of the new properties has not been kept in keeping with the rest of the local properties.
- No consideration has been taken in to account for services such as GP's, dentists, Schools.
- Sufficient school places, access to GP's or dentists to support the development are not adequately addressed
- There is no comprehensive traffic assessment for the whole of Edenfield.
- No consideration for any properties on the village roads that have no off road parking.
- No traffic report from LCC when they have had the time to present one for the scheme. Is this because the traffic issues make the concerns realistic and therefore not viable for the new development.
- Danger to children. The development will bring more cars onto a road that has a primary school. The idea of having a park right next to a busy road as a parent just screams further danger to life.



- With the rain that we've had this week alone, and the rain that this county is renowned for, no consideration has been taken into account for the water running off the moors and down into the valley. What safety measures have been considered for the residents of Irwell Vale, Strongstry and Chatterton?
- There has been no proper consultation with the community
- - It does not consider the needs of the community, including the demographic (elderly) and bears no relationship to the wider plans for regeneration for other areas of Rossendale which are focussed elsewhere.
- A common sense approach doesnt not seem to have been taken into account with accessibility of the development, i.e one entrance to the development on a busy road (not only from moving vehicles but of those parked up)
- No plan has bene made for the residents of market street in regard to parking availability.
- The damage to roads caused by the weight of construction lorries as well as the congestion, gridlock and pollution caused by the increased traffic would be indefensible and dangerous.
- Have emergency services been contacted for what is considered a 'shortcut' from Rawtenstall to Bury or the otherway round.

Regards

Morgan Edden

[REDACTED]

[REDACTED]

From: John Entwistle, [REDACTED]

Dear Rossendale Borough Council,

I wish to lodge the following objections to the Edenfield masterplan 2022/0451 and its planning application.

1. The revised masterplan still does not adequately address the principal problem of access and increased vehicular movements consequent to the proposed development.
2. The proposed junction in Market St, [REDACTED] does not address the added traffic congestion or ease the already difficult problem of parking at peak times. It would greatly decrease the parking currently available of the terrace row on Market St. Parking is already at a premium. On a personal note, as an active musician, I regularly need to park outside my house to load and unload speakers, amplifiers and a drum kit. Added traffic on an already busy road, alongside reduced or removed parking in this area, would create extreme danger to myself and those driving through the village when loading or unloading equipment. On behalf of my fellow neighbours, many of whom have young children, this is an equally worrying concern and their safety has not been considered or addressed.
3. The masterplan has also not addressed the use of Exchange St as access to part of the development. Exchange street already has parking on both sides, currently limiting traffic flow to one lane. Two cars cannot pass through this area on most days. The masterplan makes no provision to improve this situation.
4. The removal of a large number of mature trees, in section of the development titled Edenfield North, contravenes the requirement to protect the natural environment and rural character of the village.
5. The masterplan offers no heating and insulation requirements for the development. The proposed houses should be heated by heat-source pumps and/or solar panels, to meet Net Zero Carbon targets, yet no mention of these factors have been outlined. This is not a sustainable approach, and building homes powered by fossil fuels is delaying an inevitable renovation for all, including young families and first-time buyers.
6. The masterplan outlines a certain number of affordable houses would be available "subject to viability". This is a spineless and spiritless commitment to affordable housing and completely unacceptable given the current housing crisis.
7. The masterplan states that it intends to provide homes for local families yet make no statement about how this will be achieved. Indeed, points 5&6 above indicate that local families will be least likely to benefit from the development.

8. The masterplan includes a notional number of dwellings for “Buy-to-let”. This is an iniquitous, though sadly still legal, operation which sees wealthier people able to obtain a mortgage, outbid first-time buyers for a property, then rent it out to the very would-be buyers at a huge profit. There is at least one parliamentary bill aimed at eliminating this unfair practice, and it certainly should not be included in any development whose stated aim is to enhance the community.
9. The masterplan estimates that only one of the local primary schools will need increased numbers, and that by merely half a class per year. This seems to be further evidence that the proposed development is aimed overwhelmingly at older, more affluent families, at the expense of younger ones. The revised plan does not mention the school provision, nor does it address a means of deciding which of the two schools might have to accommodate the excess children, nor whether this excess number would occur only once or every year for the foreseeable future.

10. Among the proposed planting are trees such as *quercus robur* (oak) which can grow to 20 metres. While our native oak tree is marvellous for wildlife, it is not a tree for small domestic gardens. Likewise, *Acer campestre* and *amelanchier lamarckii* can grow to 7 metres, which requires sensitive planting to avoid obstruction of sightlines, particularly on narrow roads and curves. The shrubs outlined on the plan, such as *Hydrangea macrophylla*, can grow to 7 feet. This presents a potential difficulty with sightlines; *hypericum moserianum* and *Alchemilla mollis* are both attractive shrubs, but are well known among gardeners as plants which self-seed prolifically and need to be controlled. These plants could become very dominant unless controlled by the householder. The proposed planting seems to have little or no consideration for existing and / or new inhabitant ‘right to light’. This should be addressed and rectified.

11. A housing project of this size, and the planting outlined in point 10, would cause a reduction in the surface run-off area for rainfall and would increase the flood risk to those living in Alderwood Grove. This should also be researched and addressed in the plan.

For the reasons outlined above and the fact the proposal is to build green belt land, rather than the brown sites available in the county of Lancashire, I strongly object to the Edenfield masterplan 2022/0451 and its planning application.

I look forward to your response and action on each of the points made, as well as acknowledgement of receiving this email.

Yours faithfully,  
John Entwistle

## Objections to the Edenfield Masterplan

We reject the application on the following points below:

- the approved masterplan and planning application do not meet some of the requirements of the Rossendale Borough Council Local Plan.
- Not all developer proposals have been included in the masterplan.
- Market street is already gridlocked at peak times and worse when there are works happening on the A56
- The design code of the new properties has not been kept in keeping with the rest of the local properties.
- No consideration has been taken in to account for services such as GP's, dentists, Schools.
- Sufficient school places, access to GP's or dentists to support the development are not adequately addressed
- There is no comprehensive traffic assessment for the whole of Edenfield.
- No consideration for any properties on the village roads that have no off road parking.
- No traffic report from LCC when they have had the time to present one for the scheme. Is this because the traffic issues make the concerns realistic and therefore not viable for the new development.
- Danger to children. The development will bring more cars onto a road that has a primary school. The idea of having a park right next to a busy road as a parent just screams further danger to life.

- With the rain that we've had this week alone, and the rain that this county is renowned for, no consideration has been taken into account for the water running off the moors and down into the valley. What safety measures have been considered for the residents of Irwell Vale, Strongstry and Chatterton?
- There has been no proper consultation with the community
- - It does not consider the needs of the community, including the demographic (elderly) and bears no relationship to the wider plans for regeneration for other areas of Rossendale which are focussed elsewhere.
- A common sense approach doesn't seem to have been taken into account with accessibility of the development, i.e one entrance to the development on a busy road (not only from moving vehicles but of those parked up)
- No plan has been made for the residents of market street in regard to parking.
- Plans show single driveways to the new properties, most families purchasing will have more than one car which will result in more on-street parking which will reduce visibility for driving and increase danger to life, especially to local children.
- The damage to roads caused by the weight of construction lorries as well as the congestion, gridlock and pollution caused by the increased traffic would be indefensible and dangerous.
- Have emergency services been contacted for what is considered a 'shortcut' from Rawtenstall to Bury or the otherway round.

Regards

Alexandra Edden

[REDACTED]

[REDACTED]

## Objection to the Taylor Wimpey Masterplan - Land West of Market Street, Edenfield (Allocation H66)

As a resident of the village I strongly object to this so called Masterplan. Taylor Wimpey are calling this a 'Masterplan' but in reality it is not a masterplan as it only relates to one Developer rather than including all of the other Edenfield key landowners. Rossendale Council therefore requires a Masterplan that will work in partnership with key landowners and key stakeholders, including the Edenfield Community Neighbourhood Forum, to ensure a comprehensive Masterplan is prepared and abides by the criteria as set out in the councils 'Local Plan'.

The release of the local greenbelt which has facilitated the proposed development was, in my opinion a travesty. Such a vast development will spoil Edenfields character as a peaceful rural village and consequently, as it is a gateway to Rossendale, our borough will similarly be degraded. There were alternatives; Bacup being the prime example. I can understand that developers would not consider the area as desirable as Edenfield but if Bacup was what was available I am quite sure that with the current demand for housing, developers would take up the opportunity and ultimately Bacup would benefit and become more prosperous.

Without the provision for ingress/egress to the development from the M66/ bypass both North and South, the resultant traffic problems will be unimaginable. Furthermore, the proposed access points from Market Street seem to be extremely insufficient. Parking provision too, especially during the course of development has not been addressed. Market Street is already a nightmare for parking!

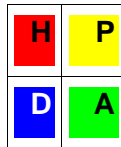
Local amenity and community facility provision including medical centres as well as the provision for new schools, etc has not been properly addressed in the Masterplan. The masterplan in itself is totally lacking in so many respects, as detailed in other objections. The recommendations submitted by the Edenfield Community Neighbourhood Forum were seemingly ignored by Taylor Wimpey.

Richard Hillel, [REDACTED]

**“Location: Land West of Market Street, Edenfield, Lancashire.**

**Consultation in Respect of a Masterplan & Design Codes Submitted by Taylor Wimpey in Association With Planning Application Reference Number 2022/0451- A Proposed Development For the Erection of 238 No. Residential Dwellings And all Associated Works, Including New Access, Landscaping and Public Open Space Within Housing AllocationH66 of the Adopted Rossendale Local Plan.”**

**Objection on behalf of Mr. and Mrs. Ashworth,** [REDACTED]



**January 2023**

**Prepared by Hartley Planning and Development Associates Ltd**

## Lack of a Comprehensive Masterplan

The proposed development of 238 dwellings forms part of a larger area of land taken out of Green Belt as part of the newly adopted Local plan 2021 (LP) for some 400 houses and included in the plan as housing allocation H66.

Policy H66 of the Local Plan is relevant to this application. It is a site-specific policy for applications made on land contained within the wider Housing Allocation H66.

Policy H66 states: “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 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

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."*

**Comments with respect to the Comprehensive Masterplan:**

Contrary to policy requirements there is no comprehensive Masterplan for the entire site. Taylor Wimpey's Masterplan and Design Code (MDC) falls well short of being comprehensive and covering the entire site.

The proposals relating to serious infrastructure issues, particularly the access to the Chatterton Hey site and the capacity of the Rochdale Road mini-roundabout remain unresolved.

The protection of the Long Views identified in the Local Plan examination from both East and West is effectively ignored.

The discussions with the other developers and the local stakeholders appear to have been almost non-existent; totally against the basis on which the Local Plan was approved by the Inspectorate. Two of the owners of H66, Peel L&P and Mr. Richard Nuttall were not involved in producing the MDC.

In addition, we highlight in this Objection the failure of the MDC to deal with any mitigation for the damage which will occur to the landscape, the important public views, the excessive density of housing and the lack of sufficient provisions for soft landscaping.

The design and layout does not consider the special character of the village and does not minimise the adverse impact due to its scale, heights and density.

There is no agreed design code or overall landscaping plan including open space provision.

The location of the proposed open space, against the bypass, will be a poor environment for relaxation and pleasure. It is little more than a noise buffer. There is little suitable open space provision elsewhere.

Within the housing area itself, there is only a cursory acknowledgement of LP policy H66 which requires *'landscaping of an appropriate density and height is implemented throughout the site to 'soften' the overall impact of the development'*.

#### **Design Codes:**

Again we understand there has been virtually no contact with fellow developers and stakeholders with respect to the design for the site despite ECNF having advised the Developers of the work that Aecom have carried out on their behalf. The developers in their wisdom have just chosen to ignore this.

Instead they have produced what appears to be one of their standard linear designs of rows of houses which detract from the historic core of Edenfield rather than complementing it, as claimed in the Masterplan.

The dense successive rows of repetitive housing as illustrated in the Design Code are not indicative of the village core and are more typical of layouts in cities and towns.

The treatment at the boundaries is not sympathetic and does not allow for integration

The proposed properties would benefit from better spacing allowing for opportunities for play areas and to enjoy gardening and grow food.

It would provide for more on site car parking that meets today's needs, discouraging parking on the road.

The Design Code does not control roof heights and pitch.

There is a danger, as shown on pages 44 and 45 of the MDC, of the pitch and mass of roof being dominant and oppressive and not being commensurate with the character of the village.

**The design should be rejected until agreement is reached with all the interested parties as specified in the Local Plan. The Design Code should be based on the one in the emerging Neighbourhood Plan.**

#### **Access and Transport:**

The proposals relating to serious infrastructure issues, particularly the access to the Chatterton Hey site and the capacity of the Rochdale Road mini-roundabout remain unresolved.

The development encourages the use of cars as general services and amenities are elsewhere. It does not take into account the vehicle needs of people today. The narrow roads and lack of on-site parking will encourage parking in the street and the habit of parking on pavements which in turn will block footpaths and discourage pedestrians.

## Heritage & Impact:

The MDC does not protect significant views to Chatterton Hey and Mushroom House, both non-listed heritage assets, or winter views to the Grade II\*-listed Church which will undermine their historic context.

## Landscaping, Important Local Views Housing Density and Height:

### 1) Landscaping Local Plan Policies including the Fifth proviso of the Site Specific Policy, the Strategic Policy SS, ENV1; HS4 & ENV3 all apply.

Protection of the views from the East and West side of the Valley relating to this site was first identified in the Landscape Study carried out by Penny Bennett Landscape Architects on behalf of Rossendale Borough Council in 2015 and reviewed in 2017.

In this study the Landscape Architects concluded that this area was unsuitable for development". The report states further as follows:

*"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 of the local landscape character area, 8b Irwell Valley south. Nor could it be effectively mitigated against because of the sites openness. Long views 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."*

### 2) Housing Density:

**2.1) In the Local Plan, Strategic Policy ENV1: High Quality Development in the Borough** includes the following:

*All proposals for new development in the Borough will be expected to take account of the character and appearance of the local area, including, as appropriate, each of the following criteria:*

- a) Siting, layout, massing, scale, **design**, materials, lighting, **building to plot ratio** and landscaping;*
- b) Safeguarding and enhancing the built and historic environment;*
- c) Being **sympathetic to surrounding land uses and occupiers**, and **avoiding demonstrable harm to the amenities of the local 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 . . . .*

**2.2) In the Local Plan, Strategic Policy ENV3: Landscape Character and Quality**, considered in further detail at Section 19 below, includes the following:

*Development proposals which are in **scale** and keeping with the **landscape character**, and which are appropriate to its surroundings in terms of siting, design, **density**, materials, and external appearance and **landscaping** will be supported.*

**2.3) In the Local Plan, Policy HS4; Housing Density** provides:

*The density should **be in keeping with the Local areas and have no detrimental impact** on the amenity, **character, appearance, distinctiveness and environmental quality** of an area.*

The proposed density of the dwellings will adversely affect views of the site from across the valley and in the case of the four houses in Alderwood Grove numbers 5 to 8 it will effectively block the view as well as being **overbearing, oppressive and detrimental**.

### 3) Plot Heights:

MDC should, but does not, control the heights of the proposed housing so as to retain the **open character** and **visual amenity that is so important in the area**.

Care must be taken to ensure that roof lines do not detract from the significant views or affect the skyline: - towards the west and Holcombe Moor on the opposite side of the valley, and the distinctive views from the west over the fields to the village, undermining the very context. In particular 2.5 storey houses are unacceptable being too dominant and incongruous, blocking the openness.

**3.1) In the Local plan the fifth proviso of the SSP** requires specific criteria for the design and layout to take into account "(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* "

**3.2) Strategic Policy SS; Spatial Strategy includes:** *Greenfield development will be required within and on the fringes of the urban boundary to meet housing and employment needs. The Council will require that the design of such **development relates well in design and layout to existing buildings, green infrastructure and services.***

**3.3) Local Plan Strategic Policy ENV1: High Quality Development in the Borough states:**

a) *Siting, layout, **massing, scale, design, materials, lighting, building to plot ratio and landscaping;***

c) *Being **sympathetic to surrounding land uses and occupiers, and avoiding demonstrable harm to the amenities of the local 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;***

**3.4) Policy ENV3: Policy ENV3: Landscape Character and Quality states:**

*"The distinctive landscape character of Rossendale, including large scale sweeping moorlands, pastures enclosed by dry stone walls, and stone built settlements contained in narrow valleys, will be **protected and enhanced.***

*The Council will expect development proposals to conserve and, where possible, enhance the natural and built environment, its immediate and wider environment, and take opportunities for improving the distinctive qualities of the area and the way it functions.*

*Development proposals which **are in scale** and keeping with the landscape character, and which are appropriate to its surroundings in terms of siting, **design, density, materials, and external appearance and landscaping** will be supported.*

*In order to protect and enhance the character and quality of the landscape, development proposals should, where appropriate:*

- *Respond positively to the visual inter-relationship between the settlements and the surrounding hillsides **and follow the contours of the site;***
- ***Not have an unacceptable impact on skylines and roofscapes;***

- *Be built to a density which respects the character of the surrounding area with only low density development likely to be acceptable in areas abutting the Enclosed Upland or Moorland Fringe Landscape Character Areas;*
- *Take into account views into and from the site and surrounding area, retaining and, where possible, enhancing key views; and*
- *Retain and restore dry stone walls, vicar stone flag walls and other boundary treatments which are particularly characteristic of Rossendale.*

*Development proposals should incorporate a high quality of landscape design, implementation and management as an integral part of the new development. Landscaping schemes should provide an appropriate landscape setting for the development and respect the character and distinctiveness of the local landscape."*

**The current proposals do not meet the goals in the policies highlighted above, they are not of an appropriate height, they are not sympathetic to surrounding occupiers, they are over-bearing and oppressive, overlooking properties and result in an unacceptable loss of light;-additionally they significantly affect the long views across the valley both from East and West and should therefore be rejected.**

**There is simple mitigation for this available; the lowering of the site so that there is a maximum finished floor level not greater than 195m. Please refer to the appended table for the Plot Heights.**

#### **4) Soft Landscaping / Screening**

**4.1) Soft Landscaping** -Policy H66 5v "Landscaping of an appropriate density and height is implemented **throughout** the site to 'soften' the overall impact of the development".

The MDC fails to ensure landscaping within the built areas. The focus is on clusters of housing with no internal breaks to facilitate openness. It does not complement the existing landscape, rather it undermines it. **In particular soft landscaping on the boundaries with existing properties, where it would be most important, is non-existent at Market Street, Mushroom House and Alderwood Grove.** Instead there is a focus on 'landscaping' areas which are not suitable for building on, such as land abutting the Bypass where the land is unstable or may be at risk from future road widening, or forms part of the Suds area. Effective and complementary boundary treatments with existing properties have been disregarded.

**4.2) Policy HS6 "Open Space requirements in new housing developments"** refers to the quantity, accessibility and quality of open space. The open space "created" within Taylor Wimpey's land is simply the area next to the A56 Bypass and is hardly an attractive area in which to relax and connect with the countryside. It might be made accessible with a mown path, but it will not make up for the loss of the open countryside being built on. It would be more sensible to make landscaped walking paths within the site or in areas on the boundary which would also provide some mitigation benefit for existing residents

Similarly, placing of the play area in the north west of Taylor Wimpey's land means that it is furthest away and not central, but above all, its sitting next to the Bypass is dangerous given the level of noise and pollution, not to mention the safety aspect of playing near a busy dual carriageway.

**4.3) The MDC fails to promote compliance with the following Policies of their LP :**

**Policy ENV1 High quality development in the Borough** "*New development in the Borough will be expected to take account of the character and appearance of the local area, ....*" -

ENV1 c) *Being sympathetic to surrounding land uses and occupiers, and avoiding demonstrable harm to the amenities of the local area;*

ENV1 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;...”*

ENV1i) *Providing landscaping as an integral part of the development, protecting existing landscape features and natural assets, habitat creation, providing open space, appropriate boundary treatments and enhancing the public realm;*

**4.4) The MDC does not promote compliance with Policy ENV3: Landscape Character and Quality, which states:**

***“The distinctive landscape character of Rossendale, including large scale sweeping moorlands, pastures enclosed by dry stone walls, and stone built 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:*

- *Respond positively to the visual inter-relationship between the settlements and the surrounding hillsides and follow the contours of the site;*
- ***Not have an unacceptable impact on skylines and roofscapes;***
- *Be built to a density which respects the character of the surrounding area with only low density development likely to be acceptable in areas abutting the Enclosed Upland or Moorland Fringe Landscape Character Areas;*
- ***Incorporate native screen planting as a buffer to soften the edge of the building line in valley side locations;***
- ***Take into account views into and from the site and surrounding area, retaining and, where possible, enhancing key views; and***
- *Retain and restore dry stone walls, vaccary stone flag walls and other boundary treatments which are particularly characteristic of Rossendale.*

*Development proposals should incorporate a high quality of landscape design, implementation and management as an integral part of the new development. Landscaping schemes should provide an appropriate landscape setting for the development and respect the character and distinctiveness of the local landscape.”*

**Primary Education:** There is no provision for the extension of either Edenfield or Stubbins School despite Policy H66 stating *“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;

#### **Drainage:**

There are no proper plans for drainage over the whole of the site. In the central section, owned by Taylor Wimpey, the fields often flood, with streams running down into the recess near the Bypass.

The Masterplan fails to adequately indicate how surface water drainage integrates with systems for existing properties and in particular to demonstrate that it will not cause flooding elsewhere.

**Open Spaces:** The open space “created” in this development is simply the area next to the A56 Bypass and it could hardly be described as an attractive area in which to relax and connect with the countryside. It exposes its users to danger given the noise and pollution level, not to mention the safety aspect of playing near one of the busiest roads in east Lancashire. Additionally, the placing of the play area in the northwest of the site means that it is furthest away and not central-

**Overall Comment:**

**It is clear the Masterplan does not meet the requirements set by the Inspectorate or the Local Council.**

**16.01.23**

To whom it may concern,

I wish to object to the master plan proposed for the village of Edenfield, as a resident, with the following reasons -

I have concerns about the master plan only including the first phase of a proposed, much bigger plan.

I don't believe that a formal transport assessment has taken place to support the plan. There is detail advising that a predicted 50% of the new houses would need to access the local highway at peak times, with 200 additional journeys based on a two car household, yet some bigger houses are likely to have three cars per household, leading to a larger number of predicted journeys.

Given that there are few local amenities available to reach by foot, this could lead to another increase of predicted journeys, as there are only two local primary schools, one local shop, one cafe, no banks or GP surgery in the village of Edenfield.

I don't believe that it meets the requirements of the 'local plan'.

I have concerns about drainage, and the increased risk of subsidence onto the nearby A56. I believe that a previous SuDS drainage systems report was deemed to advise against this kind of development.

I don't believe that the proposed style and look of the new houses is inkeeping with the character of the existing housing in the village.

Relating to the increased traffic predicted, which I believe will be higher than estimated (as detailed earlier), I have concerns about access points to the proposed development from Market Street. I travel along this road at least twice daily and there is usually double-parking occurring along the majority of the road, particularly from the mini-roundabout in the centre of the village, travelling northbound past the shops, up to the proposed junction for the development and beyond.

Traffic 'bottlenecks' frequently in this area now, before the addition of a high number of additional houses and cars.

Another access point to another part of the plan is on Exchange Street, which is usually double-parked, but a much narrower road than Market Street. There is a play area on one side and a recreation ground on the other, where children often play. An increase in traffic will lead to an increased risk of accidents, and slow traffic down considerably. Currently, only one car is passable on Exchange Street where double parking occurs - I witness this many times a day. Cars stopping and starting where children cross the road to either play on the park or rec leads to an increased risk of accidents.

Please could my points be considered as an objection to the Edenfield Master Plan.

Kind regards,  
Andrew Keir

[Redacted signature block]

[Redacted signature block]



I write to formally object to the Edenfield Masterplan submitted by Taylor Wimpey, the reasons for this are as follows:

#### Traffic & highway safety

1. The plan offers no solution to the question of traffic in the village or neighbouring areas. The immediate roads of Market Street and Bury Road are clearly not capable to deal with the level of traffic that the proposed plans would generate. Just this week, the temporary traffic lights at the Rostron Arms have created small levels of standing traffic resulting in chaos; people having to drive through red lights, drive on pavements, and reverse back down main roads because anything bigger than 2 mid-size cars driving at very slow speeds cannot pass on these roads with parked cars on both sides.
2. I don't understand how the necessary level of construction traffic would access the sites through the village and the plan does not address this.
3. Given the size of the development on green land, this will surely create huge amounts of additional surface water which is very concerning, especially so close to the A56. The A56 / M66 is fairly notorious for incidents involving water or ice on the road and Edenfield together with other neighbouring villages already suffers from localised flooding. I've spoken to the council twice about flooding near our house which they have yet to resolve.
4. There is not adequate parking for the houses already in the village (hence some of the existing traffic issues) and the type of estate Taylor Wimpey is proposing will do nothing to reduce this issue. This is evident on other such estates, where visitor parking is utilised by residents who can't park all their cars in their allocated spaces leading to overcrowded, dangerous parking.
5. Traffic in the local towns of Rawtenstall and Ramsbottom is also barely sustainable at the moment, with gridlock at certain times of the day or week. Additional residents would have to use the local towns as the plan doesn't provide any solution to develop or work with local people and businesses to provide adequate facilities within the village.
6. The impact of congestion is well documented, air pollution, noise pollution and stress / impact on well being. The plan doesn't begin to address any of this.

#### Local amenities and recreation

7. The village doesn't currently have adequate primary school places for the expected level of increase in children. The proposed solution seems to be utilising yet more green belt to increase facilities. Why can't some of the land previously designated as green belt be used for a larger, new school if that is required, rather than losing yet more green belt.
8. We moved to the village 4 years ago and the recreational and play areas are very poor compared to our previous location in Bury. When we moved to Edenfield there were plans to develop the current recreational area, increasing the size of the recreational space for existing residents, taking on board community opinions to provide well thought out areas. The plan offers no upgrade to existing areas and

adds only small, uninspiring additional areas which aren't specific to the local community or, for example, linked to sports the area is renowned for.

#### Design and local nature

9. The village currently attracts many walkers and bikers in part due to the beautiful landscape, the plan is not designed with the local environment in mind and would not look out of place in a well development, highly urban area.
10. The density and scale of the housing is completely out of place with the existing village, the plan does not explain or justify this.
11. The plan might tick the necessary boxes in terms of required green and sustainability credentials, but if we are losing green belt could the local council not work in partnership with a developer with some real vision in terms of something that would provide housing but on a truly sustainable basis, with design to attempt to match the beautiful area it is replacing, extensive green areas and actual bringing improvements for the village, not just in the council's finances.

The level of short-term thinking and profiteering by Taylor Wimpey and particularly the local council at the cost of green belt is very disappointing.

Regards

Sarah Cottam



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The level of short-term thinking and profiteering by Taylor Wimpey and particularly the local council at the cost of green belt is very disappointing.

Regards

Ben Cottam



Carolyn Duncan

[REDACTED]  
[REDACTED]  
[REDACTED]

Dear Sir/Madam,

I am writing to formally object to the Edenfield Masterplan that is currently proposed.

My objection to the proposed plan includes a range of points which are covered below:

- The current plan does not meet the requirements of the Rossendale Borough Council Local Plan - how can the council agree to this plan when it fails to meet their own requirements? This cannot be right legally, logically or morally. The council is there to serve its local residents and that is clearly not the case here should this plan be approved.
- Given that not all the developers are represented how can this Masterplan include the whole site? Rules cannot and should not be changed/broken to suit commercial interests whilst seriously detriment is caused to local residents.
- The traffic through the Edenfield is already a serious concern and there is no adequate plan to address the enormous increase to the volume of traffic that this proposed development would cause. The current analysis which estimates 50% of the homes might use a car at rush hour is seriously flawed, given the severe lack of public transport and access to local amenities (this arbitrary figure of 50% clearly cannot be applied equally to an area which has access to strong rail and public transport infrastructure compared to a village which severely lacks such infrastructure). People struggle to commute to work or access services such as doctors/dentists without using a car given the rural nature of the village – this would only worsen with the proposed plan.
- I have serious concerns that lives will be put at risk given the traffic issues – as buses and lorries struggle to move through the village on a regular basis already, I fear that lives will be put in danger should ambulances or fire engines need to reach people within the village with such a significant change to the number of vehicles in the village.
- The proposed road infrastructure and access routes are inadequate and not properly addressed.
- The Masterplan fails to address many environmental concerns including but not exclusive to:
  - How will the development deal with the flooding and drainage concerns – the sites already struggle with volumes of water – concrete and tarmac will not do anything to ease this problem.
  - There is concern about landslide risks down to the bypass.
  - The development is seriously out of keeping with the character of the village – a village it will no longer be and boundaries will be eroded, negating one of the reasons that land is marked a greenbelt in the first place.
- The plan fails to address how local infrastructure and services will cope with such a significant increase in houses – how will people be able to access school places, dentists, doctors etc.? This will again lead to increased traffic issues as well as cause stress and anxiety to local residents.

- The threat of this proposal is already causing severe strain to many local residents – the mental health and wellbeing of the residents will be further put at risk with such an enormous development and over such a long period of time; the long term impact of this is highly concerning.

These are just a few of the main points which I wish to raise in my objection.

My 12 year son asked me today: “why are they going to build all those houses on the fields mum when they could knock down all those old buildings in the area that aren’t used and make those into nice homes instead?”..... I was unable to give him a good reason.....

I would ask you to consider the irreparable damage that this proposal would cause, and the impact it will have on both current local residents and future generations; there are alternative solutions if we are prepared to consider them as responsible and honest adults.

Yours faithfully,

Carolyn Duncan

Chris Duncan

[REDACTED]

[REDACTED]

[REDACTED]

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- The current plan does not meet the requirements of the Rossendale Borough Council Local Plan - how can the council agree to this plan when it fails to meet their own requirements? This cannot be right legally, logically or morally. The council is there to serve its local residents and that is clearly not the case here should this plan be approved.
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Yours faithfully,

Chris Duncan



Objections and concerns from: Gillian Hulme, [REDACTED]

ref. Taylor Wimpey Planning Application ref 2022/0451 (Land West of Market Street, Edenfield, Lancashire)

"Your views are important to us and we want you to help us create a Masterplan that the whole community can be proud of." A fine statement. However, in reality scant regard has been paid either by the developers or by the Council to the concerns or objections expressed by the ECNF which represents Edenfield or by EDCA.

As yet:

The Masterplan and Planning Applications do not meet the requirements of the RBC Local Plan. The LPA has stated that a Masterplan is necessary. That must surely involve all the developers. If they cannot agree together upon a Masterplan, it is not up to an individual developer to produce their own version. That is the LPA's responsibility.

There is no satisfactory solution with regard to the access points to and from the proposed sites.

The inevitable huge increase in traffic along Market St. seems to have been dismissed as irrelevant. Particular difficulties will arise, because of the increase in traffic, at each end of Market St. where the road narrows. Consequently there will be queues of traffic, a likelihood of accidents involving both pedestrians and vehicles. Any closure of the bypass due to accidents or roadworks will leave Edenfield gridlocked. Access for emergency vehicles will be severely impeded if not impossible!

No regard has been given to the problems facing homeowners living along Market St.. They have no alternative but to park their cars on the road. Proposed parking restrictions suggested by the developers are certainly no solution as far as those homeowners are concerned.

Edenfield school is a small school and even increasing its capacity by 50% is hardly likely to be sufficient to accommodate all the extra children of primary school age generated by size of the proposed development.

No mention seems to have been made of any additional facilities with regard to Doctors or Dentists.

Taylor Wimpey state that they want " to open up green spaces for new and current residents to enjoy.". There will be very little open space left once these houses are built! neither is there going to be much provision for open spaces within the proposed site.

The Council commissioned a landscape study by Penny Bennett Landscape Architect's 2015 and 2017, which specifically stated that the stretch of Greenbelt to the west of Market St. is unsuitable for development due to the open aspect and views . However the Council seems to have totally disregarded their findings!

A more specific objection to the development by Taylor Wimpey is the proposed height of the houses along the eastern edge of the development. Some of these houses will actually be higher than the existing properties which form the boundary to the development. Not only will the view across to Holcombe Moor be totally obscured but they will feel totally enclosed because of the height and proximity of the new properties, especially as the main living areas of the existing houses will be directly facing the new properties . This shows a total lack of consideration by Taylor Wimpey and is contrary to the Local Plan, Strategic Policy ENVI: High Quality Development in the Borough which states amongst other things: "the scheme will not have an unacceptable adverse impact on neighbouring development by virtue of it being overbearing or oppressive, or resulting in an unacceptable loss of light".

Yours sincerely,

Gillian Hulme

Michelle Smith  
[REDACTED]  
[REDACTED]  
[REDACTED]

15 January 2023

Dear Sir/Madam

**Land West of Market Street, Edenfield, Lancashire**

I am writing in respect of the above planned development and wanted to make you aware of my strong objection to this.

I have several concerns regarding the development which I do not believe have been adequately considered by the council or developers. Firstly, neither the Masterplan nor the Planning application meets the requirement of the Rossendale Borough Council's Local Plan. I also note that the Masterplan does not include the whole site as all developers are not represented. There are a number of concerns about how the development will be built and I do not believe these have been adequately addressed.

I am also deeply concerned about the infrastructure of the village and how development of so many houses will affect this. We do not have a doctors' surgery, dentist, or many amenities which will be required for a development of this size. Surgeries and dentists in Ramsbottom are already overrun, this will just add extra pressure which I do not believe they can cope with. Schools are again another concern and I do not believe there's any real consideration here either.

One of my most prominent concerns are the road issues in the village. Market Street is the only road in and out of the village. It is a narrow road which is very very busy during rush hour and during school pick/up drop off times. As a Market Street resident, our only parking option is on the main road. I have a young daughter and regularly don't get to park outside my own property and therefore forced to park over the road or a lot further down. I can only see this getting worse if the development was to go ahead. The road gets very busy and congested already with buses blocking the road with cars parked on both sides of the road. I fear the development will only exacerbate this and involved even more big vehicles blocking the infrastructure as the development begins. This will therefore put my daughter at risk when crossing an already busy road with cars double parked and more large vehicles.

I do not understand why the green belt land needs to be used. There's plenty of other land available which is not green belt. I imagine the reason for this is the desirable location which means higher prices which can be charged for housing – this is not a good enough reason.

To myself, and many other Edenfield residents, this planned development is just another example of the council cashing in on a big development and not properly considering the impact on the local community. The developers too are only concerned about the money involved and residents' concerns are pushed to the bottom of the pile and disregarded. I am

asking you, whoever is reading this, if this was your village, on the road where you lived, would you lie back and let this happen? No probably not. So why should we?

I really do hope you listen to our concerns.

Regards

Michelle Smith

To whom it may concern,

I strongly object to the development by Taylor Wimpy to build 238 houses (and potentially even more) in Edenfield.

This development and any large scale future ones will impact on the character and appearance of Edenfield. It is a village, with a strong community, people who live there enjoy the benefits of living in a village. A small village Primary School, a cafe and local shops, we have spectacular views across the valley, lots of wildlife and places to walk, hike and horse ride.

The character of the area is synonymous with the existing properties which are constructed out of stone with many being 200 years old, they compliment the landscape.

It is a village, building an extra 238 houses, which are also unsympathetic in building material and design, will dominate Edenfield village and turn it into one big housing estate, it will not be a village.

Housebuilding should take place on brownfield sites not on our beautiful countryside.

The traffic through the village can get congested and many cars park on the road which causes bottlenecks. An extra 238 houses could equate to an extra 238 even 476 extra cars from the new residents plus their visitors who will be travelling through, and in and out of Edenfield. Which will also pose a threat to high way safety and a danger to pedestrians and children walking to school.

There are approximately 900 dwellings in Edenfield an extra 238 houses is a massive increase. As a resident All my family struggle with getting a doctors appointment and I have to travel to a different area for a dentist. I had to appeal to get my daughter in the local school. Edenfield and the surrounding areas are all villages they do not have the infrastructure and cannot accommodate a huge increase in new residents

Laurence Lai

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

First, we would like to express our concern that the Masterplan was submitted for consultation at the same time as the planning application from Taylor Wimpey. This has led to a good deal of confusion, as noted in some of the public comments available on RBC's website, and effectively undermines the process as a fair and effective consultation.

**Key issues about the proposed Masterplan and Design Code :-**

- **it has not been developed in partnership with key landowners and key stakeholders including ECNF**
- **it has not been agreed with other developers of the site and in particular there is no agreed implementation and phasing**
- **the design and layout does not consider the special character of the village adequately and as a result will have a major adverse impact on the village and the community in terms of quality of life and stress on infrastructure**
- **the design and layout specifically does not minimise adverse impact due to its scale, heights and density. It is predominantly developer-led.**
- **There will be significant damage to the environment and social costs**
- **The Masterplan and Design code is inadequate, lacking in detail and cohesion particularly relating to**

- Road infrastructure**
- Access to the site from existing roads**
- Drainage**
- Landscaping**
- Compensatory measures in green belt**
- The issue of primary school expansion**

**This is not a Masterplan developed in partnership with key landowners and key stakeholders, including the ECNF as required by the Local Plan ( paragraph 121)  
"Rossendale Council therefore requires a Masterplan and will work in partnership with key landowners and key stakeholders, including the Edenfield Community Neighbourhood Forum, to ensure a Masterplan is prepared"**

There really is no partnership working here and what we have is a Masterplan submitted by some of the developers, Taylor Wimpey and Anwyl, which reflects the needs of Taylor Wimpey.

It is not clear on whose behalf the document is being submitted and raises the question, just exactly who has agreed to its terms? There is no point having a Masterplan that is not supported by all developers on Site H66.

Deceptively people were led to believe that this so called Masterplan was created jointly with all the landowner developers, but following submission, two of the landowners, Peel and Richard Nuttall, have since confirmed that they were not involved. It all makes it meaningless and underhand. Mr Nuttall has also pointed out that the Plan misrepresents the ownership of his land on Blackburn Road.

**Lack of consultation**

The NPPF recognises the importance of designs evolving in response to local issues and to the views of the community.

There has been no proper consultation by the developers with the community, which is reprehensible given the potential impact on the community. The Taylor Wimpey-led attempt at consultation, sent out to residents in summer 2022 with a two week response period, was erroneously presented as a Masterplan led by the 'Community', which lacked any detail and also applied only to Taylor Wimpey and Anwyl land, omitting the other developers in H66.

In particular they have not consulted the ECNF, an important stakeholder, which has been working hard on developing its Neighbourhood Plan for the community, with funding from the Government under the Localism Act 2011. The Masterplan completely ignores this emerging Neighbourhood Plan, which includes a Design Code prepared by AECOM, a highly reputable, worldwide organisation who provided an impartial and dispassionate assessment of how Edenfield should be developed.

It makes a mockery of government policy to reform the planning system to make it more democratic and more effective and to ensure that decisions about housing are taken locally.

Government guidance suggests Design Codes are best prepared in partnership to secure agreed design outcomes and maintain viability particularly across complex sites and phased multi-developer schemes.

RBC should be taking responsibility to ensure that processes are managed effectively to produce a Masterplan in partnership, as promised in the Local Plan.

**It does not meet the requirement of Site Specific Policy H66 1, that “ a comprehensive development of the entire site is demonstrated through a masterplan with an agreed programme of implementation and phasing;”**

It follows then that the Masterplan is not comprehensive. It relies on assumptions and contains errors.

The suggested phasing sequence in the Masterplan is just a guess and the fact it goes on to say that phases may be delivered simultaneously is contradictory. It would be totally unacceptable to have development occurring simultaneously given the size of the site and the constraints of location.

In particular the Local Plan says in paragraph 126 “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”

There is no infrastructure delivery schedule and site access is not considered fully.

**The layout and design proposed will have a major adverse impact on the identity of Edenfield and undermines its special character.**

The Masterplan demonstrates through its proposed designs, a disregard for the special character of the village, and the context that defines it: the openness, the significant views, its links with agricultural and historical roots.

### **Scale and Density**

Housing development on this scale and density will be catastrophic to the identity of Edenfield as a Lancashire village set in the foothills of the rural Pennines damaging the distinct features of openness and visual amenity, historic, agricultural and rural nature of the area. It will adversely affect the community in terms of quality of life and stress on services, particularly around road infrastructure and schools. The environment and social costs will be significant.

The proposed layouts, density and heights of the development of the site shown in the Masterplan would be dominant and overpowering. It clearly does not meet the criteria of

Strategic Policy SD2 which states that “the Council will expect that the design of development on the [site] minimises the impact on the character of the area....”

The designs in the Masterplan disregard the important characteristics of Edenfield and focus on targets for maximising density and returns for developers.

Edenfield is historically a ribbon development with key characteristics of significant open landscape, and visual effects, particularly in the central area of proposed development. The extensive open views across the valley and the accessible footpaths forming part of the network down into the valley and up onto the moors are important characteristics of the village. In the Lives and Landscapes Assessment, dated 2015 (Local Plan Ref - Examination Library EB 025) Penny Bennett, Landscape Architect, commissioned by Rossendale BC, noted how the visual effects and the landscape effects east of the Bypass would be highly impacted by development and therefore determined that this site (referred to as A in her report) “would not be suitable for development on landscape grounds”.

It is clear the proposed development will adversely impact the open landscape and the visual amenity, key characteristics of the village. It really is not a Masterplan that is “Landscape-led” as claimed in the proposed Masterplan.

Specifically it also does not meet the requirements of the Local Plan, Site-Specific policy H66 5v and 5vi

- v) Landscaping of an appropriate density and height is implemented throughout the site to soften the overall impact of the development.....
- vi) Materials and boundary treatments should reflect the local context.

It does not meet certain requirements of other Local Plan Strategic Policies: ENV1, ENV2, ENV3.

### **Layout**

The layout does nothing to minimise the impact of the site and it therefore does not meet the requirements of policy H66 5v. In fact the number of houses, density, design and lack of open spaces within the site maximises the impact.

**Height** - the heights of the proposed housing disregard the local context i.e the need for low level development so as to retain the open character and visual amenity that is so important in the area. However the development is mostly of 2 storey high houses with some 2.5 storey and no single storey. The key here is that new properties should not dominate and block the distinctive openness and key views that are the special characteristics of Edenfield.

This is unacceptable, particularly as, in some cases, the roof lines will detract from the significant views and in some cases affect the skyline: for example towards the west and Holcombe Moor, on the opposite side of the valley, and the distinctive views from the west over the fields to the village, undermining the very context. In particular 2.5 storey houses are unacceptable being too dominant and incongruous, blocking the openness.

There are not enough single-storey properties which are more suited for the elderly.

Given the ageing population of Edenfield residents (and in Rossendale as a whole) more single-storey housing should be offered as well as supported housing schemes which will enable people to continue to live in their village in their old age. Policy HS5 refers to the need to provide housing suitable for the demographic and these development proposals do not take this into account. The National Planning Practice Guidance suggests that at least 20% of any new housing provided on a site should be specifically tailored to meet the needs of the elderly or disabled residents. The proposal does not meet the requirements of policy HS5.



## **Landscaping**

### **Hard Landscaping**

There is a lack of information about some features that will be prominent such as acoustic barriers and retaining walls (as in Taylor Wimpey's planning application) which will have significant adverse visual impact.

Height being a key factor in retaining the openness, and visual amenity, there should also be height restrictions in place for fencing and walling as well as details of suitable materials.

The Masterplan does not deal adequately with consistency and integration particularly where sites adjoin each other such as Anwyl and Taylor Wimpey, and Mr Nuttall and Peel.

More landscaping using existing dry stone walls should be a priority as this is a distinct feature of the landscape around here.

**Soft Landscaping** -Policy H66 5v "Landscaping of an appropriate density and height is implemented **throughout** the site to 'soften' the overall impact of the development".

There are no open spaces and soft landscaping within the development. including at the boundaries with existing properties. The focus is on clusters of housing with no internal breaks to facilitate openness. It does not complement the openness of the existing landscape, nor does it allow key views.

Policy HS6 "Open Space requirements in new housing developments" refers to the quantity, accessibility and quality of open space.

The Masterplan talks about Green infrastructure but does not identify areas on the Masterplan, other than the sites for play areas and the Suds site which it refers to as a Drainage Pond.

It mentions boundary treatments with 'hedgerows/landscaping, masonry walls and timber fencing' but there are no details, such as heights and materials and no location identified on the plan.

The placing of the play area in the north west of the site means that it is furthest away and not central, but above all, its siting next to the Bypass is dangerous given the level of noise and pollution, not to mention the safety aspect of playing near a busy dual carriageway.

**Design** - the linear design of rows of houses detracts from the historic core of Edenfield rather than complements it, as claimed in the Masterplan. Dense successive rows of repetitive housing as illustrated in the Design Code are not indicative of the village core and are more typical of layouts in cities and towns.

The treatment at the boundaries is not sympathetic and does not allow for integration

The proposed properties would benefit from better spacing allowing for opportunities for play areas and to enjoy gardening and grow food. It would provide for more on site car parking that meets today's needs, discouraging parking on the road.

The Design Code does not control roof heights and pitch. There is a danger, as shown in the Taylor Wimpey application, of the pitch and mass of roof being dominant and oppressive and not commensurate with the character of the village.

**Materials** - Policy H66 5vi "Materials and boundary treatments should reflect the local context"

There is reference to building materials but this is vague and open to interpretation. It could result in stock standard constructed houses that could be anywhere in the UK and bear no relation to the context of the site. There is no indication just how many will be built with specific materials i.e how many will be reconstituted stone, how many brick ?

**Layout and Boundary Treatment** Policy H66 5vi “Materials and boundary treatments should reflect the local context”

The Masterplan does not protect the amenity of existing dwellings. Plans are insensitive to the needs of the community, particularly neighbours, in some areas of boundary treatment such as Market Street, Mushroom House and Alderwood Grove. It is lacking in thought and does not integrate with existing properties in any way.

Encircling key historic landmarks with new building, such as around Mushroom House is damaging and undermines their historic context. The new properties will dominate. Similarly damaging will be the loss of openness next to Chatterton Hey, and in winter the new site will be visible behind the Grade II\* listed Church. This will be even more noticeable at night when lights will affect this view.

**Views** Policy ENV3 - requires that developments take into account views into and from the site and surrounding area, retaining and, where possible, enhancing key views.

In the Design Code the key views considered on Market Street are of ‘distant hilltops’ only. Presumably that is because the mass of Holcombe Moor is obliterated with new building. The significant views and openness are underestimated in the Masterplan and in some cases described in a totally misleading way. In the description under “Visual Context” the focus is on driving through the village, where the wall in the central section ‘screens the view’. This does not take into account the large section of wall that will be removed for access to the site, which will open it. Importantly it ignores the fact that people enjoy the open views daily from their houses and whilst walking through the village or on the public footpaths. The loss of views will be major - see previous information about the Penny Bennett Report.

Because of the elevation and openness of the location Edenfield can be viewed from miles around from the east and the west. In an area referred to as the Gateway to Rossendale, this development will be extremely damaging to the first impressions of the Borough.

Significantly the mass of Holcombe Moor opposite retains its natural features of grassland, dry stone walls and moorland yet the Edenfield side will be predominantly urban in comparison and create a visual imbalance in the valley at this point.

Obviously the impact on the important open views of the area would be catastrophic and in no way can it be described that this development enhances key views. The view of Edenfield via the Bypass would reveal a housing estate whose lines would interfere with the significant character feature of existing village core linear silhouette, which is prominent because of the open fields in front of it.

From Market Street there will be a similar loss of significant views across the valley which will be disrupted by the lines of new houses blocking large parts of the Holcombe Moor mass, interfering with its form and skyline in parts. The sunsets and dramatic skies over the Holcombe Moor are a wonderful feature of the character of the village. To lose all this will undermine the sense of place and identity that fixes Edenfield in the valley

Significant views to Chatterton Hey and Mushroom House, both non-listed heritage assets, will be lost as well as winter views to the Grade II\*listed Church which will undermine their historic context.

### **Parking and Traffic -**

There are major issues around the access to site H66 and this is not covered adequately in the Masterplan. Reference is made to entrances at Exchange Street, Market Street and Blackburn Road but there is no detail and no information about consequential impact on the existing road layouts such as installing yellow lines, developing dedicated right turn or widening paths.

There are major problems already with these roads in terms of parked cars and traffic flow and an additional 400 houses will add significantly to the problems, creating chaos and increased danger to road users.

It will also hamper public transport. Bus services have been withdrawn in the past due to the delays caused in negotiating the roads through the village.

There is also a lack of information about the road layout in the site itself and in particular how it will connect throughout.

The designs for car parking on the plots are not adequate and will create problems with parking on the site itself. The development encourages the use of cars as general services and amenities are elsewhere. It does not take into account the vehicle needs of people today. Increasingly vans are used for work purposes and households have more than one car. The narrow roads and lack of on-site parking will encourage parking in the street and the habit of parking on pavements which in turn will block footpaths and discourage pedestrians.

### **Health and wellbeing**

The Masterplan does not adequately deal with the damage to character of the public rights of way on the site or measures to protect the new building inhabitants from harm caused by living in proximity to the A56 Bypass

The immediate connection with the landscape enjoyed by residents is important for the health and wellbeing of the community, something which RBC says it wishes to promote in its policies. Direct access to the countryside and the numerous paths are a key feature of living in the village. The walk around Mushroom House and past Chatterton Hey is a popular walk and accessible because of its relatively flat levels. The proposed development whilst maintaining the public right of way, will severely change the nature of this walk, urbanising it, as it will become a lane through a housing estate, potentially deterring people from being active. It would also be crossed by a road, serving approximately half of the site, which changes its nature significantly. The views from this walk will be damaged, as would its nature as a walk in the countryside. It will be a significant loss and potentially encourage people to get in their car to go to 'the countryside' elsewhere or just not bother.

There is no specific mention of measures to mitigate the potential harm to the health of residents who will live next to the Bypass.

It is highly irresponsible to build new homes within close proximity of a busy major road, (which is effectively the extension of the M66) and subject people to deafening noise and high levels of pollution. It is likely that the A56 will be widened in the not too distant future with land on the east of the Bypass being a preferred choice, making these properties even closer to a major road.

Potentially there will be a need for a large amount of acoustic boarding but there is no mention of this in the Masterplan.

### **Nuisance, disturbance and damage from building works**

There is no mention of the significant disturbance to residents from the construction works and how this will be mitigated. This links to the need for a proper phasing.

The site is known for its unstable conditions with nearby housing having piling work. In the recent development at Pilgrim Gardens, the piling activities were a major disturbance at times and resulted in some damage.

There will be engineering solutions to the problematic site, but because the land is difficult, it will require significant ground works, including anticipated mass piling, across the whole site, and will cause major disruption to the community, and in particular the nearby residents, for many years. There is potential for damage to property as well as intolerable noise, dust and nuisance. Nothing is mentioned in the documents about this and how exactly it will be mitigated.

## **Construction**

There is nothing in the Masterplan about the groundworks on the site and whether there are any specific actions required such as removal of land, levelling, the need for retaining structures. or extensive piling. Given the unstable nature of the land in the central site owned by Taylor Wimpey I would expect this to be a significant consideration

## **Drainage**

There are no proper plans for drainage over the whole of the site.

In the central section, owned by Taylor Wimpey, the fields often flood, with streams running down into the recess near the Bypass. The Masterplan fails to adequately indicate how surface water drainage integrates with systems for existing properties and in particular demonstrate that it will not cause flooding elsewhere.

At Alderwood Grove we are concerned that construction works will interfere with the existing surface water drainage system and with our rights to those drainage systems.

## **Local Plan Requirements Site Specific Policy H66**

The Masterplan does not address requirements of the Local Plan specifically how the compensatory improvements will be provided to the Green Belt in proximity of the site in accordance with Policies SD4 and H66 7.

It also does not demonstrate how it will provide for expansion at either Edenfield CE Primary School or Stubbins Primary School from 1 form to 1.5 form entry, and for a secondary school contribution as required by Policy H66 9.

We do not see how the Masterplan meets the requirements of the NPPF paragraphs 128 and 130, c and d for good design and fail to see how it will create a beautiful and distinctive place, sympathetic to the local character both of the surrounding built environment and the landscape setting and establish and maintain a strong sense of place.

The Masterplan and Design code are totally inadequate and should be rejected

Karen Lester and Richard W Lester

████████████████████  
██████████

## **Objection to Taylor Wimpey Master Plan and Planning Application 2022/0451**

I would like to object to both Taylor Wimpey's Master Plan and Planning Application. My reasons for this are as follows:

The Master Plan only appears to have input from one developer (Taylor Wimpey), this falls far short of an acceptable Master Plan incorporating input from all developers and demonstrating collaboration between developers throughout future phases of construction.

The application for development in Edenfield does not describe the effects of increased population on local infrastructure, particularly in respect of education, healthcare, utilities, and transportation. The schools in the area are already at capacity and there are no plans for expansion. There are no provisions for new medical facilities or expansion of existing facilities in the surrounding towns to accommodate the expected population growth. The application lacks detailed proposals for infrastructure provision and capacity increases for water, drains, and gas or electricity supply. Additionally, the projections for additional car journeys and use of public transportation are optimistic and do not take into account the current transportation habits of residents.

In terms of healthcare, there are currently no medical facilities in Edenfield and the application lacks any provisions for new facilities or expansion of existing facilities in neighbouring towns. This will add a further burden on the local healthcare system. Further consideration and discussion with local primary healthcare providers (going beyond the public comments made by East Lancashire NHS Trust) is needed to develop and submit proposals to address this problem.

Additionally, the projections for additional car journeys and use of public transportation are optimistic and do not consider the current transportation habits of residents. Although Taylor Wimpey has produced a transport assessment, this fails to mention the narrowing of the roads at pinch points in Edenfield and the regular damage to parked car wing mirrors etc. this will increase if this development is permitted. The additional pollution and noise introduced by the number of additional car journeys will have a negative environmental impact and degrade the quality of life and health of Edenfield residents.

The Master Plan and Planning Application should be rejected by the council.

James Bishop  
[REDACTED]

Hi Jacob,

The Housing and Regeneration department is supportive of the Edenfield Masterplan. The development of this site is crucial to the Economic Regeneration of Rossendale and will contribute towards a key objective of the new Housing Strategy for Rossendale, which enables more housing in Rossendale to meet a range of needs for our residents. The proposal demonstrates an integrated approach to housing, which is sustainable over time aligning to our objectives.

Let me know if you need any more. Please list comment from "Housing and Regeneration" and not any personal names.

## Objection

Oliver Webster

████████████████████

I wish to object to the masterplan

- The Taylor Wimpey plan and planning application does not consider the views of the community and does not address any local needs or concerns.
- Flooding is already a problem in the village, the investigations into the floods needs to be extremely thorough, there seems to have been little recent through investigations into these already flooded areas.
- The schools in the local area would not be able to accommodate extra pupils without changing the schools and there is not infrastructure for dropping off and picking up of children from the schools which already causes problems with traffic. There is little to address these issues in the master plan.
- There is little information in the plan to cover the primary and secondary school places needed, local schools are already overstretched.
- There is no transport assessment submitted.
- The roads in Edenfield can not cope with the traffic passing through the village on a daily basis now and this is without the cars that will be using the proposed development
- The pollution caused by the traffic from cars from the proposed development would put extra pressure on local health services that are already stretched. Children would be walking to school from the development to school on one road alongside the traffic that will be on the one road out and in of the proposed development, they will be breathing in these fumes when walking to school.
- The public transport is already inadequate for the residents of Edenfield, there is no information about an expansion of bus services through Edenfield.
- Access to local health care will be compromised as there are not enough staff to care for extra people on a proposed development of over 400 houses, I have noted the money requested from East Lancashire NHS Trust, Taylor Wimpey would need to provide that money every year to cover the costs.

The council needs to consider the needs of the local community, this Taylor Wimpey plan does not consider the community, we understand the need for houses but not with a plan that is not considerate and is just to make money for a housing company.

## Objections to the Edenfield Masterplan.

From Margaret L. Callaghan [REDACTED]  
[REDACTED]

### We reject the application on the following points below:

- The approved masterplan and planning application do not meet some of the requirements of the Rossendale Borough Council Local Plan.
- Not all developments proposed for Edenfield have been included in the masterplan.
- Market street is already gridlocked at peak times and worse when there are works happening on the A56 and M66 as all traffic has to be directed through the villages.
- The design code of the new properties is in keeping or sympathetic with the rest of the local properties.
- No consideration has been given for the requirement of essential services such as GP's, dentists, Schools. These are already over subscribed.
- Insufficient school places, access to GP's and dentists to support the development have not been addressed
- There is no comprehensive traffic assessment for the whole of Edenfield.
- No consideration has been given to ANY of the properties in the village that do not have off road parking. Which is the Majority of the houses on market street alone
- No traffic report has been provided from Lancashire County Council. They have had adequate time to present one for the scheme. **Is this because the traffic issues make the concerns realistic and therefore not viable for the new development?.**
- Danger to children. The development will bring more cars onto a road that has a primary school. The idea of having a park right next to a busy road as a parent just screams further danger to life.
- With the rain that we've had this week alone, and the rain that this county is renowned for, no consideration has been taken into account for the water running off the moors and down into the valley. What safety measures have been considered for the residents of Irwell Vale, Strongstry and Chatterton?. Who already suffer severe flooding in high rain periods.



- There has been no proper consultation with the community.
- It does not consider the needs of the community, including the demographic (elderly) and bears no relationship to the wider plans for regeneration for other areas of Rossendale which are focussed elsewhere.
- A common sense approach does not seem to have been considered regarding accessibility to the development, i.e one entrance to the development on a busy road and the impact this will have on the traffic on Market street(not only from moving vehicles but for parked vehicles.)
- No plan, consideration or provision has been made for parking for the current residents of market street.
- The damage to roads caused by the weight of construction lorries as well as the congestion, gridlock and pollution caused by the increased traffic would be indefensible and dangerous.
- Have emergency services been contacted for what is considered a 'shortcut' from Rawtenstall to Bury or the other way round.

Yours Faithfully,

Margaret L. callaghan

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Amy Preston

16 January 2023

Dear Sir/Madam

**Reference no: 2022/0451 Land West of Market Street, Edenfield, Lancashire**

I am writing in respect of the above planned development and wanted to make you aware of my strong objection to this.

I have several concerns regarding the development which I do not believe have been adequately considered by the council or developers. Firstly, neither the Masterplan nor the Planning application meets the requirement of the Rossendale Borough Council's Local Plan. I also note that the Masterplan does not include the whole site as all developers are not represented. There are a number of concerns about how the development will be built and I do not believe these have been adequately addressed.

I am also deeply concerned about the infrastructure of the village and how development of so many houses will affect this. We do not have a doctors' surgery, dentist, or many amenities which will be required for a development of this size. Surgeries and dentists in Ramsbottom are already overrun, this will just add extra pressure which I do not believe they can cope with. Schools are again another concern and I do not believe there's any real consideration here either.

One of my most prominent concerns are the road issues in the village. Market Street is the only road in and out of the village. It is a narrow road which is very very busy during rush hour and during school pick/up drop off times. As a Market Street resident, our only parking option is on the main road. I have a 7 year old child and getting her in and out of the car is already very challenging and dangerous at times. I fear the development will only exacerbate this and put the safety of my child at risk. I am very very worried about how I will manage safely getting my child in/out the car once the development starts. Has there been a comprehensive traffic assessment for the whole of Edenfield?

Another big worry I have is parking. As mentioned above, our only parking option is on Market Street. My husband and I both commute for work and have 2 cars (like many residents of Market St) and have always relied on street parking. I've already had my car damaged numerous times due to the busy road, this is only likely to increase with the development. I do not feel that the resident's parking concerns have been listened to nor is there any adequate provision planned to alleviate these concerns.

I do not understand why the green belt land needs to be used. There's plenty of other land available which is not green belt. I imagine the reason for this is the desirable location which means higher prices which can be charged for housing – this is not a good enough reason.

To myself, and many other Edenfield residents, this planned development is just another example of the council cashing in on a big development and not properly considering the impact on the local community. The developers too are only concerned about the money involved and residents' concerns are pushed to the bottom of the pile and disregarded. I am asking you, whoever is reading this, if this was your village, on the road where you lived, would you lie back and let this happen? No probably not. So why should we?

I really do hope you listen to our concerns.

Regards

Amy Preston

Greg Webster



Here are my objections to the Edenfield Masterplan:

- Local roads – it only takes the bypass to have one small incident for the local roads through Edenfield to be totally gridlocked. Adding the extra homes will only increase the risk and further exacerbate the problem. The bottleneck on Market Street will also become more of a problem with the extra houses, especially with the one way in and out proposal.
- Local amenities such as doctors, dentists and schools are already oversubscribed.
- There is no plan to increase the very poor public transport services through the village which discourages people to use it. This will only increase the car volume with the extra houses.
- The risk of flooding is already a big problem within the village and local areas, and this has been evident with recent prolonged spells of very wet weather which will only increase in the future due to climate change. The flood risk will increase with the housing plans.
- The disruption within the village whilst the years of construction take place will negatively impact on everyone. How is the flow of construction traffic and inevitable ‘temporary’ traffic control systems going to be effectively managed considering how the traffic situation currently exists? As recently proved, it only takes one set of temporary lights in the village to have traffic queuing for hours at peak times.

Regards  
Greg Webster

Dear Sir/Madam

I am writing to object to the Taylor Wimpey (TW) Masterplan for the following reasons:

The plan does not include input from all developers so cannot be considered a 'masterplan'. My understanding is that this was a prerequisite by the council so I am not really sure why this has been allowed to progress to this point based solely on TW's input? So now can we expect 3 differing styles of development and the poor residents of this village (which includes myself) to have to go through all of this again on two more occasions?

In its picture (page 4) I do not agree that this development "enhances the surroundings", nor is it "attractive". I do agree that it will be "distinctive" and a "coherent pattern of development" but not in a good way as it will stand out like a sore thumb and will ruin the 'special character' of Edenfield. This is a huge, dense, development and having seen several other TW developments all having the same ilk, in my opinion this will just look like a concrete jungle which has been plonked on the village. You only have to look around other TW homes and estates to see that there is no originality and that they are all just clones of each other.

I'm not sure I can agree that they are "designed to last". I have a family member who lives in a TW home which is probably only around 7 years old who has had several problems with the house but most notably roofing problems, in fact they are currently on their 2<sup>nd</sup> issue with a leaking roof. On their estate there are a number of homes apparently with similar issues. On the day they moved in it was quite windy, I was there helping them and could see the huge dividing wall/fence between them and a neighbour swaying in the wind before it collapsed moments later. Thankfully we were all inside the house as someone could have been badly hurt had they been in the garden.

It mentions a "network of green spaces", apart from the local play areas I am unable to see much in the way of my understanding of what a "network of green spaces" may look like.

Edenfield Community Neighbourhood Forum (ENCF) have said that there will be a huge retaining wall to prevent the houses slipping down the hillside. I haven't seen this on any of the plans but to be fair I could be forgiven for having missed it as, getting through the amount of information on both the planning application and masterplan, has felt like climbing a mountain. If what the forum has said is an accurate representation then again this would be something I would object to as not being in keeping with the village. My first thought when I read it was that this would become "the Great Wall of Edenfield".

Finally, this masterplan and design code is not in keeping with the National Planning Policy Framework outlined in the Design Code document and it is both sad and very disappointing that TW have not read or taken into consideration the Design Code put forward by ECNF.

Yours faithfully

Ms Janet Smith

██████████  
██████████

Tim Preston

16 January 2023

Dear Sir/Madam

**Reference no: 2022/0451 Land West of Market Street, Edenfield, Lancashire**

I am writing in respect of the above planned development and wanted to make you aware of my strong objection to this.

I have several concerns regarding the development which I do not believe have been adequately considered by the council or developers. Firstly, neither the Masterplan nor the Planning application meets the requirement of the Rossendale Borough Council's Local Plan. I also note that the Masterplan does not include the whole site as all developers are not represented. There are a number of concerns about how the development will be built and I do not believe these have been adequately addressed.

I am also deeply concerned about the infrastructure of the village and how development of so many houses will affect this. We do not have a doctors' surgery, dentist, or many amenities which will be required for a development of this size. Surgeries and dentists in Ramsbottom are already overrun, this will just add extra pressure which I do not believe they can cope with. Schools are again another concern and I do not believe there's any real consideration here either.

One of my most prominent concerns are the road issues in the village. Market Street is the only road in and out of the village. It is a narrow road which is incredibly busy during rush hour and during school pick/up drop off times. As a Market Street resident, our only parking option is on the main road. I have a 7 year old child and getting her in and out of the car is already very challenging and dangerous at times. I fear the development will only exacerbate this and put the safety of my child at risk. I am very concerned about how I will safely manage getting my child in/out the car once the development starts. Has there been a comprehensive traffic assessment for the whole of Edenfield?

Another big worry I have is parking. As mentioned above, our only parking option is on Market Street. My wife and I both commute for work and have 2 cars (like many residents of Market St) and have always relied on street parking. I've already had my car damaged due to the busy road, this is only likely to increase with the development. I do not feel that the resident's parking concerns have been listened to nor is there any adequate provision planned to alleviate these concerns.

I do not understand why the green belt land needs to be used. There's plenty of other land available which is not green belt. I imagine the reason for this is the desirable location which means higher prices which can be charged for housing – this is not a good enough reason.

To myself, and many other Edenfield residents, this planned development is just another example of the council cashing in on a big development and not properly considering the impact on the local community. The developers too are only concerned about the money involved and residents' concerns are pushed to the bottom of the pile and disregarded. I am asking you, whoever is reading this, if this was your village, on the road where you lived, would you lie back and let this happen? No probably not. So why should we?

I really do hope you listen to our concerns.

Regards

Tim Preston

I object to the Master Plan for development of land in Edenfield on the following grounds,

1) The Land is Green Belt and as such should be preserved for benefit of all.

Sent from [Outlook for Android](#)



Wimpy's Edenfield Master Plan cannot be contemplated until Edenfield residents have more information about the proposals for managing traffic on Market Street and Exchange Street. Unless the Council and the Highways Agency have some magic solutions, it is not possible to see how the plan will ever be acceptable to Edenfield residents.

Traffic is already very busy on Market Street at **all** times of the day; it is narrow and made even narrower by resident's parking, and people parking to access the shops. It is often jammed when traffic is diverted from the A56.

Exchange Street also gets full of cars parked, not only by residents but also by people going to the hairdresser's, the butcher's and the baker's.

Market Street and Exchange Street are already difficult for emergency vehicles to negotiate and the proposals will only generate more traffic and consequently more access problems. Now that the Government have revised their requirements, the opportunity exists to revise the proposals and remove the need to build on green belt land and come up with something more sensible; plans that don't impact quite so drastically on traffic, and access to schools and GPs.

As it stands at the moment, I strongly object to Wimpey's Edenfield Master Plan.

Lesly Spurrell



## Objections to the Edenfield Masterplan.

From Daniel Callaghan [REDACTED]  
[REDACTED]

### We reject the application on the following points below:

- The approved masterplan and planning application do not meet some of the requirements of the Rossendale Borough Council Local Plan.
- Not all developments proposed for Edenfield have been included in the masterplan.
- Market street is already gridlocked at peak times and worse when there are works happening on the A56 and M66 as all traffic has to be directed through the villages.
- The design code of the new properties is not in keeping or sympathetic with the rest of the local properties.
- No consideration has been given for the requirement of essential services such as GP's, dentists, Schools. These are already over subscribed.
- Insufficient school places, access to GP's and dentists to support the development have not been addressed
- There is no comprehensive traffic assessment for the whole of Edenfield.
- No consideration has been given to ANY of the properties in the village that do not have off road parking. Which is the Majority of the houses on market street alone
- No traffic report has been provided from Lancashire County Council. They have had adequate time to present one for the scheme. **Is this because the traffic issues make the concerns realistic and therefore not viable for the new development?.**
- Danger to children. The development will bring more cars onto a road that has a primary school. The idea of having a park right next to a busy road as a parent just screams further danger to life.
- With the rain that we've had this week alone, and the rain that this county is renowned for, no consideration has been taken into account for the water running off the moors and down into the valley. What safety measures have been considered for the residents of Irwell Vale, Strongstry and Chatterton?. Who already suffer severe flooding in high rain periods.

- There has been no proper consultation with the community.
- It does not consider the needs of the community, including the demographic (elderly) and bears no relationship to the wider plans for regeneration for other areas of Rossendale which are focussed elsewhere.
- A common sense approach does not seem to have been considered regarding accessibility to the development, i.e one entrance to the development on a busy road and the impact this will have on the traffic on Market street(not only from moving vehicles but for parked vehicles.)
- No plan, consideration or provision has been made for parking for the current residents of market street.
- The damage to roads caused by the weight of construction lorries as well as the congestion, gridlock and pollution caused by the increased traffic would be indefensible and dangerous.
- Have emergency services been contacted for what is considered a 'shortcut' from Rawtenstall to Bury or the other way round.

Yours Faithfully,

Daniel Callaghan

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Good afternoon,

**From Ann E Durie and Nigel S Stacey (in copy), both of** [REDACTED]  
[REDACTED]

We object to the Edenfield Master plan - 'Land West of Market Street Edenfield (Allcoation H66)' Masterplan and Design Code published November 2022 - for the following reasons:

It does not fulfil the requirements of a Masterplan specified in Rossendale Borough Council's (RBC) Local Plan. The Masterplan does not include all developers and therefore it does not deal with the whole site as required by the RBC Local Plan.

The phasing of the development, how it will be built, site access, road infrastructure required for the development of the site and the management of construction traffic are not adequately addressed.

**Traffic and transport:**

The traffic assessment provided is not comprehensive, it does not address traffic flows throughout Edenfield or consider the impact on the wider local road network. There are no supermarkets, health services or senior schools in Edenfield and indoor leisure facilities are limited. Estimates of increased traffic need to include the journeys required to access these services and facilities, as well as journeys to and from work and schools. Also bus services in Edenfield are limited and there is no train service.

The impact on traffic flows and safety issues raised by an access point on Market Street, also apply to proposed access point from the field adjacent to no. 5 Blackburn Road. This is close to the existing traffic lights at the fingerpost junction, a 4-way junction which is already busy, including with traffic parking to take children to and from school. If Edenfield CE Primary School were expanded as suggested in the RBC Local Plan, there would be more traffic adding to concerns about safety and pollution and increasing the need for parking around this junction. Adding traffic lights or pedestrian crossings to address these issues would only add to congestion and pollution in the area.

**The scale density and character of the proposed development** is not in keeping with the existing village and would transform the character of Edenfield. The Design Code produced

by Edenfield Community Neighbourhood Forum with the support of RBC has not been considered. The number of houses proposed would substantially increase the population in an area with limited local facilities.

**Flooding** is already a recognised issue in the area, particularly in the valley below Edenfield. Climate change is likely to increase surface water issues in the area. Building on the fields in Edenfield will reduce the drainage available for surface water and increase the risk of flooding onto the A56 and the communities in the valley below.

**Schools, health and other local services:** there is no detail on the provision of sufficient school places to support the development, including when these places would be available. The impact on health services is not addressed. Will the developers be required to contribute to the costs of these services?

**Please note:** we are aware that Peel L&P did not contribute to the Masterplan. Rossendale Borough Council (RBC) Local Plan, page 55 point 5(i): states that the design and layout need to take account of the “retention and strengthening of the woodland enclosures to the north and south of the Church.” If the woodland to the north of Church Lane is the area sometimes referred to as Church Lane woods, the figures included in the Masterplan suggest that the area of land to the north of Church Lane to be developed by Peel L&P includes part (we would estimate about one third) of the Church Lane woods. If Peel L&P do intend to include part of this woodland in their development plans this would appear to be contrary to the requirements of the RBC Local Plan.


### **Masterplan – Matter for Amendment**

You may recall that on 09/01/2023 we wrote to your Team, that is Rossendale Borough Council’s (RBC’s) Forward Planning Team, by email to clarify why an area of land which forms part of our property and our neighbours’ property is included within the boundary of allocation HS66 in the Masterplan. The area we refer to is part of the H66 boundary that surrounds the area of land owned by Peel L&P, it is circled purple on the attached copy of page 39 of the Masterplan and appears on several other pages of the Masterplan. 10/01/2023 your Team confirmed to us by email that the boundary of the housing allocation H66 is different from that in the Masterplan, it does not include the land which forms part of our garden and our neighbours’ garden and this area should not be included within the boundary of the Masterplan. RBC’s Forward Planning Team have confirmed this will need to be amended and we understand that they have included this information within their response to the Masterplan as a matter for amendment. We also request that this part of the boundary of the H66 allocation is amended in the Masterplan.

For the reasons above we object to the Edenfield Masterplan.

Yours faithfully,

Ann E Durie and Nigel S Stacey

both of 

# Masterplan

## A LANDSCAPE-LED MASTERPLAN

The Masterplan presented opposite has been prepared in accordance with the design vision for land west of Market Street, making consideration of the existing local context, planning guidance and the aspirations of the future developers and the local community.

The Masterplan takes its cue from the existing landscape features both within and around the site: vegetation, landform, ecology, drainage and built form, and making detailed consideration of site constraints and opportunities.


Retention of existing landscape features helps to create a unique scheme that is responsive to the site, preserves and enhances the best of what is already there, and knits it into the wider setting, providing the foundation for a strong sense of place and local character.

The Masterplan will deliver approximately 400 new homes for Edenfield, set within a strong landscape structure and characterful setting.

### MP01

Future planning applications relating to the H66 allocation must be delivered in accordance with principles of The Masterplan.

### KEY:

-  'H66' allocation
-  Land to come forward as later phase\*
-  Existing Public Right of Way
-  Proposed residential development areas
-  Active frontages
-  Indicative internal road network
-  Proposed green space
-  Indicative landscape structure planting
-  Indicative location SUDS
-  Indicative location for LEAP play area
-  Potential acoustic mitigation
-  Proposed highway access
-  Proposed road links (alignment subject to detailed design)
-  Proposed emergency vehicle connection
-  Proposed pedestrian/cycle access
-  Indicative pedestrian /cycle routes

\*landowner not in a position to engage at the current time



Fig 2.1 The Masterplan



From: David & Pauline Clements

Address: [REDACTED]

Reference No.: 2022 / 0451

Address of Site: Land West of Market Street, Edenfield, Lancashire.

We wish to OBJECT very strongly to Taylor Wimpey's Planning Application and wish the Planning Application to be REFUSED for the following valid reasons:-

**GREEN BELT LAND:** We accept that many new Homes are required and need to be built but these should be built on Brownfield Sites of which there are ample in Rossendale, and not on Green Belt Land. Green Belt Land is designated as that for very good reason, and should only be used as a very last resort, and not when there are ample Brownfield Sites in the Rossendale Area.

The Government also says we don't need to find Greenfield Land for Housing as highlighted by Michael Gove the Secretary of State for Levelling Up, Housing and Communities of the UK, so Rossendale Borough Council should not be considering ANY Green Belt Land for development.

**DRAINAGE & FLOODING:** We are all aware of the information around the effects of New Developments with numerous Roofs, Roads, Paths & Patios etc and the consequential effects they have on Surface and Ground Water. These excesses will inevitable flow to lower levels, i.e. to the bottom of the Valley and hence into the River Irwell, and therefore will have a very significant impact on the Communities of Irwell Vale, Strongstry & Chatterton and possibly further down the Valley to Communities such as Ramsbottom etc.

An Environment Agency Report for "Irwell Vale, Chatterton and Strongstry Flood Risk Management Scheme" titled "Funding Strategy" for sharing externally in October 2021 stated "The communities have a long history of flooding, with the most recent event occurring during Storm Ciara in February 2020 where 43 number of properties were flooded. The communities were also impacted in 2008, 2012 (twice), 2015 and 2017".

This Report doesn't mention the flooding of properties during the 1990's or the 2 very near misses since, at the end of October 2020 and on 20th January 2021 (Storm Christoph) when Families from at least 5 properties in Meadow Park, Irwell Vale that we know of, including ourselves, moved out for the night during a Covid Lockdown, and one bungalow was only saved from flooding by the initiatives and help of local Residents.

Over the past couple of years we have been corresponding with The Environment Agency involved with the Project to prevent flooding in Irwell Vale, Strongstry & Chatterton and they have told us that:-

"the Lead Local Flood Authority (LLFA) is a statutory consultee in the planning process for major developments (where more than 10 dwellings are proposed). The developer has to undertake a site specific Flood Risk Assessment (FRA) which is considered and approved by the LLFA (i.e. Lancashire County Council)."

They have also told us that "The Flood Risk Assessment (FRA) must demonstrate the development will not increase flood risk either on or off site in their supporting documentation. If they cannot show this the Environment Agency objects to the planning application."

We know that with recent current rainfall, normally experienced at this time of the year, that the ground leading down to the bottom of the Valley is already saturated and in some places flooded (pictures attached taken in Valley below planned Edenfield development a week ago). Meadow Park,



with many properties, is effectively a Flood Plane. On this basis, **IF** the various Authorities are doing their jobs properly, then this Planning Application will need to be rejected.

Following the small development on the Site of the Horse & Jockey in Edenfield we understand there is still water running down the lane and eroding it. What have the Authorities done about it when we are told that following a new development there is to be no increase in the flood risk.

Also we know from our experience locally, that Approved Planning Applications are not followed up, and action taken when they are not complied with.

What hope is there then, with a significant development by a multi million pound company, to ensure that the Local Community is being looked after, and we are not placed at any additional flood risk.

**HOLISTIC APPROACH including ALL PLANNING APPLICATIONS:** The Council should implement a Holistic Approach to Planning Applications for Edenfield by looking at ALL the various plans for ALL Developers in Edenfield and not individually, e.g. not just Taylor Wimpey in isolation, but ALL in order to assess the full impact on the Local Community. While Taylor Wimpey are initially looking at 238 properties, in reality there are plans for far more properties to be built by various Developers over time (over 400 and counting), and the impact of all these properties on the local Community and Infrastructure needs to be assessed before any individual decision is made.

**LOCAL INFRASTRUCTURE:** The current Local Infrastructure is not capable of supporting all these additional Homes: Currently it is a struggle to drive through Edenfield (B6527) as the road system is inadequate with numerous parked cars and bottlenecks at each end of the Village where the road narrows. With the proposed increase in houses, increase in parking and increased volume of traffic through the 'Village' this will become gridlocked and will be virtually impossible to drive through. We know currently that when there is a problem on the A56 by-pass the whole area comes to a virtual standstill.

When houses were built on the comparatively very small development on the site of the Horse & Jockey there were additional delays and serious problems driving through Edenfield. What chance with an initial proposal of 238 increasing to over 400 + houses.

As an additional consequence this will seriously affect local businesses as people will be unable to park, which will also have a knock on affect to driving through other townships, in particular, Rawtenstall which suffers very badly at times from Congestion.

**COMMUNITY SUPPORT FACILITIES & SERVICES:** It is common knowledge that the local Primary Schools in the area (Edenfield & Stubbins) and Secondary School (Haslingden High School) are oversubscribed each year and currently already full. While they have each expanded their facilities over recent years they are now at breaking point. Currently there are serious logistical problems outside all of the Schools which currently is dangerous for both Pupils and Parents and would only be exacerbated with increased numbers.

There are no Doctor or Dentist Practices in Edenfield, NHS Dentists in Rossendale are virtually non-existent, and trying to obtain a quick appointment currently with a Doctor, Dentist etc in the local Rossendale area, Haslingden & Rawtenstall, is almost impossible.

**LOSS OF ENVIRONMENT FOR WILDLIFE:** With the many varieties of Wildlife inhabiting the area such as badgers, foxes, deer, barn owls, buzzards etc., the removal of Green Belt / Countryside will result in the removal of their natural habitat some of which could be protected species. Has this been thoroughly checked out?

For the above reasons please reject the Proposed Planning Applications.

Regards

David & Pauline Clements



I wish to register my objection to your plan on the grounds of added and lack of consideration for infrastructure.

Regards

Tim Mulviel

I wish to register my objection to your plan to build the large number of houses in Edenfield. My main concerns are your glib approach to infrastructure and increased pollution.

Regards

Tim Mulviel

[REDACTED]

This e-mail is to register my objections to the building of up to 400 houses on green belt land in Edenfield. The following impacts on the village seem to have been largely ignored:  
Huge increase in air pollution from the several hundred extra cars

Market Street is currently often gridlocked and is unsuitable for extra traffic

Where is the infrastructure needed, doctors, dentists etc.

Both local Primary Schools are oversubscribed and rated Good by Ofsted where will the children from the new houses get their education?

The impact on the physical and mental health of current residents during a 10 year long building programme

This has been untruthfully described as a "community led" project and yet no-one in the community wants this

Pauline Mulviel

[REDACTED]  
[REDACTED]

[Sent from Yahoo Mail on Android](#)

From.Wendy Bashaw.

[REDACTED]  
[REDACTED]

I object to the proposed development of approx 300+ houses by Taylor Wimpey .  
My reasons are .

- 1) No proper surveys have been carried out on the volume of traffic..using Market Street and surrounding roads .
- 2) Very clearly there are no facilities to school the incoming children without extensive development of the current facilities.
- 3) The complete lack of ground surveys..by both the builder and the council for even remotely considering this GREEN BELT land fit to build on .

Having worked with 3 major builders over a 20 year period and lived and worked in this village for over 25 years ..

I can assure T.W and the council you are jointly massively underestimating the disruption and costs involved in going ahead with this ill conceived plan ...

Nb ..it took the last new builder 4 years to sell 10 !! And get of a road side development..just sayin'.

15 January 2022

Dear Sir

**Re: Objection Edenfield Masterplan and Design Codes submitted by Taylor Wimpy**

The main issues are as follows:

*1.A Masterplan covering the H66 development area has not been developed by all interested developers.*

Rossendale Council Local Plan requires a detailed Masterplan must be completed and submitted for all the land within the H66 area, not just for on site within the area. The Masterplan must include full consultation with all interested parties and stakeholders before submission.

Taylor Wimpy has submitted a Masterplan at the same time as the planning application, it led residents to believe it was a collaboration between all the 4 landowners/ developers. However, two of the landowners Peel Homes and Richard Nuttall have confirmed that they have not been involve. Peel Homes and Anwyl have also requested, as stated on the RBC planning portal that company logos are removed from the Masterplan document, and they have not been involved in the Masterplan.

Taylor Wimpy have stated in its own ‘Statement of Community Involvement’(July 2022) that the Masterplan and Design code would be agreed before a planning application is submitted The Masterplan or design code have not been agreed , therefore Taylor Wimpy are not following their own guidance and procedure as stated in Statement of Community Involvement’(July 2022).

For the Masterplan for H66 to be ‘fit for purpose’ all developers, stakeholders and the community must be involved in the development of the plan.

*2.A full and meaningful consultation with the community and all stakeholders on the Masterplan for H66 has not taken place.*

The Localism Act 2011 state the importance of local community involvement in any developments within the community. The developers have not undertaken a proper and meaningful consultation with the local community pre-application. A very short consultation period of 2 weeks was launch on the 22<sup>nd</sup> June 2022. The consultation on the masterplan but only included 2 of the 4 developers with interest in the development of the H66 area. The consultation lacked any detailed plans or

information on the proposals, just 1 A4 leaflet was posted to residents. A small amount of information was available via a website but again this did not provide full and detailed information on all areas of the project.

A large percentage of the community are elderly and do not have the skills or knowledge of using the internet. No in-person consultation was undertaken throughout the consultation process, the only presentation on the development was through a one-hour webinar (which had major IT issues) which also limited the number of places on offer to residents. This method of consultation excludes many members of our community, who could not engage with the process due to the limited types of communication used.

The consultation process did not meet the requirements laid down by the Localism Act or the National Planning Policy framework. It was not a consultation but a tick in the box exercise by the developer. They have ignored the views of the local community and the emerging Edenfield Neighbourhood Plan prepared by Edenfield Community Neighbourhood forum.

*3.The masterplan contains no information or analysis on education, transportation and traffic*

The Masterplan for the site H66, must be consider the education provision of both primary and secondary places. If local schools cannot accommodate the needs of local children in will result in more children attending schools outside Edenfield increasing the number of children which travel to school by car. No details of Education provision have included in the Masterplan

*4.The information in the Taylor Wimpey Masterplan and design codes contains inaccurate information especially in relation to public spaces.*

*5.The proposed Masterplan is does not follow the guidance agreed in Rossendale Council Local Plan and has not considered the emerging Edenfield Neighbourhood Plan.*

We urge Rossendale Borough Council to consider the objections and concerns raised by stakeholders and the community in relation to the Taylor Wimpy Masterplan application and reject the Masterplan.

G Hoyle and C Hoyle - [REDACTED]

R Barlow and H Barlow - [REDACTED]

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We urge Rossendale Borough Council to consider the objections and concerns raised by stakeholders and the community in relation to the Taylor Wimpy Masterplan application and reject the Masterplan.

G Hoyle and C Hoyle - [REDACTED]

R Barlow and H Barlow - [REDACTED]

OBJECTION TO EDENFIELD HOUSING DEVELOPMENT  
PLANNING APPLICATION REF: 2022/0451

(1)

I am objecting to the above application to Rossendale Borough Council as detailed below.

This “Masterplan” does not address the most crucial issues that will be most certainly be generated by the proposed three individual sites:

Taylor Wimpey, Peel and ANWL Land.

An undeniable and absolute certainty will be a radical increase in the number of cars and other vehicles using the surrounding roads and streets.

Edenfield is already subjected to heavy traffic, particularly along Market Street and it is extremely rare to be able to drive along this busy thoroughfare unimpeded by oncoming vehicles, giving rise to a single flow.

This issue is compounded by the fact that, despite its semi-rural surroundings, we are actually immediately adjacent to an extremely large paper mill in Stubbins, which attracts heavy goods vehicles, from several directions, in particular Bolton Road North.

In addition, we are an apparent “rat run” for through traffic not using the A56 dual carriageway.

There is simply not the capacity for ANY increase in our population to this level.

Has there been a comprehensive and adequate traffic assessment for the impact on Edenfield?

If so, can the findings be made public before the above planning application is to be considered?

(2)

We do not have the capacity to accommodate the extra schooling that will undoubtedly be required, and I note that there has been no mention in the Masterplan of the extra primary school places that would most certainly be required.

Has there been an assessment of the impact on school capacity?

If so, can the findings be made public before the above planning application is to be considered.

(3)

The developers are taking the very lazy option of not pursuing brownfield sites, which may present more initial work requirements, instead taking the smoother route (given the Government's permission to release greenbelt land), of enticing Rossendale Council, who are now charging full steam to churn out more Council Tax bills.

In reality, this entire proposal is motivated by nothing more than **blatant greed**, both from the developers and Rossendale Council.

I once read a quotation from one of our larger house builders: *"We're not in the business of building homes. We are in the business of making money"*

The Council are complicit in assisting to sell the "dream" of living in a semi-rural (soon to be destroyed) idyll, and actually selling of OUR quality of life.

(4)

I do believe there are a series of questions that require answers.

Do the Masterplan and planning application meet the requirements of the RBC Local Plan?

Does the Masterplan represent all developers for the whole site?

If not, why not?

Have all concerns regarding the phasing of how the development will proceed been adequately addressed?

Can we have visibility of the road infrastructure blueprint?

I'm of the understanding that a design Code that has been created by ECNF has been supported by RBC. Has this been given due consideration?

Has it been considered that the scale of the development will, in fact, OBLITERATE Edenfield?

Have concerns about the ecology, drainage and flood risk been analysed in depth?

If so, can we be provided with the intricate details?

Can we have full visibility of all provisions of local services that will undoubtedly be required to supplement this proposed development?

Has there been a thorough investigation into the environmental impact of this proposed development?

If not, why not?

If yes, will you divulge the findings?

(5)

In addition to what I have said already, I have another concern which involves the historic aspect of Edenfield.

There appears to be a centuries' old plague stone in the churchyard meaning that the locals must have had concerns about the plague reaching Edenfield. But equally it may be that the plague (and there have been a few down through the centuries) did indeed touch Edenfield, and as we know, its victims were not buried in consecrated ground, but either on deconsecrated ground or land *adjacent to* the church. That is, not far outside its boundaries in what is termed a "liminal" area.

As such it was deemed necessary, whenever this happened, not to disturb these graves *for centuries* for the sake of the well-being of the inhabitants of any given area, as the remains of plague victims were believed to be contaminated.

Therefore, it is my concern that the proposed site could well have had such interments and, as is known from our history books, may include other unfortunate people not deemed fit for consecrated ground. Unbaptised children were not buried in consecrated ground, neither were strangers who fell dead on the roadside, criminals, and other persons who fell outside the accepted criteria for a Christian burial. Sad though these facts may be, they are indeed facts. And it is my concern that the proposed land should be thoroughly excavated to determine if it may have been what is generally termed "A Suicides' Graveyard."

Peter Cooke, [REDACTED]

Ruth Lyndsey Cooke

[REDACTED]

[REDACTED]

[REDACTED]

To : Rossendale Borough Council

Re: Masterplan & Planning Application 2022/0451

Dear sirs,

My father (who is a resident of Edenfield) has furnished me with details of the proposal to allow the building of a minimum of 235 houses on former farmland.

This is of very deep concern for me, as it would totally destroy the character of this village and cause massive disruption to the lifestyle of all who live in Edenfield and surrounding areas.

HGV vehicles would be in constant flow for the duration of the development and without doubt the population of other cars and vans would be increased with the arrival of the extra residents.

Before I moved to Epsom, I did in fact contemplate purchasing a property within the immediate area, which would have made my son eligible to attend Edenfield Primary School, which I understand has an excellent reputation. We visited the school and were impressed but cannot envisage that it would have the capacity to absorb being swamped with the influx of new pupils that would undoubtedly become a reality.

I urge you to decline this application in its current form.

Thank you in anticipation,

R L Cooke

Katherine Hannah Bevan

[REDACTED]  
[REDACTED]  
[REDACTED]

Ref: Masterplan & planning application: 2022/0451

To whom it may concern.

Dear sirs,

I am a frequent visitor to Edenfield, as my father lives there and I am horrified to learn of the proposal to build 235 houses on greenbelt land behind Market Street.

This village does not in any way shape or form have the capacity for the extra traffic that this would most certainly create.

Furthermore, there is simply not the educational capacity for the extra primary school places that would be a requirement.

If this proposed development were to proceed, the residents of Edenfield (including my father) would be subjected to years of mayhem.

For the above reasons I now ask Rossendale Borough Council to decline this application.

Yours sincerely,

KH Bevan

- End of Part 1 -