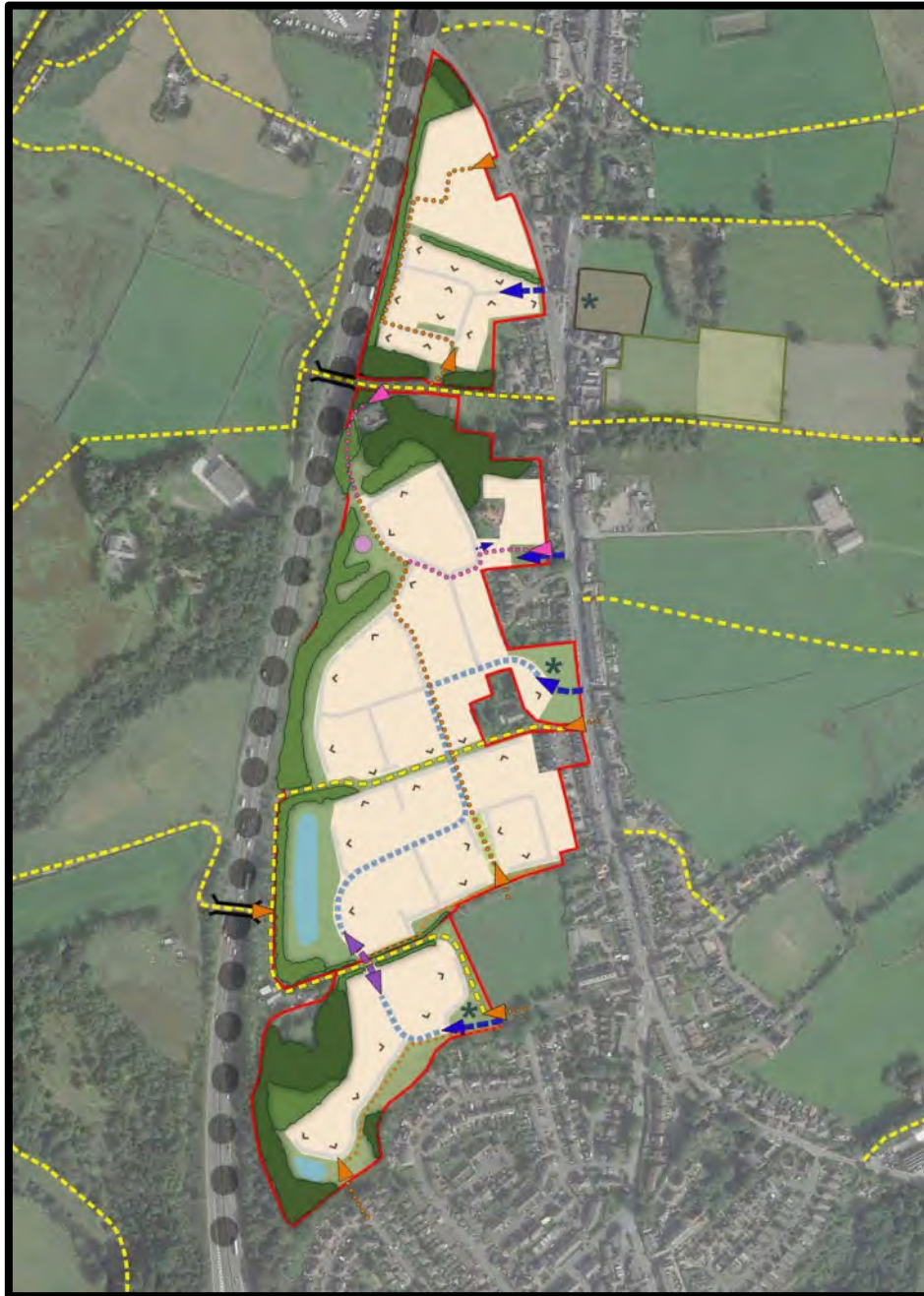


Land West of Market St, Edenfield (H66)  
Amended Masterplan submitted in September 2023

**Responses Received**



H66 Masterplan (Taylor Wimpey, 2023)

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Dear Forward Planning Team,

In response to yet another Masterplan from Taylor Wimpey all our objections in letter of 3rd. December 2022 and e-mail of 2nd. July still stand.

Too many houses and too much traffic for a village the size of Edenfield.

Yours Sincerely,

Phil and Elaine Johnson.

**Reference** 2022/0451  
**Alternative Reference** PP-11451995  
**Location** Land West Of Market Street Edenfield Bury Lancashire  
**Proposal** Full application for the erection of 238 no. residential dwellings (Use Class C3) and all associated works, including new access, landscaping and public open space.

**For the attention of James Dagleish**

Public Rights of Way have the following comments on the Amended Masterplan & Design Code for the above application.

Our previous comments dated 11 January 2023 stated the following:

1. *Footpath 14-3-FP126 between Chatterton Hey bridge over the A56 and Market Street is to be retained at its existing width and finished with a bound surface.*
2. *The cattle grids on the western and eastern section of the path are to be removed and vehicles restricted from use.*

***The removal of the cattle grids and resurfacing of footpath 14-3-FP126 is not reflected within the plan.***

3. *To improve accessibility for residents south of the development it is requested that a surfaced connection linking footpath 14-3-FP127 and the hammerhead at plot 220 be created.*

***Although the Detailed Landscape Plan indicates a connection linking footpath 14-3-FP126 and the hammerhead between plots 110 and 109 it omits to include a break in the black boundary line (not itemised on the legend) or drystone wall above plot 127, without which the path will be obstructed.***

4. *To improve accessibility for residents north of the footpath it is requested that a surfaced connection linking footpath 14-3-FP126 and the hammerhead between plots 110 and 109 be created.*

***If the footpath link is not within the purview of the developer Public Rights of Way request a Developer Contribution in the region of £2,000 to establish the link on completion of the development.***

**Segregated footpath/cycleway**

The Hard Landscaping Plan DRWG: MAN 0229\_DE\_015D\_\_A1 P states the segregated footpath/cycleway through the centre of the development to be finished with a Black Macadam surface, however this has been downgraded to an unsealed surface on the Detailed Landscape sheet 1 DRWG No: MAN-0299\_EN\_101\_1 which is not acceptable.

The length of the proposed north-south cycleway must have a sealed surface to facilitate use all year round and reduce the requirements for ongoing maintenance. However, there is equestrian use in the use in the area so consideration should be given to potentially using flexible surfacing that has been used on other similar greenway routes in Rossendale including the nearby section of National

Cycle Route 6 immediately north of Lumb Viaduct. This will provide a hard wearing, porous surface suitable for all users.

***To satisfy our requirements Public Rights of Way request a revised Detailed Landscape Sheet reflecting these changes.***

**Executive Summary (page 6 & 7 of the Masterplan, also plan on Page 51)**

5. The north – south cycleway proposed through the site is welcomed and reflects previous comments submitted on the application and masterplan. However, sections of cycleway on the Masterplan are marked in pink as 'potential pedestrian /cycle routes' rather than orange and 'proposed' as other routes are. There should be a commitment to build these routes so there should be a commitment to build any footpath/cycleway within the masterplan boundary and ownership of the potential developers.
6. There also seems to be a gap in the cycleway across the southern parcel of land where the main access road and PROW are shown (east of Chatterton Heys). A continuous cycleway route needs to be provided by any developer from the Woodlands Road site boundary in the south to Blackburn Road in the north although it is acknowledged a small section of this close to Church lane is on National Highways land so will be the subject of improvement by others through means of a S106 contribution. (£24,000 previously requested from developer)

**Street typology table (page 69)**

7. It is unclear how the headings of the different street typologies in this table relate to the vehicular access shown by the dotted blue line on the masterplan which appears to be the primary highway route through the southern part of the site and whether this is a secondary street. As well as the separate cycleway route proposed, the design of the primary highway through the site needs to take into account the core design principles ***of the Government's recent 'Gear Change' - A bold vision for cycling and walking and accompanying Cycle Infrastructure Design – Local Transport Note (LTN) 1/20, both published in July 2020.***

Given the significant size of the development; to meet the above requirements of LTN 1/20, ideally ***a segregated cycle route at least 3m wide should be provided alongside the length of the main access roads through the development.***

If this is not possible, ***as a minimum one of the footways should be widened to at least 3m and a shared use facility created for pedestrians and cyclists to segregate them from the highway and vehicular traffic.***

Any cycle routes provided within the masterplan site need to meet the core design principles set out in LTN 1/20 including:

***Design Principle 2***

'Cycles must be treated as vehicles and not as pedestrians. On urban streets, cyclists must be physically separated from pedestrians and should not share space with pedestrians. Where cycle routes cross pavements, a physically segregated track should always be provided. At crossings and junctions, cyclists should not share the space used by pedestrians but should be provided with a separate parallel route.'

**Design of proposed north – south cycleway and requirements for cycling provision alongside main access road**

8. In line with the requirements of LTN1/20 then the cycleway route should have segregated cycle and pedestrian use with a minimum 3m wide cycleway and 2m wide footway. If this isn't feasible then a shared use path ideally 4.5m wide and at least 3m wide should be provided, to meet the standards set out in Section 6.5 of LTN1/20.
9. The proposed north-south cycleway should have a sealed surface to facilitate use all year round and reduce the requirements for ongoing maintenance. However, there is equestrian use in the area so consideration should be given to potentially using flexible surfacing that has been used on other similar greenway routes in Rossendale including the nearby section of National Cycle Route 6 immediately north of Lumb Viaduct. This will provide a hard wearing, porous surface suitable for all users. This is an approved material and can potentially be adopted by Lancashire County Council so should be referred to on Page 73 of the Masterplan in regards to Surface materials.

Regards Julie

Julie Paton  
PROW Capital Project Officer  
Planning & Environment  
Lancashire County Council

[REDACTED]  
[REDACTED]

W: [www.lancashire.gov.uk](http://www.lancashire.gov.uk)  
FB: [www.facebook.com/LancsECP](https://www.facebook.com/LancsECP)

[REDACTED]

\*\*\*\*\*

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*Our Ref:* 70123  
*Your Ref:*  
*Date:* 19 October 2023  
*Please ask for:* Helen Leach  
*Direct Line:* [REDACTED]  
*Fax:* [REDACTED]  
*E-Mail:* [REDACTED]  
***Electronic or fax service of Legal documents is not accepted***

Forward Planning  
Rossendale Council  
Business Centre  
Futures Park  
OL13 0BB

Dear Sir/Madam

**Proposal: Article 18 consultation from Rossendale Council: Further Amended Masterplan & Design Code in association with Housing Allocation H66 of the Adopted Rossendale Local Plan**

**Location: Land West of Market St, Edenfield (H66)**

This application has now been considered and this Authority **RAISES NO OBJECTION** to the proposal.

I would ask that you give every consideration to any representations you have received from residents of Bury when you assess the acceptability or not of the scheme.

Yours faithfully

**The Development Management Team**



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

From: **Andrew Brimelow** <[REDACTED]>  
Date: Thu, 19 Oct 2023, 18:18  
Subject: "Edenfield Masterplan(September 2023 version)".  
To: <[forwardplanning@rossendalebc.go.uk](mailto:forwardplanning@rossendalebc.go.uk)>

Dear sir /Madam

I am writing (once again) to object to the application for development of new houses within Edenfield . As a resident of [REDACTED], I must strongly object to the masterplan for the following reasons.

Disruption to the lives of residents through high volumes of traffic that would emerge from the new builds , causing excess traffic and congestion to an already congested area.

Development by 5 developers simultaneously causing heavy goods vehicles to access edenfield on a constant basis to remove earth and supply building materials causing massive disruption to the village and damage to existing housing through vibration and earth movement.

Total lack of amenities to cater for new residents... such as doctors dentists schools and parking for existing residents ...for example Market street which only has street parking.

The noise created from excess traffic would disrupt existing residents lives and would stop residents parking within range of their own properties. (Why should we be told we can't park outside our own homes )

There is absolutely no infrastructure to accommodate the development.

Children and adults put at risk of injury or death from excess traffic.

Congestion hampering residents travel to work causing longer days commuting to and from work.

I believe this isn't an exercise to provide extra housing in an already busy area but a money grab by LCC to reap extra funds through new developments where other land could and should be used to provide areas for new builds away from edenfield and nearby surrounding areas. Lancashire has plenty of it.

The views and ambience of the village would be destroyed along with land that houses wildlife also adding to flood risks due to replacing earth with concrete .

Yours sincerely

Andrew Brimelow  
[REDACTED]

Good evening,

We would like to object to the proposed development to the land west of Market Street in Edenfield.

The traffic flow on Market Street is already heavy, an additional 200 plus houses would add to this congestion and bring further noise and pollution to a small rural villiage.

The infrastructure of Edenfield cannot support a development of this size, schools and GP surgeries cannot accommodate the number of people proposed.

There is no consideration to existing residents with regards to parking and being able to access their properties safely.

Access roads have not been carefully considered. The proposals are unsafe and badly thought out.

The bottom line is that Edenfield is a small rural area unable to support a development of this size without having a significant and detrimental impact on the flora, fawna and wellbeing of the community and we strongly object.

Kind regards

Paula and Lee Munro

Policy H66 requires a masterplan with an agreed programme of implementation and phasing. This is not a masterplan, it is Taylor Wimpey's plan which, contrary to an agreed programme, actually suggests that all five development phases could be developed simultaneously.

Policy H66 requires suitable mitigation measures in respect of the capacity of Market St to accommodate additional traffic. It can barely cope with the current weight of traffic, especially when the by-pass is closed. The proposed package of improvements for Market St and Exchange St only takes account of moving, through traffic. Stationary traffic is ignored. Parking along Market St is already insufficient for the number of terraced properties and for the customers of local businesses. The space available will be considerably reduced when restrictions are imposed and businesses will be seriously affected. WHERE WILL RESIDENTS PARK? How will elderly or disabled residents access their homes carrying shopping? How will parents of young children safely unload their cars whilst ensuring the safety of their children? Where will delivery vans, removal vans or visiting tradesmen's vans park?

A transport and traffic assessment is required, as is a road safety audit.

There is no plan to address what will be a major issue for existing residents, who will be seriously disadvantaged in favour of incoming residents to the new properties. Should an equality impact assessment be undertaken?

The lack of suitable infrastructure seems to have been completely overlooked. The primary schools within walking distance will be unable to cope with the increased demand, meaning parents will have to drive their children to school elsewhere, adding to local rush hour traffic problems, and there are no nearby secondary schools.

There are insufficient local shopping and healthcare amenities to cope with existing demand let alone a 50% increase.

The removal of existing areas of vegetation and the demands of a further 400 properties will increase the risk of flooding onto the bypass and beyond, to Irwell Vale.

I object to the masterplan.  
Kath Shaughnessy

Sent from my iPad

Sent from my iPad.

mrs J Griffiths

>

> [REDACTED]

[REDACTED]

[REDACTED] Dear Sir or Madam

I totally object to Taylor Wimpey plans for Edenfield mainly the Access to the development on Exchange st is not good and going through the village is very bad now with congestion and worse when we have an accident on the By pass .

Yours faithfully

Joyce Griffiths !

**FAO: Forward Planning Team, Rossendale Borough Council**

Thank you for inviting National Highways to make further comments on the October 2023 version of the Edenfield Masterplan covering Local Plan housing allocation H66.

I am able to state that NH has no specific further comments to make with regard the revised Masterplan, Designs code document. Our original response and comments is attached for reference.

Previous comments provided by my colleague below with regard to the Taylor Wimpey site is still an on going matter and being resolved as the planning application comes forward.

Meetings are currently beginning to take place to go through the issues with the development.

National Highways are content with the contents of the document and look forward to continuing to work with you to deliver the Housing Allocation H66 (Edenfield).

Please feel free to contact me if I can help further.

Kind Regards

Lindsay

**Lindsay Alder, PGCE,  
Pronounced: Lind-say Al-der  
Pronouns :She/Her/Hers  
Spatial Planner  
Network Development & Planning Team  
OD EDI Lead  
Equality Diversity and Inclusion NW Champion  
Please note new email address. Please update your address book to include this;** [REDACTED]

National Highways | [REDACTED]

Web: <https://nationalhighways.co.uk/>



For information and guidance on on planning and the Strategic Road Network in England please visit:

<https://nationalhighways.co.uk/our-work/planning-and-the-strategic-road-network-in-england/>

**From:** Warren Hilton <[REDACTED]>  
**Sent:** Monday, June 19, 2023 11:04 AM  
**To:** Forward Planning <[forwardplanning@rossendalebc.gov.uk](mailto:forwardplanning@rossendalebc.gov.uk)>  
**Subject:** NH RESPONSE - Housing Allocation H66 (Edenfield) - Revised Masterplan & Design Codes Consultation

**FAO: Forward Planning Team, Rossendale Borough Council**

Thank you for inviting National Highways to comment on the June 2023 version of the Edenfield Masterplan covering Local Plan housing allocation H66.

In terms of the Taylor Wimpey site subject to current application reference 2022/0451, our comments are set out in detail within our current holding recommendation response to that application.

Whilst it may be an aspiration, it has not been established to use of SUDS is a suitable drainage strategy in relation to the topography, ground conditions and the adjacent A56, as set out within those comments. National Highways therefore looks forward to this aspect and the others we have raised being addressed in detail as part of the planning application consultation process.

If you would like to discuss anything about this email, please contact me.

Kind regards,

**Warren Hilton, Assistant Spatial Planner**

Operations North West | National Highways | [REDACTED]  
[REDACTED]

Web: [www.nationalhighways.co.uk](http://www.nationalhighways.co.uk)

For information and guidance on planning and the Strategic Road Network in England please visit:

<https://nationalhighways.co.uk/our-work/planning-and-the-strategic-road-network-in-england/>

**From:** Forward Planning <[forwardplanning@rossendalebc.gov.uk](mailto:forwardplanning@rossendalebc.gov.uk)>  
**Sent:** Friday, June 16, 2023 1:27 PM  
**Cc:** Forward Planning <[forwardplanning@rossendalebc.gov.uk](mailto:forwardplanning@rossendalebc.gov.uk)>  
**Subject:** Housing Allocation H66 (Edenfield) - Revised Masterplan & Design Codes Consultation

Dear Consultee,

You are receiving this email because the Council has received a Revised Masterplan and Design Codes from Taylor Wimpey in association with 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.

This is notice of a follow up consultation in light of the Revised Masterplan and Design Codes.

This consultation will run until **17:00 on Friday 14<sup>th</sup> July 2023**, and the Council is inviting comments and representations on the Masterplan and Design Codes which can be accessed using the following link:  
[www.rossendale.gov.uk/edenfieldmasterplan](http://www.rossendale.gov.uk/edenfieldmasterplan)

### **HOW TO RESPOND**

Responses must include your name and full postal address.

*One response on behalf of a number of respondents will also be accepted so long as the names and full postal addresses of all the respondents are detailed.*

Responses received will be made publicly available and published in full on the Masterplan & Design Codes webpage and this will include your name but other personal details including addresses, contact details and signatures will be redacted.

Please return responses via **email** to [forwardplanning@rossendalebc.gov.uk](mailto:forwardplanning@rossendalebc.gov.uk).

If you are unable to access email then you can **post** your response to:

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

**IMPORTANT: It is not possible for the Planning Department to acknowledge representations or respond to them individually but they will be taken into consideration.**

Should you want to view the document please **ring: 01706 252418 / 252412** to make an appointment to come in to view the documents at Futures Park.

The Forward Planning team

Telephone: 01706 252418

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



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<https://nationalhighways.co.uk> | [REDACTED]

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[REDACTED]

Consider the environment. Please don't print this e-mail unless you really need to.



Dear Anne,

It was good to meet with you and the landowner interests last month to discuss our concerns about the Council's proposed allocation of housing site H72 (Land West of Market Street, Edenfield) within the emerging Local Plan.

As agreed at the meeting, Highways England has since received copies of desktop studies covering the majority of the proposed allocation. We have now considered these. Highways England is therefore now able to provide an updated Publication Version Local Plan consultation response for site H72, which we hope the Council is now able to accept (please see attached letter).

You'll notice that we have expressed advice in the letter that the Council (primarily) and development interests need to better understand the ground conditions within the site 'before planning decisions are made'.

Whilst the remainder of this email **isn't** part of our consultation response, we cannot stress enough the importance of the Council having a better understanding of ground conditions of the site as a whole. The Council is likely to need to be in an informed position when it comes to what the allocation can yield, and also when it comes to taking decisions on an eventual planning application. As we've said in our letter, problems can be engineered-out. The problem right now (both in terms of the proposed allocation of the site, and developer intentions for the site illustrated in the Masterplan) is that both the Council and developers don't have enough information to properly understand what the problems are, and therefore what the scope (and cost) of the 'engineering out' aspect is.

The lack of geotechnical information about the site **at present** means that the development needs to be very carefully undertaken and managed.

The relic land slips described by Betts in their desktop study for Taylor Wimpey, the slope movements we have recorded to the rear of Chatterton Heys, the problems at Woodcliffe (now north of the site) and at the Bank Lane footbridge (south of the site) all highlight that problems within the whole of the proposed allocation can so easily arise if not managed properly.

A member of the public living adjacent to the site (who has read our previous consultation letter) has provided us with anecdotal evidence that, during construction of the A56 Edenfield Bypass, material excavated from the path of the 'new' road was deposited evenly over a wide area of the field now owned by Taylor Wimpey and Manchester Methodists. Allegedly, this was done at the request of the then resident of Mushroom House so that the slightly raised level of the field would block their view of the A56. Whilst we don't have any records to confirm that this is the case, we don't have any reason to suspect that the story is untrue.

Large excavations were made to create the cuttings along the A56, such as at Woodcliffe. Excavated material during construction can be both a liability and an asset to a construction operation. Usually, material from one part of the construction site is used within another (e.g. for a road, to use to create an embankment or fill for the road). Given what the ground conditions on the A56 corridor (and at the nearby

large Woodcliffe cutting) are like, the material would be unsuitable for use elsewhere on site. Therefore, 'disposing' of it in the way that has been alleged would certainly have been convenient for us at the time. Certainly, aerial photographs of the site today that we have been given would suggest that this may be true.

This means that the geotechnical situation below some, or all, of the site could be tricky and will need careful consideration. For example if the site is to be remodelled to remove / amend this topped 'hump' layer of fill material by moving it around (seems a distinct possibility), and if laminated clays of some thickness are present below the fill relocation areas and become overloaded, instability could develop which may be difficult to recover from and could impact the A56 (depending on location) or other areas of the site. This is why it may be wise for you to now invest in having a true understanding of the actual ground conditions at the site so that decisions aren't taken in ignorance.

We hope that the Council will find our letter useful. If you would like to discuss anything about our letter, or this email, please contact me.

Kind regards,

**Warren Hilton, Assistant Asset Manager**

Highways England | [REDACTED]

Web: [www.highwaysengland.co.uk](http://www.highwaysengland.co.uk).

**From:** Forward Planning [<mailto:forwardplanning@rossendalebc.gov.uk>]

**Sent:** 23 August 2018 19:11

**Subject:** Local Plan and Statement of Community Involvement Consultations

Dear Sir / Madam,

**Publication version of the Local Plan for Rossendale (Regulation 19)  
Consultation from Thursday 23<sup>rd</sup> August to Friday 5<sup>th</sup> October 2018**

Rossendale Borough Council has published the Rossendale Local Plan (Reg 19 version) for consultation. All the consultation documents and the [online comments form](#) are available to view online at [www.rossendale.gov.uk/localplan](http://www.rossendale.gov.uk/localplan).

Paper copies can be viewed at the **One Stop Shop, Futures Park, Bacup, OL13 0BB**, on a Monday to Friday between 8.45am and 5.00pm (except Tuesdays from 09.15pm to 5.00pm), and at all libraries in Rossendale during normal opening hours, as well as at Crawshawbooth Village Centre. Copies can be viewed at Whitworth Town Council offices from Tuesday 4<sup>th</sup> September between 9am and 2.30pm.

Comments **must relate to soundness, legal compliance, and compliance with the Duty to Cooperate**. Please be aware that they cannot be anonymous and will be forwarded on for consideration to the appointed Planning Inspector as part of the

Local Plan examination. Comments must be received on or before **Friday 5<sup>th</sup> October 2018**, and any arriving after this time will not be accepted.

The attached Statement of Representations Procedure provides more information on this consultation.

Information sessions will be held at Futures Park on 13<sup>th</sup> and 18<sup>th</sup> September from 3pm to 7pm. Paper copies of the consultation form can be obtained from the One Stop Shop or by phoning 01706 21777.

You are receiving this email as you have asked to be kept informed about the Local Plan. If you no longer wish to receive correspondence on this matter please contact us.

**Statement of Community Involvement  
Consultation from Thursday 23<sup>rd</sup> August to Friday 5<sup>th</sup> October 2018**

A consultation is also taking place on the Statement of Community Involvement. Please refer to [www.rossendale.gov.uk/SCI](http://www.rossendale.gov.uk/SCI) for further details.

If you have any queries please email [forwardplanning@rossendalebc.gov.uk](mailto:forwardplanning@rossendalebc.gov.uk)

Yours faithfully,

Mike Atherton  
Planning Manager  
Rossendale Borough Council  
Planning Department | Room 121 | The Business Centre | Futures Park  
Bacup | Lancashire | OL13 0BB



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**Disclaimer**

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Anne Stora  
Rossendale Borough Council  
Room 119  
Business Centre  
Futures Park  
Bacup  
Lancashire  
OL13 0BB

Warren Hilton  
Assistant Asset Manager

Direct Line: [REDACTED]

25 January 2019

Dear Anne,

**CONSULTATION ON THE PRE-SUBMISSION PUBLICATION VERSION OF THE LOCAL PLAN**

**HIGHWAYS ENGLAND COMMENTS ON PROPOSED HOUSING SITE ALLOCATION H72 (LAND WEST OF MARKET STREET, EDENFIELD)**

Highways England is charged with operating, managing capacity, maintaining and improving England's motorways and major A roads, which form the Strategic Road Network (SRN). The SRN in Rossendale comprises the northernmost stretch of the M66 motorway and the A56 corridor; from a point south of M66 Junction '0' to a point north of the A56 roundabout junction with the A680 at Rising Bridge. This north-south corridor is a route of regional significance that links Greater Manchester with Lancashire.

In our letter dated 4th October 2018, we provided consultation comments on the Rossendale Borough Council (RBC) Pre-Submission stage Local Plan. This consultation response commented on several areas covering RBC's Highway Capacity Study, as well as viability matters linked to geotechnics and ground conditions concerning three proposed allocations. It is on this latter aspect on which we now write; specifically in respect of comments made about the housing site allocation reference 'H72' known as 'Land West of Market Street, Edenfield'.

Our previous letter expressed serious concern regarding the physical impact that developing allocation H72 may have on the stability of the earth cuttings of the adjacent A56 trunk road, particularly given the absence of a detailed ground investigation survey and assessment within the Council's supporting evidence base. Those comments were made from our standpoint as an infrastructure provider with knowledge and experience of the uniquely difficult ground conditions found in the Rossendale valley. This is emphasised by the land slip problem that we are managing at the Woodcliffe cutting. Our borehole records for the remainder of the A56 path adjacent to the allocation indicates the presence of similar ground material.

Since our letter of 4<sup>th</sup> October 2018, RBC has engaged with Highways England on these matters. The purpose of this letter is therefore to update the Council on Highways England's position on the H72 site allocation proposal following those discussions.

Firstly, Highways England now notes that the portion of the proposed allocation to the north of Blackburn Road, situated above the A56 cutting at Woodcliffe referred to above, has been removed from the Preferred Options Local Plan. Highways England strongly welcomes this change, and would not have supported the Plan otherwise.

Highways England has therefore now considered the revised site allocation based on the masterplan drawing entitled 'North West Edenfield Local Plan Representations Combined Illustrative Masterplan' Drawing No. 610C-02C prepared by Randall Thorp on behalf of the three landowning interests in the amended site. We have also considered desktop ground investigation reports and preliminary site surveys that have been submitted to us, and prepared on behalf of, those interests in the central and southern parcels of the allocation. These are:

- Preliminary Sources Study Report prepared by Betts Geo on behalf of Taylor Wimpey (Report No.18TAY043/PSSR – dated November 2018 for central and partial northern site portion owed by Peel Holdings)
- Edenfield Geotechnical Summary Sheet (covering full allocation), prepared by Betts Geo on behalf of Taylor Wimpey (Reference 18TAY043 for central and partial northern site portion)
- Desktop Geotechnical Appraisal prepared by Hydrock on behalf of Nexus Planning (Document Reference ESE-HYD-XX-XX-RP-GE-0001 dated 19<sup>th</sup> December 2018 for southern site portion)

We are aware of stability issues within our cutting slope immediately to the west of Chatterton Heys (within the Hydrock survey area), although this is some distance from the proposed housing development itself judging by the masterplan. The report by Betts also describes some relic landslips in a slope towards the northern end of the proposed site allocation (see photo 23 within the section 11 photo location plan PDF drawing on page 60). Although not significant for the A56, it demonstrates our overall point about ground stability risks within the site.

From our own route geotechnical records of the adjoining A56, we have made RBC aware of the presence of laminated clays below the general area of the site. An abundance of laminated clay may change the building foundation conditions locally and engender differential ground settlement. For housing development, special attention therefore also needs to be taken to building foundations; perhaps deeper and pile-driven for example. The level of moisture content within the ground is also important; higher moisture content generally indicating lower strength material giving lower bearing capacities, increased settlement under load and a higher risk of instability (e.g. landslip). Laminated clay is also typically an unsuitable fill material and is therefore inappropriate for structural re-use elsewhere without appropriate stabilisation treatment.

Whilst development of the areas away from the A56 fringe may not in itself affect the trunk road, the presence of these deposits (and the evidence of some instability in the HE slopes adjacent to the site) demonstrates ground stability risks are present in the general area. It therefore underlines the need for a high level of caution and technical awareness in any approach to preparing a development application for this site to avoid causing instability or damage to Highways England's asset (as well as ground problems within the wider development away from the trunk road for that matter).

We therefore counsel RBC that it would be prudent to ensure that a comprehensive (and intrusive) site survey and geotechnical assessment is carried out before planning decisions affecting the development layout (and therefore quantum of development) are taken.

Consequently, we remain content with the statement in our previous letter that there is a “*realistic possibility the disturbance caused by earthworks and loading of the surrounding land by building upon (if not considered and managed correctly) would trigger further land slippage problems along the A56 boundary. This is of course a safety concern, both in relation to the users of the trunk road and the residents of any housing – the results of a sudden land failure would be catastrophic. That is beside any gradual movement to the dwellings themselves*’.

We now comment on proposed allocation of site H72 purely from the perspective of impacts on the safety and integrity of the A56 trunk road, and not in relation to any consequences of developing the land elsewhere within the site.

Overall, we are content that, in principle, the indicative layout outlined within the masterplan drawing referred to above would be unlikely to cause instability to our asset provided that the development layout, earthworks (e.g. land regrading), site drainage and construction operations are suitably designed, planned for and executed. That way, it is possible that the risk of geotechnical problems within the site can be engineered-out. We would therefore require any development to:

- Be based upon a comprehensive site ground investigation survey and geotechnical assessment incorporating new ground investigation and borehole surveys.
- Submit plans for all earthworks and drainage in the vicinity of the A56 boundary upon a full assessment under the Design Manual for Roads and Bridges standard HD22/08 ‘Managing Geotechnical Risk’.
- Avoid loading land adjoining the A56, for example with excavated material.
- Demonstrate that the natural form of the slopes within the site along the A56 boundary around the head of Great Hey Clough and along the boundary with the adjoining A56 embankments either remain undisturbed or their stability is improved.
- Demonstrate how both the culverts of the Great Hey Clough watercourse and unnamed brook to the south west of the site (which pass under the under the A56), together with our A56 embankment toe-drainage apparatus, will be protected from damage and blocking-up during construction (Highways England would be happy to provide RBC and any subsequent planning applicant involving this land with copies of our drainage and ‘as-built’ records for this section of the A56).
- Avoid the use of sustainable urban drainage systems (SUDS) within the site along the boundary with the A56, as indicated in the masterplan. Given the properties of the existing ground material (referred to above as likely to be found in this area) are such that ground stability is significantly reduced by increasing pore pressure. Highways England does not support the use of SUDS within a zone where it could adversely influence the stability of the A56 cutting slopes. Indeed, we would advise that any intention employ SUDS within the wider site should be approached carefully.

Finally, it is worth pointing out that RBC’s Local Plan Highway Capacity Study refers to there being a future need (towards the end of the Local Plan period) to widen the adjoining section of the A56 to three lanes in each direction. This future network requirement is also something which Highways England is aware could be needed towards the early 2030s. Highways England has no proposals to take forward such a scheme at this time, but of course has the right to do so in the future. In theory, as a scheme could be completed within only 10 years of any future

dwellings being occupied, RBC and any future developer(s) of the H72 site may wish to consider this when planning the permanent internal layout and landscaping of a 'new' development.

In conclusion then, Highways England is now satisfied in principle that the emerging Rossendale Local Plan site allocation H72 could be developed for housing without adverse impact upon the A56 trunk road, provided that a careful approach is taken to its planning and construction.

We hope that this letter clarifies our position and enables the Council to make progress with this element of its emerging Local Plan. If you would like to discuss anything about this letter, please feel free to contact me.

Yours sincerely,



Warren Hilton  
North West Asset Development Team







**RANDALL THORP**

LANDSCAPE ARCHITECTURE  
ENVIRONMENTAL PLANNING  
MASTERPLANNING  
URBAN DESIGN

www.randallthorp.co.uk

|                              |                                   |  |   |
|------------------------------|-----------------------------------|--|---|
| <b>KEY:</b>                  | Draft housing allocation boundary | Proposed green space                                   | Proposed pedestrian/cycle routes                |
| Existing Public Right of Way | Proposed woodland                 | Potential footpath links                               | Potential pedestrian/cycle/emergency connection |
| Existing vegetation          | Proposed highway access           | Potential area for SuDS (subject to drainage strategy) |   |
| Proposed development cell    | Proposed primary road             |  |   |
| Proposed indicative frontage | Proposed secondary road           |  |   |

Date: 01.10.2018  
Drawn by: SR  
Checker: JF  
Rev by:  
Rev checker:  
QM Status: checked  
Product Status:  
Issue

**North West Edenfield Local Plan Representations**  
**Combined Illustrative Masterplan**

Drwg No: 610C-02C Scale: 1: 5,000 @ A3



Historic England

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



Our ref: PL00794121

27 October 2023

Dear Sir/Madam

**Rossendale Local Plan  
Amended Masterplan & Design Code**

Thank you for your email regarding the amended 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.

Yours sincerely,



HistoricEngland.org.uk



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



Emily Hrycan  
Historic Environment Planning Adviser (North West)



  
[HistoricEngland.org.uk](http://HistoricEngland.org.uk)



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

Please note my objections to the revised masterplan.

There are no improved parking ideas for the people on market street, the car park provided is not a solution.

There has been little to address the sheer volume of traffic that the amount of traffic that the high number of houses proposed will produce.

What is the pollution impact of children and parents walking to school with all the additional cars?

I can not see any pollution studies, how will the air be analysed to ensure our air is still clean despite an increase of at least 200 extra cars.

Anna Webster

Dear Sir

**RE: Amended Masterplan and design code in association Housing Allocation H66  
(Planning application 2022/0451)**

I wish to object to the proposed revised Masterplan (once again the masterplan has no version control on the document, making it increasingly difficult for residents to see which version of the plan they are considering), submitted by Taylor Wimpy on the 28/9/2023 to Rossendale Council.

Once again Taylor Wimpy has failed to consider all stakeholders, the new proposals in the Masterplan have not address all the issues raised by the residents of Edenfield, Stakeholder concerns and issued raised by Rossendale Council and Partners.

All planning application received by Rossendale Council in relation to Edenfield should be put on hold until a full and comprehensive Masterplan is developed that include the views from all the developers, stakeholders, Local Authority and most important the existing residents.

Details of objection to the Edenfield Masterplan are listed below.

**1. This is not a comprehensive masterplan, it does not include information from all stakeholders in relation to the redevelopment of Edenfield.**

The aim of a masterplan is to provide clarity and a high level of detail on all elements within the proposed development area, this should be an integrated comprehensive plan which includes input from all developers in the proposed development area, this will enable the Council, residents, and stakeholders to understand the impact of the proposals.

The master plan proposed by Taylor Wimpy does not provide the level of detail and evidence required to allow all stakeholders to have an informed decisions on the proposals. Taylor Wimpy have not given adequate consideration to the needs and requirements of the residents and the views of stakeholders. This has resulted in a plan which has visible disbenefits including.

- poorly designed road systems.
- major traffic safety concerns.
- will have a major impact on the local economy.
- a lack of consideration has been given to sustainable drainage systems and flood risks.
- infrastructure requirements that have not been addressed by the master plan.
- It fails to meet the requirements of all stakeholders.
- Is not inline with current Policies or Local Plan from Rossendale Council and Lancashire County Council.

The revised masterplan discriminates against existing residents in order to accommodate the needs of Taylor Wimpy and the residents in the new housing development.

## **2. Lack of stakeholder engagement on proposed new masterplan.**

- Taylor Wimpy submitted a Statement of Community Involvement in June 2022 in relation to the original masterplan. However, no Statement of Community Involvement or consultation has taken place in relation to the new revised masterplan which is a requirement of guidance outlined in the Localism Act 2011, the National Planning Policy Framework, the National Planning Policy Guidance. Government Guidance states that developers must proactively engage with the community, so their views can be taken into account, and it must consider maximising the opportunity for local communities to participate. Taylor Wimpy have fail to carry out any engagement with the residents in relation to all revised masterplans.
- Once again consultation by Taylor Wimpy on the revised masterplan has not taken place, in accordance with guidance. It has not enabled all residents to fully engage with the consultation due to lack of communication and information from all developers.

## **3. Traffic flow on Market Street - Proposed new junctions unsafe and not fit for purpose.**

### **• Data to support the highway changes on Market Street**

The report by Eddisons – Highways Considerations submitted to Rossendale Council on 23<sup>rd</sup> June provides transport analysis to support the proposals in the masterplan. The report lacks details and raw data information, so it is difficult to assess the accuracy, validity and reliability of the results. It should be noted the report uses 2011 census journey to work data to assign the traffic vehicles from the site to the wider road network, this data is now over 12 years old and would not give an accurate picture of the current trends in work journeys. The collection of data took place over 3 days in April this is a short data collection period and would not give accurate data. Therefore, the conclusions of the report should be viewed with caution.

### **• The proposed new vehicle access point on Market Street to central land parcel**

In the latest version of the Masterplan contains a proposed vehicle access at the side of Alderwood. This access has been refused by Lancashire County as a potential access for the development of 9 new dwellings (Application NO. 22.0577) as the junction space is significantly below the required standard and would have an impact on highway safety. It would therefore be impossible for Taylor Wimpy to propose this as an access point for the site H66.

### **• Incorrect information on Maps**

Maps used in the master plan and the Proposed Highway Improvement Plan (CAD/CROFT DESIGN 380) are incorrect, affecting the accuracy of traffic proposal and leading to further road and pedestrian safety concerns. No. 82 Market Street is no longer a single dwelling, the Horse and Jockey has been demolished and there is now a new development with 10 houses, Pilgrim Garden with a junction on to Market Street. Again, incorrect information has been used when assessing the traffic situation on Market Street.

- **Serious safety concerns regarding the proposed new junction entrance /exit to Taylor Wimpey proposed site of 238 houses.**

The site access proposed is directly opposite a private entrance to allow access to the rear of properties on Market Street, and several other private driveways, making access to these driveways dangerous. There are no proposed traffic measures for the private access road opposite, meaning that vehicles would exit straight onto the junction.

20 houses get their bins collected outside this private drive once a week. The refuse vehicle would have to park in front of the pedestrian crossing blocking the road at the junction, this would cause congestion at the junction and would put the safety of pedestrians and vulnerable road users at risk.

Double yellow lines and restrictions on parking will have a negative impact on the existing residents in the area. No consideration has been given to people with protected characteristics, families with young children, electric car owners and the delivery of goods to the properties on Market Street

#### **4. Failure of developers to submit an Equality Impact Statement (EIA) in relation to the impact on existing residents of Edenfield.**

The proposals within the masterplan will result in indirect discrimination especially in relation to parking and road safety. It will put people with protected characteristics at a particular disadvantage. Without a full EIA Rossendale Council cannot ensure that the revised masterplan is fair and does not present barriers or disadvantage to any protected groups.

#### **5. Removal of Greenbelt land**

Proposed further release of greenbelt land release for school, play area, and car park is not aligned with the RBC Local Plan. The proposed car park on greenbelt would also raise serious safety issues as it is located next to a major junction and local school.

## **6. The proposed expansion of Edenfield School**

The land identified as an area for development of the school is in Greenbelt and would result in the school losing its playing field and playground. The report also established that it is unlikely the school will need to expand as places would be available to neighbouring schools. However, transport links to neighbouring school especially primary schools are not in place and children living in Edenfield would have difficulty reaching the schools.

## **7. Housing Development**

The proposed development by Taylor Wimpy has not addressed the recommendations of the Place Matters Design Review report or the design codes in the Edenfield Community Neighbourhood plan.

Once again this is a poorly designed masterplan which does not meet the required and guidance of local and national policy.

Your sincerely

Mr CJ and Mrs GP Hoyle

[Redacted signature block]



## **Edenfield Masterplan / (September 2023version)**

As a resident of Edenfield living on [REDACTED] for the last 30 years I am writing to express my objections to the proposed development to the west of Market Street designated H66 under the planning application referenced above.

Firstly I want to comment on my absolute objection to the whole concept this proposed development in the Edenfield area.

The sheer scale of the proposal beggars belief. As everyone involved knows there are just under 1000 residences in the village at the moment. The intention is to build a further 450 houses on what is or was GREEN BELT LAND. Who are the elected official who voted this scheme through the Council meetings. No Council member who actual lives in the village that's for sure. The Council's action will ruin the lives of the people who live in this village for ever more. Councillors are elected to safeguard the lives of the people who live the Borough of Rossendale. The current elected Councillors have voted to blight the lives of all the residents of Edenfield.

**My objections to the proposed development are as follows.**

- Serious safety concerns one way system Exchange Street – won't resolve safety concerns; left hand turn from Market Street to Exchange Street is a blind left turn which is a major safety concern for traffic, pedestrians and cyclists
- Serious safety concerns junction Highfield Road/Exchange Street – particularly child, pedestrian and cycle safety as directly opposite new Cycle Pump Track which is not detailed in either masterplan or planning application
- Serious safety concerns re the proposed access to the site via The Drive, Highfield Road, Eden Avenue – visibility is severely affected by double parking and children play on these streets, hence particular concern for pedestrian and cycle safety; pavements and roads are not wide enough for the amount of traffic they will serve
- Double yellow lines proposed on Market Street and Exchange Street and restricted parking 8am until 6pm – likely to result in reduced footfall to local business butchers, bakers, pharmacy etc. which are essential services and important for the local economy – businesses are like to close if insufficient footfall resulting in a negative effect on the local economy – opposite of what was proposed in local plan
- Gateway proposed– location seems dangerous, misrepresents the start/exit of the village, is unlikely to have an effect on road/pedestrian safety due to size of development/increase in traffic, A56 being closed recently has highlighted this, and traffic diverted ignoring traffic calming measures and they have not been enforced
- No indication of who the proposed additional parking on the Anwyl site will service – is it compensatory parking for existing residents? Is it for new residents? Can it be enforced? No suggestion of future proofing e.g. electric charging points. If compensatory parking unlikely to be sufficient
- Double yellow lines in front of houses – how will current residents access properties with shopping, babies and children etc.
- Proposed further release of greenbelt
- Proposed new junctions unsafe and not fit for purpose
- Serious traffic, cycle and pedestrian safety concerns could result in fatality
- No road safety audit, despite this being raised as a concern on several occasions- we do not believe the traffic proposal would pass a road safety audit

- Double yellow lines and restrictions on parking will have a negative effect on local business's, resulting in a negative effect on the economy – the opposite of what was promised in local plan
- No phasing proposal – concerns over road and pedestrian safety if phasing is ignored and building undertaken simultaneously
- Discrimination against existing residents to accommodate needs of residents in the new houses
- Flood risk overall but particularly on the A56 leading to serious traffic and public safety concerns – still awaiting national highways feedback.
- Serious safety concerns re new junction entrance /exit to Taylor Wimpey (TW) proposed 238 houses – site access proposed on Market street which is highly trafficked, heavily parked.
- Diversion route if the A56/M66 shuts. A key route for agricultural and large quarry vehicles in the area and for cyclists and commuters (Bury, Rawtenstall & further afield). A recreational route for some of the best mountain biking in the North West.
- The site access proposed is directly opposite a private drive and other driveways, making access to these driveways dangerous.
- There are no proposed traffic measures for the private access road opposite, meaning that vehicles would exit straight onto the junction.
- 20 houses get their bins collected outside this private drive once a week. The refuse vehicle would have to park in front of the pedestrian crossing blocking the road at the junction, this would cause congestion at the junction and would put the safety of pedestrians and vulnerable road users at risk.  
Having considered the proposals there is concern that the safety measures proposed are not sufficient and may not meet the requirements for a development of the scale proposed, particularly in relation to sufficient visibility and potentially putting the lives of residents, vulnerable road users (cyclists) and the primary school children (just 250m from the junction) at risk.  
A road safety audit has been mentioned as being necessary on several occasions but has been ignored, Lancashire County Council and RBC must consider this otherwise they are potentially breaching their responsibility to ensure safe day to day life of all residents in Edenfield.
- Double yellow lines in front of houses – how will current residents access properties with shopping, babies, young children etc?
- Compensatory car park is not large enough and not fit for purpose – recent audit identified between 35 and 40 cars parked every night; the car park appears to be open to new and existing residents therefore can't be compensatory; no spaces for potential trades/service personnel; no future proofing e.g. electric charging points; no disabled provision
- No phasing proposal for TW site – therefore could be one big building site for next 10 years leading to traffic and pedestrian safety concerns
- Flood safety risk– SUDS too close to A56 where there is already a known failure of infrastructure/embankment, could reduce stability further on the A56 and put road users safety at risk
- No green spaces within the proposed housing development as recommended in the Places Matter Design Review Report – cramped layout and poor design, the green space being on the western periphery, cost saving
- Maps incorrect affecting accuracy of traffic proposal and leading to further road and pedestrian safety concerns, No. 82 is no longer a single dwelling, Horse and Jockey has been demolished and there is now a new junction with houses Pilgrim Gardens

- Bus stop proposed to be removed and relocated – there is no space to relocate
- Only one crossing point proposed at North side of the junction and not wide enough to incorporate cyclists– serious safety concerns for pedestrians particularly our very young vulnerable primary school children crossing Market Street from the south side
- Pavements not wide enough – to ensure safety of pedestrians should be 2m wide

Sent from [Mail](#) for Windows

Mr and Mrs RJ Barlow

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

Dear Sir

**RE: Amended Masterplan and design code in association Housing Allocation H66  
(Planning application 2022/0451)**

I wish to object to the proposed revised Masterplan (once again the masterplan has no version control on the document, making it increasingly difficult for residents to see which version of the plan they are considering), submitted by Taylor Wimpy on the 28/9/2023 to Rossendale Council.

Once again Taylor Wimpy has failed to consider all stakeholders, the new proposals in the Masterplan have not address all the issues raised by the residents of Edenfield, Stakeholder concerns and issued raised by Rossendale Council and Partners.

All planning application received by Rossendale Council in relation to Edenfield should be put on hold until a full and comprehensive Masterplan is developed that include the views from all the developers, stakeholders, Local Authority and most important the existing residents.

Details of objection to the Edenfield Masterplan are listed below.

**1. This is not a comprehensive masterplan, it does not include information from all stakeholders in relation to the redevelopment of Edenfield.**

The aim of a masterplan is to provide clarity and a high level of detail on all elements within the proposed development area, this should be an integrated comprehensive plan which includes input from all developers in the proposed development area, this will enable the Council, residents, and stakeholders to understand the impact of the proposals.

The master plan proposed by Taylor Wimpy does not provide the level of detail and evidence required to allow all stakeholders to have an informed decisions on the proposals. Taylor Wimpy have not given adequate consideration to the needs and requirements of the residents and the views of stakeholders. This has resulted in a plan which has visible disbenefits including.

- poorly designed road systems.
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- will have a major impact on the local economy.
- a lack of consideration has been given to sustainable drainage systems and flood risks.
- infrastructure requirements that have not been addressed by the master plan.
- It fails to meet the requirements of all stakeholders.
- Is not inline with current Policies or Local Plan from Rossendale Council and Lancashire County Council.

The revised masterplan discriminates against existing residents in order to accommodate the needs of Taylor Wimpy and the residents in the new housing development.

## **2.Lack of stakeholder engagement on proposed new masterplan.**

- Taylor Wimpy submitted a Statement of Community Involvement in June 2022 in relation to the original masterplan. However, no Statement of Community Involvement or consultation has taken place in relation to the new revised masterplan which is a requirement of guidance outlined in the Localism Act 2011, the National Planning Policy Framework, the National Planning Policy Guidance. Government Guidance states that developers must proactively engage with the community, so their views can be taken into account, and it must consider maximising the opportunity for local communities to participate. Taylor Wimpy have fail to carry out any engagement with the residents in relation to all revised masterplans.
- Once again consultation by Taylor Wimpy on the revised masterplan has not taken place, in accordance with guidance. It has not enabled all residents to fully engage with the consultation due to lack of communication and information from all developers.

## **3. Traffic flow on Market Street - Proposed new junctions unsafe and not fit for purpose.**

- **Data to support the highway changes on Market Street**

The report by Eddisons – Highways Considerations submitted to Rossendale Council on 23<sup>rd</sup> June provides transport analysis to support the proposals in the masterplan. The report lacks details and raw data information, so it is difficult to assess the accuracy, validity and reliability of the results. It should be noted the report uses 2011 census journey to work data to assign the traffic vehicles from the site to the wider road network, this data is now over 12 years old and would not give an accurate picture of the current trends in work journeys. The collection of data took place over 3 days in April this is a short data collection period and would not give accurate data. Therefore, the conclusions of the report should be viewed with caution.

- **The proposed new vehicle access point on Market Street to central land parcel**

In the latest version of the Masterplan contains a proposed vehicle access at the side of Alderwood. This access has been refused by Lancashire County as a potential access for the development of 9 new dwellings (Application NO. 22.0577) as the junction space is significantly below the required standard and would have an impact on highway safety. It would therefore be impossible for Taylor Wimpey to propose this as an access point for the site H66.

- **Incorrect information on Maps**

Maps used in the master plan and the Proposed Highway Improvement Plan (CAD/CROFT DESIGN 380) are incorrect, affecting the accuracy of traffic proposal and leading to further road and pedestrian safety concerns. No. 82 Market Street is no longer a single dwelling, the Horse and Jockey has been demolished and there is now a new development with 10 houses, Pilgrim Garden with a junction on to Market Street. Again, incorrect information has been used when assessing the traffic situation on Market Street.

- **Serious safety concerns regarding the proposed new junction entrance /exit to Taylor Wimpey proposed site of 238 houses.**

The site access proposed is directly opposite a private entrance to allow access to the rear of properties on Market Street, and several other private driveways, making access to these driveways dangerous. There are no proposed traffic measures for the private access road opposite, meaning that vehicles would exit straight onto the junction.

20 houses get their bins collected outside this private drive once a week. The refuse vehicle would have to park in front of the pedestrian crossing blocking the road at the junction, this would cause congestion at the junction and would put the safety of pedestrians and vulnerable road users at risk.

Double yellow lines and restrictions on parking will have a negative impact on the existing residents in the area. No consideration has been given to people with protected characteristics, families with young children, electric car owners and the delivery of goods to the properties on Market Street

#### **4.Failure of developers to submit an Equality Impact Statement (EIA) in relation to the impact on existing residents of Edenfield.**

The proposals within the masterplan will result in indirect discrimination especially in relation to parking and road safety. It will put people with protected characteristics at a particular disadvantage. Without a full EIA Rossendale Council cannot ensure

that the revised masterplan is fair and does not present barriers or disadvantage to any protected groups.

**5. Removal of Greenbelt land**

Proposed further release of greenbelt land release for school, play area, and car park is not aligned with the RBC Local Plan. The proposed car park on greenbelt would also raise serious safety issues as it is located next to a major junction and local school.

**6. The proposed expansion of Edenfield School**

The land identified as an area for development of the school is in Greenbelt and would result in the school losing its playing field and playground. The report also established that it is unlikely the school will need to expand as places would be available to neighbouring schools. However, transport links to neighbouring school especially primary schools are not in place and children living in Edenfield would have difficulty reaching the schools.

**7. Housing Development**

The proposed development by Taylor Wimpy has not addressed the recommendations of the Place Matters Design Review report or the design codes in the Edenfield Community Neighbourhood plan.

Once again this is a poorly designed masterplan which does not meet the required and guidance of local and national policy.

Your sincerely

Mr and Mrs RJ Barlow

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██████

Attention of Mike Atherton

Having viewed the above so called revised Masterplan for Edenfield I'm amazed that after all the so called reviews/ presentations and credible objection put forward by resident affected by the massive developments put forward by Taylor Wimpey and 4 other potential developments in Edenfield. That the fundamental objection by 90% of residents traveling/living adjacent to Market Street B6527 have not been given credible consideration. The modification to the original MP proposal have in my opinion made the situation worse in that parking places made available to residents living along its length have been reduced to allow central roadway markings to allow vehicles to turn into the TW development, this system will not work and will cause more road congestion and potential H&S problems for both motorists and pedestrians especially young school children. I also cannot also see how a one way traffic system down Exchange Street can help traffic flow at the junction of Rochdale Road either and will without doubt cause further business closure in this area.

Without doubt failure to conduct a proper H&S audit around the points raised would point to both RBC and Lancashire Highways being negligent in the care of Edenfield residents and children in our village.

Having lived in Edenfield for 40 years I'm seriously concerned about the environment and safety of our village and request RBC to refuse planning approval based on this plan.

Yours Sincerely

Stuart Dearden

██████████  
██████████  
██████████

Sent from my iPad



**Representations against the Revised Masterplan & Design Code [MDC] (September 2023)  
for the Land West of Market Street Edenfield.**

**Summary of Points**

- 1) Page 8 Revised Masterplan & Design Code (RMPDC): Criterion 1:** Masterplan with agreed programme of implementation and phasing: *Claim fully addressed*. However, as there is no statement that confirms all the Developers were involved and there is no clear phasing schedule, the claim that it has been fully addressed is not justified. Refer to paragraph 1.1 in AGA's Representation Submission (AGA) for detail.
- 2) Page 8 RMPDC: Criterion 2: Masterplan with agreed Design Code: Claim fully addressed.** *Again as it is not clear that all Developers or Stakeholders were involved, the claim cannot be justified.* Refer to (AGA) paragraph 1.2 for detail.
- 3) Page 8 RMPDC: A Transport Assessment (TA): 'TA provided demonstrating safe and suitable access for all users'.** We understand not all the issues have been resolved; therefore approval of the Revised Masterplan should be withheld until an agreement is reached with all the parties involved.
- 4) Page 8 RMPDC: Criterion 5(v): Landscaping throughout the site to 'soften the impact of development'.** Despite this issue being highlighted by RBC, RBC's Consultants and Residents it remains unresolved. Refer to (AGA) paragraph 1.4 for detail.
- 5) Page 14 RMPDC: NPPF 130: 'Sympathetic to Local Character including built environment'.** Plan makes no effort to soften the impact to Alderwood Grove with a proposed housing density of 47.7dph, house heights in excess of existing buildings and interface distance at the minimum requirement. Refer to (AGA) paragraph 2.1.1 for details.
- 6) Page 14 RMPDC: NPPF 134: 'Development that is not well designed should be refused'.** The design is not sympathetic to the surrounding built environment; the site layout is poor in terms of excessive density, height and massing. Refer to (AGA) paragraph 2.2 for detail.
- 7) Page 14 RMPDC: Section 15 of NPPF: 'protecting and enhancing valued landscapes'.** Developers have made no real effort to retain the key long views. Refer to (AGA) paragraph 2.3 for detail.
- 8) Page 14 RMPDC: Third Column: Claim 'proposals consistently follow the principles set out in the NPPF'.** Clearly not the case if you refer to paragraphs 5 to 7 above.
- 9) Page 15 RMPDC: Claim 'that the proposed development of the site accords with the NPPG'.** With the excessive density, proposed plot heights, massing etc this plan cannot be considered to accord with the NPPG. Refer to (AGA) paragraph 3.
- 10) Page 16 RMPDC: Local Planning Policy: H66:** The revised plan does not meet either Criterion 1 or 2. Refer to (AGA) paragraphs 1.1 & 1.2 and (AGA) paragraph 4.
- 11) Page 19 RMPDC: Well Designed Place Circle: 'Enhances the surroundings.....'.** These comments raise questions about the judgement of Randall Thorp. Refer to (AGA) paragraph 5.

**12) Page 26 RMPDC: Visual Context-** Photograph selected and the text downplays the importance of the view. Replace photo in the RMPDC. Refer to (AGA) paragraph 6.

**13) Page 38: Column 2: Residential Amenity:** *'Proposed development must ensure that residential amenity of existing dwellings is protected'*.

No protection proposed for Alderwood Grove residents despite the issues of density, height, massing and minimum interface distance. Refer to (AGA) paragraph 7.

**14) Page 38: Column 3 Final paragraph:** Relationship to open space: *Development should broadly seek to retain and frame views to the wider landscape context to retain a sense of place.* The MDC does not achieve this goal, particularly with respect to the existing properties in Market Street and Alderwood Grove. Refer to (AGA) paragraph 8.

**15) Page 44: Masterplan: Density:** *Developers have increased the density in the Village Streets Area to 35-40.* This is completely unjustified, it is in conflict with the Head of Planning and Building Control's recommendation-*'Density should be reduced to the Edenfield Core level and reduced even further in front of existing properties'*. Refer to (AGA) paragraphs 9 & 19.

**16) Page 50: Landscape-led Masterplan:** *'Preserve and enhance what is already there'*. The RMPDC is clearly not complying with this. Refer to (AGA) paragraph 10.

**17) Page 54: Phasing: Randall Thorp state:** *'ordering of development phases may be varied or delivered simultaneously'*. This is contrary to Phasing Policy for H66, it has been highlighted previously, yet the Developers still fail to provide any timing schedules. This is unacceptable and could lead to total chaos. Refer to (AGA) paragraph 11.

**18) Page 58: Site Wide Codes: Column 3: Identity:** *"Development should create a distinctive new place that complements and enhances the character of Edenfield by drawing upon the baseline analysis as presented within this Code. Refer to Area Types for detailed guidance."*

Plan fails to complement and enhance the character of Edenfield. Refer to paragraphs 19 to 26.

**19) Page 60: Site Wide Codes: Nature:** *'Development should safeguard and enhance the natural environment and biodiversity and positively contribute to the well-being of people.'* There is no way this plan contributes to the 'well being' of people in Market Street and Alderwood Grove. Refer to (AGA) paragraph 13.

**20) Page 76: Site Wide Codes: Built Form: Paragraph 1:** *'Density, Massing, height, materials, orientation and spacing etc'*: This plan does not provide an appropriate response to any of the issues or provide a strong sense of place to residents of Market Street and Alderwood Grove. Refer to (AGA) paragraph 14.

**21) Page 76: Site Wide Codes: Built Form: Column 2: Paragraph 8:** *'Variation in ridge height and roof pitch'*: Lower ridge heights required for plots 1 to 13. Refer to (AGA) paragraph 15.

**22) Page 76: Site Wide Codes: Column 3: BF 01:** *'Unless otherwise justified follow guidance set out in Area Type as set out in the Design Code'*. Area Type Design codes have not been agreed with all the parties involved. Refer to (AGA) paragraphs 12 to 16 & paragraphs 19 to 26.

**23) Page 77: Homes & Buildings: HB 02:** *"Development should provide well designed homes which address space standards, accessibility, adaptability, lighting, privacy, security and the delineation of public and private spaces."* HB 02 should also ensure that the daylight, spacing and privacy of

**existing properties and residents are not compromised** by the development. Refer to (AGA) paragraph 18.

**24) Page 84: Area Types: Village Streets: AT/VS 01: Density:** *Originally 29dph, with very little justification the Developers increased this to 35-40.* (Actual density behind number [REDACTED] is 47.7dph.) Developers should reduce the density proposed. Refer to (AGA) paragraph 19.

**25) Page 84: Area Types: Village Streets: AT/VS 03: Massing:** *'Identified less sensitive locations to increase the density'*. Edenfield Parish Church & Grounds a Grade 2\* building listed, in the upper 15% of all listed buildings along with Alderwood Grove and Alderwood cannot be described as 'a less sensitive area'. The MDC for Alderwood Grove proposes a density of 47.7dph, properties that are too high with minimal interface distance. Refer to (AGA) paragraph 20.

**26) Page 84: Area Types: Village Streets: AT/VS 04: Height:** *Plan proposes house heights greater than those of the existing homes that are directly behind creating a "blank wall effect"*. Approval of the MDC should be withheld until proposed heights are reduced to retain key long views, daylight and the *residential amenity of existing dwellings is protected* along with the well being of existing home owners. Refer to (AGA) paragraph 21.

**27) Page 84: Area Types: Village Streets: AT/VS 05: Building line / Set back:** *'Strong block culture will complement the character of nearby Market Street'*. The layout in no way complements Market Street. Refer to (AGA) paragraph 22.

**28) Page 84: Area Types: Village Streets: AT/VS 07: Front Boundary Treatments.** There is no clear boundary treatment plan and the use of Red brick is not sympathetic with the Market Street context. Refer to (AGA) paragraph 23.

**29) Page 84: Area Types: Village Streets: AT/VS 08: Key Views:** *'Quality of views to and from Recreation Ground'*. Evades the vital issue of the views to and from Edenfield Parish Church. Refer to (AGA) paragraph 24.

**30) Page 88: Area Types Edenfield North: AT/EN 01 Density:** *'Lower density than Edenfield Core to reflect the position at the northern fringe of Edenfield'* Statement is **incorrect**. Refer to (AGA) paragraph 25.

**31) Page 88: Edenfield North: AT/EN 04: Height:** *'Retention of Key Long Views: Select building heights to ensure long views to distant hill tops are retained'*. This policy should apply equally to the northerly section of Edenfield Village Streets and should be adopted. Refer to (AGA) paragraph 26.

**32) Page 96: Design Quality Checks:** For comments on all five of these checks refer to (AGA) paragraphs 27 to 31.

**Withhold approval of the MDC until the Developers address all the issues highlighted above.**

**Representations against the Revised Masterplan & Design Code [MDC] (September 2023)  
for the Land West of Market Street Edenfield.**

**Representations**

**1) Pages 8-9: Executive Summary: Policy H66:** *Development for approximately 400 houses would be supported provided that:*

**1.1) Criterion number 1:** Comprehensive development is demonstrated through a Masterplan with agreed programme of implementation and phasing.

**Claim:** *Fully addressed within this document (Masterplan included in section 02/page 51, phasing and implementation in section 03.)*

**This claim cannot be justified as 'fully addressed' as there is no confirmation that all of the Developers were involved and there are no clear agreed phasing schedules included.**

**1.2) Criterion number 2:** *Development is implemented in accordance with an agreed design code.*

**Claim:** *Fully addressed within this document (Sections 04 and 05, and Appendix A).*

**Again there are no grounds for this claim when the document does not state that all of the Developers and Stakeholders were involved in the Revised MDC and there is no agreed design code.**

**1.3) Criterion number 3:** *A Transport Assessment (TA) is provided demonstrating safe and suitable access for all users, including safe vehicular access points adjacent to no 5 Blackburn Road and 88-116 Market Street and suitable off-site mitigation on Market Street (between Blackburn Road and the Rawstron Arms) to accommodate additional traffic and assist pedestrians.*

*An overview of off-site mitigation measures is included at pages 46 and 47, which have been worked up in dialogue with LCC (and respond to their latest comments in August 2023), and will be refined and secured through subsequent individual planning applications.*

**We understand that not all the issues have been resolved, therefore the Revised Masterplan cannot be considered until an agreement is reached with all parties involved. It is not acceptable for issues of this importance to be 'refined and secured through subsequent individual planning applications'.**

**1.4) Criterion 5 (v):** *Landscaping throughout the site to 'soften' the impact of the development and provide a buffer to the new Green Belt boundary.*

*The Masterplan includes a substantial buffer along the western boundary to include landscape structure planting, with detail to be refined/agreed through individual planning applications.*

**Yet again this third Revised Masterplan makes no effort to cover 'softening the impact of the development' and ignores the requirement for 'landscaping throughout the site'; specifically with respect to the houses in Alderwood Grove that face onto the development. Again the Developers just try to 'kick the can down the road 'and continue to ignore this requirement.**

**2) Context Page 14. National Planning Policy:**

**2.1) Paragraph referring to NPPF Paragraph 130:** Bullet point 3 states: *“Are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities).*

**2.1.1)** The increase in density proposed for the Village Streets is against all logic for a development involving mainly semi detached and detached houses, particularly when the Head of Planning and Building Control suggested lower densities could be created near the main entrance and existing buildings. Refer to page 10 of his letter dated 18.05.23 addressed to Mr. Graham Lamb.

In the northerly section of Village Streets area there are only two terraces being built one for 4 homes and the other for 3 homes and these are directly behind the detached properties in Alderwood Grove. This northerly section of Village Streets should be reclassified as Edenfield Core and the density reduced to the 26-30dph. Refer to (AGA) paragraphs 7 & 9 below.

The proposed increase in density will have an adverse effect on views to and from Edenfield Parish Church and Grounds which is a Grade 2\* building in the upper 15% of all Listed Buildings with parts of the Tower dating back to 1614.

In my case (██████████) there are to be six + houses built directly behind my property with a density per hectare of 47.7dph and at RBC’s minimum distance of 20 metres. It beggars belief that the Developers claim this is a high quality development and sympathetic to the existing built environment.

**2.1.2)** The current Interface Distance Plan number 409469 highlights that the distance between the Patio Door and the Bedroom Window in Plot 5 are only 20metres from one of the windows in the Sun Room of no ██████████

Whilst we accept this is RBC’s minimal Interface distance which is below the generally accepted figure of 21metres we consider that in view of the proposed Plot heights and Plot densities this cannot be acceptable in terms of NPPF’s 126, 130 and 134 or the protection of the residential amenity of existing dwellings.

**2.1.3)** The heights of Plot numbers ██████████ are greater than ██████████ (AG); they are directly behind the Lounge, Dining Room, Utility, Master Bedroom and Guest Bedroom and will block light and views, remove our privacy and damage the *residential amenity protection of our existing dwellings as well as our well being.*

These issues were raised in my response to the previous consultations and when the change was made to replace a detached and a pair of semi detached houses with a terraced block of 4.

Additionally, the change in house type proposed in the first revised plan and retained in this one for the terraced plots 2 to 5 will have a significant effect on the extensive views from Market Street which were highlighted by Penny Bennett the Landscape Architects employed by RBC in the latest report dated 11.05.23 as well as in all their previous reports. The use of terraced houses in this area means that plot number 4 is now **significantly higher than it was** before and there are **no gaps for ‘glimpsed views’** between the properties.

**2.1.4)** The Penny Bennett Review dated 11.05.23, on page 6 paragraph 4.1.9 ninth bullet point, refers to the comment in the Masterplan 'where the H66 allocation adjoins Market Street, development must not fully obscure views to the high land to the west of Edenfield'.

This is in their Review; page 8 Section 4.3 Identity, the second bullet point refers to retaining the long views and keeping the development low as follows: 'This is **most important** in the vicinity of Mushroom House near the proposed road entrance where buildings to this frontage could be lower to allow views over.'

They also recommend "further consideration be given to the use of single or 1.5 storey buildings where views are to be retained" yet the Developers ignore all this and propose a **blank row of high terraced houses**.

There is further reference to this in the second bullet on page 9 - "terraced housing . . . would block views westwards, conflicting with the principle to retain long views westward".

**In view of these issues the plan is not "sympathetic to local character and history, including the surrounding built environment and landscape setting,".**

All of these issues can be remedied by reducing the density, lowering the finished ridge levels or changing house types, moving the houses further west from the eastern boundary to provide an adequate Interface Distance and by returning the field to its original topography through the removal of the man-made mound. It is ridiculous to see Developers claiming to be producing a High Quality design when they are proposing building at high densities and minimal Interface distances.

**2.2) NPPF: Paragraph 134** emphasises that 'development that is not well designed should be refused'

**The third revision of the MDC like the initial revision is not sympathetic to the surrounding built environment or existing residents, it is very poorly designed and therefore approval should be withheld. Refer to comments above in (AGA) paragraph 2.1 under NPPF 130 which indicate the poor site layout design in terms of excessive housing density and height and (AGA) sub-paragraph 2.1.2 with respect to minimal Interface distance whilst claiming a High Quality Development.**

**2.3) Section 15 of the NPPF, Conserving and Enhancing the Natural Environment, (paragraph 174)** "sets out how planning policies and decisions should contribute to and enhance the natural and local environment by:

- *Protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan).*

**Again this Masterplan does not protect or enhance the Valued Landscape as it makes no effort to retain the long views highlighted above.**

**2.4) Third Column-first paragraph claims:** "The Masterplan proposals presented within this document consistently follow the principles set out in the NPPF"

From the points we have highlighted throughout our submission to the previous Consultation and the points made in (AGA) paragraphs 1.1 to 1.4 and (AGA) paragraphs 2.1 to 2.3 it is **clear the claim that it follows the principles set out in the NPPF is incorrect and cannot be justified.**

**3) Page 15 States:** "Guidance is given on how buildings and the spaces between buildings should be considered. In terms of layout, developments should promote connections with the **existing routes and buildings**, whilst providing a clear distinction of public and private space. Care should be taken

*to design the right form for the right place, but the extent to which this is achieved can depend on architectural and design quality. It is considered that the proposed development of this site accords with the NPPG."*

How anyone can make a statement that "this site accords with the NPPG" beggars belief when directly behind number [REDACTED] the proposed housing density is 47.7dph, house numbers [REDACTED] are higher than number [REDACTED] and the Interface distance between [REDACTED] and [REDACTED] is at RBC's minimal requirement of 20metres despite the excessive height of the proposed homes. The result of these deficiencies will be dramatically reduced daylight, loss of privacy, loss of views across the valley, lack of protection for the residential amenity of the existing dwellings and significant damage to the existing residents' well-being.

**The statement that this MDC accords to the NPPG is clearly not factually based.**

**4) Page 16: 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.*

**Refer to (AGA) paragraphs 1.1 and 1.2: Criteria Numbers 1 and 2: As the document does not confirm that all the Developers have been involved in the preparation of the Revised MDC and there is no time phasing schedule it should not be approved.**

**Additionally, the Developers make no reference here or anywhere in their Revised MDC to RBC's housing density figure of 29dph when the land was released from the Green Belt, they chose to target a much higher figure and for this reason alone it should not be approved.**

**5) Page 19: In the Well Designed Place Circle** under context it states: *"Enhances the surroundings. " and under 'Homes and Buildings' it defines codes for high quality and well-designed buildings including their relationship with external spaces and a considered approach to storage, waste, servicing and utilities.*

**How Randall Thorp could possibly claim this Development enhances the surroundings and is of High Quality must raise further questions over their judgement and the rest of their submission.**

**6) Visual Context: Page 26:** States: *'The central parcel interface with Market Street is defined by a circa 1.5m high stone wall. The wall generally screens views of the undeveloped site from passing vehicles, however high land to the west of Edenfield is visible above the wall providing a sense of context. Long views to Peel Tower and Emmanuel Church, Holcombe can be seen from the PROW network both within and beyond the allocation site. '*

The Masterplan downplays the importance of the views. If the top photograph had been taken from the opposite footway on Market Street or indeed from the other footpaths, it would have shown much more clearly how extensive and valuable the view is.

No regard is paid to the value of the view for residents, pedestrians, horse-riders, passengers in buses, vans and HGV's etc.

**7) Page 38: Context: Column 2 Final Paragraph: Residential Amenity** States “Existing housing both backs and fronts towards the site at various locations along the eastern site boundary. Proposed development must ensure **that residential amenity of existing dwellings is protected.**”

Despite reference to the eastern boundary’s existing dwellings there are no mitigation measures included that cover this and no protection proposed for the existing dwellings in Alderwood Grove.

The density of the proposed houses behind number [REDACTED] is 47.7dph leading to appalling massing/ cramming. The height of plots 6 and 7 are higher than [REDACTED] and the interface distance at one point is set at RBC’s minimum of 20metres.

**From the comments above it is clear the residential amenity of existing dwellings is not being protected.**

**8) Page 38: Context: Column 3: Relationship to open space and context: Final Paragraph:** “Development should broadly seek to retain and frame views to the wider landscape context to retain sense of place. The locations of retained views should be demonstrated as part of each subsequent planning application.”

Under the revised MDC the Key View west from Market Street will be significantly obscured and the “sense of place” for the residents generally will be reduced and for residents of Market Street and Alderwood Grove it will virtually disappear.

**9) Page 44: Masterplan:** “The Masterplan indicates a residential net developable area of 13.0 hectares. Delivery of 400 dwellings across the allocation site equates to an overall development density of 31 dwellings per hectare.”

Despite what the Developers state above the reality is that the Local Plan approving the release of this site (H66) from the Green Belt was based on a density of 29dph.

Additionally, the Pilgrim Gardens development was included in the original 400 dwellings and as these have been completed the homes constructed should be reduced from the 400 figure quoted.

The Developers appear to have adjusted the figures to suit their requirements which surely cannot be acceptable, particularly when it is suspected that not all the Developers have contributed to this revised MDC.

| Area             | Land Owner             | Property Type  | Density Proposed |
|------------------|------------------------|--|------------------|
| Edenfield Core   | T. Wimpey              | Semi-detached, detached.                             | 26 to 30         |
| Village Streets  | T. Wimpey              | Semi-detached, detached and terraces.                | 35 to 40         |
| Chatterton South | Methodist Church       | Predominantly semi-detached & terraced.              | 36 to 45         |
| Edenfield North  | Peel LP and R. Nuttall | Semi-detached and detached with some terraced units. | 30-34            |



**As the original site density was calculated at 29dph when the land was approved for removal from the Green Belt how can it now be acceptable to change every area other than Edenfield Core?**

The division of the field between Mushroom House and the Old Vicarage into Edenfield Core and Village Streets does not make any sense at all particularly when the Northerly section has been identified as a Key View Area both from Market Street and Edenfield Parish Church. It is incredible that the Developers would increase the density close to Edenfield Parish Church and Grounds which are Grade 2\* and in the upper 15% of all listed buildings when they were requested to ensure views to and from the Church and Grounds should be retained. Their claims with respect to tree pruning etc are grossly insufficient and should be strongly challenged by RBC.

The property type in the Northerly section of Village Streets is effectively the same as Edenfield Core being predominantly detached and semi-detached with only two token small terraces.

We can only assume the two small terraces have been maintained in the revised MDC application to enable the Developer to retain the division of this field into two Area Types and thereby take advantage of the higher density they can achieve by changing the northerly section from 26/30 to 35/40. **(A sleight of hand increase of 34 %.)**

RBC should ensure that neither of the two sections of Village Streets nor Edenfield Core has a density of more than 26-30dph.

The Developers have made this change despite the Head of Planning and Building Control suggesting lower densities could be created near the main entrance and existing buildings in the same area. Refer to letter from RBC to Mr. Graham Lamb dated 18.05.23.

No consideration whatsoever is given to the serious adverse effect it will have on views to and from the Edenfield Parish Church and Grounds and the existing residents in Market Street and Alderwood Grove.

**10) Page 50: A LANDSCAPE-LED MASTERPLAN: Column 1 Paragraph 3:** *“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.”*

Several responses to the previous consultations highlighted the fact that the simplest way to retain the maximum of the existing landscape was to remove the man-made mound in the field between Mushroom House and the Vicarage.

This along with a reduction in the same field’s height or a change of housing design along the eastern edge boundary, adjacent to Alderwood Grove and Alderwood would significantly contribute to retaining and preserving the existing landscape features for both existing and new residents.

Additionally, it would make a significant contribution to resolving the Market Street Key View issue highlighted by Penny Bennett Landscape Architects in all their reports.

The Developers also appear to have disregarded the comments made with respect to “Everything leading from the Key Landscapes” by Places Matter in their report dated 25<sup>th</sup> March 2023 on page 3 in paragraph 3.

The Head of Planning and Building Control in his letter to Mr. Graham Lamb dated 18.05.23 on page 10 comments in bullet point 3 that ‘visual objectives need to be included’; in bullet point 7 he states ‘the design of the dwellings require alteration and significant upgrade to reflect the character of the area’; in bullet point 12 he states ‘need to be thinking in a 3 dimensional way to eliminate poor views and allow views of key vantage points’ and in bullet point 16 - he states ‘development should take into account the landscape typologies of the area’.

We can only conclude that none of these suggestions was to the liking of the Developers despite the man-made mound spoil having a value, so once again they ignore this opportunity to compromise and plough on with their minimal expense approach despite the advice given and the ‘well-being cost’ to existing residents.

It is almost inconceivable that the Developers could claim that they are ‘preserving and enhancing’ the existing landscape features when in reality they are just ignoring their responsibility for the scheme to reflect the local area and recognise the rural character of the site and wider area.

**11) Page 54: PHASING:** *“The masterplan demonstrates the independent nature of each developer’s landholding, ensuring that each parcel can be delivered independently without prejudicing any other. As a result, the ordering of development phases may be varied or delivered simultaneously.”*

**This statement which is repeated from the previous revision is unbelievable; it lacks any credibility at all. It does not comply with the Policy for Phasing for H66 as it does not provide any timing schedule for any programme of implementation at all.**

The comment that the phases could be delivered simultaneously has obviously not been considered seriously or with any regard to the traffic chaos and pollution that concurrent developments would cause.

**12) Page 58: Site Wide Codes: Column 3: IDENTITY:** *“Development should create a distinctive new place that complements and enhances the character of Edenfield by drawing upon the baseline analysis as presented within this Code. Refer to Area Types for detailed guidance.”*

**Please refer to (AGA) paragraphs 19 to 26 for comments relating to the specific issues covered in Area Types and note that the plan fails to complement and enhance the character of Edenfield.**

**13) Page 60: Site Wide Codes: Nature: Column 1 Paragraph 1:** *“Development should safeguard and enhance the natural environment and biodiversity and positively contribute to the well-being of people.”*

There is no way that this development in its present format positively contributes to the ‘Well-being’ of people who reside in Market Street and Alderwood Grove whose loss of privacy, light and views, as well as the lack of protection for the residential amenity of their existing dwellings have all been completely ignored.

**14) Page 76: Site Wide Codes: Built Form: Column 2: General built form & urban design principles: Paragraph 1:** *“Changes in built form in terms of: block structure, **density, massing, height, materials,***

*building orientation, **spacing between buildings** and building set back from highways should combine to create variety and place appropriate responses ensure the scheme has a variety of character areas and strong sense of place."*

Whilst this is a Site Wide Code it has not been adopted in the MDC for the proposed housing behind numbers 5 to 8 Alderwood Grove as the response provided particularly in terms of density, massing, spacing, minimal interface distances and height **could in no way be considered to be appropriate.**

**15) Page 76: Site Wide Codes: Built Form: Column 2: General built form & urban design principles: Pre-Penultimate bullet:** *"Variations in ridge height and roof pitch across the site should be utilised to create an interesting roofscape."*

The lower ridge heights referred to should be introduced behind existing properties particularly those in Alderwood Grove to minimise the loss of privacy, light, views, residual amenity protection and well-being of the residents and improve the retention of the key Long Views from Market Street for all village residents.

**16) Page 76: Site Wide Codes: Column 3: BF 01:** *"Unless otherwise justified, development should follow the Area Type guidance as set out in the Design Code."*

It is important that the Site Wide Codes comments made in (AGA) paragraphs 12 to 16 as well as the Area Type Identity comments in (AGA) paragraphs 19 to 26 are reviewed, taking into account the comments noted along with others received and then agreed by all the parties involved before final approval.

**17) Page 77: HOMES AND BUILDINGS:** *"Development should provide well designed homes which address space standards, accessibility, adaptability, lighting, privacy, security and the delineation of public and private spaces."*

**The development of new homes should minimise any loss of light, privacy, residual amenity protection and security to existing properties and this must be emphasised before any decision is finalised.**

**18) Page 77: HOMES AND BUILDINGS: HB 02:** *"All homes should be designed to maximise internal daylight, spacing and have appropriate privacy distances in accordance with Local Plan policies."*

**HB 02** should also ensure that the daylight, spacing, residual amenity protection and privacy distance **of existing properties are not compromised** by the development.

**For this to be achieved plots 1 to 13 should be moved away from the eastern boundary, built with lower finished ridge levels at a reduced housing density and with greater interface distances.**

**19) Page 84: Area Types: Village Streets: AT/VS 01: Density:** The original density in the Local Plan for the entire site was 29dph. The Design Code seeks with spurious reasoning to increase this to 35-40dph, which is more appropriate to areas close to a Town Centre. Refer to (AGA) paragraph 9 for the comparison of Area Type Densities and the lack of any relevant justification for the changes.

We have checked the area behind numbers 5 -8 Alderwood Grove from the Levels Strategy Sheet 1-409445 and the Interface Distance Plan 409469 carefully and calculate from the boundary of plot 2 to the boundary of plot 12 the density per hectare is 45.7dph.

We have also checked the area behind the boundary of number [REDACTED] calculating from the boundary of plot 2 to plot 7 and the density in this section is 47.7dph.

Note once again I add that this is despite the Head of Planning and Building Control suggesting lower densities could be created near the main entrance and existing buildings. Refer to page 10 of his letter dated 18.05.23 addressed to Mr. Graham Lamb.

The change in density proposed for the northerly section of Village Streets will have a very negative effect on the views to and from Edenfield Parish Church and Grounds, a Grade 2\*listed building in the upper 15% of all listed buildings.

Additionally, this high density creates a blank wall effect behind [REDACTED] as house numbers [REDACTED] are higher than [REDACTED] and they are directly behind our Lounge, Dining Room, Utility, Master Bedroom and Guest room. Additionally, [REDACTED] which are of a similar height will dramatically reduce the light, privacy, residual amenity protection and views from our Sun room.

**The housing density in front of the existing properties in Alderwood Grove and close to Edenfield Parish Church and Grounds should be significantly reduced by reclassifying the area as Edenfield Core before the MDC is considered for approval.**

**20) Page 84: Area Types: Village Streets: AT/VS 03: Massing: Semi detached, detached and terraces.** *Housing areas which sit internally to the central housing parcel, in less sensitive locations, have potential to be delivered at higher densities which can be achieved by incorporating terraces which are typical of the area.*

The massing leaves virtually no gaps in the new builds behind the existing properties in Alderwood Grove. This was highlighted in many of the submissions made on the previous Consultations and on the planning application. Note we refer again to the density of 47.7dph and the overbearing height of the new builds.

Additionally, the Interface Distance between number [REDACTED] is 20metres (RBC's) minimum requirement in what is claimed to be a 'High Quality Development'.

Surely if it were a 'High Quality Development' the Interface Distance would be considerably higher than the minimum and the housing density would be around 29dph as per the justification for the release of the land from the Green Belt.

**Note the key issue here is the 'less sensitive locations' which cannot possibly apply to the existing properties in Alderwood Grove or the Grade 2\* Edenfield Parish Church building and grounds which is in the upper 15% of all listed buildings. The density should be reduced as highlighted in (AGA) paragraph 19 with the Area Type being reclassified as Edenfield Core, the ridge heights of the new build homes should be lower and the development should be moved westwards to increase the Interface distance.**

In the first whole paragraph on page 6 of the Places Matter report dated 25.03.23 there is reference to a "sense of sprawl and sense of 'nowhere development'" and they recommend the developers seek "to create distinctive places resonating what is quirky/unique about Edenfield e.g., create smaller pockets of development, broken up by landscape".

**The proposed layout behind Alderwood Grove would appear to be a good example of the "sense of a nowhere development".**

**21) Page 84: Area Types: Village Streets: AT/VS 04 Height: Key characteristics: 2 storey, up to 10% 2.5 storey where appropriateness can be demonstrated.**  
*Housing will be situated on land at a lower level than Market Street. Appropriately located 2.5 storey development can add interest to the roofscape and street scene at this central village location.*

Supposedly 'adding interest to the roof scape and street scene' should not be at the expense of obstructing views of the landscape and 2.5 storey homes are not appropriate in front of the existing built environment.

We referred to the 'Blank Wall Effect' behind our property number [REDACTED] in our submission to the previous consultation but it would appear that the Developers have again just disregarded the comments as they appear to have done with virtually all the other objections.

The heights of plots 1 to 12 are unacceptable and unnecessary and critical for the residents in Market Street and Alderwood Grove. The Developers should reduce the housing density behind Alderwood Grove and either lower the finished floor levels and ridge heights of Plots 1 to 13 or introduce single or 1.5 storey buildings in this area. Refer also to (AGA) paragraphs 19 and 21.

The use of 1.5 storey buildings recommended by PBLA in their report dated 11.05.23 on page 8 in bullet point 2 should be adopted adjacent to Alderwood Grove.

There are two references in the Places Matter report dated 25.03.23, in the last paragraph on page 5 and on page 7 in the final paragraph, to the potential impact of topography on the site, which highlight it is an issue and they comment that the Developers **are missing part of its charm**.

There is also a reference to the site's topography in the letter from the Head of Planning and Building Control to Mr. Graham Lamb dated 18.05.23 in bullet point 16 on page 10 advising the developers to take into account the landscape typologies of the area.

**The proposals made by several responders to the previous consultation to return the field to its original topography would go a long way to solving this issue and at the same time improve the overall layout of the site.**

**Approval of the MDC should be withheld unless the Developers take into account existing residents' opinions, the comments made by RBC's Consultants and its Head of Planning and Building Control with respect to retention of the key long distance views.**

**22) Page 84: Area Types Village Streets: AT/VS 05** *"Building line/set back: Strong building line with variation in set back used to vary frontage and side parking arrangements.  
A strong block culture will complement the character of nearby Market Street and will enable a variety of parking solutions."*

**The proposed layout for this development cannot in any way, shape or form be described as complementing the character of nearby Market Street in terms of design, quality of materials used, housing densities, etc.**

**23) Page 84: Area Types: Village Streets: AT/VS 07: Front Boundary Treatments:** *"Hedgerows, shrub planting, grass, red brick masonry and stone/reconstituted stone walls, railings.  
To provide consistency with building materials and allow greater perception of change in character through the central land parcel."*

It is still unclear what additional boundary treatment other than the existing dry stone wall will be provided to 'soften' the impact of this development for residents in Alderwood Grove as they show trees/hedgerows in the Detailed Layout Colour 409463 but not in any other document.

The use of red brick as the building material (AT/VS 06) and for the walls is unsympathetic with the adjacent built environment of Market Street and should be deemed to be unacceptable.

**24) Page 84: Area Types: Village Streets: AT/VS 08: Key views to be considered.** *"Quality of views to and from recreation ground.*

*Ensure development provides a characterful and attractive elevation to the interface with Edenfield Recreation ground"*

This is a further example of the Developers/Agents trying to 'muddy the water' and steer attention away from one of the most important views highlighted by RBC's Consultants, Penny Bennett Landscape Architects(PBLA), and commented on in all their reports.

It must be no surprise to the Developers that there are two areas called Village Streets and only one of them is close to the Recreation Ground.

To clarify, the northerly Village Streets enjoys the view highlighted by PBLA and not the Recreation Ground and this area should be reclassified as Edenfield Core to protect the Key Views and Edenfield Parish Church and its Grounds which are Grade 2\* in the upper 15% of all listed buildings.

The change to Edenfield Core would also mean that the 'Key views to be considered' would then include *"Distant hilltops from Market Street and PROW. **These are locally valued and provide a sense of place.**"*

**There was never a truer statement than 'locally valued and the provision of a sense of place'.**

Market Street and Alderwood Grove residents along with others under the original and previous MDC's and Planning Applications lost access to virtually all the views and despite **this being highlighted** in many of the Objections on each occasion the Developers just continued to disregard them.

The result of the Developer's refusal to address the issue of the substitution of terraced housing for plots 2 to 5, and 10 to 12 is that not only the residents in the immediate vicinity but all pedestrians / travellers on the main road and footpaths are to be deprived of the views as well.

It is interesting to note that the Places Matter Report dated 25.03.23 highlights that the Developers and their Agents should have paid more attention to Key Views. They commented "You must keep '**glimpsed views**' to the countryside" on both page 2 paragraph 3 and page 5 paragraph 5 and said on page 3 paragraph 3 that everything should lead from key landscapes. **(The Developers should realise there are no glimpsed views through a row of terraced houses.)**

**25) Page 88: Area Types: Edenfield North: AT/EN 01 Density:** *"Lower density than Edenfield Core to reflect position at northern fringe of Edenfield."*

This statement is **incorrect**; the density for Edenfield Core is stated to be 26-30dph whilst Edenfield North is 30-34dph.

**Despite highlighting this error in my submission to the previous Revised Masterplan and Design Code document this error has still not been corrected nor has clarification been provided. This is**

another example of the diligence of the Developers who I suspect do not even read the submissions made by existing residents. However, clarification is still required to determine which figure is correct, the one quoted for Edenfield Core or the one for Edenfield North. This is important for existing residents.

**26) Page 88: Area Types: Edenfield North: AT/EN 04: Height : The Key Characteristics Column** states: "2 storey. Up to 10% 2.5 storey and 1 storey where appropriateness can be demonstrated." The **Reasoning and influences column** states: "Building heights should be selected to ensure long views to distant hill tops are retained from Fingerpost Triangle on Blackburn Road. Variation in building heights should be used to create dynamic corners and characterful vistas."

**This policy with 1 storey homes should also apply to the area along the eastern edge from Mushroom House to Edenfield Parish Church, including Alderwood Grove, to ensure the important views highlighted by Penny Bennett from Market Street are retained for all to enjoy.**

**27) Page 96: Design Quality Checklist:**

**Number 1:** "How do the proposals architecturally reflect and complement the positive characteristics of Edenfield?"

Not enough thought and care has been given to the homes of existing residents. Their privacy, space, residential amenity protection and well-being have been ignored resulting in their properties being significantly downgraded under the proposals.

**28) Number 2:** "How do the proposals positively contribute to the characterful and varied grain of Edenfield village?"

I am unable to find any way in which they make a positive contribution, if the homes had been built on the brownfield sites the Edenfield Community Neighbourhood Forum spent time and effort to identify and highlight to the Planners, many positive contributions would have occurred.

**29) Number 3:** "How do the proposals respond to the existing public footpath network, and how do they support connectivity to local facilities and amenities?"

As the Developers accept, Edenfield already has a good footpath network and connectivity.

**30) Number 4:** "How do the proposals enable appreciation of locally valued buildings located throughout the site and the wider context?"

The development will adversely affect the views to and from Edenfield Parish Church and Grounds which are Grade 2\* listed and in the upper 15% of all listed buildings. The views provide some comfort when visiting and paying respects to relatives and close friends who are buried there.

There is also a strong possibility the housing number at Chatterton Hey could increase from 70 to 104 if the maximum figure for the density range quoted in AT/CS 01 of 45 is adopted for the 2.32ha noted in SHLAA 16263. This will devalue this heritage asset even more.

**In view of these comments how could anyone appreciate the way the locally valued buildings are being treated?**

**31) Number 5:** *"How do the proposals demonstrate a landscape led approach and deliver high quality Public Realm, Public Open Space, Green Infrastructure and Biodiversity Net Gain?"*

The critical comments from the Places Matter report dated 25.03.23 highlight the fact that the Developers are "missing a regulating plan of the 'key moves' or 'must haves' that includes the key landscape and movement design strategies. Everything should lead from that" - page 3 paragraph 3.

The letter from the Head of Planning and Building Control to Mr. Graham Lamb dated 18.05.23 (page 9 bullet point 6) states *"the scheme does not reflect the local area, nor does it recognise the rural character of the site and wider area"*; page 10 bullet point 5 states *'this is a monotonous development'*; page 10 bullet point 15 states *'landscaping and open space needs to be incorporated into and throughout the development area'* and page 10 bullet point 16 states *'development should take into account the landscape typologies of the area'*.

As only very minimal changes have been made to the revised MDC it is difficult to see how anyone will consider the approach of the MDC to be landscape-led. The reference to 'delivering a high quality Public Realm' lacks any credibility when houses are being built at town centre levels of density and at the minimum Interface distance allowed.

The comments made with respect to the failure to deal with the issues relating to the existing buildings in Alderwood Grove also confirm the lack of a landscape-led approach

If the Developers had truly wanted their proposal to deliver a 'high quality public realm etc' they would have reduced the height of the field between Mushroom House and Edenfield Parish Church to a more acceptable level thus maintaining key views, privacy, light, residual amenity protection and well-being etc. for existing village residents and visitors to the Church and its Grounds instead of choosing to just disregard their opinions.

**32) Comments:**

It is very disappointing to determine that the vast majority of comments made by the residents who took the time and trouble to respond to the previous consultations have been disregarded including those relating to the houses in Alderwood Grove, despite Penny Bennett Landscape Architects employed by Rossendale Borough Council specifically referring to this area both prior to and after the submission of the plans.

The Developers also appear to treat Rossendale Borough Council in a similar manner ignoring key issues in the Letter from Head of Planning to Agent dated 18-05-2023 by specifically failing to make *"the scheme . . . reflect the local area"* or *"recognise the rural character of the site and wider area"* (bullet (bullet point 6 on page 9); failing to reduce the density *"near the main entrance and around existing buildings"* (bullet point 9 on page 10); not proposing *"landscaping . . . throughout the development area"* (bullet point 15 on page 10); not articulating *"the importance of boundary treatments"* (bullet point 1 page 11); etc".

Similarly, in the Penny Bennett Landscape Architects report dated 11.05.23, the first paragraph of the Conclusions on page 11 in section 5 states:

*"The Masterplan and Design Code promises much: stating that an overriding principle is to create a high quality development but then **failing** to demonstrate that the views of local people or local design advice has been taken on board."* This continues to be the case with this latest revision.



In the next paragraph it is stated: *“The scale and impact of this major development on Edenfield village, which is often referred to as an ‘urban area’ is underplayed, and the Edenfield’s rural setting is not emphasised.”*

The final paragraph on page 12 concludes: *“The proposed housing development on the H66 allocation will bring about a profound change to the village of Edenfield, and it is essential that this Masterplan and Design Code responds to that and really does set out how the highest quality of design can be achieved, at present it does not.”*

From the outset the Developers have chosen to ignore any adverse comment, whomever it comes from, whether it is the residents, RBC or consultants employed by RBC. The Developers just continue to progress the Plan making no effort to compromise and treat existing residents, RBC and RBC’s Consultants with contempt.

A good example of this would be their total disregard to the objections raised in the responses to the previous revised plan, with respect to subdividing the field between Mushroom House and the Old Vicarage. This is despite comments relating to the loss of key views from Market Street and Edenfield Parish Church which is a Grade 2\* in the upper 15% of all listed buildings along with the damage to existing properties due to the excessive housing density and poor design layout of their proposals.

Additionally, even at this stage there are once again in virtually every section of this third Revised Masterplan and Design Code statements highlighting that key issues have not been fully resolved and the developers continually covering this with comments similar to **‘to be refined through subsequent individual planning applications’**.  
**Surely this is unacceptable at this point.**

The issues that remain unresolved include housing density, housing heights, massing, minimal interface distance, excessive loss of key views, protection and enhancement of valued landscapes, protection of the residential amenity of existing dwellings, lack of sympathy with surrounding built environment, the use of poor quality materials and traffic assessment problems.

We recognise that some comments in this representation relate to the Planning Applications, however, this has been necessary given the fact that Taylor Wimpey submitted their Planning Application before the Masterplan and Design Codes have been agreed. The overriding impression is that the Masterplan and Design Codes have been drafted to suit the application rather than the application being informed by an agreed M&DC.

We can only live in hope that Rossendale Borough Council will act on behalf of its Edenfield Residents and reject the MDC until such time as the Developers take into account the problems highlighted by the residents who are seeing their village downgraded, their privacy, daylight, the protection of the residential amenity *of their existing dwellings* and views decimated along with their well-being.

#### Conclusion

**As the developer of the central part of H66 is making no serious effort to address the fundamental issues, we submit that the time has come to reject this third Revision of the Masterplan and Design code.**

Alan G. Ashworth and Carol Ashworth [REDACTED]  
[REDACTED]

Dear sir/madam, I wish to object again to the proposed development west of market street in edenfield. My objections haven't changed since the last time I objected or any of the times previous to that. None of my concerns have been addressed.

Furthermore I object to this process of repeatedly having to object every time a tiny change in the plan happens. This is just a tactic over time to get less and less objections due to people not realising that they have to keep objecting every time. It's underhand and dishonest.  
Protect the green belt, protect the environment and stop this development

Yours sincerely  
Henry Botham

Sent from my iPhone



**Edenfield Revised Masterplan and Design Codes H66 Consultation**

Contact Details  
Planning and Development Team  
The Coal Authority  
[Redacted]  
[Redacted]  
[Redacted]  
[Redacted]  
[Redacted]

Date  
1<sup>st</sup> November 2023

Dear Forward Planning Team

**Edenfield Revised Masterplan and Design Codes H66 Consultation**

Thank you for your notification received on the 28<sup>th</sup> September 2023 in respect of the above consultation.

The Coal Authority is a non-departmental public body sponsored by the Department for Energy Security and Net Zero. 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]  
**Melanie Lindsley** BA (Hons), DipEH, DipURP, MA, PGCertUD, PGCertSP, MRTPI  
**Principal Planning & Development Manager**

Dear Sir/Madam,

I fail to see how the building of upto 238 Taylor Wimpey houses on land to the rear of Pilgrim Gardens and Alderwood Grove will not have a severe impact on the quality of life and perhaps the health, both physical and mental, on a large number of Edenfield residents.

Most people I know have at least one motor vehicle, quite a number have two, a few even have three. We also have to account for vehicles used by trades people who would potentially live on this development, which will it would seem have quite a number of larger properties.

I am not an expert but I would estimate that there may be a minimum of 500 extra vehicles using the roads around Edenfield on a daily basis - just from this development alone. They would use already busy, narrow roads constructed in the days of the horse and cart, and this could cause gridlock, particularly so at rush hour.

I am also concerned about the air quality, particularly on Market Street, of all these extra vehicles pumping out exhaust fumes, in addition to the stress and aggravation of all the building work, which could go on for years. This I think could have repercussions on the future health and maybe mental well being of current residents in the area, many of whom are quite elderly.

To construct a minimum of 238 dwellings in such a small village as Edenfield, with its current inadequate infrastructure would blight many residents lives for many years to come and I object to it in the strongest terms.....

Regards,

*Ian Corless*

[REDACTED]

[REDACTED]

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

**OBJECTION TO MASTERPLAN AND PLANNING APPLICATION 2022/0451 version**

**3**

We are writing again to formally object to the revised Masterplan and Planning Application 2022/0451 version 3. As residents, we hold several concerns that we believe are not adequately addressed in the revised proposal.

The Masterplan's lack of comprehensive structure is still a concern. We understand from the information provided that the latest revised Masterplan still solely represents the views of Taylor Wimpey, and it appears to still disregard the necessity of a cooperative approach. We strongly advocate that the Rossendale Borough Council (RBC) or all four developers take the lead in the process, as required by the RBC Local Plan, to ensure that the interests and concerns of the community are heard and reflected. Other stakeholders are now throwing their hats into the mix and we conclude that the community is going to feel under siege by all the ensuing building works without a hint as to how its going to be phased.

The proposal still does not include an exhaustive traffic assessment or road safety audit for the entire site, which is similarly concerning. There are still significant traffic, parking, cycle, and pedestrian safety issues. These concerns will only be exacerbated by the simultaneous construction activities mentioned, a proposal that seems impractical and unsafe. What is more concerning is that LCC seems hell bent on still approving the highway aspect of the proposal. Why are we the residents not being listened to? A traffic assessment undertaken by ECNF does not appear to have been considered in any way shape or form. **THE VILLAGE DESERVES A COMPREHENSIVE ROAD SAFETY AUDIT.**

Infrastructure such as schools and healthcare, is still crucial for a development of this magnitude.

The current proposal still fails to adhere to the Design codes as detailed in the Neighbourhood Plan produced for ECNF, and thus, runs the risk of creating an uninspired, cramped development of bland properties out of character with the existing village, lacking in necessary green spaces and potentially causing ecological damage. Issues like the flood risk have not been adequately addressed, with Sustainable Urban Drainage Systems proposed close to the A56 posing serious road safety issues.

Finally, we object to the proposed further release of the Greenbelt for a school, play area and car park in the northern side of the village. This still doesn't align with the RBC Local Plan and could result in a significant environmental impact, including ecological damage and potential water drainage issues. The proposed parking site is too far away from residents homes and will lead to a free-for-all for whoever wishes to park there. This brings back the risk of direct and indirect discrimination against existing residents, especially those who are frail and disabled.

We urge Rossendale Borough Council to reconsider and re-evaluate the revised proposal, not undermine, the existing character and functionality of our village. The revised Masterplan to our minds still has the same concerns as the previous

Masterplans churned out by Taylor Wimpey. Life is going to be unbearable. Communities are supposed to have a say. We have not been listened to. We want the village to thrive and make people's lives better, not worse.

Richard Hillel and Gill Hillel

████████████████████

██████████

██████████

*In respect of the current revised Masterplan consultation it is felt that our submission just under three months ago regarding the Taylor Wimpey planning application is equally valid to the latest Masterplan. For ease of reference our previous submission is reproduced below. We would stress that much of Central Edenfield grew from small developments often of about ten properties. As well as the newer properties set out in our previous submission it should also be noted that many of the older terraced properties were built out in small blocks or rows at different times and in different styles. Building properties in large numbers all of a similar style risks completely changing the historic character and nature of the village.*

*Roy McDonald - Chair Edenfield Local History Society - November 1 2023*

***SUBMISSION (MADE 10th AUGUST 2023) IN CONNECTION WITH  
LAND TO THE WEST SIDE OF MARKET STREET, EDENFIELD REF  
2022/0451***

The Edenfield Local History Society would like to object to the planning proposals put forward on behalf of Taylor Wimpey in planning application 2022/0451. Our main comment is that the proposals are not commensurate with the nature and character of the central area of village or its history/heritage.

Central Edenfield, as it now is, has mostly evolved over the last 250 years. It is principally a ribbon development with rows of terraced properties alongside Burnley Road, Market Street and Bury Road. These areas are surrounded by rough pastureland interspersed with isolated former agricultural properties and larger residential properties of former mill owners. In recent times modest areas of development involving ten of less more contemporary properties have been introduced for example at Heycrofts View (formerly Barnet Place), Pilgrim Gardens (formerly The Horse & Jockey public house), Alderwood Grove (formerly pastureland), The Bowling Green (formerly part of the Rostron Arms public house), Church Court (formerly the site of the Chapel House), Guide Court (formerly the site of a saw mill), and the Southern end of Burnley Road (formerly the site of Spring Bank Brewery).

What is now proposed is the construction of some 238 properties with another 160 to come. Such a large number of new properties will swamp the nature and character of the existing properties. The isolated properties of Mushroom House and Chatterton Hey will be more or less surrounded, and the Old Vicarage and Grade 2\* listed Parish Church will be semi surrounded thereby removing the context of their original settings. The proposed design and layout of the new properties seems to be more suitable to a new town environment than a semi rural village.

The future of Edenfield is at a crossroads and its history and heritage are under threat. The proposals put forward need significant revision if the nature and character of the village is to be retained. It is also noted that the dry-stone wall on the eastern side of the Taylor Wimpey site is to be removed to accommodate a right hand turn on Market Street. This wall probably dates back to the period of land enclosure which was very prevalent in the that late 1700s/early 1800s. It is unclear as to whether it will be rebuilt but it is to be hoped that it will. However, it should be noted that land enclosure walls were almost invariably constructed in straight lines so to maintain authenticity this characteristic needs to be retained.

Roy McDonald - Chair Edenfield Local History Society




1/1/23

Both my husband and I  
object to all building  
and highway changes,

Just imagine the residents on  
Market st, NOT being able  
to park outside their homes

Do you live in Enderfield,  
dont think so!! Parking is at  
at premeum here, and the disruption  
of horrgs for building will be  
horderous! The government let us  
down on C vid, how you going  
to let us down Now

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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: Allocation H66 Revised Masterplan & Design Codes (Sept 2023 Version 3)**

**Location: Land West of Market Street, Edenfield, Lancashire**

**Re-Consultation in respect of a Revised Masterplan (3) & 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 Revised Masterplan application. I have examined the re-submitted masterplan v 3, and I know the H66 site well as I live in the village. I wish to object strongly to the adoption of this revised masterplan on the following basis:

- The Re-submitted September 2023 masterplan by Randall Thorp on behalf of Taylor Wimpey 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)**. Page 6 of the document has actually stipulated that the purpose of this revised masterplan 3 is to cover only points 1 and 2 of the Local plan requirements - is this a cynical attempt to try and obtain a masterplan acceptance by deception??

**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 re-submitted 'masterplan' still does not include the whole site, as all landowners of H66 are not represented
- The re-submitted 'masterplan' still does not meet the requirements of the local plan (as above), and still does not adequately IN DETAIL, address issues like traffic and flood risk. The detrimental impact to existing residents along both Market Street and Exchange Street, as well as the knock on effects to the rest of the village will be immeasurable. Increased traffic, loss of parking and amenity along with the added noise and pollution as well as loss of ancient stone field boundaries and green space will only detract from the appeal of the village. **THERE HAS TO BE A COMPREHENSIVE AND INDEPENDENT ROAD SAFETY AUDIT.**
- The re-submitted 'masterplan' still does not include the entire site and does not adequately address IN DETAIL, concerns about phasing and development timescales.
- The re-submitted 'masterplan' is still not in keeping with the character of the village and still does not IN DETAIL address concerns about ecology, drainage, and the full impact on the environment. It is clearly weighted towards the developer in an attempt to push the plans and planning application through the planning system.
- The re-submitted 'masterplan' still does not address the fact IN DETAIL that there are not enough school places or local services to support the level and density of this development.

#### ADDITIONAL CONSIDERATIONS

- PLANNING POLICY - National policy is being updated, and I believe that Edenfield would be best placed to meet the challenges ahead by having a plan based on the most up-to-date guidance. This planning process and application commenced in 2022 and has since been overtaken by various significant national and local events. The citizens of Edenfield deserve a forward-looking plan which meets THEIR needs.
- ECOLOGY – There is a lack of evidence about the ecological and biodiversity impact of the plan and no clarity about why such environmentally rich sites have been selected rather than prioritising the regeneration of brownfield sites.
- SCHOOL PLACES/HEALTH SERVICES – Despite the plan proposing new housing, there is no evidence that sufficient school places will be provided, nor that there will be sufficient sites for GPs and dentists.
- NET ZERO – I believe an alternative strategy that integrates development with sustainable public transport and EV charge points for existing residents would better support the Council's commitment to net zero. Where are future EV'S to be charged for the displaced residents parking along Market Street? The majority of these houses are terraced properties with only road parking available to them!! Surely Integrating development and public / future transport systems would also organically reduce dependency on private transport and would have a positive impact on reducing air pollution, which should avert the need to impose punitive and unfair charges on car users. None of this has been taken into account within the revised Masterplan.
- TRANSPORT INFRASTRUCTURE FUNDING – There is no evidence that funding is available to deliver the extremely long list of "Necessary" transport infrastructure requirements of the revised MASTERPLAN 3. **THERE HAS TO BE A COMPREHENSIVE AND INDEPENDENT ROAD**

**SAFETY AUDIT - FULLY FUNDED AND COSTED BEFORE ANY FORM OF DEVELOPMENT IS APPROVED - EVEN IN PRINCIPLE**

Edenfield is a small village settlement on the outskirts of the Rossendale Valley 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. **I would suggest that this revised 'masterplan' in its present form again fails to take the opportunities available for improving the character and quality of Edenfield and the way it functions. As such it should be rejected.**

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.

I understand that the Edenfield Community Neighbourhood Forum as well as many of my neighbours living in the village of Edenfield share my concerns. As our elected representatives and paid civil servants, **our** voices and concerns should be priority - NOT the developers

In its current form, this revised 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 this meeting.

Yours faithfully

Jason Straccia

To whom it may concern.

Having read the new submissions my concerns have not been addressed and I wish to resubmit my objections.

Mary Gray

Sent from my iPhone

Begin forwarded message:

**From:** BARRY GRAY <[REDACTED]>  
**Date:** July 26, 2023 at 2:08:40 PM GMT+1  
**To:** [planning@rossendalebc.gov.com](mailto:planning@rossendalebc.gov.com)  
**Subject:** Land west of Market Street, Edenfield planning application direction, 238 residential dwellings, and associated works

To whom it may concern

Having read the proposal and full application for the erection of 238 residential dwellings and associated works including access, landscaping, and public open space I wish to register my objection

The proposal in no way addresses the major issue of traffic in exchange Street market Street and the drive High Field Rd., Eden Avenue

These roads and footpaths were constructed to serve a maximum amount of residential units which has long since been exceeded

This means that there is in these areas already a traffic problem, which even the instigation of parking restrictions will not alleviate

The weight of through traffic as it exists now represents a danger and a continuing loss of amenity to the existing residents.

It is clear that this these problems cannot be overcome as is evidenced in the latest proposals, which in no way alleviates the existing problem let alone the problems, which will arise should the proposed development be allowed to proceed to the extent that it is planned by the developers

This development and its incursion into the Greenbelt, will not only irrevocably destroy the amenity enjoyed by the existing residents but actually introduce the possibility of real harm to the extent of deaths

The application completely fails to address these fundamental issues, driven one suspects by the desire to maximize profits

The real danger is that the development and its unresolved attendant problems will drive away local shops and services to the extent that edenfield will simply become a housing estate, and no longer a village community.

Mary gray

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

Sent from my iPhone

## **Masterplan / Design Code for Site H66 Land West of Market Street, Edenfield**

This latest version of the Masterplan is fundamentally no different to previous versions and outstanding issues and concerns remain unaddressed. Please see our comments to the last Masterplan, which are still relevant.

This attempt to join the disparate areas owned by different developers continues with vagueness, insufficient information, baseless claims and belligerent disregard for the rural village locality, resulting in an unworkable document promoting dysfunctional development.

### **There are considerable Issues about the proposed Masterplan and Design Code :-**

- **The proposed masterplan and design codes are inadequate and not fit for purpose. In particular :-**
  1. too Vague and open to interpretation
  2. do not declare ownership nor demonstrate commitment by all landowners
  3. disregard local input
  4. are flawed, misleading and claims made are unsubstantiated
  5. the vision is at odds with the reality of the proposals
  6. fail to meet the principles of a number of NPPF policies, primarily 'Achieving Well Designed Places' and PPG guidance
  7. fail to meet a significant number of Local Policies including site-specific Policies of H66 relating to views, and landscaping, historic environment and high quality development

### **In summary the proposals are unacceptable -**

- **the design and layout is poor and unimaginative. Densities are too high, roof heights too high and disruptive, materials are bland and lacking in innovative style. It is totally inconsiderate of the unique qualities of the village and its landscape.**
- **proposals are not evolving and responding as information becomes apparent relating to the suitability of the location for such high volume development. In particular the developable land and impact on road infrastructure and the need to meet desirable landscape goals.**
- **this is not a sustainable site for development on this scale and is at odds with any Council aspirations to create sustainable communities**

- focuses on urban principles in a rural village landscape
- lacks adequate consideration for the special character of the village
- does not minimise adverse impact with its high build, crammed densities, incongruous building materials and poor layout
- does not preserve the openness, significant views and historic nature that crucially form the main character of the village and its sense of place that fixes it in the valley
- does not adequately conserve or enhance the landscape and its historic assets
- there is much that is incongruous with the landscape such as the consequential creation of a large SUDS and high acoustic fencing all along the A56 border, creating a compound
- there is little green landscaping and open space within the site.
- disjointed layout. The individual sites do not link ; - roads, footpaths and cycle ways do not link with each other within the whole site. It does not integrate well with the existing village.
- does not meet the needs of the ageing population.
- It is predominantly developer-led, not landscape led, as claimed

#### **Loss and Damage will be significant**

- significant loss and damage will impact on quality of life and stress on infrastructure particularly roads and schools
- the design and layout are unsympathetic and damaging at the boundaries, with neighbouring properties being overpowered, with loss of privacy, light and amenity and with a disregard for existing drainage
- significant damage to the environment with loss of trees, substantial areas of green open spaces, farm land and wild life habitats
- loss of a high quality open space.

- **significant loss of popular doorstep countryside footpaths through urbanisation is unacceptable and is a loss of valued facility.**

**A number of issues have still not been addressed adequately**

- **drainage is not addressed for the whole site**
- **the proposed traffic management and parking solutions are not satisfactory and unworkable and are a major issue.**
- **additional demand for places at local schools is not properly addressed**
- **the implementation and phasing suggests that the order may vary and could be delivered simultaneously, which makes it meaningless and unworkable.**
- **Green Belt compensation is unsatisfactory and does not meet the requirement of the Local Plan.**
- **Does not mention the ground conditions and any engineering solutions.**

**The Masterplan is not fit for Purpose**

**1 ) Vague and open to interpretation**

Throughout the document reference is made continually using language such as 'may' or 'potential' and 'should'. There needs to be definite guidelines. Even the views are described as 'potential' (p 48);- either they are there or not. We would expect to see 'will' and 'must'.

The list of open ended questions included in the Design Quality Checklist is not useful when the expectation is that the Masterplan ought to demonstrate the answers through its proposals.

A more comprehensive approach is needed and not just a reference to further details in 'individual subsequent planning applications' which repeatedly appears in the Executive Summary. The point of a masterplan is to specify the main development areas and key infrastructure to create consistency, and ensure a holistic approach to the whole site.

What we have is a free for all with huge potential for a dysfunctional development driven by developers self interests rather than what is best for Edenfield.



## **2 ) Ownership of Masterplan**

Clarification is needed that this is a Masterplan jointly supported by all the developers of H66 site and that there is an undertaking by all to commit to it.

## **3 ) Disregards local input**

**“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”**

- The Masterplan specifically disregards the ECNF and the work of its agents ACEOM. It is disturbing that it criticises the emerging Neighbourhood Plan as it “focuses on the existing vernacular and characteristics of the village”, when clearly this is a priority basis for informing development.
- It is also incorrect to say that the Neighbourhood Plan is in conflict with the Local Plan. The Neighbourhood Plan has had to adapt to fit in with the Local Plan.
- The Masterplan disregards the overwhelming concerns and objections from the local community but instead focuses on the needs of the developers as a priority.
- There has been no public consultation for a Masterplan by the developers for the whole of the H66 allocation as claimed in the ‘Stakeholder Engagement’ section of this Masterplan and it is wrong to say that there was.

It is very clear local involvement and input is practically non existent in the development of these plans despite the fact that NPPF recognises the importance of designs evolving in response to local issues and to the views of the community.

**“ Whoever prepares them, all guides and codes should be based on effective community engagement and reflect local aspirations for the development of their area” NPPF paragraph 129.**

## **Perpetuates urban principles in an rural area**

**The Masterplan claims that it ‘has been prepared in the context of current best practice in relation to urban design’ Context page 20.**

Reference is repeatedly made to Urban Design principles and little attention is given to design influences that account for the significant rural aspects and

village characteristics:- the local landscape, openness, moorland, fields, significant views, context in the valley and village character .

Similarly the Masterplan continues in its confusion about 'Urban Local Service Centre' referenced in the Local Plan, claiming that Edenfield has been 'elevated' to this status. Masterplan 'Local Planning Policy' page 18.

This is not a charter to create development that is based on urban character. There are no main services as such in the village and RBC have no plans to create any. The use of the word elevate is purely fictional to suit developers aims at urbanising through the development of mass housing estates in what is essentially a rural village area.

Various Local Plan policies emphasise the need for a well designed scheme that responds to the site's context, which is clearly not urban.

#### **4) The Masterplan is flawed, misleading and not substantiated**

Claims are freely made throughout the Masterplan document but are not substantiated by the actual proposals, blatantly driven by the need to justify developers plans and their needs.

#### **5 ) The Vision is at odds with the reality of the proposals.**

They do not relate to each other and we are presented with vague ideas.

**The Masterplan seeks to "Create a vibrant residential area which architecturally reflects and complements the positive characteristics of Edenfield"**.

There is nothing vibrant about mass dense overbearing housing estates in the centre of a small rural village setting, the impact of which will be catastrophic to the unique character of the area with loss of green open spaces and significant views and damaging to the special qualities of living in a rural village.

#### **6) Fails to meet a number of NPPF guidelines**

**The Masterplan claims that 'proposals presented within this document consistently follow the principles set out in the NPPF'. This is simply not the case. It fails on a number of issues :-**

**NPPF paragraph 129 - Disregards local input - see above**

**NPPF paragraph 8 - favours sustainable developments with environmental objectives of mitigating climate change and moving to a low carbon economy.**

Development on this scale in this location is not a sustainable option :-

- Edenfield's location is in the south of the Rossendale area, out on a limb and is disconnected from the Haslingden /Bacup corridor, identified by RBC for regeneration.
- It is at odds with any Council aspirations to create sustainable communities.
- There are no main services in the locality and access to these, including, doctors, dentists, supermarkets and employment hubs will directly encourage the use of cars on an unnecessary large scale.
- Increased demand for school places will be met through the use of 'nearby' (around 2 miles away) schools rather than the local schools according to the LEA. This will increase the use of regular daily car journeys.
- Provision for bus services is not referred to in the plan. The traffic management plans will involve the moving of bus stops but do not discuss any new locations, which increasingly will be pushed away from central areas because of the number of road restrictions proposed.
- Cycle ways and footpaths on site will not offer practical alternatives to car use to get to the supermarkets, schools, doctors etc. because there are no realistic safe onward cycleways and footpath connections outside the village and the topography discourages non-leisure cycling and walking. Having cycle sheds does not necessarily discourage car use.
- Additional resources will be needed to make houses near the busy A56 By pass, habitable. This includes acoustic barriers and materials such as specialist glazing and ventilation systems to provide air circulation to compensate for the inability to open windows because of noise.

**NPPF -Achieving Well Designed Places paragraphs 126- 136**

NPPF calls for well designed places, sympathetic to local character and history that :-

will function well and add to the overall quality of the area

are visually attractive as a result of good architecture, layout and appropriate effective landscaping

are sympathetic to local character and history including the surrounding built environment and landscape setting

establish or maintain a strong sense of place through street arrangement, spaces, building types and materials to create attractive

welcoming and distinctive places to live work and visit

**'Development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design' NPPF paragraph 134**

The proposals should be refused on the basis that it is not well designed. The layout and design proposed will have a major adverse impact on the identity of Edenfield, undermining its special character and the way it functions. The designs in the Masterplan disregard the important intrinsic characteristics of Edenfield :- openness and significant key views, historic, agricultural and rural nature of the area, highly visible in its elevated location in the valley

**The design does not meet NPPF guidelines relating to landscape considerations. It is unsympathetic to the historic environment including the surrounding built environment and landscape setting.**

**NPPF paragraph 174 -188**

**"planning decisions should contribute to and enhance the natural and local environment by:protecting and enhancing valued landscapes..."**  
**Not demonstrated**

**NPPF paragraph 190**

**"Plans should set out a positive strategy for the conservation and enjoyment of the historic environment"**  
**Not demonstrated**

**NPPF 174(e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability.**

Concerns have been raised about the stability of the land relating to the middle section of H66 because of local knowledge and experience of the land here. It is crucial that this is clarified and in particular what engineering works will be required. Retaining walls are not mentioned in the Masterplan but are proposed in Taylor Wimpey's planning application. The Masterplan must include this information which will have dramatic affects on the visual layout.

It is irresponsible to build homes so close to the busy A56 placing people at risk of the air pollution and high noise levels. The effectiveness of high acoustic barriers is not certain given the built land will be higher than the barrier in some areas (mostly the central section).

**7) The design does not meet Local Plan policies relating to historic environment, views and landscaping and boundary treatments**

**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, ...." - not demonstrated**

**Environment- ENV2 expects proposals to conserve or enhance where appropriate the historic environment of Rossendale.**

**Not demonstrated**

**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.**

**Not demonstrated**

**Landscaping and boundary treatments 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.**

**Not demonstrated**

**HS5 suitable housing for the demographic of the area**

**Not demonstrated**

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**Poor, unsuitable design**

**Scale, Layout, design, density and height and materials of the development**

It is acknowledged that the landscape is special and valued. Residents enjoy doorstep access to the open countryside and wide reaching views. It is clear the proposed development will adversely impact the extensive open landscape and the visual amenity, key characteristics of the village.

The development will result in considerable loss of green open spaces, farmland and connections to local historic context. The focus is on clusters of housing with no internal breaks.

The adverse impact on roads and traffic will be major. Scale and layout is such that drastic, disruptive dangerous traffic management proposals are

offered as a way to accommodate the huge development, including further loss of green belt.

Residents' needs are put last in deference to the needs of the development, with the introduction of a large number of parking restrictions, and use of secondary residential streets as a main access point to a large housing site of housing.

### **Historic Context**

Edenfield is historically a ribbon development with key characteristics of significant open landscape, and visual effects, particularly in the central area of proposed development.

Expansive views to Holcombe Moor, Peel Tower, and Musbury Tor are an important historical aspect with links to agriculture which defines the village and gives it its sense of place in the valley and should be preserved.

Filling in with mass housing on this sort of scale, density and height will be damaging to this special character of the village. There is little in the proposed layout and design that specifically considers protecting this special landscape context.

The superficial attempts are made to allow 'glimpses of hilltops' are unacceptable.

Mushroom House, a non-listed heritage asset, will be overpowered by new properties, which will surround it, particularly those between it and Market Street which will blot out views to this farmhouse because of the height of the new build there. It should be given more space.

Similarly key views to Chatterton Hey, a non-listed heritage asset, will be lost being blocked by excessive dense housing. This is a significant view against the backdrop of the distant Holcombe Moor mass and Peel Tower.

Views to the Grade II\* listed church will be impacted with a backdrop of the development clearly visible in winter. At night the backdrop will be disturbed with the myriad of street and house lights from the development. There is no detail as to how the layout of housing parcels will achieve views to the church to continue.

### **Layout and design**

Layout is poor, dysfunctional and blocking and results in unworkable traffic solutions.

- **Historic Context**

The layout undermines the historic linear village core by infilling with mass housing.

it does not protect the setting of the listed and non listed heritage assets at Mushroom House and Chatterton Hey and the Church.

- **Road Widths encourage more build and loss of openness and views**

Roads on site are narrow and do not meet the requirements for Local Highways adoption, leading to a less open site. We know from the planning applications seen so far that building is based around a series of cul-de-sacs, which adds to the compacting build with a lot of roads gong nowhere.

- **Site Entrance to Taylor Wimpey land** The site entrance creates a distinct large junction in the middle of Market Street. The curved nature of the proposed junction roads draws the focus into the new Taylor Wimpey site detracting from the village character. It disjoins by cutting Market Street into two. This area is poorly designed, with its combination of an arc of car parking, its protective mound and dominant housing, over powering historic Mushroom House and blocking views.

- **Lack of green space throughout the site.** There is not enough green space throughout the site to soften the adverse impact and allow for openness and key views The recently added 'potential views to Peel Tower and Emanuel church' dotted lines on 'the pedestrian and cycle way plan', page 48, is meaningless and contemptible.

- **Play areas are badly located.** The one in the north west of the Taylor Wimpey site is not centrally located in that site but above all, is sited near to the Bypass with potential dangers as well as high noise and pollution.

The proposed play area in the North has limited access from the new site H66 given that it is reached only by crossing main roads at a busy junction and is also sited next to the proposed parking area. It is on land in Green Belt not released by the Local Plan.

- **Road infrastructure is disjointed and does not integrate well.**

Roads do not connect throughout the whole of the site but are mostly contained within each individual parcel of land with separate access points onto the existing road network, all of which have major problems.

Potential vehicle connection is shown for the site at Alderwood from

Market Street when we know that the Highway Authority objected to this on the separate planning application, as it is too near existing road access.

- **Footpaths and cycle ways do not connect and shared use raises questions about safety** The paths and cycle ways shown on page 48 do not connect throughout the whole site and are different from those on page 51 where they are described confusingly as 'potential', 'indicative' or 'proposed'. What does this mean?

These paths /cycle ways are shared which raises questions about safety especially where some also run alongside roads. You would expect to see every effort to make attractive off road paths and cycle ways linking throughout the site. This is not the case. The land to the north of the Taylor Wimpey site is owned separately from the developers so it is difficult to see how connecting paths and cycle ways here would be possible.

Existing countryside paths will be urbanised and provide a different experience of walking through an housing estate with limited views.

Footpaths and cycle ways on the north section are badly sited next to the busy A56 with its deafening traffic noise, and /or have no views because of the high acoustic fencing.

- **Layout at boundaries is insensitive.** In particular at Alderwood Grove, which bears the brunt of damaging loss of privacy, light, views, and disruption to amenity. Layout here should specifically aim to lessen the impact but in fact maximises it.
- To propose rows of brick terraced housing in the 'Village Streets' because it "Complements terraced built form found in the centre of Edenfield" is an alarming claim and demonstrates a lack of understanding of the nature of the area. It is just copying the style of linear, not complementing it. Just because it is the same style does not make it complementary.
- The linear character of the village on Market Street is defined by its uniqueness of mostly stone build with a strong connection to its historical roots. Parallel rows of houses would undermine that uniqueness and are more reminiscent of developments in centres of towns.
- It is inconsistent and oppressive to put a row of dense houses back to back with existing minimally spaced housing as at Alderwood Grove.



- **Location of consequential features.** The SUDS area for TW is huge and dominant and presumably will be fenced off for safety reasons. It will be particularly incongruous as water features of this size are not consistent with the landscape here.
- The high amount of acoustic fencing all along the by pass will be visually detrimental providing a view of a compound rather than a village. This urban phenomenon will impact views particularly from the east and the by pass.

**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.

- Most are 2 storey high proposed houses with a mention of 1 storey for Edenfield North site. The large percentage of 2.5 storey is totally unacceptable being too dominant and incongruous . For variation, lower single storey should be used.
- High roof lines will block the significant views and in some cases affect the skyline: for example views towards the west over 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. The distinct linear outline in the central core as seen from the By pass will be severely disrupted adding to the degeneration of village character.
- 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. 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.

#### **Densities -**

- The densities on the proposed site are far more than those of existing areas in the village as demonstrated in 'Context' section of the Masterplan. There is no reason for such excessively high densities particularly when they are not in line with the Local plan which states 29 dph.
- The densities described in the Area type Codes are totally unacceptable:

26 - 30 dph for Edenfield Core  
35 - 40 dph for 'Village Streets'  
36 - 45 dph for Chatterton South  
30 - 34 dph for Edenfield North

- Densities on this scale are not in keeping with the village character and will not provide openness and visual amenity, leading to overbearing oppressive development. The focus is too much on maximising densities at the expense of impact on the village.
- The reasons for densities have no logic. The explanation makes no sense as to why the density of the Edenfield North is higher (stated incorrectly on the Masterplan as lower) than Edenfield Core to “reflect position at northern fringe”.
- Similarly there is no explanation as to why densities are higher in ‘Edenfield Village Streets’ to “reflect proximity to services and public transport”. A ridiculous comment and clearly incorrect - they are no nearer than any other areas.
- The developable land for Taylor Wimpey is now 2.02 hectares less than the Council’s original figure which means the number of dwellings should also be reduced. It does not mean that more dwellings have to be crammed into a smaller space.
- 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. High housing densities of 35- 40 dph together with the parallel layout, back to back, has the most impact in terms of blocking, being oppressive and being overlooked.

## **Materials**

### **Basis for choice of materials is questionable**

- justification for choice of materials seems to rely on identifying the different styles existing in the village rather than focusing on creating something unique and individual that responds and integrates successfully with the existing village context.
- This is notwithstanding the fact the the Masterplan declares that “New development should be influenced by the positive architectural elements found in the village. Avoid recreating less successful architectural styles which have crept into the setting over time” the

proposals then go on to ignore this and suggest the overwhelming use of incompatible red/brown brick and tarmac.

- Natural stone should dominate, which reflects the character of the village, particularly around the core central market street area. As well as stone buildings, stone features can be used in different aspects of other buildings such as windows, porches, quoins to allow for variation but still connect and acknowledge traditional materials of the area.
- The use of more neutral colours would make development less dominant. Brick of more natural stone colour and with some incorporation of neutral render would be softer. Solid square shapes should be broken with interesting contemporary build styles and materials. Materials for the Taylor Wimpey site are particularly monotonous and lacking in imagination with a budget look.
- Dry stone walls are a prominent feature of the landscape and should be used throughout the site to provide some consistency and connection linking areas across the whole site. All existing dry stone walls should be retained though not all are considered in the Masterplan such as at the entrance to the Taylor Wimpey Site and Alderwood Grove boundary.
- Reconstituted stone blocks for walls and brick walls are not acceptable.
- In the central area owned by Taylor Wimpey, the approach is to use buildings of stone or clad in reconstituted stone around the face of the site, the more visually prominent areas, with red brick properties in the middle being 'hidden'. This is an acknowledgment that they are less visually attractive, yet they are deemed appropriate for existing residents to look out onto.
- It also leads to differentiation in a negative way and is undesirable. It insidiously indicates some sort of inferiority when it is desirable to have a mix of types and styles throughout the site to promote diversity

**The Masterplan and Design Code are inadequate - with key areas that are not satisfactorily addressed -**

- 1) Transport and parking**
- 2) Schools**
- 3) Green Belt Compensation**
- 4) Landscaping within the site**
- 5) Drainage**

**6) Implementation and Phasing**

**7) Construction - ground levels and heights of buildings**

**8) Mitigation of noise, nuisance, damage and disturbance during construction**

**1) Transport and parking -**

The proposals for traffic management and parking are unacceptable and unworkable. There is no doubt that an additional 400 houses will add significantly to the problems in Edenfield and cause chaos and increased risk of accidents. The limitations of the main roads in Edenfield and the nature of Market Street in particular, with its pinch points at either end, are well known.

From experience it is currently difficult joining Market Street from Alderwood Grove most of the time and travel through the village southwards down Market Street and Bury Road is notoriously difficult. With the increased volume of traffic, it will be worse.

The traffic survey report by Eddisons seems to say that there will be capacity for the new development. The proposals then go on to suggest a range of unsuitable ways to achieve this with parking restrictions, diversions, new road layouts and junctions all with significant adverse impact on the existing village and its residents. There was more detail about transport in the previous version of the Masterplan.

**Parking**

The Masterplan proposals to drastically reduce on street parking with no parking and restricted zones in order to 'improve' traffic management will seriously impact residents in a way that is grossly unfair and inconsiderate.

New off-street parking areas are suggested but will not be sufficient to meet the needs of those displaced on Market Street. There is no information as to whether these will be allocated, who will maintain them and whether there will be any charges.

The new proposed car park at the north end on Burnley Road is opposite and away from the Peel site, across two roads and near the traffic lights. This site is in Green Belt and has not been released and consequently should not be considered. Any application to develop this Green Belt land would be opposed as it adds to the loss of Green Belt suffered already and to the urbanisation of the village. In any case such a car park for dropping off children for school is likely to be chaotic and potentially dangerous as people manoeuvre and park in an area with a lot of children wandering around.

The off street parking areas suggested are not viable alternative options for residents, being remote from affected houses and of insufficient capacity. It is

reasonable for residents to expect to continue to park outside their homes and not some distance down the road. Making the site work for the development does not justify such drastic action, but rather indicates that the site is unsuitable for such a large development

The restriction on parking at the southern end of Market Street will impact the small businesses there and is unacceptable.

The new no parking zones near the school will also present problems for dropping off children and it is difficult to see how the new off-street car park on Peel land would help reduce the chaos. It is badly sited at a junction with traffic lights and with access points for the new developments around there.

### **Parking on the site**

Car parking at the new houses is not adequate and will create problems. It does not meet the needs of households today. Increasingly vans used for work purposes are kept at home 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 which will obstruct pedestrians.

The road widths are narrow and not up to LCC adoption standards. This will add to the feeling of lack of openness and will encourage parking on the footpath.

### **Other proposed traffic management**

There are a number of uncontrolled crossings and hatched areas proposed which are cause for concern.

The one near the school is at a point in the road which is very narrow and it is difficult to see how it would be wide enough to shelter pedestrians.

There seems to be a hatched area near the junction with Exchange Street. This will mean access to Exchange Street from Market Street will only be permissible coming from the south. This has adverse affects for those travelling from the north and will result in dangerous u turns around the mini roundabout

### **Gateway Features and coloured chipping aggregate**

The purpose of these proposed road features is not clarified but they seem unnecessary window dressing and are more consistent with defining a housing estate rather than a feature of an established functioning village road.

The proposed Gateway features are weirdly sited and are more reminiscent of Disneyland.

### **Rain Garden**

Why is this deemed necessary and will its siting mean the loss of pavement? It is not appropriate for a busy B road running through a village and has not been identified as a necessity until now.

### **Exchange Street**

The suggested one-way access down Exchange Street will force traffic elsewhere, particularly onto Highfield Road and Eden Avenue. These residential secondary streets are not suitable for this increased traffic with cars parked on street.

### **2) Schools**

There is indicated potential for school expansion but this would involve further loss of Green Belt, which would be unacceptable.

**3) Green Belt compensation** is inadequate. Proposals are not in line with the Policies SD4 and H66 7 which require measures to be taken **IN** the Green Belt land in proximity of the site H66. The Masterplan suggests enhancing PROWs and signs 'on site' which are not in the green belt. These suggestions are therefore not relevant. Other measures should be put forward and something more significant than a few signs.

### **4) Landscaping**

#### **Lack of landscaping throughout the site. More open space is needed**

People need space and this is not recognised in these proposals. It does not allow for enough space around dwellings and open-plan style landscaping which would complement the landscape but instead fills it with hard landscaping including high walls and fencing.

The so-called green corridors said to "permeate through the development areas" are largely based on the existing PROWs which will offer a completely different experience when undergoing urbanisation and losing the openness and expansive views across the whole valley to the hills. So much so that they will not be attractive to use. PROW 126 has the additional aspect of negotiating the main site artery road which will run across it.

More soft landscaping is needed at the boundaries with existing properties, to preserve openness and visual amenity.

## **5) Drainage and flooding**

Drainage is not fully covered for the whole of the site H66. SUDS are indicated on the Anwyl and Taylor Wimpey land sites. Ponds of this nature are not a natural feature of the landscape. The scale of the Taylor Wimpey SUDS will overwhelm the area and potentially be an eyesore in its states of drying up.

In the application for land at Alderwood a package treatment plant was proposed with an overflow routed to join an existing watercourse, but there is no information in the Masterplan for this.

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.

The field to the north of Mushroom House and behind Alderwood Grove is boggy, with streams developing in high rainfall which run down into the the recess near the Bypass. In view of the massive construction works required with retaining structures and the nature of the clay soils, we have concerns that this will cause flooding elsewhere and will interfere with the current water surface drainage from existing properties. The plans do not indicate how surface water drainage integrates with those of existing systems.

There are no proper plans for drainage over the whole of the site. How will sewage and foul water drain up hill into existing main drains on Market Street ? No explanation is given as to how this will be achieved.

## **6) Implementation and Phasing**

There is no commitment to a planned phasing. There is no infrastructure delivery schedule.

The phasing is set out by landowner area but to suggest that the development may be re- ordered or delivered simultaneously would be totally unacceptable, given the size of the site and the constraints of location.

This does not meet the requirement of the Local Plan paragraph 1 of the site-specific Policy.

## **7) 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 we would expect this to be a significant consideration.

Taylor Wimpey propose a mass of retaining walls in their planning application but there is no mention of this in the Masterplan.

### **8) Nuisance, disturbance and damage from building works**

There will be significant ground works involved on site, including anticipated mass piling and these 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. This links to the need for proper phasing and a schedule.

### **Conclusion**

This is the third attempt at creating a Masterplan and it is fundamentally no different to previous versions. It does not respond to challenges and feedback or requests for clarification and more information but arrogantly pursues its own self interested goals .There is so much that is wrong with it and it is so vague and lacking to be of any use, and with so many significant issues not resolved, it should be rejected.

This process is descending into chaos with developers submitting their own planning applications alongside the so called masterplan with complete disregard to the Local Plan and its conditions. They blatantly ignore government guidelines and local policies in their scramble to build what they want, as soon as they can.

It is clear developers will not and cannot work together, something that is not really a surprise.

The Developers have had their chance to put forward a Masterplan. In the circumstances it would now be appropriate for Rossendale Council to step in and take the lead on drawing up a Masterplan and Design Code.

This chaos will be nothing to the disaster when the building starts. Edenfield needs and deserves a better plan than this.

Karen and Richard W Lester



## **Local Plan Policies**

### **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, ...." -

ENV1b) Safeguarding and enhancing the built and historic environment;

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;

ENV1k) There is no adverse impact to the natural environment, biodiversity and green infrastructure unless suitable mitigation measures are proposed and the Council will seek biodiversity net gain consistent with the current national policy;

l) That proposals do not increase the risk of flooding on the site or elsewhere, where possible reducing the risk of flooding overall, having regard to the surface water drainage hierarchy;

### **ENV2 Historic Environment**

**The Council will support proposals which conserve or, where appropriate, enhance the historic environment of Rossendale**

#### **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;
- Retain existing watercourses, trees and green infrastructure features that make a positive contribution to the character of the area;
- 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.”

To whom it may concern

Having read the current application, my concerns have not been address and I resubmit my objections below.

Barry Gray

Sent from my iPhone

Begin forwarded message:

**From:** john gray <[REDACTED]>  
**Date:** July 26, 2023 at 2:01:08 PM GMT+1  
**To:** [planning@rossendalebc.gov.uk](mailto:planning@rossendalebc.gov.uk)  
**Subject:** Land west of Market Street, Edenfield

To whom it may concern

Having read the proposal and full application for the erection of 238 residential dwellings and associated works including access, landscaping, and public open space I wish to register my objection

The proposal in no way addresses the major issue of traffic in exchange Street market Street and the drive High Field Rd., Eden Avenue

These roads and footpaths were constructed to serve a maximum amount of residential units which has long since been exceeded

This means that there is in these areas already a traffic problem, which even the instigation of parking restrictions will not alleviate

The weight of through traffic as it exists now represents a danger and a continuing loss of amenity to the existing residents.

It is clear that this these problems cannot be overcome as is evidenced in the latest proposals, which in no way alleviates the existing problem let alone the problems, which will arise should the proposed development be allowed to proceed to the extent that it is planned by the developers

This development and its incursion into the Greenbelt, will not only irrevocably destroy the amenity enjoyed by the existing residents but actually introduce the possibility of real harm to the extent of deaths

The application completely fails to address these fundamental issues, driven one suspects by the desire to maximize profits

The real danger is that the development and it's unresolved attendant problems will drive away local shops and services to the extent that edenfield will simply become a housing estate, and no longer a village community.

John Barry gray

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

Sent from my iPhone

Having read the new application, my concerns still stand and have not been addressed. Please see below objection resubmitted.

Geraldine Sweet

Begin forwarded message:

**From:** [REDACTED]  
**Date:** 7 August 2023 at 12:51:23 BST

To whom it may concern.

Having read the proposal and full application for the erection of 238 residential dwellings and associated works including access, landscaping, and public open space I wish to register my objection.

The proposal in no way addresses the major issue of traffic in exchange Street market Street and the drive High Field Rd., Eden Avenue.

These roads and footpaths were constructed to serve a maximum amount of residential units which has long since been exceeded. The village is already an alternative route for the dual carriageway when there are works or accidents and the village cannot cope with the volume increase, coming to almost standstill at points. There already remains traffic issues, which even the instigation of parking restrictions will not alleviate.

The weight of through traffic as it exists now represents a danger and a continuing loss of amenity to the existing residents.

It is clear that these problems cannot be overcome as is evidenced in the latest proposals, which in no way alleviates the existing problem let alone the problems, which will arise should the proposed development be allowed to proceed to the extent that it is planned by the developers.

This development and its incursion into the Greenbelt, will not only irrevocably destroy the amenity enjoyed by the existing residents but actually introduce the possibility of real harm to the extent of deaths.

The application completely fails to address these fundamental issues, driven one suspects by the desire to maximize profits.

The real danger is that the development and its unresolved attendant problems will drive away the few local shops and services to the extent that edenfield will simply become a housing estate, and no longer a village community.

Geraldine Sweet

[REDACTED]  
[REDACTED]  
[REDACTED]

Hi,

Having read the updated Materplan I don't feel like the following objections have been addressed:

Objections

1. In it's present form, neither the master plan or planning application meet the requirements of the RBC
2. Not do they relate to the whole site, including the other proposed developments
3. There is no comprehensive traffic assessment for the whole of Edenfield
4. Such reference to traffic as there is greatly underestimates the potentially devastating effect upon market Street residents and users already under significant detrimental pressure from the existing weight of traffic
5. Market Street is essentially residential, and as such is at the heart of Edenfield Village .Even a modest increase in the weight of traffic will rob the village of this vital organ
6. Edenfield is a village with an historical Legacy of which market Street,it's buildings and residencies form of vital part
7. The scale density and character of the development is not in keeping with this legacy
8. School places are not properly addressed and one suspects this is because the would be developers recognize an insurmountable problem in this regard compatible with the character of the village
9. The proposed development of the whole site represents increase in the size of the village to the detriment of the existing residents and those who would occupy the new properties
10. The village cannot accommodate the necessary environmental and infrastructural input to support the proposed development

Thanks,

Alastair Sweet

██████████  
██████████  
██████████

I am writing to voice my objection to the above plan.

I feel this to be too large a plan for such a small village community. Also the detrimental effect this will certainly have on the local roads and current residents. The main road through Edenfield is already frequently congested and adding more traffic would be a disaster waiting to happen!

This land is greenbelt and provides a welcome green space between two towns.

The drain off onto the motorway is also a concern as the villages below the motorway already have their own flooding problem.

There must be areas of land that would be more suitable for regeneration that would not cause this horrendous blot on the landscape?

Heather Dodd

██████████

Sent from my iPhone

Good morning,

As we now have yet another Masterplan it's time for another objection, and it would seem this is done to try and wear us down.

The Masterplan does not address the destruction of Edenfield for current residents, who seem to be forgotten and ignored in the race for new houses. The needs of any future residents are well catered for but not us who live here now.

Removing parking from Market Street is utterly unacceptable. How will people live their lives? Parking outside or near your home is gone and yet more tarmac over a green space to provide a car park that can be used by anybody, so you might not actually be able to use it! Madness.

Double yellow lines will make Market Street an absolute horror of speeding lorries, band and cars. It's bad enough now, imagine what it'll be like when a free for all happens. It'll turn into a bypass to the bypass.

There has been a traffic analysis done by the Residents association, which highlighted all the problems and should have put an end to this process once and for all yet here we are again.

I see that Peel have put there planning application in BEFORE the master plan has been finalized.

Divide and conquer I guess.

Our two councils have a duty of care to protect current residents from the ravages of development and destruction of our homes. You should take that duty and trust seriously and not ignore us.

Thank you

Graeme McDonald  


**Contact:** [REDACTED]

**Date:** 03 November 2023

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 has reviewed the Land West of Market Street, Edenfield (Allocation H66) – Masterplan and Design Code (September 2023, Randall Thorp) and has **no additional comments** to make. Minimal changes have been made to the section on sustainable drainage systems.

**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

**Lancashire County Council**  
[REDACTED]



**FAO Rossendale Borough Council, Forward Planning**

Dear Sir/Madam,

**Objection to Land West of Market Street, Edenfield, Further Amended Masterplan & Design Code (Sep 2023)**

**Traffic, car parking and road safety:**

The fingerpost junction at the north end of Edenfield, controlled at 4 points by traffic lights with the fifth point a Give Way, is particularly busy with traffic and pedestrians at the start and end of the day, including for the school. Proposals in the Masterplan would increase traffic and hazards in this area, for example:

- Proposed car park on greenbelt land near the fingerpost junction. Cars waiting to turn right to enter and traffic exiting from this car park would add to congestion at the junction and increase further the risks for pedestrians crossing Burnley Road, for example to access the school.
- The proximity to the fingerpost junction of the proposed access point to the Northstone site off Blackburn Road would also add to congestion and risks at this junction. Also no consideration appears to have been given to the impact of this access point on vehicle access for existing properties on both sides of Blackburn Road.
- There are no pedestrian crossings on Blackburn Road or Burnley Road. Crossing Blackburn Road and Burnley Road is already hazardous, especially for children and people with disability. The proposed car park and access point referred to above would increase these risks.
- The proposed uncontrolled pedestrian crossing adjacent to Edenfield Primary School is opposite the entry/exit to Church Lane and almost opposite East Street. What form would the 'uncontrolled pedestrian crossings' take? Would these crossings increase the hazards for vehicles entering and exiting Church Lane and East Street? Negotiating pedestrians, including primary school children, and vehicles on Church Lane is already hazardous, particularly at the beginning and end of the school day.
- Parking restrictions proposed for Market Street would prevent current residents parking close to their house and the 'compensatory' parking areas are too far from the houses affected by the proposed parking restrictions to be a practical alternative, particularly for those with young children, the frail and disabled.
- The capacity of the off-street car park proposed by Northstone to the east of Burnley Road does not appear sufficient to accommodate vehicles displaced by parking restrictions proposed for Market Street and Blackburn Road, as well as making provision for school traffic.
- A single, comprehensive assessment of the impact of all the developments proposed for the H66 site on traffic volumes, parking and safety concerns is needed. An independent,

comprehensive assessment would allow all interested parties to review the risks assessed and consider whether the measures proposed to address those risks are adequate.

**Green spaces and biodiversity: section b) below refers to Items 1 to 3, attached to this email:**

a) Masterplan proposals to release further greenbelt land to be used for a car park and play area were not included in Rossendale Borough Council's (RBC's) Local Plan. Removing even more land from the greenbelt can only have a negative impact on biodiversity

b) **Woodland to the north of Church Lane:** the Masterplan (Executive Summary page 8, point 5i) refers to the policy requirement included in RBC's Local Plan 'Retention and strengthening of **woodland to the north and south of the Church**':

In the 'Table of Developers Responses to the Council's Comments', the Council's Policy Comments provided by RBC's Forward Planning Team include at page 3, 'Nature' section, item ii 'Biodiversity': *"The woodland along Church Lane is shown as a Deciduous Woodland Priority Habitat on the Magic Map website. As such, **any proposals to destroy part of this woodland as shown to the north of Church Lane to accommodate housing will not be supported.** ....."*

The Masterplan (page 8 point 5i, and page 42 para 5) states that it includes proposals to 'strengthen and retain the woodland at Church Lane'

We have compared the area north of Church Lane shown as a Deciduous Woodland Priority Habitat on the Magic Map website (Item 1 attached, area outlined and hatched green) with the diagram of the planned development area north of Church Court as indicated on page 51 of the Masterplan (attachment 2).

*[Note: Magic Map website, Item 1 above: we acknowledge Crown copyright and database rights 2022. Ordnance Survey 100022861. Powered by Landmark Solution. Defra's Magic Map website is managed by Natural England and delivered by Landmark Solutions <https://magic.defra.gov.uk/> ]*

On Item 2 (attached) the area outlined in green corresponds approximately to the area north of Church Court shown on Magic Map as a Deciduous Woodland Priority Habitat. This Priority Habitat area is outlined and hashed green on Item 2. The area outlined and hashed red **within** this green area on Item 2, we believe corresponds (approximately) to an area of the Northstone development that they propose to use for houses.

The scale of the diagram for Item 2 is small, therefore we have also attached Item 3. Item 3 is taken from a plan included in Northstone's planning application 2023/0396 for the area we refer to and is on a larger scale. On Item 3 the area outlined and hashed green corresponds (approximately) to the area north of Church Court designated as a Deciduous Woodland Priority Habitat on the Magic Map website. The area outlined and hashed red **within** the green area on Item 3 shows (approximately) the part of this area of Deciduous Woodland Priority Habitat that it appears Northstone are proposing is destroyed to accommodate housing.

Priority Habitats in England are identified as habitats of principal importance for the conservation of biodiversity under section 41 of The Natural Environment and Rural Communities (NERC) Act (ref: User Guide for Natural England's Priority Habitats Inventory, Version 3.0). New extended biodiversity duties for public authorities under

section 40 of the NERC Act in force come into force at the start of 2023 and include a duty for local authorities to deliver Biodiversity Reports (NERC Act section 40(A). As a public authority and a local authority, we expect that RBC will take account of the new provisions of the NERC Act when considering all aspects of this Masterplan and related applications and, as indicated by Council's Policy Comment referred to above, will not support any proposals to destroy part of the woodland north of Church Lane shown on the Magic Map website as a Deciduous Woodland Priority Habitat to accommodate housing.

**Geological suitability and flooding:** we understand that Rossendale Borough Council (RBC) has appointed independent advisors to conduct a review of the geological suitability of the Taylor Wimpey land for building. We trust this, or another, review will consider the implications of building on this land for flooding, a recognised issue in the area, particularly in the valley below Edenfield. 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 including Irwell Vale.

**Phasing:** Masterplan (pages 54 – 55): no further information is provided on the mechanisms and procedures that will be used to coordinate and manage construction works and associated traffic. What systems and procedures will be put in place to ensure that the Construction Management Plans to be agreed as part of each subsequent individual planning application (see Masterplan page 54) are coordinated across all the H66 development sites? Also, timelines for developments often change, how will changes be monitored and managed across the whole H66 area to minimise impacts on the community and highway network?

For the reasons above we object to this Further Amended Masterplan & Design Code (Sep 2023).

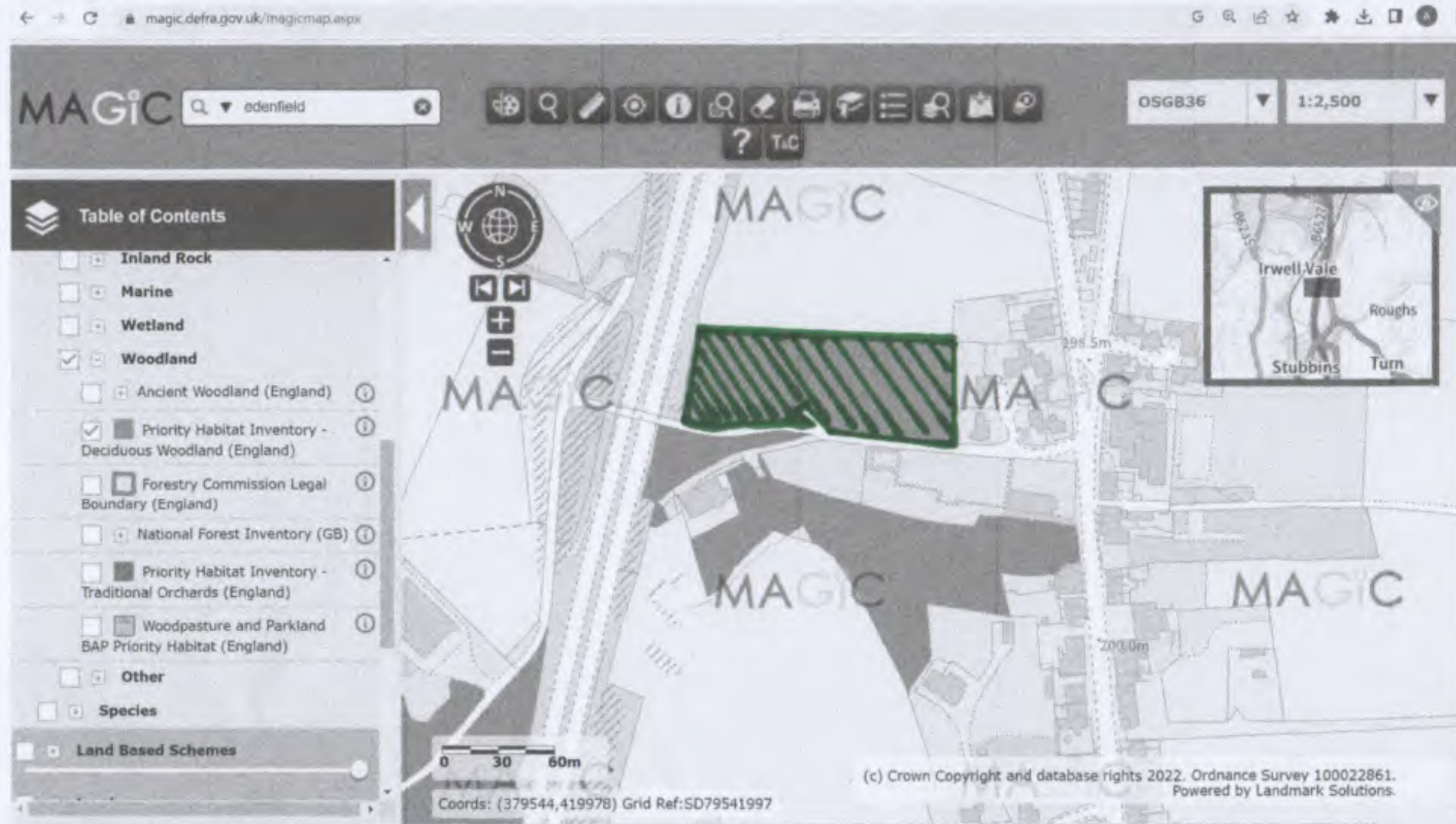
Please contact me if there are any issues accessing or interpreting the three items attached.

Yours faithfully,

Ann E Durie and Nigel S Stacey

██

# ITEM 1 - FROM MAGIC MAP WEBSITE -



ITEM 1

From:  
Magic Map  
website.

MASTER PLAN, PAGE 51

ITEM 2



The Masterplan

Masterplan page 51

ITEM 2

Land West of Market Street

51

# ITEM 3.

NORTHSTONE  
PLANNING APPLICATION  
2023/0396

# ITEM 3

NORTHSTONE  
PLANNING  
APPLICATION  
2023/0396



Tim Preston  
[REDACTED]  
[REDACTED]  
[REDACTED]

3rd November 2023

[Planning@rossendalebc.gov.uk](mailto:Planning@rossendalebc.gov.uk)

[Forwardplanning@rossendalebc.gov.uk](mailto:Forwardplanning@rossendalebc.gov.uk)

**Location: Land West of Market St, Edenfield**

**Proposal: Re-consultation in Respect of An Amended Masterplan & Design Code in Association with Housing Allocation H66 of the Adopted Rossendale Local Plan**

I am writing this letter in response to the revised Masterplan and Design Codes in association with the planning application at the above address.

I continue to express my objection to this revised plan as there are several concerns that have not adequately been addressed. I urge you to carefully consider the points outlined below as they have significant implications for the safety, accessibility and quality of life in our community.

1. Double Yellow Lines and Accessibility for Current Residents. The introduction of double yellow lines in front of our houses raises concerns about how current residents will access our properties with shopping and young children. The proposed compensatory car park remains neither sufficiently large nor fit for purpose. A recent audit has identified between 35-40 cars parked every night, suggesting that the car park is open to new and existing residents, rendering it non-compensatory. Moreover, the lack of spaces for visitors, tradespeople and services, as well as the absence of electric charging points further exacerbates the issue. Restrictions on parking will also negatively impact local businesses. This revised plan continues to demonstrate discrimination against existing residents to accommodate the needs of residents in new houses. As a family with 2 vehicles (necessary for commuting) we rely on street parking and have always managed on Market Street as there are currently no restrictions. The revised plan offers no certainty that parking for existing residents will be provided.
2. Inadequate Crossing Points. The proposed plan includes only one crossing point on the north side of the junction, which raises serious safety concerns for the very young primary school children (including my own) crossing Market Street from the south side. This lack of adequate crossing points poses a significant risk to their safety.
3. Overall Flood Risk. There appears to be an overall flood risk, particularly on the A56, leading to severe traffic and safety concerns. These risks should be thoroughly evaluated and addressed before any approval can be considered.

Thank you for your attention to these critical concerns. I trust that you will give due consideration to the objections raised and act in the best interests of our community and make decisions that prioritise the safety and well being of all residents of Edenfield.

Yours sincerely  
Tim Preston



Amy Preston

2<sup>nd</sup> November 2023

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Yours sincerely  
Amy Preston

Objection to Masterplan: Land West of Market Street, Edenfield (H66) – Further Amended Masterplan and Design Code (September 2023)

This is the third version at an attempt at a Masterplan. RBC required (their own terms) this to be agreed and in place prior to submission of planning applications.

I would say that all the details contained in this were known 12 months ago when the first Masterplan proposal was published.

It would seem that this is a deliberate strategy adopted by the developers to circumvent these requirements and to thwart residents objections.

There are still many omissions and flaws to this version of a Masterplan. I list the following:

1. Traffic plan: there is no real traffic plan. The measures amount to road painting and parking restrictions for current residents with vague (subject to additional planning applications) proposals for parking spaces on and off the site.

The very brief (3 days in April) "traffic survey" undertaken resulted in several misguided assumptions. These being that traffic levels are decreased compared to pre-pandemic levels and that small residential access roads (namely Eden Avenue and Highfield Road) have lower usage. This could be construed as correct but both are not through-roads only serving residences on these roads where parking is already at a premium. Secondly, that they are suitable for LGV use as site access to the Anwyl site will be via this route as the limited / awkward entrance to Exchange Street will be subsequently avoided by large vehicles.

The adoption of a one-way system on Exchange Street would obviously displace most, if not all, current residents vehicles. There are no proprietary safety measures proposed to Exchange Street other than "a traffic calming measure" (no detail) for the recreational area, children's play area, and pump track (parking by visiting parents would therefore be displaced onto Highfield Road creating another parking problem for residents).

2. SUDS: two large ponds are outlined at the lower margins of two developments. No details as to their size, maintenance, responsibility and safety are given. The largest appears circa. 30 metres from the A56 dual-carriageway with obvious consequences should it be overwhelmed. This plus the obvious danger to children etc. of large bodies of unsecured water are the main concerns.

3. Build phasing: this is split into four (with a potential total of 408 residencies) no detail other than being marked out as 1-4 is given as to whether there is an ordered progression to the build or if all are to be started simultaneously.

4. Pollution: no detail as to any noise, dust or other pollution mitigation measures / systems are given.

5. Design / Build: totally inadequate line drawn examples of other site builds / projections are shown. No site detail (i.e. a plan) is contained within the document.

Given the numbers anticipated this detail should be crucial as there are only 3 access points to the whole of H66 for emergency service vehicles.

In summary this third attempt gives little more detail than Version 2. There are still many absent details to the plan.

Current residents are being largely ignored throughout. Direct overview / input by RBC and planning would seem to be missing. RBC terms stated that this was to be "an agreed programme of implementation" but even this third effort falls short in most aspects.

In my opinion this document does not represent a comprehensive Masterplan for Edenfield with so much detail missing and unanswered questions.

This Masterplan would seem to represent a skewed vision to satisfy the needs of the developers to the direct detriment of virtually all existing residents of Edenfield.

I would therefore submit (again) that the reasons I have outlined constitute reasons why this document should be rejected as unsuitable as a comprehensive Masterplan.

Peter Dawson

Objection to Masterplan: Land West of Market Street, Edenfield (H66) – Further Amended Masterplan and Design Code (September 2023)

I have compiled the below alongside my husband. However, I would like to add these further comments. The total disregard that the developers and RBC have for residents' concerns is palpable. To cause such inconvenience to existing residents by removing their right to park outside their own address, which they have done since purchasing their properties many years ago, in order to make a large profit selling new homes to people willing to pay large sums to escape inner city is just a disgrace. Highfield Road and Eden Avenue, mentioned below, cannot accommodate any large influx of traffic and nor can LGV's fit along these roads, it is barely wide enough for a single car to pass. Developers and RBC planners have clearly not been through this village during the evening rush hour traffic and weekends when people are home and their vehicles are parked. The fact that Exchange Street is being mooted to be turned into a one-way street pushing traffic along these tightly packed roads, plus using it as an entrance to part of the development, shows that no-one has taken the time and trouble to complete an honest and thorough risk assessment on these roads prior to putting forward this dangerously flawed "Masterplan".

This is the third version of an attempt at a Masterplan. RBC required (their own terms) this to be agreed and in place prior to submission of planning applications.

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Joanne Ash

To The Forward Planning Dept.

Regarding the Taylor Wimpey Revised Masterplan and Design Code received by RBC In September 2023.

I wish to object to the above revised Masterplan and Design Code.

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The vision for this development was 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

On all the above counts it is clear that this revised Master Plan and Planning application does not meet the requirements of the Council's Local Plan and Design Code.

Up and down the country 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.

This latest application appears to totally disregard any of the objections and concerns raised in response to the original application...I doubt if TW even read them.

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The huge concern expressed by residents to the massive scale of the development and how that alone will impact life in the village for many years to come has been ignored by T W.

By not reducing the number of houses just illustrates how little TW cares about providing a “vibrant and sustainable residential scheme” . Rather, they continue to insist on cramming as many “units” into H66 as possible

Similarly, concerns raised about the traffic congestion and flooding problems already experienced by residents in Edenfield and surrounding areas have, once again, been ignored here.

Offering the residents on Market St parking spaces in a small parking area within the development is completely inadequate and an insult

On-road parking directly outside the existing terraced housing has always been considered a necessary and legitimate facility available to those houses. It may not be legally owned by the householder, but it is often included in the house details when offered for sale. Certainly, the majority of residents would not, in this day and age, consider buying a terraced property without the opportunity to have parking available directly on the road outside.

It would appear, however, that the needs of existing residents are to be bulldozed in order to facilitate “flow”. TW know that the huge increase in traffic their development will cause has to be addressed somehow. So it’s simple ...just remove all on street parking on Market St. .and give “them” a few spaces to fight over just a short walk away!

On paper they are allocating “them” their own space but in reality that space will probably be taken by friends visiting the new householders on the estate!

Oh, and never mind that this parking area will take up the majority of one of only two green spaces on H66 allocated in the whole of this desert of poorly designed, economically constructed houses, roads, and hard landscaping. But hey why should TW care...they will be long gone.

There is so much to object to in this latest so-called Masterplan and design code submitted by Taylor Wimpey.



All my previous objections still apply. None of those concerns or those of hundreds of other residents or many at RBC have been addressed at all in this latest application

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The scale of this development must be addressed...it cannot be allowed to go ahead.

I urge Rossendale Borough Council Planning Department to refuse this application.

Elizabeth Stooke,

## H66 Masterplan & Design Code

I note that there has been no significant change to any part of the H66 Edenfield Masterplan & Design Code & therefore all of my previous objections remain on the following grounds:

- development density would dramatically change the nature of our village from semi-rural to urban sprawl due to the decimation of the green space which immediately surrounds the village
- increased traffic from the development would cause an increase in pollution along Market Street & Bury Road, where properties & the primary school are close to & front onto these roads
- current traffic volumes are already a challenge on Market Street & Bury Road without the extra volume of vehicles & journeys that would be generated
- concern regarding the amount of traffic generated & impact of such during the build time (the length of which still does not seem to be agreed upon)
- access to the site via Exchange Street remains a major concern
- proposal to ban parking outside of the shopping area remains a major concern, not least for businesses
- proposal that children could go to Balladen Primary School would definitely increase traffic through the village at peak times
- lack of extra service provision (i.e. doctors, dentists etc) would add to already stretched amenities in the surrounding towns

I also note that other developments locally, still have not sold some of their properties after a considerable time. I don't disagree that there is a need for properties for first time buyers & older people downsizing but executive homes seem to be in abundance & question whether that element of the build is required at all.

I'd also question why Bury Development Management Team are responding to these plans. What is their involvement in this Masterplan?

I previously read an article regarding Rossendale Borough Council painting Edenfield as the welcoming gateway to the Valley. Everybody that I have spoken to in the village thinks that this proposed development is a massive error of judgement & Edenfield would no longer hold that place.

Regards,

Mrs Carol Jary  
Edenfield resident

We commend Taylor Wimpey for their consistency in, yet again, submitting another Masterplan that isn't!

The planning requirement, and indeed the first criteria, has not been met: namely "a Masterplan with an agreed programme of implementation and phasing". The submission does not provide a clear indication of the order of phasing, whether they are concurrent or sequential and, most importantly, the planned timescale of each phase.

Indeed they seem inordinately proud of "the independent nature of each developer's landholding, ensuring that each parcel can be delivered independently without prejudicing any other. As a result, the ordering of development phases may be varied or delivered simultaneously." Apart from being a recipe for complete and utter chaos this is patently untrue, because some of the phases are interdependent.

In terms of current facilities for the village, LCC via the LHA, specifically objected to the loss of residential parking on Market Street (February 2023 correspondence) and requested "a designated car park served from the new access road, located in a convenient location for the existing residents on Market Street". They also noted this would require long term management by the developer, highlighting the pressure on parking that will ensue in these circumstances. This appears to have been ignored by Taylor Wimpey. The siting of two car parks at either end of the village (one of which had already been earmarked as assisting with school pickup and drop off to compensate for loss of on street parking) for residents from the centre is inappropriate and unacceptable. The meagre on site provision (at the front of the proposed development adjacent to Market Street) of 10 parking places now increased to 13 is insultingly inadequate, given the acknowledged existing capacity which will be removed under these proposals.

These issues and the overall problems with parking are well referenced in the report produced by SK Transport Planning for ECNF (which seems to have been ignored by the relevant parties) and, from a personal audit of parking on the length of Market Street over several weeks, we can confirm that an average of over 60 vehicles are parked there during the working day. Clearly in the evening and at weekends this figure will be higher. The proposed parking restrictions can only greatly exacerbate an already difficult situation and make resolution of this problem vital before any development can take place.

In terms of the actual proposed housing, it is apparent from Section 05 "Area Types" that Taylor Wimpey persists in foisting an alien and completely unsympathetic development upon Edenfield by choosing previously out of character additions to the village as examples to be replicated. This will result in an urban layout being 'cut and pasted' into a rural environment to which it is totally unsuited, and thereby enabling the developer to impose inappropriate 'off the peg' pick and mix housing units rather than bespoke design solutions.

There is also the conveniently cosmetic dismissal of the underlying safety and sustainability of the site and concomitant drainage issues, which appear to have been 'kicked into the long grass' for some vague future consideration at some unspecified date. This is too important to be left to some uncertain and unaccountable process.

Finally, and most importantly, there remains the overriding, and well documented, problem of traffic - current and future - which renders the entire proposal invalid.

Again Taylor Wimpey have chosen to relegate the issue to a six paragraph Appendix (in a document of over 100 pages) claiming that their surveys confirm there is no problem with capacity. To support

this absurdity they comment "Additional information is contained within a separate, detailed highways note" - to which the response is where?

Previous applications have contained flawed and inaccurate data that has been challenged by various parties and, to date, developers have not provided satisfactory answers. The LHA in its first response (February 2023) pointed out that the "planning application fails to demonstrate that the proposed development can be fully and appropriately integrated into the local environment without a significant negative impact on the local and wider highway network, and that its impacts without appropriate mitigation would be unacceptable in terms of highway safety and sustainability. This is contrary to the National Planning Policy Framework".

They go on to say that that the any impacts must mitigate the full allocation (ie 400 units) on local and strategic networks. The current application patently does not do that and therefore does not meet the objections originally detailed by LHA.

Dr Ann-Marie Coyne  
M J Coyne Dipl.Arch.(Dist.) RIBA

My name is Ken Parkes and myself and my wife live at [REDACTED] I am writing to express my strong objection to the latest planning proposal for 238 houses on the land to the west of Market Street.

I have studied the plan for access from the proposed site onto Market Street and I am appalled that so little thought has been given to the volume of traffic expected to access Market Street especially during key times of the day, namely early morning and late afternoon. The proposed measures to create double yellow lines and very limited roadside parking will create a bottleneck more or less outside our front door. Even with current levels of traffic there are already problems if two or more buses or large lorries try to pass and this regularly results in long queues and frustration. I find it completely staggering that this situation has been ignored and that things will not get significantly worse once the volume of traffic increases exponentially. I have grave misgivings that our once happy and rural community will end up as an enormous car park for set parts of every day. In addition we have a separate problem in that we currently have off road parking and need to pull out on to Market Street turning either left into Rawtenstall or more regularly right towards Ramsbottom. This manoeuvre is already extremely precarious as on street parking vastly reduces visibility and with the significant increase in traffic this situation is only going to get worse and will certainly reduce our ability to get out and about. It will inevitably mean we feel trapped inside our own home.

I must say that our impression of the consultation process so far has not been favourable and neither the local council or the developer have bothered to actually contact the most affected households to gain first hand experience of their concerns and how the proposed traffic measures would work in practice.

Another issue we have is that no details have been given about the actual building work and how the various elements of the plan will be scheduled. This too is causing concern and unnecessary worry among households.

Finally, I freely understand the need for an increase in house building nationally and locally and that Edenfield is an attractive place to live and grow, but the current plans for traffic management through the village are completely unworkable both for existing and future residents, resulting in Edenfield ceasing to be an attractive place to live.

I respectfully ask that the developer and the council highways department reconsider this plan or at the very least come and speak to the residents to better appreciate the difficulties we face.

I look forward to your consideration of our very real worries.

Thank you for your time,

Ken Parkes

Sent from my iPad

Hello

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

The plan still 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.

I continue to believe that 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

Mrs Tracy Finney

Saturday, 04 November 2023

For the attention of Mr Mike Atherton  
Chief Planning Officer  
Rossendale Borough Council  
Futures Park  
Bacup  
Rossendale  
OL13 0BB

**Edenfield Masterplan/September 2023 version**

Dear Sirs,

I write to express my serious concerns about the revised masterplan for Edenfield linked to the planning application by Taylor Wimpey.

The vehicular access to my property is via a cul-de-sac off Highfield Road. Access to the cul-de-sac is at the bottom of The Drive. Without any alternations to the village road layout, this is already a problematic junction to navigate either on foot or by vehicle. Cars frequently speed down The Drive and swing left down Highfield Road. There have been many occasions when I have nearly been involved in a road traffic accident while I have been stationary checking safe egress from the cul-de-sac. Again, without any changes to local roads surrounding the area(s) planned for housing development the existing residents of Eden Avenue, Highfield Road and including my own neighbours on Bolton Road North have to park on the road outside their houses as this is the only parking they have available. This already makes it difficult to navigate the footpaths as the cars are always parked across them. When I attempt to walk up to the children's play area with my family members and dogs we are forced onto the main road as we cannot walk, let alone push a pram through the gaps that are left. With the current flow of traffic on these roads, this is not a significant problem. Add another 300 houses and an equal number of cars, all of which you are going to force down these roads to gain access to their houses would have a seriously detrimental impact on the safety of the existing residents of this community.

Two members of my family have already had road traffic accidents at the junction of Eden Avenue, attempting to turn right onto Bolton Road North. These plans will make all the surrounding areas busier, and it is more likely that accidents numbers will increase. Recent road works on the A56 demonstrate the effect of a high number of vehicles attempting to travel through the village on its only road. Gridlock.

In addition to above, the plans to make Exchange Street a one-way system are ludicrous. Travelling down Exchange Street leads to the children's playground, the recreation ground, and the new pump track. The number of children on bicycles in this area has increased 10-fold. To force traffic onto Highfield Road and Eden Avenue to navigate around a one-way Exchange Street will lead to a fatality. Exacerbate this with double yellow lines on Market

Street and Exchange Street with restricted parking again will force additional vehicles onto Highfield Road and Eden Avenue. I am struggling to understand how anyone can think these are satisfactory solutions to provide access to a new housing development. It has no regard whatsoever for the existing residents of Edenfield Village. It has no regard for the safety of our residents, our children, or our community.

That is without even considering the impact on the village itself. Of the few shops that remain, these plans are likely to force their closure as customers will not easily have access to them during their opening hours.

The Masterplan as it currently exists provides no real detail about the overarching plan. What are the proposals for the Anwyl site? Is this where you plan to push the existing residents to park or is this exclusively for the new build homeowners? Are you considering further release of greenbelt areas? Has there been a road safety audit carried out? What about the existing natural habitats for wildlife, will these just be destroyed to accommodate houses?

I believe that this is a seriously ill-thought-out Masterplan, lacking in any detail. This is not a Masterplan for existing Edenfield residents this is a plan thought out by Rossendale Borough Council to boost council tax income which no doubt will be spent in other areas of Rossendale. Edenfield is too close to the boundary for Greater Manchester for any funds or services to head in our direction. You only have to ring 999 for police or ambulance services to experience that or wait for it to snow and see how long it takes for the roads to be gritted or even just take a walk around the village and look at the state of the roads and footpaths. Our public transport services are almost non-existent – Edenfield is the forgotten village. Until of course you want to buy a house here – inflated prices because of its idyllic location and picturesque scenery. Until that is you allow over 450 new houses to be built, declassification of greenbelt land to accommodate it and a village with little infrastructure to accommodate its existing residents let alone add more.

This is not a Masterplan for the residents of Edenfield, this is more likely to be a funeral plan. Either for the death of our village community or one of our children.

Yours faithfully,



Tracy Finney, MSc, Chartered MCIPD, MInstLM



Mr William Finney  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

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I believe that this is a seriously ill-thought-out Masterplan, lacking in any detail. This is not a Masterplan for existing Edenfield residents this is a plan thought out by Rossendale Borough Council to boost council tax income which no doubt will be spent in other areas of Rossendale. Edenfield is too close to the boundary for Greater Manchester for any funds or services to head in our direction. You only have to ring 999 for police or ambulance services to experience that or wait for it to snow and see how long it takes for the roads to be gritted or even just take a walk around the village and look at the state of the roads and footpaths. Our public transport services are almost non-existent – Edenfield is the forgotten village. Until of course you want to buy a house here – inflated prices because of its idyllic location and picturesque scenery. Until that is you allow over 450 new houses to be built, declassification of greenbelt land to accommodate it and a village with little infrastructure to accommodate its existing residents let alone add more.

This is not a Masterplan for the residents of Edenfield, this is more likely to be a funeral plan. Either for the death of our village community or one of our children.

Yours faithfully,



Mr William Finney

Kieron Finney



Saturday, 04 November 2023

For the attention of Mr Mike Atherton  
Chief Planning Officer  
Rossendale Borough Council  
Futures Park  
Bacup  
Rossendale  
OL13 0BB

**Edenfield Masterplan/September 2023 version**

Dear Sirs,

I write to express my serious concerns about the revised masterplan for Edenfield linked to the planning application by Taylor Wimpey.

The vehicular access to my property is via a cul-de-sac off Highfield Road. Access to the cul-de-sac is at the bottom of The Drive. Without any alternations to the village road layout, this is already a problematic junction to navigate either on foot or by vehicle. Cars frequently speed down The Drive and swing left down Highfield Road. There have been many occasions when I have nearly been involved in a road traffic accident while I have been stationary checking safe egress from the cul-de-sac. Again, without any changes to local roads surrounding the area(s) planned for housing development the existing residents of Eden Avenue, Highfield Road and including my own neighbours on Bolton Road North have to park on the road outside their houses as this is the only parking they have available. This already makes it difficult to navigate the footpaths as the cars are always parked across them. When I attempt to walk up to the children's play area with my family members and dogs we are forced onto the main road as we cannot walk, let alone push a pram through the gaps that are left. With the current flow of traffic on these roads, this is not a significant problem. Add another 300 houses and an equal number of cars, all of which you are going to force down these roads to gain access to their houses would have a seriously detrimental impact on the safety of the existing residents of this community.

Two members of my family have already had road traffic accidents at the junction of Eden Avenue, attempting to turn right onto Bolton Road North. These plans will make all the surrounding areas busier, and it is more likely that accidents numbers will increase. Recent road works on the A56 demonstrate the effect of a high number of vehicles attempting to travel through the village on its only road. Gridlock.

In addition to above, the plans to make Exchange Street a one-way system are ludicrous. Travelling down Exchange Street leads to the children's playground, the recreation ground, and the new pump track. The number of children on bicycles in this area has increased 10-fold. To force traffic onto Highfield Road and Eden Avenue to navigate around a one-way

Exchange Street will lead to a fatality. Exacerbate this with double yellow lines on Market Street and Exchange Street with restricted parking again will force additional vehicles onto Highfield Road and Eden Avenue. I am struggling to understand how anyone can think these are satisfactory solutions to provide access to a new housing development. It has no regard whatsoever for the existing residents of Edenfield Village. It has no regard for the safety of our residents, our children, or our community.

That is without even considering the impact on the village itself. Of the few shops that remain, these plans are likely to force their closure as customers will not easily have access to them during their opening hours.

The Masterplan as it currently exists provides no real detail about the overarching plan. What are the proposals for the Anwyl site? Is this where you plan to push the existing residents to park or is this exclusively for the new build homeowners? Are you considering further release of greenbelt areas? Has there been a road safety audit carried out? What about the existing natural habitats for wildlife, will these just be destroyed to accommodate houses?

I believe that this is a seriously ill-thought-out Masterplan, lacking in any detail. This is not a Masterplan for existing Edenfield residents this is a plan thought out by Rossendale Borough Council to boost council tax income which no doubt will be spent in other areas of Rossendale. Edenfield is too close to the boundary for Greater Manchester for any funds or services to head in our direction. You only have to ring 999 for police or ambulance services to experience that or wait for it to snow and see how long it takes for the roads to be gritted or even just take a walk around the village and look at the state of the roads and footpaths. Our public transport services are almost non-existent – Edenfield is the forgotten village. Until of course you want to buy a house here – inflated prices because of its idyllic location and picturesque scenery. Until that is you allow over 450 new houses to be built, declassification of greenbelt land to accommodate it and a village with little infrastructure to accommodate its existing residents let alone add more.

This is not a Masterplan for the residents of Edenfield, this is more likely to be a funeral plan. Either for the death of our village community or one of our children.

Yours faithfully,

A solid black rectangular box used to redact the signature of Kieron Finney.

Kieron Finney

I wish to offer my objections to the proposed build in Edenfield. The road through the village is totally unsuitable for the volume of daily traffic this housing site is going to create. The village already struggles with the amount of traffic coming through here let alone 400 some houses and parking is already an issue, I cannot believe you would even consider this plan in its entirety. The fields the planned builds are on act as natural drainage turn them into concrete and the risk of flooding quadruples. Infrastructure I.E schools primary and highschool are all ready at capacity with children at present having to travel well out of the area to get in to a school. Doctors and dentist in the area are full and you are unable to get an appointment. This land was originally agreed to be moved out of the green belt so affordable social housing could be built. Non of this proposal is for affordable housing Taylor Wimpy have offered a percentage (9) houses where feasible, By the time they have finished with will not have built any and are using this as a way to push through their plan. Rossendale borough council it's time you went back to the beginning where the plan could only be submitted in its entirety not TW slipping in different plans trying to get it through. Stand by the villagers and surrounding areas and stick to what you agreed to us the whole plan in its entirety for the whole build 400 plus houses.

Elizabeth Brooks  
Walter Brooks

Good afternoon,

Having written in the past to express my concerns about the planned H66 development I am very disappointed to note that the issues I raised previously with regard to access and parking along Market Street have not be addressed in a satisfactory manner.

Market Street is often a challenge to drive along due to the number of parked cars, but there is still no positive arrangement for the residents of the area of Market Street where access to the site is planned to park their vehicles. In fact the additional vehicles accessing the site will exacerbate matters.

I also have strong concerns for the period of building when numerous large vehicles will need access over a prolonged period. I have witnessed at first hand the problems during the building of only 9 properties off Rochdale road on the site of Hawthorn House. This will have impact on the:

nearby residents

Local businesses and amenities – shops, public houses and the church to name only a few

the school run twice a day

emergency vehicles

buses

In addition the dirt and debris which accumulates on the surrounding road surfaces.

I will be interested to see the comments of Rossendale Borough Council on these matters, in addition to numerous others raised by the local community.

Sincerely

Gaynor Brady

Sent from [Mail](#) for Windows

## H66 Master Plan & Design code (v3)

### Objections:

1. Page 7 shows a new alternative vehicle access on land adjacent to Alderwood Grove. Presumably this land is to be purchased either freely or compulsorily. However, this new access would be immediately adjacent to the turning for Alderwood Grove, the electricity substation and the bus stop. Presumably this last could be moved, but not the other two. This would cause confusion to drivers, disruption and delay to pedestrians, particularly at school run times, and any work undertaken at the substation would inevitably involve delays and detours into the proposed access.
2. Page 8 shows they can't even spell the Rostron Arms correctly. How can we trust this plan?
3. Page 47 shows proposed 2m parking bay for the houses opposite the Market St access point, with No Parking at Any time on the opposite side. This leaves nowhere for owners' second cars to park, and since many owners will be young couples in their first home, they are likely to need 2 cars.
4. Page 47 shows the proposal to remove the centre line from one section of Market Street, returning the village to the same state as before the construction of the bypass. A retrograde step which should not be allowed.
5. Page 47 shows a proposed No Parking 8am – 6pm outside the shops on Market St, with no alternative provided except the Alwyn off-street parking area at the western end of Exchange St. This is insufficient for those older residents who can drive but have difficulty walking, especially uphill. This suggestion would almost certainly devastate the local shops and businesses, who find parking very limited as it is, and negate the promise of more trade from the new residents. The suggestion destroys one of the key pull factors of the proposed development.
6. Page 43 mentions greenspace adjacent to Market St, which MAY contain a parking area. Contrarily, p27 shows no such area, but instead shows a crescent of housing. My objection is to the vagueness of the proposal to provide parking amid greenspace, and the contradiction of these two pages.
7. Page 47 proposes making Exchange St one-way, westwards. This in itself adds no extra traffic to Highfield road and the rest of that estate, but the Alwyn development will increase traffic significantly, both North-bound and South-bound depending on the time of day. It risks making Highfield Rd, Eden Avenue and The Drive into a rat-run both morning and evening.

Lee Ash and Lorna McGlynn



**Objection to the Revised Masterplan and Design Code for Land West of Market Street, Edenfield (H66) – September 2023**

The disregard shown by the developers and the RBC for the concerns of the residents is deeply concerning. It is unjust to inconvenience existing residents by stripping away their right to park in front of their homes, a privilege they have enjoyed for many years, all in the pursuit of maximising profits from selling new homes to those seeking to escape the inner city.

This approach is nothing short of a disgrace. Highfield Road and Eden Avenue, as mentioned below, are ill-equipped to handle a sudden surge in traffic, and these narrow streets are barely wide enough for a single car to pass. The developers and RBC planners appear to have overlooked the chaos that engulfs the village during evening rush hours and weekends when residents are at home and their vehicles are parked.

The proposal to turn Exchange Street into a one-way street, redirecting traffic along these already congested roads and using it as an entrance to part of the development, demonstrates a lack of a thorough and honest risk assessment of these roads. We invite you to stay in our house when the bypass is closed at night or when an accident occurs. Only then will you witness the traffic jams and chaos that ensue.

This Masterplan still contains numerous omissions and flaws, as outlined below:

**Sustainable Urban Drainage Systems (SUDS):** The plan mentions two large ponds at the outskirts of two developments, but it lacks crucial details regarding their size, maintenance, responsibility, and safety. The proximity of one of these ponds to the A56 dual-carriageway raises concerns about potential flooding, posing dangers to children and the community.

**Traffic Plan:** The proposed measures largely consist of road painting and parking restrictions for current residents, with vague proposals for additional parking spaces both on and off the site. The brief "traffic survey" conducted over three days in April leads to misguided assumptions, such as the belief that traffic levels have decreased compared to pre-pandemic times. It also fails to consider that small residential access roads like Eden Avenue and Highfield Road primarily serve residents and are already under heavy parking pressure. The plan's assumption that these roads are suitable for large vehicles as an access route to the Anwyl site is flawed. Implementing a one-way system on Exchange Street would displace most, if not all, current residents' vehicles, and there are no proposed safety measures for Exchange Street other than a vague "traffic calming measure."



**Build Phasing:** The plan divides the construction into four phases, labelled as 1-4, but it provides no information about whether there will be an orderly progression of these phases or if they will all commence simultaneously.

**Pollution:** The plan lacks details regarding mitigation measures for noise, dust, or other types of pollution.

**Design/Build:** The document offers inadequate visual representations of other site builds and projections, with no detailed site plan provided.

**This Masterplan appears to prioritise the developers' interests at the direct expense of almost all existing residents of Edenfield.**

From: John Entwistle,

Dear Rossendale Borough Council,

I wish to lodge the following objections to the Edenfield Masterplan (September 2023 version) and its planning application.

The revised masterplan still does not adequately address the principal problem of access and increased vehicular movements consequent to the proposed development.

The proposed junction in Market St, directly opposite my house, 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 on Market St. Parking is already at a premium. The proposed new provision and off-street parking areas are not adequate and are wholly unsuitable for the current volume of cars.

The "traffic calming features" do not address the lack of parking provision for current residents, let alone any prospective new residents.

The inadequacy of the proposed "compensatory car parking" solution after parking is restricted on Market Street is another area of concern. It has come to my attention that the so-called "compensatory parking" spaces will be open for all to use, rendering the term 'compensatory' entirely misleading. This situation is especially troubling given the already limited parking spaces in our area, as previously stated. The proposal fails to address the pressing need for designated parking spaces for local residents, exacerbating the existing parking problems rather than ameliorating them.

Furthermore, I am deeply concerned about the proposal to construct some of the compensatory parking spaces on green belt land. Preserving green belt areas is essential for the well-being of our community and the environment. Building on these protected spaces threatens the natural habitat, biodiversity, and overall quality of life for residents.

In addition to these concerns, the proposed compensatory parking spaces are located too far away from residents' homes, making them impractical and inconvenient for everyday use. The

distance from the proposed parking spaces to our residences raises serious questions about accessibility and safety, especially during late hours.

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.

Equally concerning is the absence of a clear plan for phasing the development. The proposals contain no outline for staggered building work. With five separate developers working across the project, the lack of clarity and clear format for staggered planning, could result in a prolonged period of parking shortages, high volumes of construction traffic which would have a negative impact on all residents' safety and daily lives.

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 (September 2023 version) 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

Good afternoon,

We residents of Edenfield wish to oppose to the plan.

1. Not enough parking already for existing residents. Many park on pavements and in turnaround bays already making it almost impossible to manoeuvre when needed. (Merlewood is a nightmare at times)
2. Will be even less parking with roads being marked with yellow lines.
3. Not enough schools in the area
4. Not enough doctors in the area
5. Traffic will be more chaotic trying to get in and out of the village
6. Residents who lose parking spaces currently outside their home will potentially lose value on their homes
7. No plan for forward thinking for when electric vehicle ls come into place for residents to charge.

Sent from [Outlook for Android](#)

To whom it may concern,

I have to confess to getting a little tired of writing objection letters, reiterating the same or very similar points. I suspect that Taylor Wimpey is trying to fatigue respondents from Edenfield so that they can finally get their way and put their poorly thought-out plans for over-development into action.

I wrote and objected to Taylor Wimpey's very similar plans in January as well as August and would like to reiterate the following points:

**Masterplan is not comprehensive**

Edenfield residents expected a Master Plan to address issues including traffic, healthcare, schooling, and infrastructure concerns. This is the third version of the so-called Master Plan published by Taylor Wimpey. This version along with those before it, disregard both the council's Local Plan and the Design Code for Edenfield published by the Neighbourhood Forum. In addition it still does not represent a master plan with input from all potential developers of the proposed development sites in Edenfield.

It is clear that development should be of a lower density for villages like Edenfield and local services need enhancements before such large-scale proposals can be approved.

**Local Plan & Site-Specific Policy (SSP) Violations:**

The submitted Master Plan misleadingly presents an impression of comprehensive planning, lacking input from all key developers and landowners. The SSP's mandates - including a full biodiversity assessment, landscaping, compensation for greenbelt loss, and transportation plans - haven't been met.

**Traffic Concerns:**

Existing traffic bottlenecks in Edenfield present a significant challenge to residents and commuters. The current Master Plan doesn't fully encompass all developers and building phases, and traffic mitigation details remain ambiguous.

Taylor Wimpey's Transport Assessment underestimates additional traffic, potentially straining the village's infrastructure. Future developments in nearby areas would further intensify traffic congestion.

The Master Plan appears to ignore the traffic impact assessment completed by Edenfield Community Neighbourhood Forum.

The proposed one-way system for Exchange street gives no consideration to adjoining roads and junctions. Safety concerns for children accessing play area, "rec" and pump track have not been addressed. No consideration given to ECNF and resident concerns regarding traffic safety and traffic volume despite numerous objections

**Parking**

Parking concerns of Edenfield residents have been ignored.

Proposed compensatory car parking is insufficient because it is open to all, rather than reserved for residents. Some is proposed to be built on green belt land and is too far away from residents homes. Without a phased plan for housing development, how do we even know that the new spaces will be developed before existing Market Street parking is taken away?

**Inappropriate Development:**

Taylor Wimpey's plans, by neglecting the Design Code, diverge from Edenfield's character.

The proposed development scale threatens the village's essence.

The terrain's sloping nature presents design challenges, with proposed retaining walls posing safety risks.

**Drainage and Flood Risk:**

The main sewer system presents potential challenges due to its current design and past failures. Concerns arise with Taylor Wimpey's proposed Sustainable Drainage System (SuDS) near the

A56, which could destabilize the land and present landslide risks.  
Existing evidence suggests the development site is prone to waterlogging, heightening flood risks for surrounding areas.

**Green Space Issues:**

Proposed play spaces are insufficient and might be waterlogged due to their location, rendering them unusable for extended periods.

As well as these concerns, the proposals to prevent parking on Market Street will increase vehicle speeds through the village and are detrimental to the well-being of existing residents whose quality of life will be affected by the loss of parking provision. This will be particularly difficult for elderly or disabled residents and those with young children.

In light of these concerns, the Master Plan and Planning Application should be declined by the council.

Richard Bishop

To whom it may concern,

I am writing further to my objections from January and August this year and wish to formally register my objections to Taylor Wimpey's Master Plan for the proposed housing development in Edenfield.

While the council's initiative may address congestion in parts of Rossendale like Rawtenstall, it appears to merely displace traffic concerns further down towards Bury. Without an integrated plan for enhanced public transport access, we're inevitably compounding the existing traffic woes.

The proposed "double-yellow" lines along the length of Market Street together with the lack of parking provision for existing residents is a major concern. Vehicles traveling from "Owd Betts" and heading North invariably travel via the bypass to Haslingden, Rawtenstall and further afield. Removing the "traffic calming" effect of parked vehicles on Market Street will make this more of a major route, increasing vehicle speeds, traffic volumes and danger to road users, including school children at Edenfield Primary School.

The Master Plan's reliance on a sizeable pond for drainage, given the vicinity to the A56, rings alarm bells. The persistent waterlogging in those fields makes me wonder if this method is robust enough. The area's sewer capacity already shows signs of strain. Introducing more households without a clear strategy, especially when sewage requires uphill pumping towards Market Street, seems imprudent.

Having resided on Market Street for over two decades, I've witnessed at first-hand the periodic water pressure drops and sub-optimal gas supply. Heightened consumption due to the development could amplify these utility concerns. It's crucial to remember that surges in gas demand, especially during colder periods, already strain our current system.

Our local schools, both primary and secondary, are stretched to their limits. This proposal does little to address this capacity problem. Similarly, healthcare facilities in Edenfield are already operating at maximum capacity. The inevitable reliance on cars by new residents to access these facilities contradicts national developmental guidelines.

The envisioned expansion, increasing Edenfield's size by a substantial 50%, seems excessively ambitious. Moreover, the chosen materials and design aesthetics don't resonate with the unique character of our village.

In closing, I fervently request the Council Planning Team to object to this proposal. The repercussions on our community's fabric and the natural environment are too significant to overlook. Alternative solutions with minimal adverse effects should be considered instead.

Yours sincerely

Sarah Bishop

Mr & Mrs J Horsfall

Objections to the [Amended H66 Masterplan & Design Code](#)

Dear Rossendale Forward Planning Team

Please find enclosed our objections to the recent amended H66 Masterplan for Edenfield

We note that in the last report from LCC Highways they expressed their support to the revised proposals for Exchange Street and Market Street yet a full traffic assessment for the whole of H66 site has not been completed

We have raised the issue previously regarding Exchange Street and the challenges it already faces regarding traffic issues and a childrens play area. By having a one way system this will increase more traffic in areas where there is currently a normal flow of volume traffic increasing noise, and risk to children

We propose that there is a full detailed Road Safety Audit carried out by as soon as possible to further detail the issues already known

There are also key compromises that have apparently been made regarding the Market Street junction, what appears to have changed here?

Vital issues that were also raised in previous reports were never followed up in the latest report, as we know the problems of traffic issues within the village have not just suddenly disappeared they are still there so why is it being considered as acceptable now

The proposed compensatory car parking for those losing on street parking is not compensatory because anyone can use it at any time, there is again the issue that unnecessary greenbelt land is being taken to support the developers, not really 'exceptional circumstances'. There will potentially be an increase in vandalism as it is not located close to residents properties.

Please confirm that these objections have been received and added to the list

Thanks

Jason & Julie Horsfall



To Whom it may Concern

Please note my objection to the above as a resident of Edenfield. As previously stated in my objections to the earlier proposals my main concerns relate to the traffic and transport proposals which do not appear to be adequate to address the obvious congestion issues rising as a result from the increase in traffic and lack of / removal of parking throughout the main part of Edenfield village. The proposals ignore the previous concerns and needs raised by residents alongside the obvious concerns voiced regarding Road safety.

Again I am concerned regarding no proposals to increase health care facilities or education places as the current infrastructure will clearly not support adequately the increase in demand on resources resulting from the development,

Yours faithfully

Susan Crook

Sent from my iPhone

5 November 2023

Dear Sirs

Objection to Land West of Market Street, Edenfield, Further Amended Masterplan & Design Code (Sep 2023)

### **Traffic, car parking and road safety**

The Northstone off street park area, is this not part of greenbelt land? Are the Council, therefore, proposing to release further greenbelt land for development? This land is not part of H66 so separate processes will be required.

Pedestrian crossing – the Council and those making this decision owe a duty of care to all those impacted, particularly should there be any serious incidents or even fatalities if this proposal is accepted.

Parking restrictions along Market Street, wholly unacceptable. Why would the council think this is going to resolve an issue of potentially an additional 800+ vehicles within the area?

Traffic calming and provision of slow markings, as per above, the Council and those making this decision owe a duty of care to all those impacted, particularly should there be any serious incidents or even fatalities if this proposal is accepted.

There is still 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.

The capacity of the off-street car park proposed by Northstone to the east of Burnley Road is not sufficient to accommodate vehicles displaced by parking restrictions proposed for Market Street and Blackburn Road, as well as making provision for school traffic.

### **Green spaces and biodiversity**

In the 'Table of Developers Responses to the Council's Comments', the Council's Policy Comments provided by RBC's Forward Planning Team include at page 3, 'Nature' section, explicitly states that the woodland and associated habitat would be protected.

Geological suitability and flooding: we understand that Rossendale Borough Council (RBC) has appointed independent advisors to conduct a review of the geological suitability of the land for building. There needs to be a full review of the risks to the valley, including onto the A56.

### **Phasing**

Concerns over the phasing/how the development will be built have still not been adequately addressed. The information provided to date appears to suggest the building works by each developer may run simultaneously. A comprehensive timing plan needs to be provided by each developer.

The Design Code produced by ECNF with support of RBC has still not been fully considered

The proposal still fails to address the lack of infrastructure including schools, doctors but also other local amenities which if not addressed will increase the number of car journeys thus impacting not least on the local environment but also the air quality, particularly around the school.

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?

The current proposal appears to focus on the development of the village and fails to give any consideration to current existing residents. The suggestion that current residents would be unable to park outside their own homes is potentially discrimination. Rossendale Council, as a public body, are reminded of their duties under the Equality Act 2010. An Equality Impact Assessment needs to be completed and shared to ensure there is no direct or indirect discrimination to existing residents.

For the reasons above we object to this Further Amended Masterplan & Design Code (Sep 2023).

Yours faithfully

Claire Jewell & Graham Jewell

Dear Sir/Madam

I live at [REDACTED] and I strongly object to the master plan.

I object to this proposal due to the scale of the development which will significantly affect the character and affect the visual amenity to the village, but more importantly makes inadequate consideration of the increased concentration of air pollution from the proposed developments. The proposed development is only 2km from the Air Quality Management Area which has highlighted dangerous levels of NO<sub>2</sub>. Excessive levels of Nitrous Oxides are linked to premature deaths and increasing the concentration of homes close to an AQMA will only increase the concentration of NO<sub>x</sub> in the Area.

If these homes are needed in the borough then the development should be remote from Areas where NO<sub>x</sub> is already a concern, such as further up the Valley.

Developing up to 400 homes will have an unacceptable impact on air emissions because all of the homes will have gas boilers and some will have wood burners, both of which emit NO<sub>x</sub>.

The development will also further increase the risk of water pollution to the Irwell because the increased loading of waste water from each of the 400 homes will place additional strain on the sewage treatment works. The works already discharges sewage to the Irwell under so called storm conditions, and the extra volume of waste water in times of flooding will only exacerbate the situation. Walking downstream of the sewage works it is plain to see that the detritus and litter from the works is disgusting and having even more sewage piped to the works from these homes will make the situation even worse.

Traffic is already problematic in Edenfield and adding 400 houses with about 800 cars is unsustainable and will make Edenfield too congested and too urbanised by changing the character of the village in one foul swoop.

Finally the developer has not considered the climate emergency. There are numerous sites in the valley that have existing development and are derelict. To propose to rip up green field land for development and use raw materials and resources to add to urbanisation in Rossendale is simply unacceptable. Green fields are the character of the village and the district and should be protected, not bulldozed.

Kind Regards

Matthew Bennett

My name is Pamela Bennett, I live at [REDACTED]  
I object to the development because ripping up the greenbelt must be avoided at all costs. Unspoilt fields are central to the character of our village - and even in the name - - Eden-field! Allowing ripping up of the greenbelt flies in the face of sustainable development when there are brownfield and derelict sites in many locations in Lancashire.

How were these fields even removed from the greenbelt? There certainly was not sufficient consultation about this because I look out on these fields everyday and enjoy the views. I would have vehemently objected to this. Who were the councilors who voted on allowing this to happen? Where are they now? I'm absolutely horrified and disgusted about this. It makes Rossendale councilors look completely inept and happy to contribute to our own little destruction of the planet!

I was also horrified to read that in the masterplan titled Edenfield North requires the removal of a large number of mature trees!! This cannot be allowed! Trees must also be protected in order to protect our wildlife and ecology!

Kind Regards

Pamela Bennett

Dear Forward Planning team,

I'm an 18-year-old who's grown up in Edenfield, spending my entire life breathing its air, walking its streets, and cherishing its green surroundings. I originally wrote this objection in August but for some reason you appear to have omitted it from the list of objections on your website. As I sit down to write this objection to Taylor Wimpey's latest version of their MasterPlan, one overwhelming thought prevails:

What on earth are you thinking of?

**Traffic & Congestion:**

I may not have decades of driving experience, but even I can see that pushing the traffic problems from Rossendale down towards Bury without enhancing public transport is setting us up for chaos. Growing up, I watched the roads become busier and now, just as I'm starting to drive, it seems I might be battling even more congestion.

**Green Fields vs Brown Fields:**

I've walked, played, and enjoyed picnics in Edenfield's green fields. Now, when I hear about the proposed construction, I wonder: Don't we have enough brownfield sites in Rossendale? I've read and heard about them, sites waiting for a touch of revitalisation. Why target our green fields when numerous brown field alternatives exist? Is it because they're easier and more profitable for developers or is it just simpler for the council to oversee?

**Utility & Infrastructure:**

Growing up here, I've heard my parents complain about water pressure drops or the gas supply issues, especially during those cold winter days when we needed it the most. Can our already struggling system handle the surge from this development? What about the increasing demand from EV drivers and the heat pumps that we're being encouraged to install?

**Lack of Local Services:**

It's not just about houses. Where will the children of these new homes go to school? Edenfield's primary schools are already full. What about healthcare and other local services?

**Design & Village Character:**

Edenfield has a distinct character, one that's been imprinted in my memories. The proposed designs, increasing our little village by a whopping 50%, feel out of place. They don't fit in with the Edenfield I know and love.

The Edenfield I've grown up in deserves thoughtfulness and preservation, not just for me but for generations to come. I urge you to reconsider this proposal. Remember, we look to you to protect and cherish what makes our community unique, not to alter its essence for convenience or profit.

Yours faithfully,  
Katie Bishop

I object strongly to Taylor Wimpey's Master Plan for the following reasons:

**Infrastructure Concerns:** The development application for Edenfield falls short in detailing the impact of an increased population on our local infrastructure, particularly:

**Education:** Local schools are already operating at their maximum capacity, with no visible plans for expansion.

**Healthcare:** Edenfield currently lacks medical facilities. The proposal does not provide plans for introducing new medical facilities or expanding those in nearby towns to cater to the anticipated growth. This oversight is concerning, particularly given the existing strain on the local healthcare system. It is vital to engage in further consultation with local primary healthcare providers, beyond the comments from the East Lancashire NHS Trust, to formulate and propose suitable solutions.

**Utilities:** The application lacks detailed plans concerning the provision and enhancement of infrastructure for water, drainage, and power supply (both gas and electricity). This is particularly important in view of the government's aims to promote the use of Electric Vehicles and Heat Pumps which will increase the power requirements for the village.

**Transportation:** The projected increase in car journeys and public transportation use seems overly optimistic and does not resonate with the current commuting patterns of local residents.

**Transport and Road Safety:** Taylor Wimpey's transport assessment fails to address the road narrowing issues at Edenfield's pinch points and the recurring damage to parked vehicles. Introducing double yellow lines, as proposed, is likely to transform Edenfield into even more of a rat run, elevating the risks for all road users. This, coupled with inadequate parking provisions, will impose unfair constraints on current residents, making it a challenge for them to park in proximity to their homes. This lack of consideration is especially concerning for elderly or disabled residents, as well as those with young children, who will face increased difficulties due to these proposed changes. The issues surrounding traffic, pedestrian safety, and cycling, especially with the proposed new junctions in Edenfield, necessitate a comprehensive approach and in-depth discussions with local authorities. By ignoring the traffic assessment produced by ECNF, Taylor Wimpey is demonstrating how it does not care about the residents of Edenfield of their future.

**Design and Environment:** The proposed site plan does not present a thorough masterplan, which still has not secured approval from all developers involved. The application gives scant attention to the design codes of the Neighbourhood Plan and landscaping. Furthermore, critical environmental issues, such as ecology, rainwater pollution, flood risks, and SUDS near the A56, seem to be neglected.

**Local Economy and Environment:** The proposal's parking restrictions may detrimentally affect local businesses. The suggested release of the Greenbelt for school, play areas, and car parking does not align with the RBC Local Plan, presenting potential environmental and safety concerns.

Given the myriad issues and concerns highlighted above, I urge the council to reject this Master Plan.

James Bishop



**Feedback on Revised Masterplan and Design Code for Edenfield/Market Street 28<sup>th</sup> September 2023-**

**5<sup>th</sup> November 2023**

**Name:** Helen McVey

**Address:** [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

**Overall I object to the revised masterplan and design code, below is my feedback and rational for the reason of my objection. This is based on my concern that it doesn't meet the obligations set out in Rossendale Borough Council Local Plan (RBCLP), which summarises the requirements of the building inspectorate upon the release of greenbelt for any potential development of the H66 site:**

**RBCLP: The comprehensive development of the entire site is demonstrated through a masterplan with an agreed programme of implementation and phasing**

This requirement is not being met. The masterplan remains a TW masterplan not a comprehensive masterplan for the whole site as all the developers have not contributed to the masterplan and one in particular has asked previously for their name to be removed from the plan.

On this basis there are too many assumptions within the plan and no definite detail to consider, as it would rely on the other developers agreeing to TW's proposal and a combined plan for implementation, and there is no indication of this.

Either RBC need to take over and manage the Masterplan process to ensure it is comprehensive for the entire site and meets the needs of both existing residents and the development of the H66 site or they need to ensure the developers work together to produce a comprehensive plan with involvement of Edenfield Community Neighbourhood Forum and local residents, as is also a requirement of RBC local plan. Until this has been done the TW planning application and any other planning applications that may be subsequently received by the other developers should either not be considered or rejected on this basis.

Within the proposed Masterplan there is insufficient information on phasing, which was a promise in the local plan, and it actually details simultaneous development. Potentially Edenfield could be one big building site for the next 10 years. This would be absolutely disastrous to current residents living in the village as it would cause road chaos, traffic and pedestrian safety concerns and challenges commuting. It could also impact negatively on people's health and wellbeing, due to noise, pollution of development etc.

On this basis both the Masterplan and TW planning application should be rejected until details of a suitable and safe plan for phasing can be agreed.

**RBCLP: 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 (sic) Arms. Measures to assist pedestrian and vulnerable road users will be required.**

The proposed Masterplan does not meet this requirement as there is no comprehensive traffic assessment for the whole site, for example where it is proposed acceptable that Exchange street be one way, no traffic assessment or road safety audit has been undertaken on the impact of this on the side streets that feed Exchange street and particularly the proposed junction of Highfield Road and Exchange Street opposite the pump track where children play, potentially putting the lives of young children at risk.

There are also serious concerns for the traffic assessment for the TW site, particularly from the filed opposite nos. 88-116 Market Street:

- The assessment is insufficient as it is based on 2030 traffic data and should be based on at least 2040/50 to be realistic for the future impact on the village, especially as building is expected to take 10 years overall. It also focuses only on the 238 houses and doesn't take account the development overall of 400 houses
- The traffic assessment should discount Covid and the recovery period after, as it gives a false representation of traffic impact
- The junction proposed is directly opposite an access road which has serious safety concerns, traffic potentially coming head on with no controls, there will also be safety issues because of this for pedestrians and for cyclists. This is also where residents in the terraced houses currently place bins for collection weekly, which would cause an obstruction at the junction and potential safety issues
- There is an assumption that traffic will travel left to access the A56 to Bury/Manchester, Burnley etc. This is not what is experienced as a resident and also not the way the signs in Edenfield currently direct the traffic
- There are at least 30/40 cars parked daily where the new junction to the TW site is proposed, these people will be displaced from parking near their houses due to the junction and parking restrictions applied adjacent to the junction. The 13 compensatory car park spaces are insufficient and in fact not compensatory as on the plans they are designated general parking area for both for the development and visitors to Edenfield, there is also no mention of disabled parking
- The road is not wide enough to accommodate the junction safely, the visibility of the junction is affected by the houses both on Pilgrim Gardens and Market Street
- The pavements are not wide enough to accommodate the junction, particularly the pavement opposite the new proposed junction is very narrow and would need to be widened to ensure pedestrian safety, particularly young children walking to school, babies in prams/pushchairs
- Blackburn Road, Market Street and Bury Road is the only main diversion route for when the A56 is closed due to maintenance or as a result of an accident, this means there are times when these roads are much busier and this should be taken into account in any traffic assessment or traffic audit. This does not appear to have been considered. However on these occasions which happen frequently, as on these traffic, cyclists and pedestrian safety is an increasing cause of concern due to the increased number of vehicles including large commercial lorries and vans, which often lead to the road becoming blocked to two way traffic
- The whole of Market Street is currently busy without the impact of 400 houses, for those who are frail and elderly and those with children and babies it is difficult to safely cross the road already and this will only be exacerbated with the addition of 400 houses and increased traffic. Compensatory measures to support road crossing seem insufficient as pedestrian crossings only seem to have been proposed where they fit, not where they are needed to support safe crossing.
- Public transport (bus) services have been reduced recently and are much less frequent meaning that more people have to rely on their own transport rather than public transport, this will undoubtedly mean that more people will be reliant on their own cars and hence increase traffic on the roads, and needs to be taken into consideration in any transport assessment for the whole site.
- The parking restrictions proposed to accommodate the Masterplan mean that people will not be able to park or will be restricted from parking outside the shops/businesses which will significantly affect footfall to them and could potentially result in closure. There is an assumption that only people access the shops from the village, however due to their excellent reputation it is known that people come from outside

the village and which is what makes them viable as businesses. With government levelling up plans promoting business development it is wrong that businesses could be negatively affected.

- The parking restrictions proposed will displace current residents from parking outside their houses particularly frail, elderly and those pregnant and with children and babies. The only means they will have are proposed compensatory parking which is general parking therefore not compensatory and which requires an ability to walk to for children and the frail and disabled. This is therefore discriminatory and goes against the principles of the Equality Act 2010. The Masterplan proposal benefitting the protected characteristics of people in the new development particularly in relation to access and parking and driveway width etc. at the detriment of the protected characteristics of existing residents resulting in direct and indirect discrimination of existing residents.
- Overall there is no road safety audit, hence as detailed above until this is undertaken there are serious safety concerns caused with the proposed new road structure, particularly for existing residents.

**Before the masterplan can be approved - Road infrastructure phasing needs to be agreed for the whole H66 site for inclusion in the masterplan** - this to include a comprehensive traffic assessment and road safety audit of the whole site, not just the Taylor Wimpey site, taking account of data for the next 20 years not 10 years, market street corridor improvements and parking restrictions to be consulted including the Traffic regulation order consultation - should the issues regarding roads then be adequately addressed the road infrastructure and compensatory car parking should have its own phasing plan included in the masterplan. Without this the viability of planning applications can't be addressed. All developers should be required to work together on this, and the masterplan and planning permission shouldn't be approved until a road and infrastructure plan and implementation timescale is agreed for the whole site - there is evidence from across the country that developers, particularly Taylor Wimpey (TW), fail to deliver on the road infrastructure which is a huge risk to such a large development. Phasing consideration is essential for the compensatory car parking for existing residents, for example, should this not be in place first residents could find themselves with nowhere to park whilst the road infrastructure is being put in place.

**Phase of housing development, drainage, green space, and play areas should be after the road infrastructure is assessed as being safe and fit for purpose** - simultaneous development of house building would cause complete chaos for the road infrastructure of Edenfield and residents have the potential to live in a building site for many years- an agreed phasing including staging of development should be put forward with estimated start and finish times for each separate development, particularly for the TW site there should be additional phasing for the 238 houses as these can't possibly be built in one phase - this should include when the affordable housing, green spaces, play areas are to be developed - again from research TW in other areas have been so fixed on development of houses that they have neglected green, play areas and open space development and social/affordable housing has not been given priority, to the point where they have been threatened with legal action by local councils - hence this needs to be clear in the masterplan and any subsequent planning applications shouldn't be approved until suitable phasing is agreed

**RBCLP: Specific criteria for the design and layout needs (sic) 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**

- The concern re the proposed Masterplan is that it is hard to comment on this as all developers have not inputted into the plan and hence there are assumptions made that have not been committed to, until this is clarified the Masterplan should be rejected
- With regards to the TW site the development proposed is cramped with buildings and there is a lack of green/landscaped spaces within the site to 'soften the overall impact of the development'. This therefore ignores the local plan and also the Places Matter Design Report which was produced following

the initial planning application. This is particularly pertinent to myself and my neighbours as we will look directly out onto buildings and no green space, in comparison to the lovely green space we have now

**RBCLP: Compensatory improvements must be provided to the Green Belt land in proximity of the site in accordance with Policy SD4 8.**

- Compensatory improvements in the revised masterplan remain unclear and as all the developers having been involved in putting the plan together there is no real commitment to what the compensatory improvements will be, until this can be clarified planning permission should not go ahead

**RBCLP: 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.**

- The issues of flooding and potential impact on the A56 have not been addressed. I have had several very scary experiences of flooding whilst driving on the A56 which have almost caused an accident, I'm also aware of incidents where flooding has caused accidents on the A56. The proposed building on land which already floods poses an increased flood risk both for Stubbins, Irwell Vale and the A56, the SUDS located close to the A56 also pose a serious safety concern of further flooding as located so close to the bypass.

**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.**

- This is mentioned in the Masterplan but there is no firm plan detailed, this needs to be incorporated into the Masterplan and on this basis the Masterplan should be rejected until a plan for education is approved
- There is no mention either about how the additional needs of secondary school placements will be met.

In addition to the above concerns that the Masterplan does not meet the requirements of RBCLP, there are also other reasons for my objection: -

- Concerns of existing residents and Edenfield Community Neighbourhood Forum (ECNF) are not being adequately addressed – it is quoted that a consultation was undertaken with residents however this was rushed in the height of summer with no feedback to emails or social media enquiries, there has been no further consultation since despite the revised masterplan and revised planning application being put forward by them. In the initial consultation phase I raised questions with them particularly in relation to transport and phasing on both email, Facebook and Facebook messenger but with no response.
- The design code is not in keeping with the current village, it gives very little consideration of the design code produced by Edenfield Community Neighbourhood Forum in conjunction with RBC and mentioned positively within the Places Matter Design report, particularly in relation to the inclusion of 2.5 storey houses and green spaces and should be rejected on this basis
- There are insufficient amenities proposed for the size of development as was a recommendation of the Places Matter Design report, no consideration has been given to health and social care provision particular GP, hospital and dental provision despite the objections by East Lancashire Hospitals trust and the Integrated Care Board to the initial planning application and Masterplan. Currently existing residents struggle to get GP and dental access when they move to the village, this will be further exacerbated with the development of the H66 and must be a requirement of the Masterplan before any planning application is even considered. I'm aware that this could be part of a section 106, however to fulfil this requirement requires more than money, there is insufficient medical, clinical and social care professionals overall to fulfil the requirement for the size of development

- There are also no other facilities such as shops as is proposed in the Places Matter Design review report, in fact it is more than likely these will be reduced further due to parking restrictions. This only adds to the traffic chaos and safety concerns as residents will have to leave the village to access facilities and amenities.
- The proposal for further release of Greenbelt for the school, play area and car park at the north side of the village is unacceptable as it removes further Greenbelt and greenspace from the village (particularly the proposed car park) in addition to that already agreed in RBCLP for the H66 site and will have an adverse effect on the environment/ecology/water drainage and also sets a precedent for further release in the future which is unacceptable and will have a negative effect on future generations.

**Overall my objections to the Masterplan, as previously stated in previous objections, is an overarching concern that the Masterplan is inadequate and fails to meet the requirements of RBCLP for a comprehensive Masterplan, traffic assessment and suitable phasing for the whole H66 site upon release of the greenbelt.** That due to this there are serious safety concerns for traffic, cycle and pedestrian safety that are not adequately addressed and pose a high risk. In addition to this the proposals are discriminatory under the Equality Act 2010, the needs and protected characteristics of existing residents being ignored whilst full consideration being given to the protected characteristics of residents who are to live in the new houses, so fixed are the plans on development of the H66 site. A full and transparent equality impact assessment of the Masterplan should be undertaken in accordance with the Equality Act and until this has been done the Masterplan should not be approved.

I wish to object to the proposed revised Masterplan, submitted by Taylor Wimpey to Rossendale Council on 16/6/2023, Masterplan and Planning application 2022/0451.

The reasons for objection are as listed below.

1. Contrary to the site-specific particulars for H66 as set out in the local plan this is not a comprehensive Masterplan covering the whole of H66 by all landowners / developers. The revised version of the masterplan does not represent all four developers, nor does it represent Rossendale Borough Council, it is a representation of what Taylor Wimpey wants. This has been solely developed by and for the benefit of Taylor Wimpey.
2. The proposals on traffic are a serious health and safety concern. There is no site wide traffic or road safety assessment and no road safety audit despite previous recommendations. Market Street is an incredibly busy road throughout the day and even in the evening often cars pass through, especially when the motorway is closed. To introduce over 400 houses with the entrance at this point is totally impractical.
3. The proposed site access on Market St as a new junction entrance produces serious safety concerns. Market St is already a highly trafficked road and serves as a National Highways Diversion route when the A56/M66 experiences closures. The safety measures proposed do not appear to be sufficient and may not meet the requirements for a development of the proposed scale. Insufficient visibility and the potential risk to the lives of residents, cyclists and primary school children are of grave concern. The necessity of a road safety audit has been mentioned, yet it has been disregarded. By neglecting to address these safety concerns, Lancashire County Council and RBC may potentially breach their responsibility to ensure the safe day to day life of all residents in Edenfield. No site wide traffic assessment has been completed for the health and safety of all existing and new residents of Edenfield.
4. The proposed one way system will now make a quiet road extremely busy. The entrance to this proposed system is also a blind corner. No safety measures have been considered for the play park and recreational area directly next to the route, or the cyclists coming down from the pump track.
5. Inadequate Crossing Points. The proposed plan includes only one crossing point on the north side of the junction, which raises serious safety concerns for the pedestrians crossing Market St from the south side. This lack of adequate crossing points poses a significant risk to their safety.
6. Double Yellow Lines and Accessibility for Current Residents. The introduction of double yellow lines in front of our houses raises concerns about how current residents will access their properties. The proposed compensatory car park is neither sufficiently large nor fit for purpose. Furthermore, the lack of spaces for visitors and services, as well as the absence of electric charging points, further exacerbates the issue. This plan demonstrates discrimination against existing residents to accommodate the needs of residents in new houses. RBC as a public body have a duty under the Equality Act 2010 to Eliminate discrimination. The principles applied to H66 should also apply equally to existing residents.
7. Restrictions on parking will also negatively impact local businesses. Removal of parking outside of shops will result in loss of trade and thus foreclosure of these businesses.
8. Details on infrastructure for example schools, healthcare provision have been ignored.
9. The Masterplan lacks any detail on drainage, flood risk, ecology, power. The rainwater that runs off scout moor across to the proposed development area is currently soaked in before it hits the A56. Once this Greenbelt land has been concreted over, what evidence is there to show that this will not affect the busy roads. The use of SUDS is not developed and unclear whether it is viable.
10. There is no phasing plan and the MP talks of simultaneous development.
11. It appears that concerns, especially in respect to parking and volume of traffic, raised previously by residents and the Edenfield forum have been ignored. Similarly this can also be said for the safety concerns raised previously.
11. In line with the amendments in the Levelling Up Bill now enshrined in law. The current masterplan offered does not appear to take into account any of the following:

"Put local people at the heart of development – making it easier to put local plans in place and requiring design codes that set out where homes will be built and how they will look. These plans will deliver more homes in a way that works for communities."

"Boost local services – requiring developers to deliver vital infrastructure. This will put an end to lifeless edge-of-town developments with no community assets and ensure developers deliver the schools, doctors surgeries and public services communities need and expect."

"The Act will ensure the homes we need are built where they are needed in urban areas rather than concreting over the countryside."

I kindly request your acknowledgement of this objection.

Helen and Daniel Quinton

To whom it may concern,

I wish to object to the recent amended Masterplan. My previous objection was as follows (below) -

**In relation to planning application 2022/0451 and Edenfield Masterplan.**

**As a resident of Exchange Street, which is a street proposed to be majorly affected by the revised plan, I wish to object to this application and to the masterplan.**

**I understand the need for more housing nationally, and therefore locally within Rossendale and Edenfield. However, with the scale of the plan, given there are approximately just over 1000 houses currently in Edenfield - the full development would increase the number by approximately 45%. I feel that the number of houses proposed is too large for a small village.**

**I object with the following rationale -**

**The proposed plan lacks a comprehensive masterplan and hasn't been approved by RBC or all developers. I'm of the understanding that the master plan must include views/proposals of all developers involved, and this represents only Taylor Wimpeys views.**

**Increased traffic is a huge concern, along with pedestrian safety. Market Street is a main road carrying a high volume of traffic for a residential area, due to the access links from Rawtenstall (and surrounding areas) to A56/M66 and vice versa. I believe that there has been no site-wide traffic or road safety assessment to assess the potential impact of the volume if further homes proposed.**

**The infrastructure needs, including schools and healthcare, are unaddressed. I believe that a potential plan is for one of the two existing local primary schools to be extended with further places, and physically extended. I don't feel that one school expanding could accommodate the amount of children that could be living in all of the family homes proposed. In addition, it is proposed that further greenbelt land would be used to extend the school. There is GP surgery or dentist in the village, and only one general store.**

**The design codes of the Neighbourhood Plan and landscaping are given minimal consideration, therefore, would not be inkeeping with the existing aesthetic of the village.**

**I am concerned about an increased flood risk. SUDS near the A56 appears to not be taken into account.**

**Some residents of Market Street and Exchange Street will have restrictions on parking due to double yellow lines. There does not appear to be enough alternative parking spaces offered, and those proposed are too far away from the homes for elderly bringing shopping bags and families safely getting their young children from**



car to home and vice versa. Local businesses will be impacted by the proposed parking restrictions along Market Street and Exchange Street. From talking to local business owners, many of their customers do travel from outside of the village, and rely on delivery vehicles being able to park close to their premises. Anwyl have proposed off-street parking at the bottom of Exchange Street which will not serve any purpose to my points.

I am also concerned about the volume of traffic proposed to be flowing around the junction of Exchange Street/Highfield Road. One-way traffic from the top of Exchange Street, bearing left into Highfield Road, along with traffic to and from the proposed site of the Anwyl homes turning into Highfield Road, leads to a potentially heavily congested area, where there is the pump track with direct access to the main road, an entrance to the children's play area and a rec ground all directly next to this junction.

Road safety for the amount of children that utilise these three areas is very concerning.

Highfield Road itself is a narrow road with housing along both sides and is usually double-parked. The amount of traffic that could travel along here would raise significantly.

My elderly mother lives on Highfield Road in a housing association flat complex for 'over 55s', and there are several residents within the 12 flats with mobility issues. I am concerned about the increased traffic and their road safety.

I wish to add that, following reviewing the most recent amendment, I believe that a road safety audit has still not been completed. Edenfield Community Neighbourhood Forum conducted a traffic assessment and this does not appear to have been considered.

Greenbelt land has been proposed for a car park, that is too far away from residents homes to be used practically and fairly. It also seems to be open to everybody, not particularly for those residents losing parking outside their homes.

I'm still very concerned regarding the traffic flow around Exchange Street and Highfield Road, given the three areas designed for children's use (pump track, park and rec).

There has been no plan to my knowledge, of staggering any potential building developments. Given the size of the proposed plan and number of houses being built, to have these all started at the same time would bring widespread traffic chaos with so many large vehicles accessing the village at the same time.

I truly believe that the existing residents of Edenfield are still not having their views and rights taken seriously with regards to the changes proposed with the recent Masterplan.

Please consider my objection.

Kind regards,

Fiona Keir

Good Evening,

Following the revised submission of the masterplan and design code for H66 we would like to reiterate our objections to the submission. We acknowledge Northstone have submitted an application for the “Edenfield North” area; we’ll send our thoughts in on that application shortly. However - the majority of the points we’ve made previously remain valid and have not been adequately addressed in the revised Masterplan and Design Code submission.

In particular we draw your attention to our objections regarding the proposed new community car parking in the “Edenfield North” area which is an unsuitable release of green belt land and will cause flooding to our home (point four in our email of 9th August 2023 below). The cost of this proposed car park is simply disproportionate to the “benefit” of off-road all-day parking for circa ten teachers and other school staff, and will lead to greater pollution (including reducing our quality of life through poorer air quality), increased traffic volumes, and longer journey times due to additional congestion. Furthermore it does not support national efforts to reduce car journeys and pollution by encouraging children to walk to school.

We also (re)draw your attention to point three in our August email regarding the continued inaccuracy of the traffic management assumptions which are now exacerbated by the proposal to make Exchange Street one way and to introduce “no parking at any time” zones on various streets. A thorough analysis of the impact of all the proposed traffic alterations has not been undertaken. What’s being proposed in terms of road amendment and site access routes and impacts, when considered alongside incorrect assumptions on flow and behaviours, and underestimated additional traffic volumes, needs to be properly assessed as a whole in this initial submission stage of any Master Plan and not kicked into touch to a possible future “detailed design” phase.

Thank you for reading our objection once again and we’d be grateful if you would acknowledge receipt by reply.

Yours sincerely,  
Karen Farquhar and Nadia Krasij,

[Redacted signature block]

On 10 Aug 2023, at 08:36, Forward Planning <[forwardplanning@rossendalebc.gov.uk](mailto:forwardplanning@rossendalebc.gov.uk)> wrote:

Good morning,

Thank you for taking the time to leave a response on this Masterplan. Your comments have been recorded and redacted and will be made publically available once the consultation has concluded.

Kind regards,

The Forward Planning Team

01706 252412 / 252415 / 252418

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

[<image001.jpg>](#)[<image002.jpg>](#)

**From:** Karen Farquhar <[REDACTED]>  
**Sent:** 09 August 2023 21:06  
**To:** Planning <[planning@rossendalebc.gov.uk](mailto:planning@rossendalebc.gov.uk)>; Forward Planning <[forwardplanning@rossendalebc.gov.uk](mailto:forwardplanning@rossendalebc.gov.uk)>  
**Cc:** Nadia Krasij <[REDACTED]>  
**Subject:** Objection to Planning Application 2022/0451 - Edenfield Masterplan & Taylor Wimpey Planning Application

Good Evening,

Ref: 2022/0451. Site H66 Masterplan and Design Codes. In particular H66 Site: North (Junction of Burnley Road / Blackburn Road, Market Street).

We have previously submitted an objection to the Edenfield Master Plan and Taylor Wimpey submission (Ref 2022/0451. Site H66 Masterplan and Design Codes) back in January 2023. We restate our original submission's objections towards the bottom of this email for convenience because we still believe these concerns are valid and have not been addressed satisfactorily in the resubmission, and we want to restate them to ensure they are considered once again.

We would now like to submit additional points of objection following the revised submission by Taylor Wimpey which have provided further areas of concern:

#### 1. No Parking on Market Street

This will reduce footfall to existing businesses on Market Street adversely affecting the few facilities provided in the village. Residents who do currently park their vehicles on the proposed restricted length of the street will not have alternative provision provided by Taylor Wimpey on land proposed to be developed by Taylor Wimpey. The proposal does not take into account residents who may have specific requirements to park close to their homes such as those with limited mobility, nor provide consideration or compensation for those who have invested in and installed electric charging equipment for private vehicles.

#### 2. Traffic Assessment Concern

The revised assessment notes traffic is still below pre-pandemic levels. However there may be several, perhaps temporary, factors causing the low figures observed at the time of survey which are likely to cause the numbers to increase over time. Working from home appears to be on the wane with some companies now asking workers to return to their offices and public

transport subsidies, currently capped at £2 rising to £2.50 shortly, are scheduled to end in November 2024. We refer you to consider the census data relating to modes of transport (noted in our previous objection) which remains valid.

### 3. Traffic Management Assumption is Incorrect

It is incorrect to believe that residents in the north of the village access the A56 at the Bent Gate roundabout whether travelling north or south. It does not represent the reality of the daily traffic flow and should not therefore be used for traffic management planning. Village residents travelling north may well join the bypass at this roundabout but those travelling south will pass through the village to the junction on Walmersley Road. Has a traffic survey been conducted at Bent Gate to ascertain whether or not this junction could cope with the extra traffic? Additional surveys and consultation with the Highways Agency and LCC are necessary to understand the cumulative impact of the additional traffic the developments are expected to generate.

### 4. Proposed Allocation of Green Belt Land for the provision of a car park opposite 1-5 Spring Bank, Burnley Road / near Edenfield Primary School

There is no justification for removing land from the greenbelt to provide a car park. Furthermore it is not for Taylor Wimpey to incorporate this as a suggestion in the Master Plan on the assumed approval of another landowner / developer, and the assumed approval of the council to re-designate the land. The caption on the diagram on page 23: "land available for car parking and POS" is both misleading and inaccurate. It does not reflect the current designation of the land. Furthermore the size of the proposed car park in the same diagram is considerably larger than the initial very-early-stages proposal Northstone shared in consultation relating to this area; again this shows a regrettable lack of accuracy in the overall Master Plan resubmission.

National planning policy allows for the removal of land from the green belt when there are 'exceptional circumstances' for doing so. A car park is not an exceptional circumstance. Especially when consideration is given to how much green belt land has already been lost to the proposed development area, some of which should be used for such an amenity rather than requesting additional land.

A car park on this particular field will result in the flooding of local homes; particularly the five Spring Bank properties and 34, 36, and 38 Burnley Road. Taylor Wimpey appear unaware, as were Northstone / Peel, that this field contains a culvert which provides vital drainage for run-off from the surrounding hills. During relatively short periods (two or more consecutive days) of medium volumes of rainfall the field is often flooded (see media included in this submission) and any building work/hard standing will adversely affect neighbouring properties with run-off entering those properties rather than naturally draining away. There is no provision in the Master Plan regarding new drainage works to remediate this, nor any provision of compensation for homeowners for actions resulting in making their homes ultimately unsuitable for habitation and/or unsellable. It cannot be an exceptional circumstance to release green belt land to flood existing homes simply to provide a car park.

There is no mention of provision for security arrangements which would be required for a car park to ensure no misuse, loitering, encampments etc. This is not acceptable. More information is needed on this and on proposed opening hours, parking charges, maintenance responsibilities etc. Especially if the proposal intends for a car park to be open all day for those who have been displaced by the proposed no parking on Market Street rather than just during school hours. Note this particular point is valid regardless of where a new car park would be situated within the development.

If this car park is intended for use by those visiting or teaching at the local primary school then a full traffic assessment of the flow and impact needs to be undertaken and submitted. Additional delays, both to users of the car park and to other motorists, and additional pollution and noise from those delays can be expected when vehicles wait to enter and exit the car park, lowering the quality of life and air standards for residents in the area. The Fingerpost junction would need to be redesigned to accommodate the changing patterns of traffic resulting from ingress or egress to the car park; no proposal is made as to how to do this. It should be borne in mind that the current "school run" is a known event and ultimately finite in terms of car numbers, with residents in the local areas very aware of the temporary impact at particular times of day with most if not all cars well away from the area by 5pm. A car park would increase the duration of the school run; this is not an advantage nor benefit to the village or residents. It would also discourage parents and guardians from looking for alternative, greener, modes of transporting their children to school.

Therefore we reiterate our objection to the proposed development. Because we have had difficulties with the online portal, could you kindly acknowledge by reply this submission in full will be included in the objections for this planning application.

Yours sincerely,  
Karen Farquhar and Nadia Krasij,

[Redacted signature block]

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Photo taken 23rd July 2023 showing recent flooding of the field proposed to be taken out of green belt for the provision of a car park (opp. 1-5 Spring Bank, Burnley Road).

<image003.jpg>

Video from February 2020 showing a more prolonged period of rainfall (constant but not heavy for four+ days) and the impact on the Burnley Road houses in particular.

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Original Objection submitted via the council's online portal on January 15th 2023 regarding this application, the Master Plan and Design Codes, and which we wish to ensure are considered again as part of your assessment:

Reasons for comment:

- Affect local ecology
- Development too high
- Inadequate access
- Inadequate public transport provisions
- Increase danger of flooding
- Increase in traffic
- Increase of pollution
- Information missing from plans
- Loss of parking
- More open space needed on development
- Noise nuisance
- Out of keeping with character of area
- Strain on existing community facilities
- Traffic or Highways

Comments: Dear Sir / Madam,

We write to raise an objection to planning application 2022/0451 - the erection of 238 dwellings in part of allocation H66 in Edenfield. We will also be commenting on further aspects in Taylor Wimpey's commissioned "Masterplan and Design Code" document which cover the remainder / total of the H66 allocation.

Before going into detailed objections we would like to highlight the recent change in Government policy regarding mandatory building targets. The Local Plan notes, and Councillors have been at pains to point out, Government-determined mandatory targets when attempting to justify the re-designation of Green Belt land (which should only be done under "very special circumstances") in Edenfield. Now mandatory targets have been withdrawn, the opportunity should be taken to review the Local Plan to distribute housebuilding sites in a more sympathetic manner with less Green Belt land impacted, and giving due consideration to the equivalent land area in Brownfield sites available throughout Rossendale to support the number of dwellings proposed in 2022/0451, and in H66 / Edenfield overall. Application 2022/0451 should be withdrawn for the developers to consider alternative Brownfield sites in the area which would provide ample opportunities for good quality housing with considerably less environmental impact.

H66 "Masterplan and Design Code" Document (Ref: "610E Edenfield Mplan Dcode V8")

Taylor Wimpey's H66 Masterplan and Design Code document raises a number of concerns and fails to address the significant risks and impact of the erection of over 400 dwellings within Edenfield. The document does not represent all developers involved in the H66 discussions and may actually misrepresent the land ownership within the so-called "Edenfield North" sub-allocation. Indeed it could be argued that the document (and by extension because this is a core document - application 2022/0451) should be withdrawn from submission on those points alone.

This is the only document relating to H66 which is labelled as a "masterplan". However it is not a Masterplan authored or accepted by the council or community. The lack of RBC-authored Masterplan and integrated planning documents with other local councils, service providers, and government agencies (DoE / DoH / DoT / Highways Agency etc) is a matter of regret because it undermines significantly the case and practical realisation of a development of this scale. Without any integrated masterplan, any medium to large development - certainly one on the scale of 2022/0451 - cannot succeed. The application should be withdrawn or rejected giving the council an opportunity to produce its own masterplan for the H66 site.

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2022/0451 Specific Objections

## Lack of Infrastructure Provision

### Education

The application does not adequately consider the impact of the scale of the development and expected population increase on local infrastructure. Edenfield CoE Primary School and Stubbins Primary school are at or nearing capacity and there are no plans submitted as part of this application (or in the Masterplan and Design Code document) to expand either during the proposed timescale of this development. Squeezing in additional children into either establishment will be to the detriment of all pupils. Further consideration is required and an integrated expansion and growth plan, developed in conjunction with the local education authorities, is needed.

### Healthcare

With the exception of the chemist, there are no medical facilities in Edenfield. Neither the Application nor Masterplan and Design Code include any provision for new facilities or expansion of existing facilities in neighbouring towns to accommodate expected growth. The increase in population expected will add a further burden on an over-burdened local healthcare system. Further consideration and discussion with local healthcare providers is needed to develop and submit proposals which will address this problem.

### Utilities

The application does not include detailed proposals regarding infrastructure provision and/or capacity increases for water, drains, and gas to the site, nor does it seem to acknowledge or consider the ageing pipelines and give undertakings to upgrade to adequate support the scale of development without impact or reduction in provision to local residents. For awareness there have been at least two major water bursts in Edenfield in the last four months alone. Low gas pressure can regularly be experienced in Edenfield; this will impact existing and proposed developments and will need addressing.

### Transportation

The application is optimistic in its projections for additional car journeys and use of public transport. Recent data gathered and submitted in Taylor Wimpey's commissioned traffic assessment appears to be for one day in June 2022 only, alongside utilisation of data relating to a location near Preston rather than a more comprehensive analysis of the traffic flow through Edenfield itself which could have been taken over a longer timeframe. When submitting an application of this scale, with significant uplift on traffic flows and footfall, a more comprehensive analysis is essential rather than the token gesture submitted herein. The application should revisit the traffic analysis and give the proper time and attention needed to do this properly, and resubmit accordingly. More comprehensive analysis will no doubt encounter the regular snarl-ups and traffic jams which occur in the village, at the roundabout near the Rostron Arms in particular, and give more accurate "queue" times.

Whilst proposals to increase the use of public and other non-car methods of transport are always welcome, the reality shows there is some way to go to change which methods of transport are used by residents of Edenfield. The recent census shows 63.5% of journeys to work are by car (including passengers); only 1.6% by bus, and 3.9% on foot. There is no direct public transport route from Edenfield to Rochdale, and limited capacity on the public transport which does go directly through the village during standard commuting times. Underestimating the likely number of additional car journeys in the application, and insufficient road ingress and egress planning to the site, raises questions regarding whether the environmental impact and the impact on the quality of life and health of Edenfield residents due to the additional pollution and noise introduced by the number of additional car journeys have also been underestimated or inadequately considered.

The application has included data regarding traffic accidents to paint a favourable picture of free-flowing traffic through the village with minimal accidents. However the data being used

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relies on reports being submitted to these sites; it will not therefore reflect all the near-misses, the clipped wing mirrors, nor the scrapes along the sides of vehicles that we, as residents of Edenfield, see regularly and which are not likely to be submitted to such websites to "track". Living close to the Fingerpost garden we can state there is a near-collision at least once a week due to poor traffic light and road design when drivers are heading North from Market Street onto Blackburn Road where they will see both a traffic light and a Give Way sign; if you don't know this junction you may assume the traffic control is controlling the flow of traffic on your route onto Blackburn Road when it does not. Neither the application nor the Masterplan and Design Code document include adequate detail on proposals to resolve existing road layout concerns, nor have adequately considered traffic management needed for ingress and egress to the site.

#### Surface Water, Drainage, and Land Slippage Considerations

Building on land close to the proposed site in the past has resulted in land slippage and corrective and mitigating actions being required to steady the land and ensure no slippage onto the A56. This is part of the reason there are no dwellings on this site currently. The Slope Stability Assessment Document notes a number of concerns and has a large number of recommendations in this regard. The application itself does not appear to adequately consider this; plots and therefore dwellings are dangerously close to areas not recommended to be built on without significant remedial action (if built on at all).

Increased heavy bursts of rain have been experienced in recent years and will increase in frequency. The ground on which the application proposes to build holds and drains a lot of surface water. There does not appear to be a detailed risk and impact assessment of surface water and associated flooring as part of the application, either to the proposed development itself or to the wider village and surrounding areas. Building on this land is not desirable; the water will have nowhere to go other than onto the A56 and existing properties. The recent Parsonage Gardens development has seen exactly this with increased surface water now flowing downwards because it cannot drain, with detrimental impact to existing properties. This was not given proper consideration by the developer nor RBC during the Parsonage Gardens application and building processes so lessons must be learned for any further developments to the West of Market Street.

The 2022/0451 application, whilst including the provision for a couple of "drainage ponds" does not give detailed consideration to the need for proper, sufficient, drainage as recommended by the Slope Stability Assessment and the recent experiences of the Parsonage Garden development. The application should be withdrawn to enable this to be remedied and for all of the recommendations of the Slope Stability Assessment to be considered in detail. No doubt replanning the application to include a sufficient drainage management system will recast the timeline of the development as a whole, notwithstanding the need for greater consultation with local authorities and the Highways Agency regarding any impact to the road infrastructure. However, the risk of not giving proper consideration to the geology, increased rainfall projections and reduction in natural drainage, and proceeding to build dwellings on potentially unsound ground is not worth taking.

#### Scale and Style of Development

The scale of the development is significant and will fundamentally change the make-up and character of Edenfield. We reiterate the lack of integrated planning with other potential developers for the H66 site as part of this application, the overall lack of an H66 Master Plan developed by RBC, and lack of integrated and considered planning of healthcare, education, and transportation needs. The scale of this development is simply too much, too quickly, and with too few supporting services. Smaller scale development is more in line with what Edenfield can realistically support, and there are local Brownfield sites available in the vicinity.

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The designs proposed, including the height of the dwellings themselves and the need to introduce 2.6m and 2.1m structures to serve as acoustic barriers (not a commonly necessary feature of Edenfield housing) do not constitute sensitive urban design and are not in keeping with the rest of the village. The applicant's design proposals have not given adequate consideration to sympathetically "blending in" in an attractive way. The application should reconsider this in line with the ECNF's Design Code.

There are not enough two or three bedroom dwellings in the application which is to the detriment of addressing social housing concerns and the shortage of provision of smaller houses with fewer bedrooms as a whole nationally. The application should reconsider the split of dwellings, increasing the ratio of number of dwellings with two or less bedrooms.

In conclusion, we object to this application and request that it be rejected.

Yours sincerely,  
Nadia Krasij and Karen Farquhar.



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Hi,

I would like to object to the recently amended Edenfield Masterplan/Taylor Wimpey Planning Application 2022/0451.

This is based on the following points:-

1. The proposed car park at the northern end of the village next to the school would further release of green belt land which is not part of the Rossendale local plan. This would also be likely to cause further traffic and road safety problems as it is so close to the traffic lights, and the junction with Blackburn / Burnley roads.

2. The proposals to introduce double yellow lines along significant parts of Market street discriminates against existing residents and the proposed parking areas would not compensate for this as they would not be big enough to allow for the number of cars currently parked on Market street. Additionally, commercial businesses along Market street are likely to suffer significantly due to the lack of parking and this is likely to have a serious affect on the local economy.

3. The southern part of the village, where the Anwyl development is, has serious road traffic/safety implications. Making Exchange street one way would seem to be an acknowledgment of the problems caused by the scale of the development and therefore the number of vehicles needing to travel along there if it was left as it is. However, such a proposal is merely moving the problem along Highfield rd, Eden Avenue, The Drive.

The plan does not show how such a massive increase in traffic can be safely managed along these small, narrow already double parked residential streets.

The plan does not suggest any mitigating measures for this part of the village and there are likely to be serious traffic / safety issues as vehicles try to enter/exit the development site from Bury rd and Bolton Rd North. The junction of The Drive with Bury rd is very close to another major, very busy junction; Bolton rd North and serious traffic congestion/ accidents are likely.

Bury rd, south from the junction with Bolton Rd North is already heavily double parked and a major pinch point for traffic with regular congestion along this road, so the proposed plans can only make this worse and cause serious access/grid lock situations (this is already in evidence whenever there is any kind of accident on the A56 bypass as Edenfield becomes a diversionary route to/from the northern part of the Rossendale Valley.

4. No transport/traffic assessment has been conducted to show how the volume of traffic can be safely/sustainably managed, particularly the immediate exit routes from the development in the southern section, and also more widely on the already heavily congested roads leading into/out of Edenfield.

5. Overall, the scale of the development in terms of the land area being built on and the number of houses is excessive and out of proportion with the existing size of the village (increasing the number of houses by around 40%). The density of the proposed houses is also too high and the design/appearance of the houses, particularly in the Taylor Wimpey plot is poor and unsuited to the village.

Regards,

Mark Tweedale

Sent from my iPad

To whom it may concern,

I am sick to death of writing these objections when none of the original objections have been rectified!

Please make the effort to see my previous comments about all of the objections I have! And as not a single one has even attempted to have been addressed by the builders or council, everything still applies.

To summarise my very detailed past comments:

- the village cannot sustain this many numbers
- there is no local transport besides unreliable buses
- no close access to motorway
- Edenfield is the only detour route when the A56 is shut so numbers driving through the village would be even more ridiculous
- pollution
- it was greenbelt, there's literally no need for these houses
- the houses near to The Duckworth Arms all failed to sell quickly, so how on earth can you justify 400
- even the new build houses near Edenfield roundabout (where there's 10!!!) haven't all sold
- children will end up dying, or anyone for that matter as you're putting a main road in a village
- pollution
- removing anywhere for people who live in the terraced houses to park

I could go on and on and on. But this whole thing is a mess, unsafe and unnecessary.

This should be criminal. The council should never have voted to remove Greenland. It's a disgrace and I am truly disgusted by all.

Regards,

Melissa Mukuna

Dear Rossendale Borough Council,

I am writing to object to the proposed planning application for Land West Of Market Street Edenfield

My objections are as follows:

- This is greenbelt land and should be protected from development. Building 238 homes here goes against greenbelt policy and will negatively impact the openness and rural character of the area.
- The scale, density and design of the development is completely out of keeping with the existing village of Edenfield. It will irreversibly damage the character of the village.
- There are serious concerns about the impact on local ecology that have not been properly addressed. Protected species may be put at risk by this development.
- The proposed access to the site is inadequate and dangerous. Parking provision is also inadequate. This will lead to highway safety issues in the village.
- There is no detail on how local services like schools and healthcare will cope with the huge influx of new residents. Existing community facilities will be put under enormous strain.
- Drainage and flood risk issues have not been adequately assessed. Building on this land could increase flood risk to the A56 bypass and other areas.
- The increase in traffic will add to pollution, noise and disruption for existing residents.
- Important amenities like parking and privacy will be lost with this overdevelopment of the village.
- You should be prioritising brownfield sites before allowing the loss of greenbelt land. There are viable alternative sites available.
- The number of homes proposed (238) is disproportionately large for the size of Edenfield village.
- The development contradicts Policy EP3 of your Local Plan which aims to protect the adequacy of school places. There is no evidence that local schools have the capacity to accommodate the influx of families.
- The increased light, air and noise pollution from such a large housing estate will severely impact the quality of life of those in neighboring properties
- The local wildlife, including protected species like bats, birds and badgers will be disturbed by the removal of habitat and increased human activity. An ecological survey must be done

- The homes planned are up to 2.5 storeys but local housing is predominantly 2 storey. This will make the development feel imposing and uncomfortably overbearing
- The access road onto Market Street and Bolton Rd North is unsuitable for construction traffic and additional cars. It will endanger children attending both Edenfield and Stubbins Primary Schools nearby
- Parking provision falls well below expected standards and the narrow village streets will become gridlocked with street parking.
- The public transport links in the village are inadequate for the expanded population. This will lead to over-reliance on cars
- The council should adhere to its declaration of a climate emergency and stop building on greenbelt land which offers crucial carbon absorption benefits.

I urge the council to reject this inappropriate and damaging application. It is unacceptable to concrete over the open countryside and forever change the nature of Edenfield village.

Please take residents' objections into consideration and defend our village from this unsuitable proposal.

Yours sincerely, Emily Formby

My objection to the plans submitted are as follows  
I do not feel the current plans benefit the Rossendale Valley housing situation in any way .  
They are so 1990's in layout  
Where are young starter homes ..capped at £130k  
Retirement properties capped at £175 allowing locals to downsize and free up the established  
larger detached homes ...  
Access ..is simple ...  
Instead of appeasing the builder make it a condition of planning that they EXIT the  
development onto the M66 at there expense..afterall what they have paid for this huge plot is  
peanuts in comparison to the revenue!  
And finally who do my solicitors contact for compensation??  
My Plaice Edenfield has operated as a fish and chip shop since at least the 1940"s to double  
yellow line Market St would be forcing my business that I have given 18yrs of my life to  
serve the residents to CLOSE ...forever ...  
Who pays me out .  
Lancashire County Council  
Rossendale for allowing this volume of overbuild ..or thr developer ..  
I object ...  
I strongly object..  
This development is illegal .

Please accept this email as an objection to the latest proposed Edenfield masterplan.

Our main concerns, as they were for previous plans, revolve around traffic and parking issues.

Support has been given by LCC to remove parking on Market Street but has a full traffic and parking assessment been carried out for the whole of Edenfield? And have the council listened to concerns of residents? Many of whom will lose parking either outside or at least close to their homes, with no priority given to residents. Some parking options seem to be on green belt land too? And a good distance from residents homes creating a safety/accessibility issue for older residents and those with children.

And what will this do to the local businesses? If shoppers can't park, they'll go elsewhere, threatening the livelihoods of these long established and welcomed businesses, that could be a lifeline for some residents who are unable to go further afield.

With no agreed "phasing" of building work, this could potentially mean up to five developers building at the same time, causing major traffic and parking issues throughout the length of Edenfield. This could put the lives of road users and pedestrians at risk unless it is given very careful consideration.

The concerns around the provision of school places do not seem to have been fully addressed. Again, with assumptions of extending Edenfield School and again, this seems to be on green belt land? Without the proper provision of school places, those living any further away from the proposed new homes may not get a place at what is the closest catchment school to their homes. Where would the children from homes on Rochdale Road/Turn be expected to travel to?

There are other issues too - access down Exchange Street and proposed one way system through a highly residential area with lots of families/children. It is worrying that this could become a thoroughfare for traffic into and out of the new properties, again being a safety risk.

And we know this land has already been stripped of its protected green belt status, but it is still heartbreaking to residents to see this beautiful area becoming a sea of houses, hemming in those houses already in existence.

We sincerely hope that all of the objections you receive are seriously considered,

Kind regards,

Natalie and Simon Paintin  
Edenfield residents

Sent from [Outlook for iOS](#)

Hi,

I wish to register my objection to the latest version of the Masterplan, specifically the Chatterton South allocation. I feel the high housing density is inappropriate to the size of the plot. The proposed access to the area is wholly unsuitable - the potential extra traffic would have to travel along already congested roads, past the Childrens playground, pump track and recreation field making it extremely hazardous for children accessing these amenities. Highfield Road and Eden Avenue are difficult to navigate at the best of times due to on street parking. The exit from Eden Avenue onto Bolton Road North suffers from a limited view of the traffic travelling up the road due to the bend in the road and is quite often further limited due to cars parked at the shop. I would suggest that access from the site is dangerous and ill thought through. I would like to ask whether a proper risk assessment has been carried out regarding the feasibility of this route for all the inevitable extra traffic which would result from a development of the proposed size of the site.

Regarding the plan for the whole of the village (it would cease to be a village if all this development were to happen) - I don't feel the added need for access to health and education been adequately addressed. The services in the valley are insufficient for the existing population. Basically the proposed development of H66 is just too large.

Kind Regards,  
Audrey Davis.

Sent from my iPad



Dear Sir/Madam,

I am writing to object to the plans for development across Edenfield. Please see below;

1) Environmental

The developments will take much of the existing green areas and transform them into houses. There are very few greens areas left and removing these are very detrimental. This will have a massive impact on the wildlife within the area, meaning a loss of habitats and feeding grounds

2) Pollution

Due to the increased number of cars the development will bring to Edenfield, this will inevitably increase the number of cars. Due to a lack of public transport infrastructure in place, residents will have to rely on their cars for commuting. As they will be in a more rural setting, this increases the distance and thus air pollution in order to travel. Until a more robust public transport system is in place, it seems impossible for not just Edenfield but the local communities to accommodate this number of extra residents.

3) Parking

Due to the plans in place to make Edenfield manage with the extra traffic, it appears that local residents will have to rely on car parks. The placement of the car parks is questionable as they appear to be next to the primary school and also the children's playground. It seems very poorly thought through to have car parks placed in such close locations to areas where children will be very high. This is considering the pollution concerns as well as the traffic and risk to life that would be brought about.

4) Traffic flow

Due to the potential increase in cars, there are a number of proposed traffic flow changes. One of these is down Exchange Street. My concerns around this are the fact it will become a rat run, especially heightening concerns that this will be right outside the children's playground and pump track. I would have concerns for child safety due to parking along this road for residents mixed with increased traffic due to the development.

5) Positioning of houses

It appears that houses will be three storey in some places and will overshadow some of the existing properties. This will cause an increase in light pollution and energy costs due to the houses (partially Alderwood Grove), being in the shadow of new properties.

6) General traffic

It seems implausible that Edenfield can manage any further traffic without a much more robust public transport system and road system being put in place. Edenfield struggles to manage with the traffic levels at present. Any increase on the infrastructure will not be sustainable. Although potential proposed access points to Market Street have been identified, it still does not address the increased level of traffic that will inevitably have to use Market Street. This road struggles to accommodate traffic at present during the day. It is impossible for two cars to travel along Market Street at some points and this causes a back up through the village. How it would be possible for any additional traffic to use this road, especially at rush hour, seems impossible. This increase in traffic will also put extra strain on the road and if any road repairs need to be carried out, it would be impossible to close the road to do this without causing mass disturbance to the entire village.

7) Public safety

Due to the proposed traffic measures through the village, I suspect that this may increase the flow of traffic through the village where possible, however this is at the detriment to footpaths. Due to Edenfield Primary school having to take on extra pupils, there will be an increase in the number of cars within the village. Due to the footpaths being altered to accommodate this extra traffic this is of a concern for the safety of pedestrians, especially children

8) Amenities

The amenities within Edenfield are already compromised at times and works for broadband are having to be carried out and upgraded. With the proposed new development, this would put further strain on these amenities. In order to upgrade broadband, gas, electricity and water supplies, this will cause great disruption throughout the whole of the village with implications both environmentally and with traffic. If any major roads need to be closed for upgrades to take place, this will stop the village from being able to function due to the disruption.

9) Local Business

Although local businesses should be able to improve trade through the increase in population from the village, this does rely on these new houses utilising these businesses. If this is not the case, local businesses will struggle to survive as many of their current customers will be deterred due to the lack of parking and traffic issues the village will face.

Thank you for your time,

Kind regards

Liz Lawton.

Sent from [Outlook for Android](#)

To Whom it May Concern,

I am writing to raise my objection to the latest updated planning application by Taylor Wimpey (TW). I'll take the opportunity to reiterate my disagreement with the whole H66 development and the release of greenbelt land that enabled this.

The Places Matter document addresses the concerns about the development which echo those that I made in my original objection. Edenfield will lose its "special character" and probably could no longer be called a village should this development go ahead. I am still appalled at the size of the whole of the H66 development and the inequity compared to proposed developments in other parts of the borough. This development could be a village in its own right! The current planning application should be put on hold whilst RBC reviews whether the decision that was made to release the greenbelt sits in line with the government's vision to "not concrete over our countryside" and "regenerate existing brownfield land".

I'd like to highlight the amendments in the levelling up bill which has now been enshrined in law that states that measures in the levelling up and regeneration act will....

- Put local people at the heart of development – making it easier to put local plans in place and requiring design codes that set out where homes will be built and how they will look.
- These plans will deliver more homes in a way that works for communities.
- Boost local services – requiring developers to deliver vital infrastructure. This will put an end to lifeless edge-of-town developments with no community assets and ensure developers deliver the schools, doctors surgeries and public services communities need and expect"

There is STILL no comprehensive masterplan from all developers. Why is this not being addressed???

I am still very concerned about the proposed restriction of parking for current residents of the village which I feel is extremely discriminatory. Displacing current residents in order to accommodate the needs of residents in the new build is not only unfair but morally wrong. Even if the additional parking proposed were suitable in its location and size to offset this which I don't believe it is, it presumably would not be monitored and therefore will end up being used by new TW residents and their visitors, and not the affected village residents.

I am concerned about the proposal to make Exchange Street one way and the subsequent impact on additional traffic via Eden Avenue and Highfield Road. At the moment both of these roads make driving challenging as visibility is affected due to double parking. Potentially this could have a future knock on effect as a result of increasing traffic. I can envision parking restrictions for residents in those areas also. Again this could be seen as discriminatory as future residents of a new build will not have to put with these levels of traffic and nor will they have issues around safety for children who play in the streets, (as a result of increased traffic). I already have my concerns of a possible design flaw of the recently installed pump park with children flying out on to the road even before additional traffic!

There is little parking for local businesses at the moment, parking restrictions could seriously affect this and subsequently the local economy.

Previous concerns raised by LCC Highways have not been addressed but what is more concerning is that, despite this, LCC do not seem to be pursuing these concerns and now seem broadly in support of the highway aspect of the proposal. **WHAT IS GOING ON??** **Concerns raised by village residents and Edenfield Community Neighbourhood Forum (including a traffic assessment recently submitted) regarding parking, volume of traffic and safety concerns are just being ignored.** It begs the question...is anyone actually reading these responses?!

Any proposed further release of Greenbelt is not aligned to RBC Local Plan.

There is **STILL** no phasing plan. I raised in my original objection about my concerns on the impact of the wellbeing of residents of the size, nature and duration of the proposed building work. This not only stands, but I also would like to add to that the impact on our wellbeing from having to keep trawling through these huge amounts of documentation. This is exaggerated by the fact that developers are not working together.

I remain in full support of any and all concerns and potential solutions raised by the Edenfield Community Neighbourhood Programme. I would like to thank them once again for advocating for us and for their help in making sense of the more technical aspects of the proposal.

Yours faithfully

Janet Smith

I would like to object to the Edenfield Masterplan 3 for the following reasons:

- Serious safety concerns one way system Exchange Street – won't resolve safety concerns; left hand turn from Market Street to Exchange Street is a blind left turn which is a major safety concern for traffic, pedestrians and cyclists
- Serious safety concerns junction Highfield Road/Exchange Street – particularly child, pedestrian and cycle safety as directly opposite new Cycle Pump Track which is not detailed in either masterplan or planning application
- Serious safety concerns re the proposed access to the site via The Drive, Highfield Road, Eden Avenue – visibility is severely affected by double parking and children play on these streets, hence particular concern for pedestrian and cycle safety; pavements and roads are not wide enough for the amount of traffic they will serve
- Double yellow lines proposed on Market Street and Exchange Street and restricted parking 8am until 6pm – likely to result in reduced footfall to local business butchers, bakers, pharmacy etc. which are essential services and important for the local economy – businesses are likely to close if insufficient footfall resulting in a negative effect on the local economy – opposite of what was proposed in local plan
- Gateway proposed – location seems dangerous, misrepresents the start/exit of the village, is unlikely to have an effect on road/pedestrian safety due to size of development/increase in traffic, A56 being closed recently has highlighted this, and traffic diverted ignoring traffic calming measures and they have not been enforced
- No indication of who the proposed additional parking on the Anwyl site will service – is it compensatory parking for existing residents? Is it for new residents? Can it be enforced? No suggestion of future proofing e.g. electric charging points. If compensatory parking unlikely to be sufficient
- Double yellow lines in front of houses – how will current residents access properties with shopping, babies and children, the disabled etc.

#### OVERARCHING CONCERNS FOR EDENFIELD AS A WHOLE:

There is still no comprehensive masterplan including input from all developers

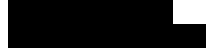
- Proposed further release of greenbelt
- Proposed new junctions unsafe and not fit for purpose
- Serious traffic, cycle and pedestrian safety concerns could result in fatality
- No road safety audit, despite this being raised as a concern on several occasions- we do not believe the traffic proposal would pass a road safety audit
- Double yellow lines and restrictions on parking will have a negative effect on local business's, resulting in a negative effect on the economy – the opposite of what was promised in local plan
- No phasing proposal – concerns over road and pedestrian safety if phasing is ignored and building undertaken simultaneously
- Discrimination against existing residents to accommodate needs of residents in the new houses
- Flood risk overall but particularly on the A56 leading to serious traffic and public safety concerns – still awaiting national highways feedback.

It is ludicrous that this is being considered, the safety of residents, the prejudice for existing residents over potential new ones. Nothing in place for the disabled, the elderly

or those with young families! There is so much wrong with this. Edenfield is already a bottleneck and that's before anything that happens on the A56 that results in all that heavy traffic through the village. God forbid any roadworks!

This is all totally unacceptable.

Janet Campbell



Sent from my iPhone

Attention of Mike Atherton.

Having spoken to you and your team on numerous occasions with the Edenfield neighbourhood forum group regarding the Edenfield Masterplan it would appear that yet again we have another planning application submitted by yet another Building Developer outlining another 50 houses without any concern or thoughts about the EM Plan regarding to Road congestion around on the only highway passage along Market Street which will again cause congestion this time on the Northern entrance to our village.

This also happens to coincide with a traffic junction adjacent to our only school with 3 major roadways plus 2 side roads immediately opposite the entrance to the site and close to the school gates. In my opinion this is increasing the danger to both the Health and Safety of both school children and other pedestrians/ car users on this hairpin junction and in noway should RBC Planning approve this application based on the above plan and without consideration to the EM plan of which I was assured by RBC that all developers would need to comply and conform The number of which Im now informed has increased to four separate developers requesting permission to build.

I also note that the above developers application is indicating additional increased school car parking to try and alleviate the congestion around this traffic controlled hairpin junction.

Would this not in fact need Government approval as it would be located on the only Greenbelt field left in Edenfield and no approval has been as yet given?

I would also ask that due concern by RBC is given also to the drainage condition of this field as in wet periods causes flooding along Burnley Road and flood risks to the houses located on both sides of the roadway on the Northern approach from Rawtenstall.

Finally in consideration to the points raised above I would respectfully ask Rossendale Borough Council to refuse permission for this application.

Yours Sincerely

Mr S Dearden

[REDACTED]  
[REDACTED]  
[REDACTED]

Sent from my iPad

**H66 Land West of Market Street Edenfield  
Masterplan/Design Code September 2023 version V17**

Our concerns in relation to the accuracy and feasibility outlined in the above published Masterplan are as follows:-

Whilst the current version of the Edenfield Masterplan includes information not previously shown, it is still not a comprehensive Masterplan covering the whole of the H66 site. There is no information stating what, if any, involvement other developers have contributed to this Masterplan. There are still incorrect and contradicting facts included and our previous comments still apply.

It appears that issues raised by the current residents of Edenfield have not been addressed and in fact totally ignored.

It is suggested that Rossendale Borough Council reject this current version of the Masterplan, until some, if not all the issues raised by the residents of Edenfield, National Highways and Lancashire County Council highways department have been addressed and agreed.

**Comprehensive Masterplan**

Page 6 of the document 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 “**

The current version of the Masterplan does not provide sufficient information to deem these statements compliant with the Rossendale Borough Council adopted Local Plan.

**Stakeholder Engagement**

The public consultation referred to on page 21 was merely an exercise by Taylor Wimpey and was not a comprehensive or inclusive consultation. The leaflet drop did not provide any detail of significance nor was it delivered to all residents. The feedback options were at best, just options, and were inaccessible by the majority of residents. Questions asked via email, are still awaiting replies.

**Land Ownership Control**

Page 22 states that David Hancock controls land known as Alderwood, this is incorrect as the land is owned by David Warren.

There are no statements provided in the Masterplan by any of the other developers named as to the amount, if any, of input they have contributed, which would infer that this is a Taylor Wimpey led Masterplan.

The map on page 23 is also inaccurate, as it shows David Hancock as the stakeholder of the Alderwood site.

**Street Hierarchy**

Page 32 – First paragraph still shows the roundabout at the south of Edenfield village as an access to M66/A56.

This statement is incorrect. There is no direct access to the M66 from Edenfield at all.

The A56 is a dual carriageway and in fact can only be accessed northbound via the Bolton Road north roundabout.

**Site Constraints and Opportunities**

The map on page 39 shows a potential access into the Alderwood site via Market Street.

LCC Highways has determined that this access is unsuitable and recommends that the entrance/exit be via the central land parcel, owned by Taylor Wimpey.

**Land Use**

The map on page 44 shows a Community car park and potential school expansion on land that is currently Green Belt and is not included in the Adopted Local Plan. If this land were to be removed from the Green Belt, this would result in more Green Belt land being removed.



### Vehicular movement

The map on page 45 states "Access to Alderwood either via Market Street or central land parcel" as referred to in the above-mentioned "Site Constraints ....."

LCC Highways have determined this access is not viable via Market Street.

Paragraph 3 states " A controlled emergency vehicular access point will be provided between the southern and central land parcels, close to Chatterton Hey."

1. This statement does not make sense. How can an Emergency Access be controlled? If this is an Emergency Access it should be accessible at all times.
2. It would seem therefore, that the residents of the Anwyl development will have access to the Taylor Wimpey development, and subsequently vehicles would be able to enter and leave the development via the new junction proposed on Market Street. It would also suggest that the Anwyl construction traffic will enter/leave the site via the Market Street junction. due to the constraints of Exchange Street being a narrow road and the turning proposed into the Anwyl site via Highfield Road will be a tight turn, especially for the larger construction vehicles. Vehicles. These points need more clarification.

### Off site highway improvements – Pages 46 & 47

The diagrams shown on the pages numbered 46 & 47 have still been produced on out of date maps. There has been an increase of 19 dwellings along Market Street, which are not shown on the page 47 drawing. This does not engender a great deal of confidence when addressing the problems associated with the Market Street corridor as commented on below:-

**Page 46** – the issues of the proposed off street car park area on Burnley Road are detailed above (Land Use)

As with the majority of this Masterplan, details of proposals are incomplete eg "Details to be agreed" "Details to be agreed at Design Stage"

The proposed uncontrolled crossing at Edenfield Primary School is situated in close proximity to the junction of Burnley Road and Blackburn Road.

What is the purpose of the proposed rain garden at 157 Market Street? This feature appears to be on the footpath and as such will be an obstruction and a danger to pedestrians, particularly to disabled and partially sighted or blind people.

### Page 47

It is still not clear whether yellow lines are to be introduced in front of the properties numbered 115 -129 Market Street. There are no annotations on this length of highway stating no parking.

It is unclear as to where the entrance/exit road into the Taylor Wimpey development actually joins Market Street. It appears to join the existing road. As the road, at this point only measures 9m, and the proposed priority junction together with the parking bay on the east side of Market Street requires 10.9m it would seem that part of the field adjacent to 115 Market Street would need to be used in order to accommodate the new junction. If there is to be a curve in the road, then it is possible the visual display of traffic turning right out of the development may be compromised.

There are no proposals as to how much, if any, of the dry stone wall facing onto Market Street is to be retained.

Rossendale Borough Council adopted Local Plan states " **that parking provision for existing residents should be conveniently located to the development it serves, be safe, secure and benefit from natural surveillance.** The proposed parking area on the land adjacent to no 115 Market Street is neither safe or secure. In fact it is to be an open car park for the use of residents of the new development as well as displaced vehicles on Market Street. As the parking bays are in the shape of a horseshoe and parallel parking , it is unlikely 13 vehicles can be accommodated in the spaces provided, due to the differing length of vehicles. There are a minimum of 39 vehicles parked overnight on Market Street between Pilgrim Gardens and Alderwood Grove, 14 vehicles can be accommodated in the parking bay on the east side of Market Street in front of properties numbered 102-136b.

The parking area does not provide any spaces for disabled parking, motorcycles or cycles. There is no provision for visitors or maintenance vehicles eg Plumbers, Electricians, Roofers, Decorators etc working on properties on Market Street) There is no spare capacity for future residents of Market Street, where a change of hands results in a property going from a 1 car owner to a 2 car ownership. As a Masterplan is designed to cover the longterm future of the development and not just the present, the off street parking area does not have any provision for the introduction of electric car charging bays.

The document covering street lighting, shows only 2 street lights are to be provided in the car park. These lights would not be sufficient to light the whole of the area, particularly the dark corners. As a result this will cause anxiety

for some drivers, especially lone drivers or those with mobility issues or visual impairment (where bright light is a necessity in dark places) having to walk from the car park and along the footpath to reach their destination. The existing Bus stop will probably be lost, as there is no footpath wide enough to relocate the Bus stop going south along Market Street.

As previously stated above, there are dwellings not included in this drawing, 14 of which are located close to the new junction proposed on Market Street. Number 82 Market Street is now a property containing 5 apartments. On the west side of Market Street there are 4 properties facing the street and 6 properties to the rear (Pilgrim Gardens). The new junction from Pilgrim Gardens onto Market Street is not shown on the diagram.

The proposed yellow lines on the west side of Market Street will have the greatest impact on both residents and businesses. There are 2 takeaways and a Pharmacy located in the terraced properties at the south end of the village. All 3 of these businesses have regular deliveries of stock, to enable them to continue their business. As it is proposed to restrict parking in this area between 8AM-6PM, it could cause problems for the delivery drivers. It is assumed that loading and unloading will be permitted during the restricted parking hours. Between Exchange Street and number 47 Market Street there are a minimum of 20 vehicles parked during the daytime on the west side of the street. There is no off street parking available or access to the rear of the properties for these vehicles.

Gincroft Lane is a narrow lane and on street parking is not an option. Elizabeth Street no longer exists, this is now a courtyard and is used as outdoor seating for the Drop Off Café.

Vehicles exiting the Anwyl development will have to do so via Highfield Road and surrounding streets, which will increase traffic levels in this area. The exit is also close to the newly installed Pump Track (which is not shown on the drawing). Therefore there is an issue of safety of the children using this track to be considered.

#### Site Wide Codes

Page 74 – Access and parking typologies

Car parking will :

**“Include kerbside visitor/community parking in appropriate agreed locations (with the level of new parking provision to exceed that displaced as a result of the development)”**

This statement is completely false.

There are a minimum of 55-60 vehicles on Market Street that will be displaced as a result of the development.

14 vehicles can be accommodated in the parking bay in front of the eastern terrace, numbered 102 – 136b. Parking proposed on the land adjacent to 115 Market Street will accommodate 13 (probably only 10) vehicles, but are not for the use of displaced vehicles only.

This leaves a minimum of 30 – 35 vehicles still displaced, either during the day or overnight.

These figures do not include, visitor parking or maintenance vehicles.

#### Transport Assessment Summary - Appendix C

Whilst this assessment was undertaken in April 2023, it did not survey vehicles parked overnight on Market Street. Since April 2023 there have been amendments to the Masterplan, which will increase the traffic entering/exiting the new priority junction.

As well as the 238 dwellings proposed by Taylor Wimpey, there will now be a further 20 plus vehicles from the Alderwood site, at least 25 vehicles displaced between Pilgrim Gardens and Alderwood Grove.

There may also be vehicles from the Anwyl site using this junction, if the emergency road into the development via the Taylor Wimpey site is permanent.

The transport assessment does not appear to consider other vehicles using this junction on a regular basis, for example, visitors, maintenance vehicles, parcel delivery vehicles, supermarket delivery vehicles etc.

With the inclusion of all these extra vehicles, the junction may not be fit for purpose.

#### Health and Safety

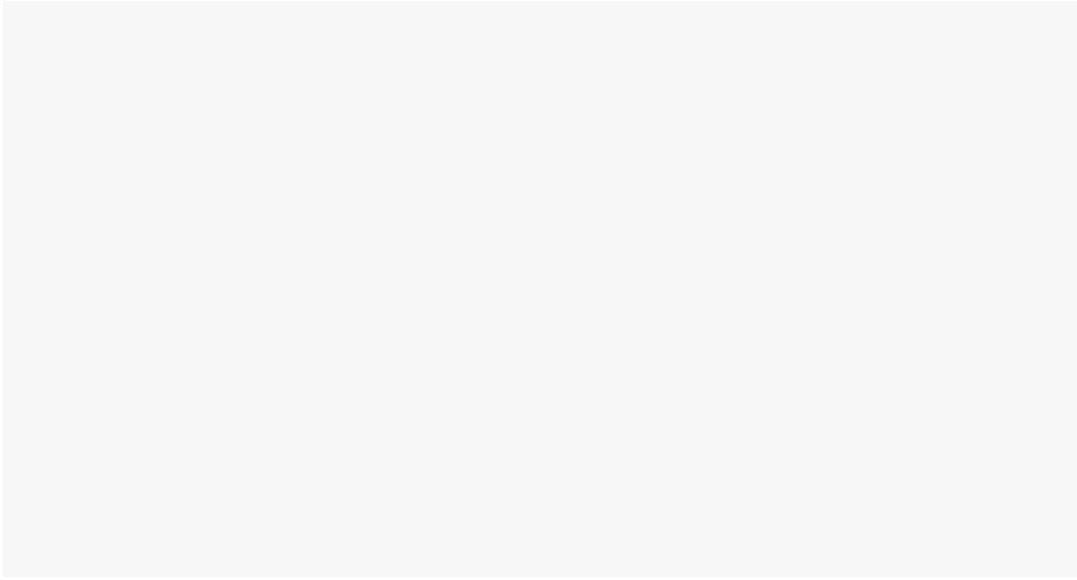
The introduction of yellow lines along the west side of Market Street, particularly at the southern end of the village, where the footpath is very narrow, could have an adverse effect on the health of primary school children.

The removal of parked vehicles will result in the traffic travelling closer to the kerb and pedestrians will be at risk of pollution from exhaust fumes. In particular young children, who are walked to school by parents.

There is also the possibility of pedestrians being hit by the wing mirrors of passing vehicles as there will be no barrier between pedestrians and the flow of traffic.

Margaret Filkins and Gordon Worth





### **Additional objection by Ian and Barbara Lord to the Masterplan & Design Code for Edenfield allocation H66**

The following comments are in addition to those we submitted on 17<sup>th</sup> January 2023 and 11<sup>th</sup> August 2023 and relate to the revised Masterplan and Design Code (MDC) and the Table of Responses to Council Comments (TRCC) which was published in September. We have also previously commented separately in January 2023 and June 2023 on planning application 2022/0451 including the Highways Consideration of Masterplan (HCM) and the Market Street Corridor Improvement Plan (MSCP).

#### **Overview**

The MDC does not make any substantial changes to the June version which is concerning considering the extensive objections submitted by residents, Edenfield Community Neighbourhood Forum and others during the consultation on that version. This is not really surprising as Taylor Wimpey (who are undoubtedly the major contributor to the MDC) have substantially ignored the views of residents ever since the wholly inadequate masterplan consultation in June 2022.

The paucity of changes is illustrated in the Executive Summary on pages 8/9. The changes from the previous version of the MDC are few and of relatively low importance despite the large number of responses submitted during the consultation process. We comment in more detail below on the major issues.

#### **Stakeholder engagement**

The section on stakeholder engagement (page 21) does not mention the consultations on the November 2022 and June 2023 versions of the MDC which resulted in a large number of comments from stakeholders. This reinforces our comment in the overview above that most if not all of these have been ignored.

#### **Phasing**

The importance of phasing was recognised in the Rossendale Local Plan. The first site specific policy of the Plan relating to site H66 states: *'The comprehensive development of the **entire site** is demonstrated with an agreed programme of **implementation and phasing**'* (our emphasis). Our following comments confirm the importance of phasing and show that the masterplan attempts to circumvent the 'entire site' element of this statement.

In our previous two submissions we have stressed the importance of having an agreed phasing plan as part of any masterplan. Even with an agreed plan Edenfield residents will be subjected to considerable upheaval for many years. Without a plan they will be at the mercy of the developers with the potential for chaos for many years. It is imperative that indicative housing build numbers for each site in H66 are incorporated in the phasing plan along with timing of the necessary infrastructure and services to ensure that they are in place **in advance** of construction.

The key deliverables which have been added to the phasing section of the masterplan (pages 54/55) lack any detail and need to be considered in total for H66 rather than on a

site-by-site basis. The off-site highway changes need to be substantially complete before any construction commences due to the impact of construction traffic. Consequently the occupancy trigger for most of these highway changes needs to be zero which should be specified in the masterplan.

In the TRCC the response to the Council's comment 1iii states "*the phasing section (pages 54 and 55) has been updated to confirm the current agreed phasing and the key deliverables of each phase. However we reiterate that each parcel can be delivered independently without prejudicing any other, and therefore the phasing could change/ overlap without significant impact. As such, there is no need (or policy requirement) to specify time periods, and it is not reasonable or practical for a multi phase, multi ownership allocation to commit to this at this stage of the process anyway*". This confirms that the developers have no intention of committing to a combined H66 phasing and prefer to deliver each site independently. For the reasons stated above this must not be allowed to happen.

#### **Transport Assessment**

Criterion 3 of the Executive Summary covers the requirement for a Transport Assessment (TA). The masterplan compliance for this criterion (which is unchanged from the June MDC) states "*a detailed TA has been submitted with the Taylor Wimpey (TW) Phase 1 application, including a cumulative analysis for the full allocation (as summarised in Appendix C), to be refined through subsequent individual planning applications*". This is supported by the off-site highway improvements on pages 46/47 which are virtually unchanged from the June MDC.

This fails totally to consider the large number of objections to the TA submitted during the consultation period on the TW planning application 2022/0431, the Market Street Corridor Improvement Plan and the Highways Consideration of Masterplan Note. These objections included comments by transport consultants and others on the technical failings of the proposals, views of residents who have day-to-day knowledge of traffic conditions in the village and views of residents who will suffer hardship as a result of the proposals particularly related to parking. Our own comments which were included in our objections dated 11<sup>th</sup> August 2023 are attached as Appendix 1.

The assumption in the MDC seems to be that the TA is a "done deal" which it certainly should not be. The objections submitted in the consultation must be considered, the TA revised and then subjected to further consultation.

#### **Geotechnical investigations**

The site specific policies for H66 in the Rossendale Local Plan required land stability and protection of the A56 to be confirmed through geotechnical investigations. Criterion 8 in the Executive Summary of the MDC states: '*The Masterplan accounts for ground conditions and land stability. The TW Phase 1 application includes a detailed Site Investigation worked up in dialogue with relevant consultees, as will subsequent applications to allow detail to be refined/agreed*'. This is incorrect as the MDC does not account for ground conditions and stability. This is acknowledged in the response to TRCC 4i which repeats the statement in

Criterion 8 and adds *'There is no policy justification to provide any more detail at this stage, nor is it necessary for this high level document'*.

Rossendale Council had sufficient concern over the geotechnical issues to commission their own report by Mott MacDonald who issued an interim technical note on 7<sup>th</sup> September but, as far as we aware, a final report is still awaited. National Highways are also waiting on this final report because of their concerns of the potential effect on the A56.

The policy requires confirmation of land stability and protection of the A56 but as yet there is no such confirmation so it is totally incorrect to say that there is no policy justification. Furthermore why would it not be necessary for the MDC to include this confirmation when the policy covers the entire H66 site and there are potential implications for the parts of the site not owned by TW including the potential A56 impact. It is just a further illustration of the attempts to circumvent requirements without consideration for residents, the Council and other bodies.

**Ian and Barbara Lord**

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

**5<sup>th</sup> November 2023**

## **APPENDIX 1**

**Excerpt from objection dated 11<sup>th</sup> August 2023 by Ian and Barbara Lord to Planning Application number 2022/0451**

### **Transport Assessment**

The Highways Consideration of Masterplan (HCM) and the Market Street Corridor Improvement Plan (MSCP) which have now been made available at last put some detail on the requirement to have a Transport Assessment for the whole of Edenfield. However, this only goes to prove that it is impossible to improve the highways sufficiently enough to cater for the proposed developments without causing considerable distress and inconvenience to many existing residents whilst failing to provide a safe and efficient road network for new residents and visitors to the village. Following are our comments on the proposals particularly regarding the Exchange Street/Highfield Road area where, as living there, we are well aware of the current situation and the likely impact of the proposals.

#### **Exchange Street**

It has been obvious for some time that access to the Anwyl site via Exchange Street is problematical. The proposed solution to this is to make the eastern end of the street one way west bound. It also appears from the MSCP there are parking restrictions but these are not mentioned in the HCM. This urgently needs clarifying because of the impact on parking

for residents, Market Street businesses and users of the pump track, play area and recreation ground.

This proposed access to the Anwyl site (proposed development of 90 houses) raises serious safety concerns. The entrance is only yards away from the pump track (which exits direct onto Exchange Street), the children's playground and the recreation ground as well as the junction with Highfield Road. We live in this area and, outside of school times, it is very busy with children (many on bikes and/or skateboards). The recently built pump track has attracted people from outside the area who come in cars and vans and consequently add to the traffic issues. The thought of the current situation being exacerbated by the additional traffic from the Anwyl site and from vehicles being unable to exit Exchange Street eastwards (residents of Exchange Street and the Bowling Green plus Community Centre users) is frightening.

#### Highfield Road

We commented as follows in our previous objection: *Living as we do on the junction of Exchange Street and Highfield Road we see daily the difficulties that traffic already encounters due to the narrow width of both roads and parking on both sides. To add traffic from another 95 houses is madness and severely reduces road safety through a residential area.* This issue has not been resolved by the proposals which make the situation worse due to the increased traffic from Exchange Street (see Exchange Street above). Also vehicles coming to the pump track appear not to have been considered, presumably because it has only recently been installed.

All this traffic would flow through Highfield Road, The Drive and Eden Avenue. These roads are only 5.5m wide and regularly have vehicles parked on one side (and often two) making large sections effectively single lane. These roads were designed over fifty years ago to serve this residential area of approximately 180 houses. They are patently not suitable to also be a thoroughway for the traffic generated by another 90 homes.

#### Edenfield South

The Market Place roundabout is far from ideal now particularly for longer vehicles (most trucks and buses) which take over the entire junction when entering or exiting Rochdale Road (due to Scout Moor quarry a large number of heavy vehicles use this road). However, due to the surrounding buildings, is almost impossible to improve this junction. The additional traffic from 400 houses potentially makes it unworkable and certainly raises serious safety concerns for pedestrians and cyclists.

The MSCP conveniently cuts off a few yards south of both the Market Place roundabout and the Highfield Road junction. Consequently any issues here are not addressed. As well as those affecting Highfield Road/The Drive/Eden Avenue mentioned above those affecting Bury Road are ignored. Bury Road south of its junction with Bolton Road West has parking on both sides 24/7 which effectively makes it single track for a large part of its length. The parking is a necessity for residents who have no alternatives. The additional southbound



traffic resulting from the 400 houses will make this road even more difficult to navigate with the potential for queues to back up to the Market Place roundabout.

#### Market Street

The proposals for the "Market Street corridor", as well as having technical failings, will bring misery to the residents of that street as a result of the parking restrictions (and wholly inadequate alternative parking provision) which will mean that many will be unable to park anywhere near their homes. This is simply not right when they (and their visitors) have always been able to do so. This is particularly devastating for the elderly and infirm, many of whom have lived there all or a large part of their lives.

The impact on the Market Street businesses will be equally devastating. These include two bars/restaurants, two take-aways, pharmacy, butcher, baker, barber and hair salon. All of these have a large number of customers who drive to visit (many from outside the village). If they cannot park they will not come.

#### Edenfield North

There needs to be a much better assessment of the Blackburn Road/Burnley Road/Market Street junction. Two additional site accesses within close proximity of the traffic lights together with increased traffic flow from the 400 houses and a large increase in pupil numbers at the school raises not only traffic flow issues but also pedestrian and cyclist safety concerns.

#### Traffic survey

The survey was undertaken on only three days and during the working week (but only to 7pm). Edenfield is a largely residential area which means that traffic and parking issues are often more prevalent at weekend and evenings - but these times have not been considered. On the residential streets child safety at these times is paramount but has been ignored.

To whom it may concern,

I would like to object to the Edenfield Masterplan. I live on Blackburn Road which has a very tricky and busy traffic intersection. More housing and building work in the area would entail serious safety concerns for the people living here. The village struggles to cope with increased traffic when Highways sets up a diversion on the motorway and that's only temporary and short term, I can't imagine what would happen if we had consistently sustained traffic through the village.

The village simply can't take any more building work. There must be somewhere else that this plan can be implemented.

Thank you.

Heloise

To whom It May Concern,

We have reviewed the amended Masterplan re H66 and wish to object on the grounds of traffic concerns.

We note that policy H66 (3) (ii) states the need to " agree suitable migration measures in respect of the capacity of Market Street to accommodate additional traffic". We do not agree that the Masterplan satisfies this requirement. the traffic on Market Street is already highly congested and at times completely gridlocked. (We do not agree that the traffic levels in April 2023 were less than those prior to the pandemic).

We also object on the grounds of inadequate parking provision for existing residents.

Yours faithfully

Mr. Stephen and Mrs Carole Higginbotham

[Redacted signature block for Mr. Stephen and Mrs Carole Higginbotham]

Mr. Mark Higginbotham

[Redacted signature block for Mr. Mark Higginbotham]

Mrs. Elizabeth Dalby,

[Redacted signature block for Mrs. Elizabeth Dalby]

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Mr. Stephen and Mrs Carole Higginbotham

[Redacted signature block for Mr. Stephen and Mrs Carole Higginbotham]

Mr. Mark Higginbotham

[Redacted signature block for Mr. Mark Higginbotham]

Mrs. Elizabeth Dalby,

[Redacted signature block for Mrs. Elizabeth Dalby]

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Yours faithfully

Mr. Stephen and Mrs Carole Higginbotham

[Redacted signature block for Mr. Stephen and Mrs Carole Higginbotham]

Mr. Mark Higginbotham

[Redacted signature block for Mr. Mark Higginbotham]

Mrs. Elizabeth Dalby,

[Redacted signature block for Mrs. Elizabeth Dalby]

Morning,

I would like to object to the Edenfield Masterplan (September 2023 version), on the following grounds.

1. The Masterplan is not comprehensive and does not include the input of all the developers for site H66.
2. The traffic proposals have serious health and safety aspects surrounding the new junction for access to the Taylor Wimpey proposed 238 houses, the one way system on Exchange Street, the junction with Highfield Road and Exchange Street and the proposed access via The Drive, Highfield Road and Eden Avenue. All of these have serious safety concerns.
3. There is no road safety audit completed it is therefore not clear whether the proposals would pass an audit.
4. There is no phasing proposal which means that the building can be undertaken simultaneously which leads to concerns over road and pedestrian safety.
5. There are proposals to release further greenbelt land for car parking but no indication whether this is for the use of existing residents or for new residents.
6. The proposal for the use of double yellow lines will affect both businesses and residents. Businesses will suffer a reduced footfall and residents will have their parking removed how will they access their properties with shopping, babies, children and what of disabled residents.
7. There is a flood risk overall but in particular on the A56 leading to serious traffic and public safety concerns.
8. There is active discrimination against existing residents in favour of new residents.

These were my objections to the last masterplan and are still all valid!

Chris and Adele Hanson  
[REDACTED]

This objection is submitted by  
Marianne Rushton and Alistair Rushton

[REDACTED]

[REDACTED]

AND

Julie Smith and Gideon Smith

[REDACTED]

We object on the following grounds:

**There is no cohesive plan for the development of the whole site.** This application is only for one of the developers. We need to see a comprehensive plan for the whole site before any planning application is considered to ensure that the development will not have a detrimental effect on the residents of Edenfield.

**There is still no sitewide traffic or road safety assessment.**

In this plan the quiet road by the play area and bike track (Exchange Street) will become a busy road leading to the new developments. We need a proper safety assessment for this area to ensure the safety of the children using these facilities before any planning consent is considered.

There are two bridleways coming out onto Bury Road:

1. Gin Croft Lane, where riders, walkers and cyclists cross Bury Road to Exchange street to access routes which go through the proposed development.
2. At the other end of the village Fish Rake Lane crosses the main road into Crow Woods and proceeds to the B6527 to connect with the bridleway at Hardsough Lane. There is a footpath from Crow Woods which joins the B6527 by the bridge which takes the A56 over this road.

None of these rights of way have a good line of sight for horse riders, pedestrians or cyclists. These routes will be considerably more dangerous because of the increase in traffic if this planning is considered without any traffic and road safety assessments. The increased number of houses already being built at Holcombe Gardens and in Shuttleworth needs to be factored into any traffic assessment as this is the connecting route to the M66 and Manchester which is already seriously congested at rush hour. Likewise, where Bury Road joins the A682 in Rawtenstall, it is difficult to get out on to the junction. This route out of Edenfield needs to be part of any traffic assessment.

**Infrastructure needs.** None of the infrastructure needs have been addressed. School places and healthcare are a particular concern.

**Flooding.** Flooding is seriously underestimated in this neighbourhood plan. The sites proposed for development currently soak up a lot of run off from the hills. A few soakaways will not make up for this loss when the site is developed. Flooding of the bypass is a continuing problem and there is nothing in this plan to address this.

**Landscaping and environmental issues.** The design codes and landscaping in the Neighbourhood plan are sketchy. More detailed proposals are needed before any planning application is considered. There is no attempt as far as we can see to address the serious environmental issues likely to arise in the next few years. An environmental assessment which looks at all possible detrimental impacts of this development should be undertaken to safeguard the present and future residents of Edenfield.

**Parking Restrictions.** People already living in Edenfield will have their lives made difficult if the proposed parking restrictions come into force. There is nothing in this plan to mitigate the effect of restricted parking on the current householders. Local businesses will also be affected if people can't park to shop in the village.

**Greenbelt Release.** The proposed greenbelt release for the school, play area and car park isn't aligned with Rossendale Borough Council's Local Plan and does not address the problems created by this development while simultaneously causing more safety and environmental issues.

The advertising material for this development emphasises Edenfield as "opportunity to create one of the best places to live in the borough of Rossendale". We already have a great place to live. If this development goes ahead it will adversely affect existing residents as well as creating a traffic trap for new residents who will have been sold the false promise of easy access to the motorway network.

Alistair Rushton, Marianne Rushton, Julie Smith, Gideon Smith



This objection is submitted by  
Marianne Rushton and Alistair Rushton

[REDACTED]

[REDACTED]

AND

Julie Smith and Gideon Smith

[REDACTED]

[REDACTED]

following grounds:

**There is no cohesive plan for the development of the whole site.** This application is only for one of the developers. We need to see a comprehensive plan for the whole site before any planning application is considered to ensure that the development will not have a detrimental effect on the residents of Edenfield.

**There is still no sitewide traffic or road safety assessment.**

In this plan the quiet road by the play area and bike track (Exchange Street) will become a busy road leading to the new developments. We need a proper safety assessment for this area to ensure the safety of the children using these facilities before any planning consent is considered.

There are two bridleways coming out onto Bury Road:

1. Gin Croft Lane, where riders, walkers and cyclists cross Bury Road to Exchange street to access routes which go through the proposed development.
2. At the other end of the village Fish Rake Lane crosses the main road into Crow Woods and proceeds to the B6527 to connect with the bridleway at Hardsough Lane. There is a footpath from Crow Woods which joins the B6527 by the bridge which takes the A56 over this road.

None of these rights of way have a good line of sight for horse riders, pedestrians or cyclists. These routes will be considerably more dangerous because of the increase in traffic if this planning is considered without any traffic and road safety assessments. The increased number of houses already being built at Holcombe Gardens and in Shuttleworth needs to be factored into any traffic assessment as this is the connecting route to the M66 and Manchester which is already seriously congested at rush hour. Likewise, where Bury Road joins the A682 in Rawtenstall, it is difficult to get out on to the junction. This route out of Edenfield needs to be part of any traffic assessment.

**Infrastructure needs.** None of the infrastructure needs have been addressed. School places and healthcare are a particular concern.

**Flooding.** Flooding is seriously underestimated in this neighbourhood plan. The sites proposed for development currently soak up a lot of run off from the hills. A few soakaways will not make up for this loss when the site is developed. Flooding of the bypass is a continuing problem and there is nothing in this plan to address this.

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Alistair Rushton, Marianne Rushton, Julie Smith, Gideon Smith

FOA  
Rossendale Borough Council

████████████████████  
████████████████████  
Your ref: Draft Masterplan for Land West  
of **Market** Street – Edenfield  
(Allocation H66)

Date: 2<sup>nd</sup> November 2023

Dear Sir/Madam

Lancashire County Council's School Planning Team welcomes the opportunity to comment on the draft Masterplan for Land West of Market Street – Edenfield (Allocation H66) and have provided comments below.

The draft Masterplan identifies the following requirements for education at as per the Local Plan allocation:

*"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." (Rossendale Masterplan & page 56 of Rossendale's Local Plan 2019-2036 adopted 15 December 2021*

The School Provision and Sufficiency Team welcome the inclusion of the maps detailing the potential land available for school expansion. We note that the revised Draft Masterplan provides greater clarity on pages 7, 23, 51 and 55 of the schools existing playing field and the proposed identified School Extension Land. We acknowledge your comments in relation to an expansion into green belt land. Our preference would be to build on the current school playing field (subject to feasibility) and utilise the proposed school expansion land for external (Green) space/school playing field in place of building on Greenbelt land.

The School Provision and Sufficiency Team acknowledges and welcomes the inclusion on page 44 of the Revised Draft Masterplan in relation to the school land.

*"This includes an area outside the allocation for the potential expansion of Edenfield CE Primary School, in line with criterion 9 of Policy H66 and the adopted policies map. The provision of this land will be subject to evidence of need and through*

**Lancashire County Council**  
████████████████████



*developer/landowner contributions in a proportionate basis based upon the size of their development to ensure the developer/landowner hosting the school expansion is not disadvantaged." (Rossendale Masterplan & page 56 of Rossendale's Local Plan 2019-2036 adopted 15 December 2021).*

*However, please can we draw your attention to the DfE guidance in relation to both land and construction contributions to mitigate the impact of development on school place provision:*

The DfE Guidance [Securing Developer Contributions for Education August 2023](#) states that:

*'Housing development should mitigate its impact on community infrastructure, including schools and other education and childcare facilities.*

*• Developer contributions towards new school places should provide both funding for construction and freehold land where applicable, subject to viability assessment when strategic plans are prepared and using up-to-date cost information'.*

The School Provision and Sufficiency Team would request the requirement to provide both funding for construction and freehold land where applicable also acknowledged within the revised Masterplan design Code for Housing Allocation H66(Edenfield) as this will ensure that the impact of the development on school places is mitigated by developers and that there are sufficient local school places to meet additional demand.

### **School Place requirement**

It is LCC's policy to assess the impact of a strategic site on existing provision and to provide a projection of how this will influence the community infrastructure. In addition to any known strategic sites any further planning applications in the area will be assessed individually. This combined approach will determine the level of financial contribution needed to mitigate the impact of the housing developments. LCC adhere to their three-test process to ensure CIL compliance. Assessments will consider shortfall as well as surplus places.

### Pupil Yield

For the purposes of the site analysis, we have provided our methodology below based on the assumption of a four-bedroom dwelling mix. This is in line with [LCC's Planning Obligations Education Contribution Methodology \(Annex2\)](#) for assessing the impact of Outline planning applications and will be reassessed at Reserved Matters application stage to take account of a more accurate bedroom mix.

### Projected Demand

#### Primary Place Demand

| Primary Planning Area | Dwellings | Pupil Yield | Scale of Demand |
|-----------------------|-----------|-------------|-----------------|
| Ramsbottom            | 400       | 152         | 1 Form of Entry |

Based on a 4-bedroom pupil yield the following additional place need has been identified:

Primary 152 places



**Secondary Place Demand**

|              | Dwellings | Pupil Yield | Scale of Demand   |
|--------------|-----------|-------------|-------------------|
| <b>Total</b> | 400       | 60          | 0.5 Form of Entry |

Based on a 4-bedroom pupil yield the following additional place need has been identified:

Secondary 60 places

LCC's School Provision and Sufficiency Team look forward to further liaison with Rossendale Borough Council to determine how the education requirements from the impact of the Masterplan site will be mitigated.

If you have any questions, please do not hesitate to contact me.

Yours Faithfully



Paula Durant  
 School Planning Manager  
 School Provision & Sufficiency Team  
 Lancashire County Council



Morgan Edden

6 November 2023

Dear Sir/Madam

**Edenfield Masterplan/Taylor Wimpey Planning Application 2022/0451**

**Location: Land West of Market St, Edenfield**

**Proposal: Full application for the erection of 238 no. residential dwellings and all associated works, including new access, landscaping and public open space.**

I am writing in respect of the above planned development and wanted to make you aware of my strong objection to this.

The revised version of the masterplan does not represent all four developers, nor does it represent Rossendale Borough Council, it is a representation of what Taylor Wimpey wants. Given the severity of the proposal to Edenfield, I would have expected a unified plan to have been submitted.

The plan itself, again raises a number of concerns for me, especially that of safety. And fails to address those existing residents of Edenfield.

I live on Market Street, [REDACTED] Market Street is an incredibly busy road throughout the day and even in the evening often cars pass through, especially when the motorway is closed. To introduce over 400 houses with the entrance at this point is ludicrous.

I've bullet pointed my concerns below, please take time to read and digest.

- Firstly, no comprehensive masterplan covering the whole of H66 has been released by the developers.
- Another huge concern for me is the infrastructure. Even after many people voiced their concerns for lack of information on new schools, doctors, dentists have fallen on deaf ears. In Edenfield we have one school and no healthcare. With only one school in the area, it is unreasonable to expect Edenfield to take such a big increase in numbers of children. It is a small school with already large classes. This will result in larger classes and a lower standard of education. The surgeries in Ramsbottom & Rawtenstall is over-subscribed and barely surviving. If you want to see a dentist in the area we cant as they are already full and no longer taking on new residents. There are no proposals to open a new surgery. This means there will be more pressure on existing surgeries which I'm certain they cannot cope with.
- Safety Concerns Regarding the New Junction Entrance on Market St. The proposed site access on Market St as a new junction entrances raises serious safety concerns. Market St is already a highly trafficked road and serves as a National Highways Diversion route when the A56/M66

experiences closures. The safety measures proposed do not appear to be sufficient and may not meet the requirements for a development of the proposed scale. Insufficient visibility and the potential risk to the lives of residents, cyclists and primary school children (located just 250m from the junction) are of grave concern. The necessity of a road safety audit has been mentioned, yet it has been disregarded. By neglecting to address these safety concerns, Lancashire County Council and RBC may potentially breach their responsibility to ensure the safe day to day life of all residents in Edenfield. No site wide traffic assessment has been completed for the health and safety of all existing and new residents of Edenfield.

- Lack of detail regarding drainage, flooding. The rainwater that runs off scout moor across to the proposed development area is currently soaked in before it hits the A56. Once this Greenbelt land has been concreted over, what evidence is there to show that this will not affect the busy roads.
- The proposed one way system will now make a quiet road extremely busy, no safety measures have been considered for the play park directly next to the park, or the cyclists coming down from the pump track.
- Inadequate Crossing Points. The proposed plan includes only one crossing point on the north side of the junction, which raises serious safety concerns for the very young primary school children (including my own) crossing Market St from the south side. This lack of adequate crossing points poses a significant risk to their safety.
- Residents of market street opposite the proposed entrance to the site is where we currently leave our bins for collection. Currently there is no where else for these to go. There has been no consideration for where this could be relocated to.
- Future proofing, government is planning for all cars to be electric. How do you plan for people who can no longer park near their house to charge their vehicle.
- Double Yellow Lines and Accessibility for Current Residents. The introduction of double yellow lines in front of our houses raises concerns about us, current residents will access our properties with shopping and young children. The proposed compensatory car park is neither sufficiently large nor fit for purpose. A recent audit has identified between 35-40 cars parked every night, suggesting that the car park is open to new and existing residents, rendering it non-compensatory. Moreover, the lack of spaces for visitors, tradespeople and services, as well as the absence of electric charging points, further exacerbates the issue. Restrictions on parking will also negatively impact local businesses. This plan demonstrates discrimination against existing residents to accommodate the needs of residents in new houses.
- Discrimination against local existing residents of Edenfield, especially the frail and elderly by removing their parking from outside they're homes. In severe weather conditions they will now have to walk up to half a mile to get to their car.
- Removal of parking out side of shops will result in loss of trade and therefore foreclosure of these businesses.
- Guarantee spacing for existing residents either outside their homes or in new developments, whats to stop new residents of the proposed development park there once again discriminating against existing residents.

Surely a new development should fit into a small rural village, whether that be Edenfield or anywhere else in the country. Not the other way around, with Edenfield having to fit in to Taylor Wimpeys plans and to hell with everyone already settled in the village.

Surely there are more than enough reasons why this disastrous plan should be stopped for good, and the developers given more suitable land that wont destroy this beautiful village that is Edenfield.

I kindly request your acknowledgement of this objection.

I really do hope you listen to our concerns.

Regards

Morgan Edden



I should be grateful if you would take note of the following:-

1) As a member of the Edenfield Community Neighbourhood Forum management committee I have been involved in and fully support its detailed response. My own comments form the rest of this consultation response.

2) The latest Masterplan seems to fall well short of what is required to lead to either a High Quality or Well Designed development in Edenfield as required by the Local Plan. Indeed as the prefix Master would indicate main or principal it really is difficult to see how it lives up to being either Master in nature or a Plan at all. At best, it seems to include vague and incomplete proposals. Furthermore it seems to fail the criteria set out in the Local Plan of demonstrating (for site H66) "The comprehensive development of the entire site" . **For this reason alone the Masterplan as submitted should be rejected.**

3) There is really little need to read further than page 6 of the document submitted. Therein it correctly highlights two requirements of the RBC Local Plan being (i) a masterplan with an agreed programme of implementation and phasing and (ii) an agreed design code. The key word in both cases is "agreed" which requires there to be an agreement which in turn would require some solid agreed terms between two or more parties. The document submitted does not identify any parties or any agreement or any terms of any agreement. Indeed page 6 states that it provides "guidance", "themes", "principles" and "strategy" so something that might be followed but equally might not. **For this reason alone the Masterplan as submitted should be rejected.**

4) Putting aside for a moment that a "strategy" is not an "Agreement" page 6 goes on to claim that a "phasing and implementation strategy" has been produced. Page 54 sets out what are purported to be the various phases involved (1A, 1B, 2, 3, and 4) but these are just a list of various parcels of land and current owners thereof. These "phases" all have the same "key deliverables" except that each "phase" includes a different number of dwellings (broadly based on the size of land parcel involved) and each "phase" has a different vehicular access location (reflecting that each are at different locations). These "key deliverables" are not mandatory as they may be varied without restriction if "otherwise reasoned and justified" (see Box PH01 on page 54) so adopting the strategy is optional. Notwithstanding this it is claimed that it results "in ensuring that each parcel (of land) can be delivered independently without prejudicing any other" and that "the ordering of the development phases may be varied or delivered simultaneously". There is no justification for these conclusions. The key deliverables are generic and, in any event, are optional. This section of the document submitted is followed by a picture of a waste bin on page 56 which may reflect the writer's sub conscious concerns over its content! **For these reasons alone the Masterplan as submitted should be rejected.**

5) Page 8 of the document submitted states that "A Transport Assessment (TA) is provided". This Transport Assessment is not attached to the document submitted nor is there any indication as to how it

can be accessed. **This would seem, prima facie, to be reason alone for the Masterplan as submitted to be rejected or require re consultation with the Transport Assessment.**

6) Notwithstanding the above it may be that a 28 page undated document prepared by Eddisons issued for consultation with the previous version of a Masterplan entitled "Highways Consideration of Masterplan" is what is being referred on page 8 as the Transport Assessment (perhaps read in conjunction with the Market/Exchange Street proposals included on pages 46, 47 and 100 of the document submitted). If this is indeed the position the Local Plan has a requirement for a Transport Assessment "demonstrating that the site can be safely and suitably accessed" using "access points...adjacent to 5 Blackburn Road and from the field opposite 88-116 Market Street" with a requirement to "agree suitable mitigation measures". These requirements do not seem to have been fulfilled. Firstly an additional site access point has been introduced at the bottom of Exchange Street potentially causing transport/traffic issues in that area. Secondly there is no mention of safety or suitability and how or indeed whether this has been considered. Thirdly the mitigation measures mentioned on page 46 are simple a list of measures that "could include" which are not therefore agreed and may or may not be appropriate or delivered. **For these reasons alone the Masterplan as submitted should be rejected.**

7) The proposals on pages 46 and 47 suggest considerable additional areas of restricted parking on Burnley Road, Blackburn Road, Market Street and Exchange Street with limited replacement parking in three parking areas (two of which are somewhat remote from the on street parking lost). I cannot see any appraisal of why these proposals have been put forward or why/how the replacement parking will operate satisfactorily for existing residents who will lose access to on street parking. As existing residents will suffer significant adverse effects with these proposals it would be expected far more information would be supplied to justify the proposals put forward. **For this reason the Masterplan as submitted should be rejected. More generally any traffic/transport proposals (either those now put forward or revised proposals) should ensure they are safe and suitable by being supported with independent Road Safety Audits on all new/revised junctions and an independent review of their impact on the whole village.**

8) Page 18 of the document submitted largely dismisses the draft Neighbourhood Plan produced by Edenfield Community Neighbourhood Forum including the draft Design Code produced independently by Aecom. Various reasons are given to justify the position taken some of which are disputed. However it is acknowledged, also on page 18, that to some extent the draft Neighbourhood Plan/Design Code is useful. In that the Neighbourhood Plan/Design code has recently been updated in particular to take account of representations made on behalf of Taylor Wimpey it seems eminently sensible for any Masterplan to take account of the revised draft Neighbourhood Plan/ Design Code now available. **The Masterplan as submitted should be amended accordingly.**

9) Page 57 onwards of the document submitted includes details of "Site Wide Codes", "Area Types", a "Summary of Codes" and a "Design Quality Checklist" all of which are important aspects of any Masterplan. However the detail supplied seems to be insufficiently prescriptive to be of any real value for inclusion in what is supposed to be a Masterplan for Edenfield. **For this reason alone the Masterplan in its current form should be rejected.**

10) Page 10 of the document submitted sets out a vision for "Land West of Market Street". Bullet point one seems to be contradictory in that it seeks an "area which architecturally reflects and compliments the positive characteristics of Edenfield" but also wants to "avoid pastiche development". Bullet point two has a vision of enhancing the public footpath network but footpaths 126 and 127 which provide vehicular access to Mushroom House, Chatterton Hey and other properties to the west (see pages 54 and 55) will also be potentially used by vehicles from the new residents on the site thereby detracting from, rather than enhancing the existing public footpath network. Bullet point three sets out a vision of creating "a network of safe and attractive public green space" but the plan on page 7 shows that the vast majority of this will be adjacent to the A56 so hardly an attractive location. The green space adjacent to Market Street will be blighted by an access road and small public car park so also not attractive. It's also unclear as to how a "network" allowing "a range of functions including pedestrian and cycle movement" between the green space areas will be achieved bearing in mind there is no indication these spaces will be in public ownership. In summary **the Masterplan's own vision appears in respect of Bullet point one appears to be flawed and in respect of Bullet points two and three does not seem to have been achieved and so the Masterplan as submitted should be rejected.**

Mervyn MacDonald

6 November 2023

Sent from my iPad

## Edenfield Village Residents Association

### Response to the recent revised Masterplan and Design Code ref. V17 for the proposed H66 Development in Edenfield

We write to object to the above document submitted by developers because it is not what it purports to be. It is not prepared by ALL the developers and therefore cannot be considered as a Masterplan for the whole of the H66 site as laid out in the Site Specific Policies included in the Local Plan.

It seems to us that Taylor Wimpey and Northstone do not want to work together to produce what is required in the Local Plan. In these circumstances it must be up to the Council to produce a Masterplan of their own. For as well as being part of the Local Plan it was one of the justifications used by the Council to remove this land from the Green Belt and of course no Planning Application should be considered until such a Plan is in place against which such applications can be examined.

As is stated in Edenfield Community Neighbourhood Forum's (ECNF) response if these two developers did not like it (the Masterplan) why did they not raise it at the Public Examination.

We find that we cannot improve on the response from ECNF to this latest proposal and so will not go into detail in this response, but suffice to say that we agree with everything they have submitted. We would add that the residents of Edenfield did not ask for this development, in fact they almost unanimously opposed it as the Council well knows so it is incumbent on the Council and developers to do everything possible to mitigate the dire effects of this scheme on the existing residents of our village.

This Association asked the Council at the meeting of full Council to approve the Local Plan if consideration of the Edenfield part of it could be deferred until the question of its effect on Traffic in the village was resolved to which we received a bland response to the effect that it would be sorted out as part of the Planning Process. Well, that is where we are now with no resolution in sight that is in any way satisfactory to the residents of Edenfield. What is proposed in this Plan has the potential to cause existing residents of our village considerable inconvenience and possible danger, leave us with houses that are completely out of keeping with existing dwellings and much more as is highlighted in ECNF's response and for those reasons should be rejected.

Paul Bradburn

Chairman, Edenfield Village Residents Association

Dear sirs,

In response to the amended TW master plan version 3.

The document still falls a long way short of fulfilling the requirements needed by the community to have this 50% population expansion feel anywhere near positive and acceptable or even thought out. It is clearly nothing more than a collection of sticking plaster solutions to an ill conceived proposal, and the massively obvious issues it throws up still don't feel planned or mitigated for even at the third attempt. Is this a tactical attempt to induce objection fatigue ?

In addition in the opinions of every single resident I've chatted about it is an overwhelming feeling that it falls well short of not just ours but your own expectations.

You wrote into your own local plan 11 points for an application to be successful. One being a master plan that covers the entirety of the village. There are omissions including a full village wide traffic survey.

Reading the last rounds objections and noting the limited changes since then - with regards LCC's highways previo expectations I am at a loss to see how they arrived at their new position. It now appears supportive of the proposal even though very minor tweaks have been made. How has this happened?

There are glaring safety issues especially around the exchange street area and I feel this issue that once of concern to LCC is now omitted?

This is unacceptable as nothing has changed to mitigate the proposal from a safety standpoint.

All proposals are geared around unfettered access to H66 with no sense of balance or improvement for the village as a whole. On the contrary it is obvious that it poses extra safety issues for pedestrians of all ages none of which are mitigated for.

I THINK AS A MINIMUM A FULL SAFETY AUDIT MUST BE COMMISSIONED. This would presumably require a full traffic survey to inform a proper assessment as what has gone before is an insult for a key road and a village that is about to grow by 50% The loss of on street parking is detrimental for the businesses of Edenfield and residents of market street. There is no balance in this proposal and the suggested additional car parks are ill placed and provide access problems for all.

In the north end of H66 - who on earth would see the loss of the community's last visible roadside Greenbelt as exceptional circumstance? When the reality is that the whole car park idea is merely a solution to a problem caused by the recent loss of Greenbelt in last huge rezoning sadly passed in the last local plan! Facilitation of a large new big junction on Blackburn rd and displaced parking is the undisguised reason. It would be crazy if that represented exceptional circumstance, especially given the levelling up planning changes.

It really would be a travesty if that was passed.

Additionally It would further encourage parents to drive the kids to school A) for convenience B) because the amount of new extra (very busy at peak) junctions caused by the proposed developments would render parents anxiety to be even higher than it already is. When it comes to road safety and exercise choice it should be known that parents worry a lot about the state of traffic on the roads and junctions kids need to cross. It is afterall a corridor village in a very busy main road. I feel our kids deserve better especially given the child obesity explosion the country faces. It would be very small minded planning if this master plan was allowed to be passed.

The TW junction appears dangerous, forcing residents to park some distance away from their homes and being forced to cross at a now complicated high used junction. This is also the route to school for a

great many pupils at our village school just 500m down the road. Where do the rights of residents not to suffer a loss of life quality come into play?

The main reason that the proposed masterplan fails is that it's incomplete. It does not deal with the Methodist (southern) end of H66.

How is the traffic to move through highfield rd or past the park and cycle track? How is it to connect to the main roads?

The information actually provided is highly problematic but the volume of basic information that's still missing but so obviously needed to form a comprehensive joined up master plan is huge and to accept it as anything like a blueprint for 50% housing growth going forward is totally unacceptable.

The area deserves better.

These proposals are potentially dangerous to pedestrians and cyclists.

Rossendale promotes itself as a cycling hub. We have a very well used cycling gateway hub in Edenfield in the form of 'the drop off cafe' we need proper provision for cyclists crossing points for our children we need cycle lanes not bottlenecks and dodgy junctions.

How can a masterplan include a car park on Greenbelt? This is a separate planning issue and RBC accepting this masterplan would presumably be a green light for this to happen.

I'm sure that is impossible due to the nature of planning law?!

Finally , as mentioned earlier the government have amended the planning requirements in recent their levelling up amendments. I would very much hope that its contents are applied to this area changing proposal.

Yours sincerely

Martin Dearden

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

Sent from my iPhone

I have lived on market st edenfield for over 60 years and fail to see how anybody would want to build so many houses in such beautiful village .but it appears they do but why you are all so concerned with pollution and vehicle imissions to have traffic lights placed where you want them would first of all grid lock our tiny village not to mention the state of the roads all ready and would certainly not help anybody's health.

John Davies

Concerned villager.

Dear Sirs

I sent an email in objection to Northstone's proposals for a car park in Edenfield at the site off Burnley Road (to the rear of Guide Court). My email is below.

I am aware that subsequently a revised application has been submitted under the above reference number and I am emailing to object. For convenience, I repeat the below points that I made to Northstone as part of the feedback to their consultation process as my primary objections. Where they require amendment / variation due to the updated position, I have done so in red below.

I have copied in my neighbour, Mr Isaac, in the event that he wishes to provide further comment by way of objection / reply. Mr Isaac – I assume you are on top of this but the deadline for a response is today.

Kind regards

Darren Gray

**From:** > \_\_\_\_\_  
**Sent:** Tuesday, February 28, 2023 10:06 PM  
**To:** '  
**Cc:** 'Nabil Isaac' < \_\_\_\_\_ >  
**Subject:** Feedback to Northstone regarding the proposed building of a car park on the land owned by Peel L&P off Burnley Road

Dear Sirs

I attended your recent consultation that took place on 11 February 2023 at Edenfield Community Centre, Exchange Street, Edenfield, BL0 0LA. I took the opportunity to speak to your representatives, who provided some further information, and, as requested, I am emailing you in order to provide some feedback regarding my views. I appreciate that some of what I express below may not be necessary at this stage and may be more suitable representations to be made in response to your planning application. However, I feel it appropriate to raise these issues now in the event that Northstone have any response to make to me in the short term and so that I may make a more informed decision as to my representations at the planning stage. For the avoidance of doubt, the position adopted below relates solely to the proposed building of a car park on the land owned by Peel L&P off Burnley Road ("the Proposal") and does not relate to the land at Blackburn Road where you propose to build 50 properties.



### Primary position

My primary position to the Proposal is that I do and will object to it for the following reasons:

(a) the land is green belt land and our local council have maintained throughout the recent process that it should stay as green belt land

(b) I have to called into question your reasons for building this car park. I asked several times at the recent meeting what Peel's / Northstone's reason is for building a car park at significant expense (estimated £1m) on land that holds potential significant value and the response that I received varied from "it's for the benefit of the community" to "we don't know" to "we'd rather not spend the money to build it". None of these make any logical or commercial sense and I suspect the reality is that Peel / Northstone wish to use this as leverage in the future to gain planning permission to build on the remainder of the land that will remain in the green belt should the Proposal succeed. This I am afraid is disingenuous. I therefore invite Peel / Northstone to set out in writing their true reasons for the Proposal so that the community can make an informed decision. Any failure to do so will draw obvious adverse inferences.

(c) I do not see a car park being of any benefit to the community as, quite frankly, Edenfield does not need a car park – it may benefit those who attend the school for two brief periods of time during the day when drop offs and pick ups take place. This as I see it is the only benefit. I am not aware that the staff at Edenfield Primary School have a problem with parking their cars and such parking is simply not required at any other times during the day. Edenfield is a sleepy village which people cycle through and walk their dogs whilst enjoying the countryside. It is not a busy town or city that requires parking so that out of towners can access shops for example. **In addition to this point, I suspect Northstone's position is that the new Masterplan necessitates a car park. With respect, the residents of Edenfield being asked to park 5 – 10 minutes away from their homes is not a solution to the problem.**

(d) the Proposal would be at the expense of the only remaining bit of green belt land that is adjacent to the road in Edenfield, and which is what the village of Edenfield is supposed to represent, ie the countryside

(e) I believe that a car park on a busy road will only add to rather than take away from existing road infrastructure issues, which has the precise opposite effect of what I would assume the Proposal is intended to convey and (f) the Proposal will create light, noise and air pollution issues, and may lead to "anti-social" behaviour as an area for youngsters to congregate late at night. **In particular, I remain concerned at significant light pollution that will be necessitated by the creation of a car park. Not only will this not be in keeping with the look of Edenfield generally, but also it will create light pollution directly into my home that overlooks any car park. This would create an actionable nuisance. I make this comment again below.**

### **Secondary position**

As outlined, the above is and will be my primary position. However, I shall use the consultation process as intended and should the Proposal succeed then I will say as follows:

(g) the finalised Proposal needs to be done in a way that is in keeping with the council's view that the land is the "gateway to Edenfield", so as much as possible there must be a significant amount that remains green land. It will therefore need:

- a lot of trees / bushes planting (more than that presently proposed),
- the bushes must block our view of the car park (we reside at 1 Guide Court) but maintain our view of the field that will stay behind and the hills behind,
- it must not only preserve but contribute to existing wildlife such as birds, bats and other animals that have habitats in the area.
- there should be several electric charge points,
- you must consult directly with us in relation to any building works to ensure that a nuisance actionable at common law is not created. For the avoidance of doubt, should this proposal proceed I reserve the right to take action for any nuisance actionable at common law. What I am inevitably keen to avoid is any work undertaken having a significant adverse impact on the value of our property.

(h) there should be no lights as any lights will create a nuisance directly into our bedroom window (note – you have denoted windows with blue arrows on your proposed plans for 2 and 3 Guide Court but not for 1 Guide Court – our bedroom window, lounge windows and dining room windows all look out onto the existing fields, which was how and why the house was designed this way)

(i) has Peel / Northstone considered moving the car park to the opposite end of the field, ie away from the rear of Guide Court? I ask as the proposed entrance to the car park is very close to the traffic light system which it is noted has not been proposed to move. As outlined at (e) above, I believe the current plans will result in an adverse outcome for traffic in the area rather than act as a benefit but by moving the car park, and therefore the entrance, I think the extent of the adverse impact would be lessened. I appreciate that this makes it more difficult to gain access to Edenfield Primary School, which appears to be the primary driver for the Proposal, but it is still safe to access the school by foot and the distance is not significant.

(j) as a further alternative, has Peel / Northstone considered not building a car park / drop off zone at all, simply adding a path or concrete route that is surrounded by green belt land (rather than building an entire car park plot), meaning the land and make up of the land is largely preserved and sheep remain free to wander across the land, ie the land doesn't become a car park, but becomes a strip of concrete in the middle of the green belt. To me, if a drop off area is considered by the community to be needed, then this is a fair compromise that enables 99% of the green belt land and the animals wandering freely around the land to be preserved. I think my point really is if you are intent on doing this then why not think outside the box and create something new and that would be of genuine benefit to the

community, something that people would talk about and not from round here, rather than simply creating something either for your own benefit or that bluntly is a large plot of concrete on the only remaining bit of green belt land that is adjacent to the main road and that represents what would be the remaining soul of Edenfield.

#### **Response to questions on your feedback form**

In answer to the specific questions you raised on your feedback form for completeness (my answers in red for ease):

- (1) Do you support Northstone's vision for Edenfield?  
**No**
- (2) What sizes of property do you think are required locally?  
**4-5 bedroom, if at all**
- (3) Which of these sustainable features are most important to you?  
**Community parks, green space and play space and wildlife corridors**
- (4) Do you welcome Northstone's proposals for a new Community Car Park?  
**No**
- (5) Northstone's proposals commit to the delivery of new Public Open Space (POS). What community benefits would you like to see delivered here?  
**All of them. I fully support the development of a recreational and nature based area that would benefit the school. Insofar as the community is concerned I note that you propose a play area in the development on Blackburn Road and I believe Taylor Wimpey have also proposed the same. I am sure any other developers will also propose the same and we would go from having no parks to several parks very quickly. There is a risk of overkill in the community in this regard.**

I have copied my neighbour, Nabil Isaac, who resides at [REDACTED] into this reply. I am sure that Nabil will express his own views in reply to this email.

I look forward to hearing from you.

Kind regards

Darren Gray

Dear planning

I submitted an objected to the edenfield development this afternoon 6/11/23.

I don't know whether wether I should have included my address. It is

Jane Hartley Jacques

[REDACTED]

On Mon, 6 Nov 2023, 15:29 , [REDACTED] wrote:

Dear Rossendale Planning

I would Like to object to the proposed housing developments in Edenfield, Lancashire.

H66, land to the west of Market St.

Land at the bottom of Exchange St.

Land of Blackburn Rd

Land at Alderwood.

I note that there is a specification for affordable housing in the builds but would ask at what price will that cost, and will that make them affordable to people on local average wages? Will it do anything to help Rossendale people get on the housing ladder?

I object to the developments as there is still no overall masterplan, as requested by the Planning Inspector and LCC. The plan therefore fails at the first hurdle.

There is no phasing as building, as requested. It would be highly detrimental to the resident Edenfield population not to phase the build.

The roads of Edenfield are congested, the roads were not built for modern traffic.

Bury Rd is always double parked and can only allow single line traffic through at a time. Rostrons Roundabout is often busy.

The road measures to help traffic suggested by the developers are unhelpful.

Double yellow lines will inconvenience Exchange st residents, with an alternative car park at the bottom of the proposed development. This is much to far to walk for the elderly, those with mobility issues, in the dark etc.

The bus stop at Pilgrim Gardens is to be moved. Where to? There is a limit where bus stops can be moved to, other wise it will be too near the previous or next stop. I write as a mobility impaired bus user who uses this stop at times. Please don't inconvenience me or other bus users.

The car park off Burnley Rd was not on the proposed original submission for green belt removal. It is a land grab of green belt, and I object strongly to this.

It was proposed , I think by Rossendale that all pavements through Edenfield should be 2meters wide. This is contradicted by the developers plan for parking bays outside some houses. I strongly support the 2 meter pavement plan.

The developers seem to have no answer to flood issues.

The developers environmental plans seem weak

I understand that there may be no need to build an extension to local schools as Ballenden school could be used. There is no direct bus from Edenfield to Ballenden.

Every 30 mins to Rawtenstall

Every hour Rawtenstall to Ballenden

Up a steep hill from Bury Rd up Lomas Lane.

If no car this is not a doable journey x2 daily.

I am not affected, but I think it is important.

Yours faithfully

Jane Hartley Jacques

With reference the above:

Current residents are still being ignored throughout. There is no traffic plan other than to remove current residents' rights to park their vehicles in front of their own property and to try to send a large proportion of vehicles along a narrow residential street which is already problematic to drive along - to use Highfield Road and Eden Avenue as an ingress and egress onto the site will result in road traffic accidents as these roads are not designed to be 'through-roads'. The brief traffic survey that noted these roads had 'capacity' is incorrect as, if someone took the time to visit and try to drive along these roads, they would see that only residents use them and LGV's would not get along these without causing damage to resident's vehicles (they cannot turn left onto Exchange Street and are unlikely to drive to Rawtenstall or Haslingden to do a 'U-turn' so it's highly expected that they will try to use these narrow streets).

The two large SUDS / ponds which are proposed have no details as to their size, maintenance, responsibility and safety. The largest is to be placed close to the A56 dual-carriageway with obvious consequences when it overflows. This plus the obvious danger to children etc. of large bodies of unsecured water are the main concerns. The land that is being built on, during moderate and heavy rain, is often flooded but would spill out to neighbouring properties if it wasn't for the fact that it is grass and soil and so is absorbed. When this is concreted over, not only will the new properties become a flood risk but so will neighbouring / pre-existing properties in addition to the A56.

In summation, we totally reject this amended Masterplan as it is severely flawed and still incomplete despite being the third attempt in 12 months.

Peter and Christine Ash

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

I would like to register my objections to the above.

The comments that I made regarding the previous version still stand.

Additional comments:-

Issues raised in the first report have not been pursued in the second report.

The traffic/transport proposals are very similar to the previous proposals, which were completely unsatisfactory.

Concerns raised previously by Edenfield Community Neighbourhood Forum and residents regarding parking, volume of traffic, and safety, expressed many times, have been ignored.

No apparent consideration of the traffic assessment undertaken by ECNF.

LCC expressed support of Market Street and Exchange Street proposals without a full traffic assessment for the H66 site.

One way system Exchange Street - no consideration of effect on adjoining roads and junctions, safety concerns of children accessing the play area, recreation ground and pump track.

The proposed compensatory car parking for those losing Street parking is not compensatory as it is not open to all to use. Some of this is proposed to be put on our remaining green belt and very far away from residents' homes. There is also no plan for phasing parking changes.

I must request that a road safety audit is undertaken. The lives of road users and pedestrians are being put at risk by this plan.

I have concerns about the design proposals. No information has been provided as to how any building work would be staggered, indeed page 52 suggests that all construction work could be carried out simultaneously by 5 separate developers.

I would also request that amendments in the Levelling Up Bill, now enshrined in law, are applied to this submission. Particularly by delivering homes in a way that works for communities by making it easier to put local plans in place and requiring design codes that set out where homes will be built and how they will look. Also requiring developers to deliver vital infrastructure.

Regards

Elizabeth Latham

██████████

██████████



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Regards

Trevor Latham

██████████

██████████

I write concerning the latest proposed H66 master plan and design code submitted by Taylor Wimpey re the building of 450 new houses in Edenfield.

As I know nothing about urban planning law I cannot raise an objection on the legality of the latest proposals by Taylor Wimpey and the other builders represented in the H66 masterplan.

However, I can object on the grounds of common sense to the proposals affecting the throughput of the extra traffic this will generate and the adverse effect these will have on the local residents.

To cater for the extra traffic the proposal is to basically make Market Street a no parking zone and to alleviate this by providing a carpark approximately a third of a mile away from the nearest shops, I presume that those who live on Market Street will be expected to no longer park outside their house but to walk with their shopping and possibly children the two or three hundred yards to their front door, not to mention the problems the elderly could have making this trip. Who comes up with these brainless ideas?

To provide access to one of the sights the proposal is to make Exchange Street one-way so that contractors can get their heavy building equipment on-site, this will take them immediately by a children's play area on one side and a recently built children's cycling area on the other, how many children have to be killed or injured before this is deemed not a good idea. Also, this means that by making Exchange Street one way means that all the heavy traffic travelling back will have to travel through a residential estate with cars parked and children playing, perhaps they want double yellow lines here as well.

I could go on but as I said common sense should prevail when this ridiculous scheme is looked at by Rossendale Planners.

J. Quintin Crossley. [REDACTED]



6 November 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 (September 2023 version)**

The above document may well be a new version but in essence very few if any of the key concerns in the former version have been addressed in this latest iteration.

In consequence we are bound to say the Masterplan now produced should be rejected on the basis that the concerns we set out in our letter dated 24<sup>th</sup> July 2023 have either not been considered at all or considered in such a cursory way as to offer no acceptable or demonstrably working solutions.

In summary we believe the objections raised in our 24<sup>th</sup> July letter are as valid today as they were then. For the sake of good order we have not reproduced the full text of this letter but do feel it is appropriate to reproduce some of the more salient issues as set out below.

***Further general points:***

- 1. There is still no agreed comprehensive Masterplan for the whole site and even though a revised version has been produced it substantially relates to the Taylor Wimpey site whereas the Masterplan should be a collective document involving RBC and all four developers.*
- 2. Flood risks overall are a known issue along with the specific concerns from National Highways about the A56. These cannot be ignored put perhaps what is equally significant is that it is also possible that the matters raised by National Highways are*

*not capable of being resolved. Allied to the above is the proposed SUDS location being too near to the A56 posing a further serious road safety concern.*

- 3. The infrastructure required for such a major development as this is still being substantially ignored especially in terms of schools and healthcare.*
- 4. Design codes as detailed in the Neighbourhood Plan produced by ECNF and referred to positively in the Places Matter Design Review report are given very limited consideration whereas they are very much a key issue in this development.*
- 5. The importance of the above is enforced when looking at the Taylor Wimpey development and observing that it is both cramped as well as being lacking in green spaces/landscaped areas thereby ignoring the recommendations in the Places Matter Design Review report.*
- 6. The Market Street mitigation measures that include double yellow lines and new junctions across the North, Central and South of Edenfield pose serious traffic, cycle and pedestrian safety concerns.*
- 7. There is no traffic assessment for the whole site and no road safety audit despite previous recommendations.*
- 8. The mitigation measures noted above and in particular the increases in parking restrictions will have a negative effect on the local businesses and consequently the local economy. The most significant of these will be the resultant decreased footfall potentially giving rise to business closures and loss of livelihood.*

#### **Exchange Street Area and associated Safety Concerns**

- 1. The lower reaches of Exchange Street are bordered by a Play Area on one side and a Recreation Ground on the other along with a new Cycle Pump Track. The existence of the above facilities necessarily means the area is regularly used by children both on foot and riding pedal cycles not to mention other pedestrians such as dog walkers etc.*
- 2. These aspects alone should be sufficient to make the case that any proposed increase in traffic here is just not realistic, safe or sensible and really would be an accident waiting to happen.*
- 3. The proposal to make the street one way with double yellow lines in some parts could make the situation even worse in that traffic would be capable of going faster. Enforcement measures and calming schemes are not likely to satisfactorily resolve matters.*
- 4. The street is used for car parking by both residents and those who are working at or who are customers of the local shops - where will they go?*
- 5. The left turn into the street from Market Street is blind which considerably compromises safety aspects further exacerbated by double yellow lines and narrow footpaths.*
- 6. The proposed changes to Exchange Street will also considerably impact on The Drive – Highfield Road and Eden Avenue creating significant safety issues throughout the*

*area. These are all main access routes to the facilities for those persons noted in 1 above further compounding the safety issues.*

- 7. It appears to me that no proposals could come close to creating an environment that would produce the required degree of safety for those using the area.*
- 8. In consequence I am bound to say that any proposal to utilise any of the above routes for access to either the Anwyl site or the Taylor Wimpey site is on safety grounds alone just not feasible and must be rejected at all costs.*

Other matters that we consider as being significant are set out below:-

- It seems that many of the issues raised by LCC Highways in their letter of 24<sup>th</sup> February 2023 are not being pursued – why is this?
- It equally seems that concerns especially in respect of parking and volumes of traffic as well as safety issues raised by the ECNF and residents have been ignored.
- There appears to be no apparent consideration of the traffic assessment undertaken by ECNF.
- Parking concerns of current residents have been ignored or inadequately addressed.

#### **Letter from LCC to RBC dated 25<sup>th</sup> August 2023**

In the above letter it is noted that whilst LCC acknowledge some areas of concern have been addressed some concerns still remain.

Whilst we do not necessarily agree with the LCC findings that some concerns have been addressed that is the position that unfortunately remains.

That said we must turn our thoughts to those remaining issues and whilst they are not reproduced here it is our view that the Masterplan cannot be accepted until the remaining LCC concerns have been adequately and fully addressed.

It is also our view that any suggestion that some issues can be dealt with as “matters progress” does not equate to matters having been “adequately and fully addressed.”

#### **Section of the Masterplan in connection with Phasing**

Whilst this section purports to detail phasing it offers little more than phasing identification numbers viz: 1A, 1B, 2, 3, and 4.

Accordingly it is as equally unhelpful and uninformative as was the previous version of the Masterplan.

No information has been provided in respect of how the building work will be staggered and indeed there is some suggestion that all five separate developments could proceed simultaneously.

The aspect of phasing is such a material issue that it should include clear information on timeframes for each of the developments and the relevant triggers for each.

The lack of any basic information on these matters must in our view mean that the Masterplan does not fulfil its purpose on yet another issue which is an additional reason as to why it should be rejected.

Ultimately we feel that the lives of road users and pedestrians are being put at risk in the haste for this development to proceed and if there is one singular issue that is of paramount importance then the issue of lives must very much meet this criterion.

Based on the above we are firmly of the view that this revised version of the Masterplan remains inadequate at many levels and must 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) and any of its representatives along with those of the Edenfield Local History Society.

Yours faithfully

David Fisher and Sandra Fisher

Dear Sirs

This email is my feedback to the developers and I am happy for it to be included in their on-line consultation documentation to be made public.

My position remains the same with regards to the revised application made by Northstone for building a new community car park in Edenfield, off Burnley Road, at the back of our residential home [REDACTED]. I already sent to you an email on 1 March 2023 in response to their first application, and I reiterate my position of objection for this development to go ahead.

I agree will all the mentioned points that were raised by my neighbour Darren Gray - as outlined below - and I maintain the same primary and secondary positions. I object to this development to go ahead because of the clear negative impact on Edenfield village and it's direct view of the countryside. The land on which the car park is proposed is a green belt land and it should remain a green belt land, as decided already by our local council, for all the reasons outline in Mr Gray's email.

#### **Response to questions on your feedback form**

In answer to the specific questions you raised on your feedback form:

1. Do you support Northstone's vision for Edenfield?

No

2. What sizes of property do you think are required locally?

3-4 bedrooms

3. Which of these sustainable features are most important to you?

Community parks, green space and wildlife corridors

4. Do you welcome Northstone's proposals for a new Community Car Park?

No

5. Northstone's proposals commit to the delivery of new Public Open Space (POS). What community benefits would you like to see delivered here?



I support the development of new recreational and nature based areas in Edenfield, but not in this plot of green belt land just off the main road in Edenfield. It is not appropriate as it will kill any direct views to the natural greenery and wild life from the main road. Every day walking along the road with my family has been a great joy which will be lost forever. This was one of the reasons I decided to purchase my house to live in Edenfield without the need to make our family recreational walks through muddy country public walks.

Kind Regards

Nabil Isaac

3 Guide Court, Edenfield, Bury BL0 0GL

e-Mail communication (preferred method): \_\_\_\_\_

On 6 Nov 2023, at 15:10, <> wrote: \_\_\_\_\_

Dear Sirs

I sent an email in objection to Northstone's proposals for a car park in Edenfield at the site off Burnley Road (to the rear of Guide Court). My email is below.

I am aware that subsequently a revised application has been submitted under the above reference number and I am emailing to object. For convenience, I repeat the below points that I made to Northstone as part of the feedback to their consultation process as my primary objections. Where they require amendment / variation due to the updated position, I have done so in red below.

I have copied in my neighbour, Mr Isaac, in the event that he wishes to provide further comment by way of objection / reply. Mr Isaac – I assume you are on top of this but the deadline for a response is today.

Kind regards

Darren Gray

**From:** \_\_\_\_\_  
**Sent:** Tuesday, February 28, 2023 10:06 PM  
**To:** '**\_\_\_\_\_**'  
**Cc:** 'Nabil Isaac' <\_\_\_\_\_>  
**Subject:** Feedback to Northstone regarding the proposed building of a car park on the land owned by Peel L&P off Burnley Road

Dear Sirs

I attended your recent consultation that took place on 11 February 2023 at Edenfield Community Centre, Exchange Street, Edenfield, BL0 0LA. I took the opportunity to speak to your representatives, who provided some further information, and, as requested, I am emailing you in order to provide some feedback regarding my views. I appreciate that some of what I express below may not be necessary at this stage and may be more suitable representations to be made in response to your planning application. However, I feel it appropriate to raise these issues now in the event that Northstone have any response to make to me in the short term and so that I may make a more informed decision as to my representations at the planning stage. For the avoidance of doubt, the position adopted below relates solely to the proposed building of a car park on the land owned by Peel L&P off Burnley Road ("the Proposal") and does not relate to the land at Blackburn Road where you propose to build 50 properties.

**Primary position**

My primary position to the Proposal is that I do and will object to it for the following reasons:

(a) the land is green belt land and our local council have maintained throughout the recent process that it should stay as green belt land

(b) I have to called into question your reasons for building this car park. I asked several times at the recent meeting what Peel's / Northstone's reason is for building a car park at significant expense (estimated £1m) on land that holds potential significant value and the response that I received varied from "it's for the benefit of the community" to "we don't know" to "we'd rather not spend the money to build it". None of these make any logical or commercial sense and I suspect the reality is that Peel / Northstone wish to use this as leverage in the future to gain planning permission to build on the remainder of the land that will remain in the green belt should the Proposal succeed. This I am afraid is disingenuous. I therefore invite Peel / Northstone to set out in writing their true reasons for the Proposal so that the community can make an informed decision. Any failure to do so will draw obvious adverse inferences.

(c) I do not see a car park being of any benefit to the community as, quite frankly, Edenfield does not need a car park – it may benefit those who attend the school for two brief periods of time during the day

when drop offs and pick ups take place. This as I see it is the only benefit. I am not aware that the staff at Edenfield Primary School have a problem with parking their cars and such parking is simply not required at any other times during the day. Edenfield is a sleepy village which people cycle through and walk their dogs whilst enjoying the countryside. It is not a busy town or city that requires parking so that out of towners can access shops for example. **In addition to this point, I suspect Northstone's position is that the new Masterplan necessitates a car park. With respect, the residents of Edenfield being asked to park 5 – 10 minutes away from their homes is not a solution to the problem.**

(d) the Proposal would be at the expense of the only remaining bit of green belt land that is adjacent to the road in Edenfield, and which is what the village of Edenfield is supposed to represent, ie the countryside

(e) I believe that a car park on a busy road will only add to rather than take away from existing road infrastructure issues, which has the precise opposite effect of what I would assume the Proposal is intended to convey and (f) the Proposal will create light, noise and air pollution issues, and may lead to "anti-social" behaviour as an area for youngsters to congregate late at night. **In particular, I remain concerned at significant light pollution that will be necessitated by the creation of a car park. Not only will this not be in keeping with the look of Edenfield generally, but also it will create light pollution directly into my home that overlooks any car park. This would create an actionable nuisance. I make this comment again below.**

### **Secondary position**

As outlined, the above is and will be my primary position. However, I shall use the consultation process as intended and should the Proposal succeed then I will say as follows:

(g) the finalised Proposal needs to be done in a way that is in keeping with the council's view that the land is the "gateway to Edenfield", so as much as possible there must be a significant amount that remains green land. It will therefore need:

- a lot of trees / bushes planting (more than that presently proposed),
  - the bushes must block our view of the car park (we reside at 1 Guide Court) but maintain our view of the field that will stay behind and the hills behind,
  - it must not only preserve but contribute to existing wildlife such as birds, bats and other animals that have habitats in the area.
  - there should be several electric charge points,
- you must consult directly with us in relation to any building works to ensure that a nuisance actionable at common law is not created. For the avoidance of doubt, should this proposal proceed I reserve the right to take action for any nuisance actionable at common law. What I am inevitably keen to avoid is any work undertaken having a significant adverse impact on the value of our property.

(h) there should be no lights as any lights will create a nuisance directly into our bedroom window (note – you have denoted windows with blue arrows on your proposed plans for 2 and 3 Guide Court but not for 1 Guide Court – our bedroom window, lounge windows and dining room windows all look out onto the existing fields, which was how and why the house was designed this way)

(i) has Peel / Northstone considered moving the car park to the opposite end of the field, ie away from the rear of Guide Court? I ask as the proposed entrance to the car park is very close to the traffic light system which it is noted has not been proposed to move. As outlined at (e) above, I believe the current plans will result in an adverse outcome for traffic in the area rather than act as a benefit but by moving the car park, and therefore the entrance, I think the extent of the adverse impact would be lessened. I appreciate that this makes it more difficult to gain access to Edenfield Primary School, which appears to be the primary driver for the Proposal, but it is still safe to access the school by foot and the distance is not significant.

(j) as a further alternative, has Peel / Northstone considered not building a car park / drop off zone at all, simply adding a path or concrete route that is surrounded by green belt land (rather than building an entire car park plot), meaning the land and make up of the land is largely preserved and sheep remain free to wander across the land, ie the land doesn't become a car park, but becomes a strip of concrete in the middle of the green belt. To me, if a drop off area is considered by the community to be needed, then this is a fair compromise that enables 99% of the green belt land and the animals wandering freely around the land to be preserved. I think my point really is if you are intent on doing this then why not think outside the box and create something new and that would be of genuine benefit to the community, something that people would talk about and not from round here, rather than simply creating something either for your own benefit or that bluntly is a large plot of concrete on the only remaining bit of green belt land that is adjacent to the main road and that represents what would be the remaining soul of Edenfield.

#### **Response to questions on your feedback form**

In answer to the specific questions you raised on your feedback form for completeness (my answers in red for ease):

1. Do you support Northstone's vision for Edenfield?  
**No**
2. What sizes of property do you think are required locally?  
**4-5 bedroom, if at all**
3. Which of these sustainable features are most important to you?  
**Community parks, green space and play space and wildlife corridors**
4. Do you welcome Northstone's proposals for a new Community Car Park?  
**No**
5. Northstone's proposals commit to the delivery of new Public Open Space (POS). What community benefits would you like to see delivered here?

All of them. I fully support the development of a recreational and nature based area that would benefit the school. Insofar as the community is concerned I note that you propose a play area in the development on Blackburn Road and I believe Taylor Wimpey have also proposed the same. I am sure any other developers will also propose the same and we would go from having no parks to several parks very quickly. There is a risk of overkill in the community in this regard.

I have copied my neighbour, Nabil Isaac, who resides at [REDACTED] into this reply. I am sure that Nabil will express his own views in reply to this email.

I look forward to hearing from you.

Kind regards

Darren Gray

As a resident of Market Street, and a long-term resident of Edenfield, I would like to submit my objection once more to the planned housing development Land West of Market St. Edenfield (H66).

The objections previously raised on many occasions have not been adequately addressed. The damage the proposed development will cause to the village is unwarranted. The plans do not consider the needs of current residents; the concern is purely for the developers to make as much money as possible.

[REDACTED]

Further, I am not the only local resident who will be affected; there are many older people in my terrace, and living in the vicinity, who are likely to develop mobility issues in coming years and who will need to be able to easily access personal vehicles.

**Safety:** The planned changes to Market Street represent clear and present danger, not only to the older residents, but also to those with young families. With the proximity of Edenfield primary school, as well as families residing on Market Street, children, along with vulnerable road users such as cyclists, will be put at risk by the planned developments. I am aware that a road safety audit has been recognised as a necessary part of considerations, yet no action has been taken to provide this. The proposed junctions are unsafe, with poor visibility and limited safe crossing.

**Traffic and pollution:** Market Street can already suffer heavy traffic, and is a key route for large agricultural vehicles. The 'choke' points at both ends of the street can be difficult to progress through now, even during non rush-hour periods. The planned housing development, combined with other local housing developments in Edenfield and Shuttleworth, would bring approximately 1000 more cars through the village per day. It is simply not feasible for Market Street to absorb this additional level of traffic. Additionally, the additional level of traffic would create intolerable levels of pollution, known to exacerbate risk of respiratory mortality (Doiron et al., 2019).

**Parking:** The proposed parking solution for Market Street is not fit for purpose. I have lived on Market Street for three years, and on a typical day there are around 35 cars parked on areas of the road which would be marked with double yellow lines. Where do the developers imagine Market Street residents will park? How will we progress home improvements, when tradespeople will be unable to park in front of our properties? How will we take shopping into our homes, especially those of us who face reduced functioning as we age? How will parents get their young children safely home?

The above points, in addition to concerns about further release of greenbelt land, heightened flood risk, and impact on local businesses must be taken into consideration. The proposed developments infringe my (and other residents') human rights.

Best wishes,

Dr Sue Bellass, [REDACTED]

Housing Allocation H66 (Edenfield) - Revised Masterplan & Design Codes Consultation.

The application site is located nearby the Grade II\* listed Edenfield Parish Church, and is also adjacent to three non-designated heritage assets. This includes Chatterton Hey House (Heaton House), Mushroom House and the Old Vicarage. NDHAs are identified as being buildings, monuments, sites, places, areas or landscapes identified by plan-making bodies as having a degree of heritage significance meriting consideration in planning decisions but which do not meet the criteria for designated heritage assets.

The revised Masterplan shows that the tree cover will be retained around the Grade II\* listed Edenfield Parish Church and Chatterton Hey, as well as the mature garden at Mushroom House. Tree cover will also be retained to the south of the former Vicarage, creating separation between the non-designated heritage asset and the proposed development.

There have been no notable alterations to the proposed scheme within the setting of the Grade II\* listed Edenfield Parish Church or the NDHAs. Overall, I feel that the plans will have a limited impact on the setting of the NDHAs and on the Grade II\* listed Church. The previous comments (submitted 24/01/23) can be referred to in regard to the general impact of the overall scheme. Again, I feel that the proposed scheme will likely cause only negligible levels of harm to the heritage assets discussed above. Whilst the new housing and associated works will likely be seen in the setting of each of the heritage assets, this is largely mitigated by screening from existing or proposed trees and the distance/space between the assets and the proposed dwellings. As such the proposal meets the objectives of Chapter 16 of the NPPF and accords with the policies of the Local Plan.

Kind regards,

**Olivia Birks**  
**Heritage and Conservation Advisor**  
**Growth Lancashire**

[Redacted signature block]

W: [www.growthlancashire.co.uk](http://www.growthlancashire.co.uk)

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Good evening,

I write in respect of the Edenfield Masterplan: Planning Application 2023/0396

I'm truly saddened that yet another application has been put in without, it would appear, any consideration of the concerns of residents. The proposed "Highway improvement measures" following the "traffic assessment" - firstly, I cannot fathom how anyone can possibly accept these measures as an improvement - I was utterly shocked to see that their idea of an improvement was just as obnoxious as discovering that 400+ houses (in total) were indeed regarded a good idea for this small village.

It's as if these people have never visited this village.

Restrictions to parking outside the shops for the entire hours most of these shops are open? - It's not rocket science to know that is detrimental to these businesses. Also, what about the residents that live on Market Street? Oh, they want to build a car park to help with parking... at the other end of the village and on the only roadside greenbelt field that would be left!! On that note, has anyone looked at that field when it rains? The water that comes from the hills behind is already a huge issue to the residents of Burnley Road and can be witnessed on that field where streams develop from the enormity of the volume of water.. which then floods the roads and completely overwhelms the inadequate drainage.

The traffic that these building proposals would cause for present residents and those that purchase these homes is beyond unacceptable. It will be gridlock throughout the village with an impact on surrounding areas - Rossendale and Ramsbottom do not need further traffic problems! Creating a car park next to the school does not assist with the traffic right in front of the school where 3 major roads meet.

How has this been allowed to happen? How has it already gotten this far? There are so many brownfield areas with good potential across the valley, and yet here we are, fighting to keep a horrendous amount of houses not just in a small village that will irreparably and immeasurably destroy this village, but the entire plan on greenbelt land.

When you look at that map of Edenfield with the area highlighted in red of the full building area proposal.. it's simply shocking.

I pray that common sense prevails, quickly, and the magnitude of this disastrous build is diminished. The people and wildlife of Edenfield, and surrounding areas deserve better.

Regards,

Donna Cryer

## Edenfield Community Neighbourhood Forum

### H66 Land West of Market Street, Edenfield

#### Masterplan / Design Code (Version V17 - Randall Thorp - September 2023)

### Representations

#### 1. Interpretation, Summary Reasons for Rejection and Background

##### 1.1 Interpretation, abbreviations and definitions

in these representations, extracts of Policies and Strategic Policies and their Explanation in the Local Plan are coloured blue, and expressions and abbreviations have the following meanings -

Section or paragraph number followed by 'above' or 'below' - a Section or paragraph of these representations, unless otherwise apparent from context

application - planning application reference 2022/0451 submitted to RBC on behalf of TW for the construction of 238 dwellings in the central portion of H66

CE PS - Church of England Primary School

DAS - Design and Access Statement submitted with the application

dph - dwellings per hectare

ECNF - Edenfield Community Neighbourhood Forum

Executive Summary - Executive Summary in the MDC (unnumbered page 08, continued on page 09)

H66 - the site allocated for housing by the Local Plan under reference H66 Land West of Market Street, Edenfield

ha - hectares

LAP - local area of play

LCC - Lancashire County Council

LLFA - Lead Local Flood Authority

Local Plan - the Rossendale Local Plan adopted by RBC on 15 December 2021

MDC - the Masterplan and Design Code dated September 2023 (Version V17) and presented by Randall Thorp that is the subject of consultation and these representations

NPPF - National Planning Policy Framework (September 2023)

page, with a number - unless otherwise stated, a page of the MDC

Planning Statement - Planning Statement (Including Heads of Terms, Waste Management Strategy and Affordable Housing & Parking Provision Statements) submitted in 2022 with the application

Policy - a Policy of the Local Plan

PPG - Planning Practice Guidance, promulgated by the Government

PROW - Public right(s) of way

RBC - Rossendale Borough Council

SCI - Statement of Community Involvement, dated July 2022 and submitted with the application

SHLAA - Strategic Housing Land Availability Assessment

SK - SK Transport Planning Limited

SPD - Supplementary Planning Document

SSP - the site-specific policy in the Local Plan for H66

Strategic Policy - a Strategic Policy of the Local Plan

SUDS - Sustainable Drainage System(s)

TRO - traffic regulation order

TW - Taylor Wimpey

unnumbered page - page of the MDC, the number of which is not shown and has to be reckoned by reference to one or more adjacent pages

## **1.2 Summary Reasons to Reject the MDC**

a) The MDC cannot be assumed to apply to the whole of site H66, as the SSP contemplates, because it is questionable whether all the site owners were involved in its preparation, and because the MDC does not state on whose behalf it was prepared or which owners support it (paragraphs 1.3.8, 3.1.2 to 3.1.6, 10.9.4 and 12.4.2 below).

b) Contrary to its bogus claim, the MDC is not accompanied by an agreed, or any, programme of implementation and phasing and therefore does not comply with the SSP. Nor is there an infrastructure delivery schedule. See paragraphs 3.2.1 to 3.2.10 and 3.3.2 below;

c) The design code in the MDC is riddled with errors and inadequate (see Sections 3.3 and 13 to 15 below);

d) MDC accords insufficient weight to the Design Code in the emerging Neighbourhood Plan, which should be the basis for the design and layout of H66 and an updated version of which is submitted alongside these representations (Section 5 below);

e) The comprehensive development of the entire site has not been demonstrated and in particular (paragraph 2.8 below) there is -

- no planned highway network for the whole site,
  - no clarity about drainage arrangements for the whole site,
  - no overall provision for landscaping and open space, and
  - no assessment of required developer contributions;
- f) RBC must insist on a comprehensive masterplan and design code for the whole site, as it is a policy requirement of the Local Plan (paragraph 2.2 below) and because the opportunity for a masterplan was a reason for removing H66 from the Green Belt (paragraph 2.1 below);
- g) MDC mistakes the availability outside H66 of FP126 and FP127 for cycling (paragraphs 12.2 and 12.3 below);
- h) MDC does not accord with national planning policy or with planning practice guidance (Section 6 below);
- i) MDC content is inadequate or incorrect in:
- its Vision (paragraph 7.3 below),
  - its assessment of visual context (Section 7.4 below),
  - not acknowledging the existing defined and defensible Green Belt boundary and showing it in the wrong place (paragraphs 7.1 and 7.2 below),
  - lack of site-wide ecological assessment (paragraph 7.6 below),
  - not requiring the removal of a large mound of spoil (paragraph 7.5 below),
  - Code MP 01 (paragraph 7.7 below)
  - Code US 01 and failure to provide for self-build/custom-built dwellings (paragraph 7.8 below)
  - provision for ridge height (paragraphs 7.9 and 14.15 below),
  - failing to promote suitable levels of internal daylight and privacy (paragraph 7.11 below)
  - failing clearly to identify and distinguish between public and private rights of way (paragraphs 8.5 to 8.10 below),
  - proposing estate roads of less than adoption standard (paragraph 8.4 below),
  - describing the street hierarchy and emergency access (paragraphs 8.1 to 8.3, 8.12.1 to 8.12.3 and 8.13 below),
  - proposing access to development at Alderwood by the existing driveway to the bungalow (paragraph 8.11 below), and
  - forbidding essential and/or desirable removal of vegetation (paragraph 13.1 below)
- j) MDC does not protect the drystone walls along the Market Street boundary and the boundary with 5-8 Alderwood Grove (paragraphs 9.1.1 and 9.1.2 below);
- k) MDC disregards the SSP by failing to specify landscaping throughout the site, including the interface with existing dwellings (paragraph 9.2 below);
- l) Proposed off-site car park and LAP are unacceptable as they -
- involve loss of street parking,
  - the need for parking/set down/pick up facilities has been exaggerated and not evidentially demonstrated,
  - the proposed parking/set down/pick up facilities would not encourage active travel,
  - involve encroachment into Green Belt, which should have been raised and considered during the Local Plan process,
  - present danger to traffic and pedestrians, insufficiently addressed in the Highways Consideration of Masterplan Note and Market Street Corridor Improvement Plan,
  - are in a location that does not meet accepted LAP criteria,
  - are not accompanied by information about their dimensions, surfacing, drainage, lighting and maintenance, and
  - cannot be assumed to receive planning permission.

Any such facilities must be contained within H66 and provided at nil cost to RBC and the community. The MDC must be rejected if these proposals are not deleted (see Section 10 below);

- m) MDC fails to acknowledge that it has yet to be demonstrated that SUDS can be safely accommodated (Section 13 below);
- n) MDC misunderstands requirement of compensatory improvements within the Green Belt (paragraphs 12.1.1 and 12.1.2 below);
- o) MDC's proposed housing density is too high (Section 15 below);
- p) MDC is confused about boundary treatment at the interface of development and the Green Belt (paragraphs 7.1 and 13.2.2 to 13.2.6 below)
- q) Simplistic approach to enabling appreciation of heritage assets (paragraphs 7.3 and 14.8 below);
- r) Discrepancies between the plan on unnumbered page 48 and the one on pages 7 and 51 and the confusing nomenclature render the MDC unfit for purpose (paragraphs 12.4.1 to 12.4.4 below);
- s) Various deficiencies in Area Type Codes, including building materials, failure to protect heritage assets and safeguard their setting, and failure to protect westward views and views to and from the Parish Church (all considered in further detail in Section 14 below);
- t) The developers' transport assessment, Market Street Corridor Improvement Plan and Highways Consideration of Masterplan Note are inadequate as shown in Section 11 below, in the letter dated 9th August 2023 from SK on behalf of ECNF responding to consultation about Version V13 of the MDC and in Appendix 3 hereto (both now resubmitted as representations about current Version V17);
- u) A car park concealed by a mound would attract criminals and be contrary to national and local policy, and its approval would be a breach of RBC's duty under section 17 of the Crime and Disorder Act 1998 (paragraph 11.9 below);
- v) Loss of street parking would be inconvenient to local residents, detrimental to businesses and harsh on households with a disabled member who relies on their motor vehicle (paragraphs 11.7 and 11.8 below);
- w) Proposed obstruction of busy footway with rain garden (paragraph 11.6 below); and
- x) An equality impact assessment of the application should be conducted (Section 16 below);

**1.3 Table of responses to Council comments** Separately from the MDC, an anonymous Table of the Developers' Responses to RBC's Comments about Version V13 of the MDC has been produced, purporting to demonstrate how the MDC addresses comments from RBC. It was publicised by RBC in September 2023. This is considered at Section 18 below, where analysis shows that the Table is unreliable.

#### **1.4 Background**

**1.4.1** A local consultation of sorts was conducted on behalf of TW in June/July 2022. This is being misrepresented by the authors of the MDC as being for a masterplan for the whole of H66, when in reality it was only for the land of TW and Anwyl. ECNF pointed this out in January 2023 and August 2023 in response to the consultations on previous versions (V7, V8 and V13) of the MDC, and it is deeply regrettable that the MDC (page 21) perpetuates the error (please refer to Section 4 below).

**1.4.2** TW, apparently with the support of Anwyl, submitted to RBC in Autumn 2022 Version V7 of a Masterplan and Design Code for H66, which was taken out of the Green Belt and allocated for housing in the Local Plan. In the central portion of H66, TW own a large part and other potential developers are the respective owners of Alderwood and the former Vicarage. Anwyl represent the owners of the southern portion. The northern portion is in two separate ownerships: Peel L&P and Mr Richard Nuttall, neither of whom was involved in preparing Version V7.

**1.4.3** TW's portion of H66 is the subject of the application. The documents supporting that application included Version V7 of the MDC, dated 3 October 2022. RBC committed, rightly, to putting the MDC to consultation, and launched a concurrent statutory consultation about the application, which, because of time constraints, RBC did not wish to delay.

**1.4.4** Notably, Version V7 stated by whom, but not on whose behalf, it was prepared. Version V7 included the logo of Peel L & P on the first two pages, as well as those of TW and Anwyl, thereby dishonestly giving the impression that it was endorsed by Peel.

**1.4.5** On the RBC website pages relating to the consultation about the Masterplan and Design Code, but not on the RBC website pages relating to the application, Version V7 was replaced by Version V8 dated 30 November 2022 which omitted the Peel L & P logo. Version V8 still did not state unequivocally on whose behalf it was produced. RBC's website page introducing the Masterplan and Design Code advised that the document was amended to

- *Remove Peel Land and Property's logo from the cover/introduction;*
- *Make it clear that Peel Land and Property did not input into the document; and*
- *Correct a small number of typing errors.*

**1.4.6** In Version V8 a paragraph was added on the unnumbered page 8 in bold print:

*Peel have not had input to this document as they were not in a position to engage when it was produced. This is confirmed in the Masterplan at Fig. 2.1.*

**1.4.7** Version V13 of the MDC was received by RBC in June 2023 and was the subject of consultation. It did not state on whose behalf it was prepared. Around the same time a raft of revised documents was submitted in support of the planning application, which RBC also put out to consultation. There are two basic objections to that approach by TW. One is that the Masterplan and Design Code need to be settled first. Then, informed by those agreed documents, applications for planning permission can be made. It was difficult to escape the conclusion that the MDC was drafted to fit the planning application. Secondly, a repeat consultation in duplicate, which TW forced on RBC, was calculated to cause confusion, particularly among the general public, not all of whom will be familiar with the intricacies of planning procedure.

**1.4.8** Version V17 of the MDC was received by RBC in September 2023 and is the subject of these representations. It does not state on whose behalf it was prepared or which owners support it.

**1.4.9** The MDC has from the outset been, and continues to be, badly presented. More than half its pages, and most of those with text, do not carry a number, causing gratuitous inconvenience to readers and those who wish to comment by reference to pages.

## **Section 2 Masterplan for whole of H66 is a policy requirement**

**2.1** H66 was removed from the Green Belt and allocated for housing despite considerable opposition. Part of RBC's justification was that allocating it for housing presented the opportunity to masterplan a large site. A key topic in Strategic Policy SS: Spatial Strategy (paragraph 30) is:

- **Strategic Green Belt releases** for housing are proposed in Edenfield. The development in Edenfield creates the opportunity to masterplan a substantial new addition to the village that would have a limited impact on the openness of the Green Belt.

In the Explanation of Strategic Policy SD2, paragraphs 50 and 51 of the Local Plan state:

- 50 At Edenfield the justification for Green Belt release particularly relates to the strong defensible boundary of the A56 and the opportunity to masterplan the site to produce a high quality planned housing development that minimises impact on openness. There is strong market demand in the area . . . .
- 51 Masterplanning or, for smaller sites, the development of a design framework, will be expected to demonstrate how the design of the scheme minimises impacts on openness such as through the location of development within the site; the scale of the buildings and appropriate landscaping . . . .

**2.2** Accordingly, the Local Plan included a SSP, of which the parts directly relevant to this consultation stipulated:

Development [of H66] 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 . . . .

**2.3** The SSP includes an Explanation for those provisos, at paragraphs 120, 121 and 126, as follows:

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.

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.

**2.4** Having set much store by the opportunity to masterplan a large site and used that as a reason for removing the site from the Green Belt, RBC will wish to uphold the SSP and the commitment in paragraph 121 to ensuring the preparation of a masterplan covering H66 in its entirety.

**2.5** It has been suggested that the respective landowners are not minded to co-operate on producing a masterplan and that the RBC cannot force them to do so. That may be the case, but it does not dispense with the need for a masterplan.



**2.6** If any of the respective landowners anticipated difficulty in preparing a site-wide masterplan, they should have flagged this up at the Examination of the Local Plan. None of them did so, the Inspectors approved the policy, and the Plan was duly adopted.

**2.7** The landowners' disinclination to produce a comprehensive masterplan need not frustrate development of H66. RBC itself can organise the production of a masterplan. As the site was promoted by RBC for housing development, it would not be inappropriate for RBC rather than the developers to take the lead on this, particularly in view of RBC's stated commitment at paragraph 121 of the Local Plan (see paragraph 2.3 above), to ensure that a masterplan is prepared.

**2.8** A comprehensive masterplan for the whole of H66 is a Policy pre-requisite for development, and the lack of one would have at least four consequences:

1. There is no planned highway network for the whole site. Piecemeal development risks creating ransom strips that could hold up development on the rest of H66.
2. It is not clear that there is an overall drainage system for the whole allocation.
3. There is no overall landscaping plan including open space provision.
4. There is no indication as to how the necessary developer contributions might be determined, apportioned and agreed.

### **Section 3 MDC does not meet the requirements of a Masterplan for H66**

#### **3.1 Comprehensive development of the entire site**

**3.1.1** The masterplan must demonstrate the **comprehensive** development of the **entire** site - criterion 1 of the SSP.

**3.1.2** It might reasonably be expected that any proposed MDC would not be submitted until all potential developers had been given the opportunity to participate and that the MDC would state that this had been done and indicate exactly which potential developers do or do not support it.

**3.1.3** This is especially important, given that TW were exposed for having used another owner's logo without permission on a previous proposed MDC (paragraphs 1.4.4 and 1.4.5 above). However, the MDC contains no such statements. Indeed, the MDC does not specify on exactly whose behalf it is put forward.

**3.1.4** It is not clear whether the owners of the former Vicarage have been considered in the process.

**3.1.5** The MDC fails to identify clearly the ownership and control of Alderwood. Unnumbered page 22 (reinforced by the land ownership plan on page 23) states that the land is controlled by David Hancock, but that individual's only connection appears to be that he acted as an agent in a planning application. Unnumbered page 54 states that David Warren has primary land control.

**3.1.6** It is obvious that without the stated involvement of all relevant landowners the MDC does not and cannot demonstrate an achievable "comprehensive development of the entire site".

#### **3.2 Phasing and infrastructure delivery schedule**

**3.2.1** With the MDC must be an agreed programme of implementation and phasing. An infrastructure delivery schedule is also required. See criterion 1 of the SSP and paragraph 126 of the Local Plan (reproduced at paragraphs 2.2 and 2.3 above).

**3.2.2** Pages 54 (unnumbered) and 55 consider phasing. They identify five phases of development. The unnumbered page 54 says about Phasing:

*The Masterplan demonstrates the independent nature of each developer's landholding, ensuring that each parcel can be delivered independently without prejudicing any other. As a result, the ordering of development phases may be varied or delivered (sic) simultaneously.*

**3.2.3** Unnumbered page 54 provides

*All construction works and associated traffic across the allocation will be coordinated (sic) and managed to minimise impacts on the existing community and highway network, through detailed Construction Management Plans to be agreed as part of each subsequent planning application*

That does not constitute compliance with, and is no substitute for, the fundamental SSP requirement for a Masterplan with an agreed programme of implementation and phasing. Furthermore, in the absence of evidence, it may be doubted whether co-ordinated detailed Plans would be achievable, effective or enforceable. Nor is it clear how a failure to agree such Plans would be managed.

**3.2.4** The Executive Summary claims (unnumbered page 8) to address fully criteria 1 and 2 of the SSP and underlines (unnumbered page 6) '*with an agreed programme of phasing and implementation*'. Unnumbered page 6 claims to present "*a phasing and implementation strategy*". Unless a free-for-all counts as a strategy, those claims are false.

**3.2.5** The only Phasing Code (Code PH 01, unnumbered pages 54 and 92) does not deal at all with phasing as such. There needs to be a Code providing that the Phases shall be developed in a specified order and that, until a specified milestone in one development has been reached, the next development shall not commence. It also needs to make clear at what stage the affordable housing, green spaces and play areas shall be developed. This is particularly important, as there is evidence that elsewhere TW have pressed on with housebuilding to the exclusion of open space and play area provision and have delayed the provision of affordable housing.

**3.2.6.1** The MDC therefore runs completely counter to the SSP requirement for the Masterplan to be accompanied by an agreed programme of implementation and phasing. Not the least concern is the need to avoid the pressure on site accesses, concurrent excavations in the highway, build-up of traffic and workers' parked vehicles associated with four or five adjacent construction sites on H66. Simultaneous developments in different parts of H66 are likely to cause traffic chaos in the village

**3.2.6.2** RBC flagged this up, and the response - in the Table of Developers' Responses to RBC's comments (see paragraph 1.3 above and Section 18 below) - is breathtaking in its arrogance and defiance of the Local Plan policies that were determined after an exhaustive process of consultation, examination and refinement:

*...we reiterate that each parcel can be delivered independently without prejudicing any other, and therefore the phasing could change/overlap without significant impact. As such, there is no need (or policy requirement) to specify time periods, and it is not reasonable or practical for a multi phase, multi ownership allocation to commit to this at this stage of the process anyway.*

If the developers truly believed that it was unreasonable or impractical for a multi-phase, multi-ownership allocation to be subject at the outset to a programme of phasing and implementation, then they should have argued against the policy at the Examination and then challenged the policy in the High Court on the basis that it was so unreasonable as to render the Local Plan unsound.

**3.2.6.3** The Table uses the expression '*to specify time periods*', but that is not what the Policy requires. A programme of phasing might identify the order in which development takes place and then set triggers or milestones at which the next phase might start.

**3.2.6.4** In any case the detriment that the policy seeks to avoid is not, or not only, that delivery of one parcel might prejudice another, but the adverse cumulative impact of concurrent developments on a large site in a small village.

**3.2.6.5** Nor does the MDC conform with paragraph 41 of the Local Plan, explaining Strategic Policy SS: Spatial Strategy and saying of H66 (incorrectly referred to as H62):

This will be perceived as the main block of settlement within Edenfield, growing incrementally north and will to fill (sic) the gap between the A56 and the linear settlement along Market Street, to create a stronger Green Belt boundary and settlement edge.

To conform with the Local Plan, the basis of the phasing must therefore be that development of H66 will begin in its southernmost part.

**3.2.7** The MDC is silent about an infrastructure delivery schedule. Infrastructure may be taken as including (but not being limited to) new and improved roads, water supply, wastewater collection, electric power supply, gas supply, education facilities and health facilities.

**3.2.8** Accordingly, before the infrastructure delivery schedule can be settled, it is necessary to identify all the new roads to be provided and all the alterations required to the existing roads (including TROs for proposed additional prohibitions and restrictions of waiting and one-way traffic schemes), arising from the entire development of H66. This should include a comprehensive traffic assessment and road safety audit of the effect of the whole development on the local road network taking account of existing data and projections for the next twenty years (not just ten). Any proposed TRO would of course be subject to consultation and consideration of any objections. Only when the issues regarding roads have been fully addressed can the road infrastructure and compensatory car parking be included in the infrastructure delivery schedule, which would deal with all the matters indicated at paragraph 3.2.7 above and which would be linked to the programme of phasing and implementation.

**3.2.9** Without the framework of a programme of phasing and implementation and an infrastructure delivery schedule, the effect of planning applications for different parts of H66 cannot be assessed. It must be emphasised that H66 was allocated as one site for development by the Local Plan, that none of the owners objected to that or to the SSP, and that it is contrary to Local Plan policy for the development of any part of H66 to be approved before a Masterplan and Design Code with a programme of phasing and implementation and infrastructure delivery schedule has been approved by RBC.

**3.2.10** Developers' disregard and indeed defiance of the requirements for an implementation programme and infrastructure delivery schedule is an attempted subversion of the Local Plan which has been through a democratic process of consultation, examination and refinement. That attempt must be rejected by RBC outright. There is evidence from across the country that developers, particularly TW, fail to deliver on the road infrastructure, which is a huge risk in a large development. RBC must be alert to prevent such a situation here.

**3.2.11** ECNF has concerns about some of the transport assessment work to date - please see Section 11 below.

**3.2.12** Unnumbered page 54 shows that Phases 1A and 1B are subject to a planning application. Therefore, page 55 should do likewise with Phase 4.

**3.2.13** Throughout the 'Phasing and associated key deliverables' table on pages 54 (unnumbered) and 55 "maintenance" is mis-spelt.

**3.2.14** The "Key deliverables" on pages 54 (unnumbered) and 55 appear not to be a comprehensive list of the monetary contributions that might be required by means of a planning obligation. For example, there is no mention of the financial support LCC are seeking for the X41 bus service.

**3.2.15** An error on unnumbered page 54 is to be noted. It states that there will be emergency access to Phase 1A via FP126, but the plans on pages 7 and 51 clearly show it will be via FP127.

### **3.3 No agreed Design Code**

**3.3.1** The SSP states:

The development [of H66 for 400 houses] would be supported provided that . . . 2. the development is implemented in accordance with an agreed design code.

One of the Local Plan Objectives (page 12) is:

ensuring good design that reinforces Rossendale's local character.

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.

Paragraph 234 of the Explanation of Strategic Policy ENV1 states:

Design briefs or design codes will be required for major development and other sites as appropriate to help deliver high quality proposals. The Council will work with developers to address the nature and scope of these documents. The Council will prepare a Design Guide SPD to provide specific advice to developers. An SPD addressing climate change will also be produced.

**3.3.2** It is not stated in the MDC that all the landowners have been involved in its preparation. Therefore, RBC's only proper course is to reject the MDC. No Masterplan and Design Code should be entertained by RBC unless it is stated to have, and has, involved all the landowners.

**3.3.3** The Executive Summary (unnumbered page 8) claims that the agreed design code in accordance with which development is to be implemented is fully addressed within the MDC. The Executive Summary refers to Sections 04 and 05 of the MDC, which are appraised at Sections 13 to 15 below.

### **3.4 Summary**

**3.4.1** The MDC does not meet the requirements of a site-wide Masterplan and should be rejected. It is not clear about which landowners have been involved in its preparation and about which of them support it. It does not cover the whole of H66 in sufficient detail. Nor is there an agreed programme of phasing and implementation and an infrastructure delivery schedule. A masterplan and an agreed programme of implementation and phasing are specific policy requirements, as is an agreed Design Code. Without them there can be no guarantee as to how the totality of the housing allocation can function adequately or be of good design.

## **Section 4 Stakeholder engagement**

**4.1** Page 21 states under the heading 'Stakeholder Engagement':

*This Masterplan and Design Code has been developed in consultation with the Local Planning Authority (LPA) and local stakeholders.*

*A public consultation exercise for the H66 Masterplan process was undertaken prior to the submission of a planning application for the Taylor Wimpey land. This public consultation exercise related to the whole H66 allocation, seeking to gain views on the overall Masterplan and agreeing high-level principles. The consultation provided the opportunity for local residents to provide feedback online and via post/phone. A webinar was also held for residents to ask questions of the Development Team. Local residents were informed about the consultation by a leaflet drop and a letter was also sent to local councillors.*

**4.2** TW's masterplan consultation leaflet, distributed in June 2022, declared that the subject land was the site promoted by Taylor Wimpey and Anwyl Land ("our site"), and the home page of the TW/Anwyl consultation website referred to the land "that is in Taylor Wimpey and Anwyl's control". It is therefore simply untrue to claim, as the MDC does, that a site-wide masterplan had been the subject of public consultation before the application was submitted. ECNF drew attention to this in their response to RBC's consultations on Versions V8 and V13 of the MDC, as well as in their observations about the SCI as part of their representations about the application. It is deplorable that, in an apparent desire to pursue their false narrative, the authors of the MDC have ignored the facts placed in front of them and doubled down on their original lie.

**4.3** There is a lot more that is wrong with page 21 -

- It is not clear which, if any, local stakeholders were consulted, but no part was developed in consultation with ECNF, which is obviously local and which, as a group concerned with town and country planning and established pursuant to statute, is obviously a stakeholder. RBC regard ECNF as a stakeholder - see paragraph 121 of the Local Plan, quoted at paragraph 2.3 above
- In turn that raises doubts about how much, if any, consultation actually took place with other stakeholders and RBC
- The TW consultation was about the TW and Anwyl sites only, not H66 as a whole - see paragraph 4.2 above
- There was no opportunity to respond by post
- It is not claimed that any responses during the consultation period were fed into the MDC - certainly ECNF's response was not (see for example Section 5 below).

**4.4** Readers of the consultation leaflet and website pages (and the letter to RBC and LCC councillors and the press release) could not have used the postal address that has been said to have been available, as it was not published in those places. Unsurprisingly, zero letters were received (paragraph 3.3 of the SCI).

**4.5** People who did not have access to or who were not comfortable with using a telephone or electronic device were thereby excluded.

**4.6** The SCI claims that a dedicated email address was established to answer enquiries, although it does not claim that enquiries by email were actually answered. ECNF is aware of cases where an email enquiry received no response.

**4.7** Page 21 refers to the Design Code's having been "reviewed and updated to address many of the comments made" by the Places Matter Design Review Panel in March 2023. Meanwhile it appears that many of the Panel's criticisms continue to apply, e.g., generic design, "one lump and wall of development", lack of integral green spaces, key views, lack of nuance of topography, suburban attitude, inferior building materials.

## **Section 5 Local planning policy - no reason to give only limited weight to the Design Code in the emerging Neighbourhood Plan**

**5.1** The MDC refers at unnumbered page 18 to

*H66 Masterplan (Version V17)*

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*the initial informal Regulation 14 consultation on a draft [of the Neighbourhood] Plan (and Design Code Report prepared by AECOM) undertaken by ECNF in March and April 2023.*

**5.2** In fact there was nothing informal about that consultation, which was carried out in strict accordance with the Neighbourhood Planning (General) Regulations 2012, as amended, and with the benefit of advice from RBC. ECNF condemn the misrepresentation and in their response to Version V13 requested deletion of the word “informal”. It is appalling that the misrepresentation persists in the current Version V17.

**5.3** The MDC continues:

*It is pertinent that the plan and Design Code largely ignore the allocation of H66 and Edenfield’s elevated status as a ‘Urban Local Service Centre’ in the adopted Local Plan, and focuses on the existing vernacular and characteristics of the village.*

**5.4** The Neighbourhood Plan and Design Code were prepared in the knowledge that the (then emerging) Local Plan allocated H66 for housing. Prior to the Regulation 14 consultation it was amended after consultation with RBC. In the light of responses to the Regulation 14 consultation, the Plan and Design Code are being further amended to take account of the adopted Local Plan. As regards the issue of whether Edenfield should be treated as urban or as a village, we note the comment at the top of page 8 of Places Matter’s assessment dated 25th March 2023 of Versions V7 and V8:

*You are forgetting about the things that make this sort of village attractive and showing a suburban attitude to what the new place will look like.*

**5.5.1** In any case the word ‘Urban’ in the expression ‘Urban Local Service Centre’ is not to be taken as a *carte blanche* for development. Whilst Edenfield is identified as an Urban Local Service Centre by Strategic Policy SS: Spatial Strategy, paragraph 30 of the Local Plan makes clear that “[The development in Edenfield creates the opportunity to masterplan a substantial new addition to the village that would have a limited impact on the openness of the Green Belt](#)”. H66 “[will require a well-designed scheme that responds to the site’s context](#)” (paragraph 120, *ibid.*) and “[development must be of a high quality design using construction methods and materials that make a positive contribution to design quality, character and appearance](#)” (paragraph 125). See also paragraphs 50 and 51 of the Local Plan (noted at paragraph 2.1 above).

**5.5.2** Elsewhere the MDC repeatedly affirms that Edenfield is a village. See, for example, unnumbered pages 10 (*Vision to allow the characterful and varied grain of the village to continue to evolve*), 18 (*MDC ensuring that settlement character can be preserved as the village evolves*). 24 (five references in the context of H66 in the Settled Valley Landscape), 26 (visual context), 28 (two references under Architectural character) and 30 (describing Market Street), page 31 (describing South Edenfield), unnumbered pages 32 (three references under Street Hierarchy), 34 (nine references under Non-vehicular movement and open space), 42 (one reference under Green and blue infrastructure), 46 (two references to Edenfield Village and one to the village), 50 (*The Masterplan will deliver approximately 400 new homes for Edenfield, set within a strong landscape structure and characterful village setting*), and 60 (*landscaped front gardens and pockets of green space contribute to ‘greening’ the street scene in parts of the village*), page 67 (*scale of the H66 allocation site within the village*) and numerous references in the Area Types section as well as the Area Type designation ‘Village Streets’

**5.6** The MDC declares at unnumbered page 18:

*Given this conflict with the Local Plan, the early stage of the document, and the fact it postdates the submission of this Masterplan & Design Code, the Policies within the Neighbourhood Plan cannot be afforded due weight at this stage.*

**5.7** In similar vein the MDC states at page 21:

*This Masterplan and Design Code also takes account of the AECOM Design Code Report within the emerging Neighbourhood Plan, albeit this has only been given limited weight, due to its early stage of*  
*H66 Masterplan (Version V17) Page 12 of 55 ECNF representations November 2023*

*production (with the initial Regulation 14 consultation undertaken in March and April 2023, some time after this document was submitted) and the fact that it largely ignores the development of the H66 site and is primarily focused on the existing vernacular and characteristics of the village.*

**5.8** ECNF denies that the emerging Neighbourhood Plan is in conflict with the Local Plan and considers it to have progressed to its middle to late stage. The MDC's use of the word 'postdates' is puzzling: being dated 22nd September 2023 (see unnumbered page 2), the MDC obviously postdates the Regulation 14 consultation version of the Neighbourhood Plan. It is simply wrong to say that the Regulation 14 consultation took place after submission. The reasons for giving limited weight to the Neighbourhood Plan and Design Code are therefore completely spurious.

**5.9** Furthermore unnumbered page 18 promptly contradicts itself by saying, after claiming the Neighbourhood Plan postdates the MDC,

*[its] useful local insights and observations . . . have positively contributed to the preparation of this Masterplan and Design Code.*

**5.10** That being said, ECNF asked AECOM to review the Design Code in the light of the adoption of the new Local Plan and the responses to the Regulation 14 consultation. The outcome is an up-to-date document, taking full account of relevant national and local policy, compiled by consultants who are experts in their field, who are free of any vested interest and whose brief was not to produce a document that suited the client's preferred development. Developers may quibble about how much weight should be attached to it at this stage of the Neighbourhood Plan process, but the fact is that it provides an authoritative yardstick against which the MDC may be assessed.

**5.11** Accordingly, ECNF is submitting as part of their consultation response (separately, for reasons of convenience) the AECOM Design Code as an exemplar which the MDC should emulate, and respectfully suggest that the MDC needs to be amended accordingly.

## **Section 6 MDC is contrary to National Planning Policy and to Planning Practice Guidance**

**6.1** Unnumbered page 14 of the MDC refers to the NPPF:

*The NPPF was updated in July 2021. The revised NPPF promotes a presumption in favour of sustainable development for both plan making and decision-taking (Paragraph 11).*

*Section 12 of the NPPF, "achieving well- designed places", states (paragraph 126) that 'good design is a key aspect of sustainable development, creates better places to live and work and helps make development acceptable to communities'*

*Paragraph 130 states, 'planning policies and decisions should ensure that developments:*

- Will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*
- Are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;*
- Are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities); and*

- Establish or **maintain a strong sense of place**, using the arrangements of streets, spaces, building types and materials to **create attractive, welcoming and distinctive places** to live, work and visit’.

Paragraph 131 requires 'planning policies and decisions should ensure that new streets are tree-lined, that opportunities are taken to incorporate trees elsewhere in developments (such as park and community orchards), that appropriate measures are in place to secure the long term maintenance of newly-planted trees, and that existing trees are retained wherever possible'.

Paragraph 134 emphasises that '**development that is not well designed should be refused**'.

Section 14 of the NPPF, *Meeting the Challenge of Climate Change, Flooding and Coastal Change* (paragraph 154), sets out that in order to plan for climate change, new development should be planned for in ways that:

- a) Avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through the planning of green infrastructure; and
- b) can help to reduce greenhouse gas emissions, such as through its location, orientation and design. Any local requirements for the sustainability of buildings should reflect the Government’s policy for national technical standards'.

Section 15 of the NPPF, *Conserving and Enhancing the Natural Environment*, (paragraph 174) sets out how planning policies and decisions should contribute to and enhance the natural and local environment by:

- '**Protecting and enhancing valued landscapes**, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan); and
- Recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of best and most versatile agricultural land, and of trees and woodland'.

The Masterplan proposals presented within this document consistently follow the principles set out in the NPPF.

**6.2** Given that the MDC is said to have been checked on 22nd September 2023 (unnumbered page 2), it is regrettable that it does not refer to the NPPF update on 5th September 2023.

**6.3** The emboldened extracts in paragraph 6.1 above indicate areas in which the MDC fails to follow NPPF principles.

**6.4** It is significant that the MDC does not quote paragraph 129 of the NPPF, which provides:

*. . . all [Design] guides and codes should be based on effective community engagement and reflect local aspirations for the development of their area.*

The absence of meaningful stakeholder engagement (Section 4 above) and the dismissal of the Design Code (Section 5 above) in the Neighbourhood Plan, which fully reflects local aspirations, clearly demonstrate that the MDC does not conform with national planning policy.



**6.5** Unnumbered page 14 and page 15 go on to consider PPG, which is referred to as NPPG and wrongly called "Planning Policy Guidance". Emboldened in the extract below are the areas where the MDC does not measure up to PPG:

*The design section of the NPPG establishes the **importance of high quality design** as part of wider sustainable development and considerations alongside NPPF policies*

*The guidance states that proposals should be **responsive to the local context**. It is established that highly sustainable, well- designed developments should not be refused where there are concerns about compatibility with existing townscape, unless proposals cause significant impact or material harm to heritage assets. **Great weight is given to outstanding design quality which raises the local design standard.***

*The guidance establishes that **good design can help schemes achieve social, environmental and economic gains** and that the following issues should be considered:*

- **Local character (including landscape setting);**
- *Safe, connected and efficient streets;*
- **A network of green spaces (including parks) and public places;**
- **Development context;**
- **Crime prevention;**
- *Security measures;*
- *Access and inclusion;*
- *Efficient use of natural resources; and*
- **Cohesive and vibrant neighbourhoods.**

*Acknowledgment is given to the value which is attributed to well designed places. The criteria establishing what a 'well designed place' should seek to achieve are: be functional; support mixed uses and tenures; include successful public spaces; be adaptable and resilient; **have a distinctive character; be attractive;** and encourage ease of movement.*

*Guidance is given on how buildings and the spaces between buildings should be considered. In terms of layout, developments should promote connections with the existing routes and buildings, whilst providing a clear distinction of public and private space. Care should be taken to design the **right form for the right place**, but the extent to which this is achieved can depend on architectural and design quality.*

*It is considered that the proposed development of this site accords with the NPPG.*

Crammed layout, disregard of landscape and local context, lack of architectural and design quality actually make the MDC contrary to PPG.

**6.6** At page 16 the MDC considers Local Planning Policy. It says that SPDs from RBC that should be considered in any planning application include "Open space and play contributions". (It should have said "play equipment contributions".) It is curious that it does not mention RBC's Climate Change SPD.

## Section 7 Content of MDC

**7.1 Green Belt boundary** It is nonsensical to claim (unnumbered page 42):

*The masterplan allows space to create a defined Green Belt boundary which will follow the route of the A56 to the west of the site. Existing vegetation along this edge of the allocation will be retained and enhanced with a new woodland structure planting which will frame the western extent of Edenfield, preventing encroachment of development into the lower slopes of the valley.*

During the Examination of the Local Plan it was stated that the A56 itself would provide a strong defensible boundary for the Green Belt. (See, for example, paragraph 50 of the Local Plan reproduced at paragraph 2.1 above.) The boundary needs no further definition. Encroachment of development into the lower slopes of the valley is already prevented by the A56 and the remaining Green Belt. Furthermore the proposal for a new woodland structure is inconsistent with the last bullet on page 60 (see paragraph 13.2.2 below).

**7.2** The map on page 43 incorrectly implies by the position of the words 'GREEN BELT BOUNDARY' that the A56 is not in the Green Belt. Another error in this map is the inclusion of the words "and play area" in the caption to the green patch on the south east boundary of H66.

**7.3 Vision** The Vision on unnumbered page 10 includes:

- *Retain and enhance the existing public footpath network . . . to enable the appreciation of locally valued buildings located throughout the allocation site and in the local context.*

The word 'throughout' is misleading: the fact is that there are only two substantial buildings (the former Vicarage and the private house Alderwood) located in H66, whilst three heritage buildings (Parish Church, Mushroom House and Chatterton Hey) are adjacent. As stated at paragraph 14.8 below, it is not necessary to enhance the footpath network to 'enable appreciation' of the Church or desirable to do so in the case of private property.

## 7.4 Visual Context

**7.4.1** The unnumbered page 26 is plainly wrong in stating:

*There are limited views to the allocation site from rising land to the east of Edenfield due to topography and existing development within the village.*

In fact H66 is clearly visible from much of the lengths of Footpaths 136, 137, 138, 140 and 143 and Restricted Byways 147 and 277, shown on the map at Appendix 1 hereto.

**7.4.2** The unnumbered page 26 adds that

*. . . a circa 1.5m high stone wall [on Market Street] generally screens views of the undeveloped site from passing vehicles.*

That very much depends on the height of the vehicle's seats. Moreover, an adult pedestrian's view of the site from the western footway is unimpeded, notwithstanding the impression given by the photograph from the eastern side of Market Street.

**7.4.3** The 'Design influences' box on unnumbered page 26 should require development to retain visual appreciation of the landscape to the west from viewpoints outside as well as within the development, and this needs to be carried forward to the Design Code.

**7.4.4** The caption to the lower photograph on unnumbered page 26 "View across northern parcel from Blackburn Road" is wrong. Blackburn Road is seen in the middle distance. The viewpoint is no closer than Burnley Road.

**7.5 Artificial mound** The MDC fails to address the need to clear the mound of spoil created during construction of the bypass from the area to the west and north west of Mushroom House. Restoration of the natural contours would mitigate the loss of views resulting from the development and reduce the dominance of the new housing.

**7.6 Ecology** Criterion 6 of the SSP requires that “an Ecological Assessment is undertaken with mitigation for any adverse impacts on the Woodland Network and stepping stone habitat located within the site” The Executive Summary states:

*The Masterplan accounts for known ecological constraints across the allocation site. The TW Phase 1 application includes a detailed Ecological Assessment, as will subsequent applications to allow detail to be refined/ agreed.*

That does not disguise the fact that there is no site-wide ecological assessment, which is what criterion 6 demands.

**7.7 A Landscape-led Masterplan** There is much that is wrong with the MDC, as shown in these representations, and it is best to ignore the hyperbole on unnumbered page 50, but, assuming for the moment that the MDC were in good order, where Code MP 01 on unnumbered pages 50 and 92 provides:

*Future planning applications relating to the H66 allocation must be delivered in accordance with principles of The Masterplan*

it is recommended that “Future” be deleted, and “The” changed to “this”.

**7.8 Self-build and Custom-built Houses** On unnumbered pages 58 and 92, in Code US 01, “Policy HS3”, dealing with Affordable Housing, should be changed to “Policies HS3 and HS16”. According to Local Plan Policy HS16 some 40 plots at least on H66 should, subject to site viability, be made available for sale to small builders or individuals or groups who wish to custom build their own homes. The MDC needs to identify the general location and the phasing of the affordable and self-build/custom-built homes. In particular it needs to identify whether or not the plots for self-build/custom-built will be distributed proportionately between the various ownerships and, if not, how they will be distributed numerically.

**7.9 Ridge height and roof pitch** With the exception of the Pilgrim Gardens (site of former Horse & Jockey) development, on a brownfield site outside the former Green Belt and not subject to the stringent planning policy requirements imposed on H66 by the current Local Plan, steeply pitched roofs are not typical of Edenfield. They make a building dominant, with the result that it blocks any long-distance views and increases the loss of openness, which as far as possible the MDC should aim to protect. It is therefore necessary to delete the following bullet on unnumbered page 76:

- *Variations in ridge height and roof pitch across the site should be utilised to create an interesting roofscape.*

**7.10 Identity** Unnumbered page 58 states:

*Development should create a distinctive new place that complements and enhances the character of Edenfield by drawing upon the baseline analysis as presented within this Code.*

It is not clear where in the Code (the Codes begin at unnumbered page 50) any baseline analysis is presented.

**7.11 Internal daylight and Privacy** Code HB 02 (pages 77 and 93) provides:

*All homes should be designed to maximise internal daylight and have appropriate privacy distances in accordance with Local Plan policies.*

**7.11.1** It is not obvious which Local Plan policies the MDC is contemplating when it speaks of policies addressing internal daylight and privacy distances, but in any event Code HB 02 should specify the policies concerned.

**7.11.2** Only Policy HS8 refers to privacy, but even then only in general terms and not to the specifics of distance. It requires all new residential development to provide useable private outdoor amenity space with an adequate level of privacy.

**7.11.3** Strategic Policy ENV1: High Quality Development in the Borough provides

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) . . .
- 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 . . .

**7.11.4** The 'Homes and buildings' Codes need to embed and elaborate upon those principles of Policy HS8 and Strategic Policy ENV1. The Codes must not be confined to issues within the new development but must specifically control and minimise the impact of development on adjacent properties. This would be entirely consistent with the principle at unnumbered page 38:

*Existing housing both backs and fronts towards the site at various locations along the eastern site boundary. Proposed development should ensure that residential amenity of existing dwellings is protected*

In this context it is noted that the application fails to mitigate the over-bearing and oppressive impact of the proposal on properties on Market Street and Alderwood Grove.

## **Section 8 Street Hierarchy, Estate Roads, Rights of Way, Vehicle Movements and Emergency Access**

**8.1 Street Hierarchy** The plan on unnumbered page 32 exaggerates the extent of shops, school and community facilities along Market Street, Bury Road and Bolton Road North. There is no shop, school or community facility on Bury Road/Bolton Road North between the Rostron Arms and Edenfield Mini Market (save for little-used Sparrow Park at the junction of those roads) and none on Market Street between Elizabeth Street and the Coach (formerly Coach and Horses) public house

**8.2** The reference in the text on that page to "the M66/A56 roundabout" is confusing as the roundabout has no connection with the M66.

**8.3** On unnumbered page 70, Code MO 04 provides:

*A secondary street will be provided along the controlled circulatory road link between Market Street and Exchange Street.*

This is unclear. Ordinarily there will be no road link within H66 between those highways. If the controlled emergency access (see paragraphs 8.12.1, 8.12.3 and 8.13 below) were in use, there would still be no link, as the emergency would preclude use of the normal access.

**8.4 Estate roads** By implication, the headings to the Table on page 69 suggest that secondary and tertiary roads are to be considered for adoption, private drives being expressly stated to be non-adoptable. It is therefore pointless to specify carriageway widths less than LCC's minimum adoption standard.

**8.5 Rights of Way** Unnumbered page 38 refers to PROW FP 126 and FP127 and the (private) vehicular right of access to Chatterton Hey:

*Three Public Right of Way routes pass through, or close to, the H66 allocation. PROW FP126 and FP127 link Market Street and Exchange Street with the southerly footbridge across the A56. PROW FP127 also provides vehicular access to Chatterton Hey at the west of the allocation.*

For completeness it should have identified also the private rights of way with vehicles to Mushroom House, Alderbottom and Swallows Barn.

**8.6** It may be that for practical purposes access to the last two mentioned properties is taken via Exchange Street, FP127 past Chatterton Hey and onto the bridge over the A56 and along FP126, and indeed the properties might enjoy an express or prescriptive right of way with vehicles along FP127, but historically the access from Market Street was along FP126, which ran in a more or less direct line before it was diverted for construction of the A56 bypass. It is understood that that historic private right of way with vehicles is extant.

**8.7** Unnumbered page 54 appears to acknowledge that private right by stating in respect of TW's land:

*Retained vehicular access to Mushroom House (and other properties to the west) via Market Street/FP126*

It is good to know that no interference with Mushroom House's access from Market Street is proposed, especially as that length of FP126 lies outside H66 any way.

**8.8** However, there are difficulties with the plan on pages 7 and 51, which shows only orange triangles (proposed pedestrian/cycle access) at the Market Street/FP126, FP126/FP127 and Exchange Street/FP127 junctions. The plan needs at least two corrections. First, it must clarify that there is to be no interference with any private vehicular right of way. Secondly, the orange triangle at the Market Street/FP126 junction needs to be relocated to the point where FP126 crosses the H66 boundary.

**8.9** In representations in January 2023 about the application, ECFN stated at paragraph 9.7.5 thereof:

*We have read the comments [dated 11th January 2023] of the LCC Public Rights of Way Officer (Development). The expression 'vehicles restricted from use [on Footpath 126]' is unclear. Does it mean prohibition, or some lesser restriction? How would that sit with claimed private vehicular rights of way to Mushroom House and Alderbottom?*

**8.10** It is therefore concerning that the LCC PROW Capital Project Officer's response to the MDC posted by RBC on 12th October 2023 repeats,

*The cattle grids on the western and eastern section of the path [FP126 between Chatterton Hey bridge over the A56 and Market Street] are to be removed and vehicles restricted from use.*

This is in complete disregard of existing private vehicular rights of way.

**8.11 Vehicular movements** Page 45, supported by a plan, states:

*Land at Alderwood bungalow can be served either via the existing access onto Market Street or via the central land parcel.*

Unnumbered page 54 says of this land:

#### *Primary vehicular access via Market Street or Phase 1a*

This is disingenuous, as LCC in their response to planning application 2022/0577 made it crystal clear that the existing access would be totally unsuitable for a development of nine more dwellings at Alderwood. The text on both pages should be amended to make clear that the access would be via the field opposite 88-116 Market Street, and the plans on pages 7, 45 and 51 should be amended accordingly. Saying that access would be via the central parcel is too vague and might refer to Church Lane. The actual access point must be specified.

#### **8.12.1 Emergency access** Page 45 states also:

*A controlled emergency vehicular access point will be provided between the southern and central land parcels, close to Chatterton Hey.*

This is marked on the plan on page 45, as well as the plans on pages 7, 39 and 51. This implies permanent two-way emergency access between the sites, but pages 54 (unnumbered) and 55 state otherwise: TW's land (the central parcel) is to have **temporary** (ECNF emphasis) *controlled emergency vehicular access via PROW FP 126* (this must mean FP127), and the Anwyl (southern) parcel **permanent** (ECNF emphasis) *emergency vehicular access via Phase 1A* (TW's land). That means one-way emergency traffic off but not onto Anwyl's land. It will be dangerous if TW's projected 238-home estate does not enjoy a permanent emergency access arrangement.

**8.12.2** Some assumptions appear to be made here by the MDC as to the order of phasing and implementation, which the MDC expressly (and wrongly) leaves open. There is an unacceptable lack of clarity.

**8.12.3** Also unacceptable is the lack of clarity about the design of the emergency access. How will its use otherwise than in emergency be prevented? How will it prevent vehicle movements between the H66 internal roads and FP127?

**8.13** Unnumbered pages 38 and 68 add to the confusion by implying a two-way emergency connection between TW's land and Anwyl's:

[Unnumbered page 38] *An emergency access link across PROW FP127 will ensure that the larger southern part of the allocation site can be safely accessed from two locations; and*

[Unnumbered page 68] *Fixed [overall principles for the street network] include . . . Principle of a controlled vehicle access across PROW FP127 which will enable emergency access between land parcels*

## **Section 9 Blue and green infrastructure**

### **9.1.1** Unnumbered page 42 provides:

*The green infrastructure network is designed to ensure that valued existing landscape features can be retained. These are mainly limited to existing trees around Edenfield Parish Church and Chatterton Heys (sic), and dry stone walls located along the PROW routes through the allocation site.*

The MDC needs also to commit expressly to retention and maintenance of the drystone wall along the site boundary with Market Street, except at the point of site access. Where Market Street is to be widened, the MDC needs to confirm that the drystone wall shall be re-erected.

**9.1.2** The MDC needs too to commit to protecting the drystone wall at the site boundary with 5-8 Alderwood Grove and not allowing any development that might harm its integrity or obstruct its maintenance.

**9.2** The Executive Summary says of SSP criterion 5 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”)

*The Masterplan includes a substantial buffer along the western boundary to include landscape structure planting, with detail to be refined/agreed through individual planning applications.*

In other words there is complete disregard of the full SSP requirement in 5 v of landscaping **throughout** the site. Without prejudice to the generality of that requirement, there needs to be, in particular, reference to the necessity of landscaping the eastern boundary at the interface with existing residential properties.

## **Section 10 Off-site car park and public open space**

**10.0** Unnumbered page 44 notes:

*The Masterplan indicates an area for community car parking and public open space to the east of Blackburn Road, outside of the H66 allocation, with the detailed requirements and justification for this provision to be addressed through subsequent planning applications, subject to a proportionate contribution to cost, including cost of land*

The accompanying plans (unnumbered pages 44 and 46) show the area, located east of Burnley Road. The access point is marked on the plan on page 46, which shows 33 car parking bays plus 10 drop-off spaces, with the unquantified loss of street parking on Burnley Road. There is no information about the dimensions of the bays.

**10.1** The purpose of the MDC is to guide the development of H66, as a site allocated for housing. It has no legitimacy to propose development of a detached, unrelated site in the Green Belt. The MDC acknowledges on page 44 that it does not contain justification for the car park. It cannot be assumed that planning permission would be granted for the proposed drop-off area/car park. Therefore, unless the drop-off area/car park were granted planning permission, it is wrong for the MDC to proceed on the basis that it is an achievable proposition.

**10.2** Whether the location of proposed car park is desirable, given that it is outside H66 and in the Green Belt, is extremely doubtful. Whether it is required has not been evidentially demonstrated. The possibility of this car park, on land owned by Peel, together with drop-off facilities and a play and recreation space and trails was first raised by Peel’s subsidiary, Northstone, in a pre-application public consultation in 2023. It forms part of the recent planning application 2023/0396, currently the subject of consultation.

**10.3.1** It is alarming that, to bring forward development of former Green Belt, the site promoters are proposing a car park and drop-off facilities and public open space in the remaining Green Belt. If this is essential to the development of H66 or Northstone’s part of H66, it should have been raised during the Local Plan process. If the Inspectors had considered provision for a new car park necessary to make the Local Plan sound, RBC could have allowed for a further incursion into the Green Belt in the same way as the Policies Map provides for the potential extension of Edenfield CE PS. The matter was not raised, and therefore what remains of the Green Belt around Edenfield should not be subjected to urbanising development. All necessary car parking provision should be confined to H66.

**10.3.2** The provision of local transport infrastructure is not something to be considered on an ad hoc basis. It needs proper planning, and the appropriate way to plan it is through the Local Plan. See, for example, Strategic Policy TR1: Strategic Transport and its protection of a site for Park and Ride facilities at Ewood Bridge. The Local Plan requires a Transport Assessment for H66 (paragraph 10.4 below) but contains no suggestion that a car park outside H66 should be provided.,

**10.4** The third proviso to the site-specific policy is -

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.

**10.5** The MDC does not justify the provision of the proposed car park and drop-off facilities, and it lacks crucial detail about their design as well as about their implications for traffic flows and street parking currently available on Burnley Road. It is to be noted that as well as the anticipated new access (from Blackburn Road to H66), the MDC proposes another (from Burnley Road to the car park/drop-off), and that both these accesses will be close to a school and the signalised junction of these roads with Market Street.

**10.6** The vagueness of the Market Street Corridor Improvement Plan as quoted in the third bullet on unnumbered page 46 is not acceptable:

*details to be confirmed through subsequent planning applications.*

**10.7.1** Northstone's justification for the car park, offered separately from the MDC, is plainly exaggerated. FAQ 17 **Will this proposal increase traffic?** in their pre-application consultation stated -

*The proposals for the parking area will have a positive impact on traffic locally. It will reduce the issue of on street parking as well as remove traffic impact at peak times within the village at school drop off and pick up times and remove the necessity for a coach to reverse down Church Lane to turn.*

**10.7.2** Paragraph 7.24 of the planning statement accompanying application reference 2023/0396 is to like effect:

*The Burnley Road proposals will provide a significant benefit to the local community by improving the local environment and improving the safety of the village and school children. The proposals will reduce the proliferation of on street parking as well as remove traffic impact at peak times within the village at school drop off and pick up times and remove the necessity for a coach to reverse down Church Lane to turn.*

**10.7.3** That justification is desperate. There is no evidence of accidents injuring pupils of Edenfield CE PS on their way to and from school. It is improbable that the proposals would **remove** traffic impact at peak times. 'The necessity for a coach to reverse down Church Lane' is pure fiction. It is well established that school coaches load and unload on the school side of Market Street and achieve this by using the A56 Edenfield bypass as appropriate. A professional driver in a twelve-metre long vehicle would not attempt reversing into or out of Church Lane in close proximity to the signalised junction. There is simply no evidence that this happens.

**10.7.4** As regards 'traffic impact at peak times', consultants Eddisons reported in a Highways Consideration of Masterplan Note [www.rossendale.gov.uk/downloads/file/18151/highways-consideration-of-masterplan-note](http://www.rossendale.gov.uk/downloads/file/18151/highways-consideration-of-masterplan-note) at paragraph 1.12 that

*Importantly, the surveys [in April 2023] reveal that traffic levels have reduced compared to pre-pandemic levels, and which formed the evidence base at the time of the preparation of the Local Plan.*

Moreover, according to paragraph 1.56,

*A detailed consideration of existing conditions confirms that traffic flows have generally reduced since the preparation of the evidence base that supported the Local Plan.*



They found also (paragraph 1.11, *ibid.*) that the weekday AM peak ended at 0845 hours and that the PM peak began at 1645 hours. It can therefore be inferred that school drop-offs have minimal impact on the AM peak and that pick-ups have none at all on the PM peak.

**10.8** There is a shortage, if not an absence, of information about the proposed car park and drop-off facilities and public open space. There is no clarity about the following:

- Will they be transferred out of Peel's ownership, and, if so, to whom?
- Notwithstanding the answer to Northstone's FAQ 14 **Will local facilities be able to accommodate this many new homes in the area?** -

*Whilst we appreciate that our proposal will increase the population size in the local community, as part of the application Northstone will agree a financial contribution to Rossendale Borough Council or other relevant providers of services. This contribution will mitigate against any impacts that the proposed development may have on local services. The providers will be able to invest this into the local infrastructure where deficiencies have been identified -*

at Northstone's consultation event, one of the ECNF members was given to understand that, if Peel provide the proposed car park and drop-off facilities, they would set off the cost against the section 106 contributions that would be expected of a development of this nature. That is not apparent from the MDC which fosters the impression that the proposed car park and drop-off facilities are a boon to be provided at no cost to the community. It appears that in reality RBC as representative of the local community will miss out on contributions which it could put to better use. Northstone's answer to FAQ 6 **Isn't this site located within the Green Belt?** is that '*the site of the proposed car park is within Green Belt but what we are proposing represents appropriate development and a valuable asset to the local community*'. The reality is that the community would be bearing both the financial cost and the loss of another field in the Green Belt.

- How would their introduction and continued availability for use be guaranteed?
- Who will manage them and be responsible for their maintenance, and how will such maintenance be funded?
- Will the car park be illuminated? If so, at whose expense?
- It would be dangerous for residents to use the proposed car park, as there is no footway on the east side of Burnley Road between the proposed car park entrance and the B6527 / Guide Court junction. They would have to walk in the carriageway or take a chance in crossing Burnley Road amid traffic speeding towards or away from the junction. How would these dangers be eliminated?
- On what evidential basis has it been determined that 33 is the appropriate number of parking spaces to be provided?
- The car park/drop-off proposal creates at least three potential traffic conflicts on Burnley Road: any queue at the traffic lights is likely to block the car park entrance/exit; in the event of such a queue right-turning vehicles emerging from the car park/drop-off would have limited views of approaching northbound traffic; and traffic from the south waiting to enter the car park/drop-off might tail back, affecting the efficient operation of the signalised junction. How would all those hazards be avoided?
- How, if at all, would sustainable drainage of the proposed car park and drop-off facilities be achieved? It emerged at the consultation event that Northstone are aware that drainage issues require attention.
- Would street parking spaces on Burnley Road be lost to allow for traffic flow at its access, and, if so, how many?

**10.9.1** Even if the above-mentioned questions were answered satisfactorily, there could be no guarantee that the requisite planning application for change of use from grazing to a car park involving the effective extension of the Urban Boundary into the Green Belt would be approved. Northstone say (paragraph 5.8 of

the planning statement accompanying application 2023/0396) that the car park could be considered as 'local transport infrastructure which can demonstrate a requirement for a Green Belt location' as defined at NPPF, paragraph 150 c), but the case has yet to be made either that the car park is required or that it must be in the Green Belt.

**10.9.2** Much was said at the time of the Local Plan Examination about extending either Edenfield CE PS or Stubbins Primary School and the consequent prospect of more drop-offs and pick-ups at Edenfield, but the likelihood of an extension seems to have receded in the light of falling birth rate and primary school capacity predictions from LCC in response to recent planning applications. There is no commitment yet to extending either school.

**10.9.3** It may be that the development of H66 will change the mix of Edenfield CE PS pupils to include more who live within easy walking distance. That would tend to reduce the number travelling by car.

**10.9.4** If off-street provision for school drop-off and pick-up is necessary, it should be provided within H66, on either Peel/Northstone's or Mr Nuttall's land. If the MDC were fit for purpose, it would have provided an on-site solution for this and for public open space/play facilities. This demonstrates the importance of the SSP requirement for a **comprehensive site-wide** MDC, that prioritises holistic planning over landowners' narrow interests.

**10.9.5** There could be no objection on safety grounds to a pick-up/drop-off area in the location proposed in paragraph 10.9.4 above. The children and their carers would have only one main road to cross on their way to and from school, where they would be protected by a 'lollipop' school crossing patrol.

**10.9.6** There is no requirement or official guidance that children travelling to school by car must be set down or picked up in a position where they do not have to cross a road. Crossing a road safely is a lesson that children need to learn as early as possible. Facilitating and normalising car travel to and from school runs counter to the current policy of promoting active travel, with its benefits to health. If car travellers have to find street parking at a distance from school, the walk will be beneficial.

**10.9.7** RBC cannot allow themselves to pre-empt the determination of a planning application for the car park on a site outside the remit of the MDC by approving a MDC containing this proposal. Nor can RBC approve a MDC, a component of which might not receive planning permission.

**10.10** At unnumbered page 22 it is stated:

*Peel also control land to the east of Burnley Road, some of which can be made available for school expansion land, public open space and/or community car parking subject to planning requirements in accordance with the Rossendale Local Plan.*

The problem with that extract is that it conflates school expansion land, for which the Local Plan provides, and a site for public open space and parking, which is not contemplated in the Local Plan. Particularly as this site is in the Green Belt, it is wrong to assume that the proposal for a car park and some sort of leisure area (see paragraph 10.12 below) with its myriad unanswered questions, would receive planning permission.

**10.11** Accordingly, in Code US 03 on unnumbered page 58, the words "subsequent" and "off-site community car parking and/or" should be deleted.

**10.12** Having described the proposed car park as "community car parking and public open space" (unnumbered page 44) and "off-street parking area" and "Northstone off-street car park area" (both on unnumbered page 46), "car park, public open space" (unnumbered page 50) and "community car park and public open space" (page 51), the MDC changes tack at unnumbered page 64 where it is called "Local Area for Play (LAP)", part of "a dispersed range of play experiences".

**10.13** For a play area, the location is truly sub-optimal. Users would need to cross at least one busy road, enter and leave where there is no footway on the road and navigate through a drop-off area and car park. It

must be relocated within H66 (paragraph 10.9.4 above) and the “Green infrastructure and play provision’ plan on unnumbered page 64 redrawn accordingly, because it fails to meet the parameters set out in the MDC (unnumbered page 66):

*Local Areas for Play (LAPs) will provide informal open spaces with natural play opportunities, in accessible locations close to dwellings. They should be designed to appeal to all ages as a place for incidental play, social interaction amongst neighbours and a common space for people to enjoy in the close setting of their homes. LAPs should occur often and should offer variety in terms of their character, features and the play opportunities they provide. LAPs may be situated within housing areas or on the edge of housing parcels, bringing greenways into the development, enhancing the setting and play opportunities provided. . . . LAPs are more versatile as a result being accessible to the whole community for a variety of uses, such as a meeting place for friends or taking a quick break during a walk home from school.*

**10.14** Any proposal for a car parking area would need to be assessed against Local Plan Policy TR4: Parking, which provides among other matters:

Where parking is being provided to serve new development or to address specific local parking problems in existing residential and business areas . . . the Council will expect the parking provision to:

- Be conveniently located in relation to the development it serves;
- Be safe, secure and benefit from natural surveillance;
- Be designed to ensure that the use of the parking provision would not prejudice the safe and efficient operation of the highway network;
- Not . . . detract from the character of the area;
- Incorporate secure, covered cycle parking in line with the Parking Standards set out in the Local Plan unless otherwise agreed;
- Where appropriate, incorporate adequate soft landscaping and permeable surfaces to avoid the over-dominance of parking and to limit surface water run-off;and
- Incorporate electric vehicle charging points, in the following scenarios as a minimum:
  - One charger per every five apartment dwellings;
  - One charger per every individual new house on all residential developments;
  - One charger per every ten parking spaces in non-residential car parks.

Exceptions to the minimum provision of electric charging points will only be considered if it can be demonstrated to the satisfaction of the Council that this is not technically feasible or prohibitively expensive. [Presumably that meant to say “is prohibitively expensive or not technically feasible.] Paragraph 316 of the Local Plan notes the importance of charging points in encouraging the take-up of electric vehicles.

**10.15** Taking those bullets one by one -

- If the car park is meant to serve the development of H66 west of Blackburn Road, users will have to cross two main roads without the benefit of a footway on the side of road adjacent to the car park - see paragraph 10.8 above, sixth bullet
- Natural surveillance is minimal
- There are at least three potential traffic conflicts - see paragraphs 10.5 and 10.8 (eighth bullet) above - in addition to the prospect of 12-metre coaches entering and leaving - cf. paragraph 10.7 above.
- The car park would be perceived as an urban extension, detrimental to the character of the Green Belt
- There is no provision for cycle parking
- Drainage is likely to be a problem - see paragraph 10.8 above, ninth bullet
- There is no information about proposed charging points

**10.16** Accordingly, it is extremely doubtful that the suggested car park would be compliant with Local Plan policy. The proposal in the MDC for a car park/open space east of Burnley Road must be deleted and replaced with provision within H66.

## **Section 11 Transport**

**11.1** In the last preceding consultation, on V13 of the MDC, SK submitted a letter dated 9th August 2023 on behalf of ECNF. There is a link to that letter at Appendix 2 to these representations. Additionally, ECNF submitted a document reflecting local concerns about traffic arrangements, reprinted at Appendix 3 hereto. Those documents are hereby resubmitted as part of ECNF's response to the present consultation as the concerns they contain have not been allayed. They demonstrate the considerable issues arising from the transport/traffic proposals. A letter from LCC dated 25th August 2023, to which there is a link at Appendix 4 hereto, was considered at a meeting between RBC, ECNF and SK on 28th September 2023. A note SK prepared to assist discussion at that meeting is reprinted at Appendix 5 hereto. ECNF and SK then sought a meeting with LCC and RBC (see email from SK reprinted at Appendix 6 hereto), although it has not yet been arranged.

**11.2** Unnumbered page 46 wrongly includes under the heading "Off site highway improvements" the proposed on-site car parks off Market Street and Exchange Street.

**11.3** The map on page 46 does not take account of the potential new or improved access to site H65. The map on page 47 is out of date: it fails to show the junction of Market Street and Pilgrim Gardens and the new houses in the vicinity.

**11.4** The maps on pages 46 (unnumbered) and 47 are unclear, lacking any key to the colours and symbols used, failing to show clearly (if at all) the extent of proposed restriction and prohibition of waiting, failing to show existing restriction and prohibition of waiting and showing yellow lines on Exchange Street without any explanation at all.

**11.5** Coloured chippings/aggregate seem pointless. It is not clear what 'gateway features' are being proposed, what purpose they would serve or how they might be safely accommodated in a narrow highway with a zebra crossing or at a junction.

**11.6** A bizarre and unexplained feature of the map on unnumbered page 46 is a rain garden on Market Street, seemingly in the footway, near nos 155 and 157. Obviously this would represent an inconvenience to the numerous users of the footway. The proposal can be viewed only as a gesture of contempt to the public, negating any credibility that the MDC might have had.

**11.7** The proposed restriction and prohibition of waiting will inconvenience residents who rely on the availability of street parking. It will be harmful to the businesses whose customers might go elsewhere if they cannot find a place to park.

**11.8** The extensive proposed prohibition of and restriction on waiting outside existing houses will bear harshly on disabled occupiers and their carers who might otherwise have been able to apply for a disabled person's parking space outside their door.

**11.9** One aspect of the on-site parking area intended to replace lost spaces on Market Street causes particular concern. It is proposed to be concealed by a mound, which, in addition to its aesthetic deficiencies and problems around its landscaping, would conceal criminals intent on damaging or breaking into vehicles or assaulting people going to or from the vehicles. It is wholly inimical to the concept of "Designing out Crime" or "Crime Prevention through Environmental Design". RBC is required under section 17 of the Crime and Disorder Act 1998 to exercise its functions with due regard to their likely effect on crime and disorder, and to do all it reasonably can to prevent crime and disorder. The mound is contrary to NPPF, paragraph 130 f), PPG (crime prevention to be considered - paragraph 6.5 above) and the second bullet in the extract of Local Plan Policy TR4: Parking, quoted at paragraph 10.14 above.

**11.10** ECNF notes the claim in the anonymous Table of the Developers' Responses to RBC's Comments about Version V13 of the MDC (see paragraph 18.1 below) that

*A Full Transport Assessment has been submitted alongside the Masterplan & Design Code (with a summary included at Appendix C) and this has been largely endorsed by LCC (in their comments dated 25.08.2023), subject to some minor amends to the 'Market St Corridor Improvement Plan' which have been incorporated in the updated (September 2023) document. The 7th bullet in the 'Access and parking typologies' section of the Site Wide Codes (page 74) confirms that the level of new visitor/ community parking will exceed that displaced as a result of the development. The current TW application meets this commitment and the detailed arrangements for how these spaces will be managed will be negotiated and agreed with LCC through the individual planning applications for each phase.*

**11.11** It is noted that the MDC makes reference to the involvement of LCC Highways in the transport/traffic proposals. As set out in this submission ECNF have considerable concerns in respect of these proposals (paragraph 11.1 above and Appendices 2 and 3 to these representations) so it is disappointing that ECNF's suggestion of a meeting with LCC Highways has not been taken up (Appendices 5 and 6). In these circumstances it is felt that the MDC's transport/traffic proposals should be subjected to an independent review and report to RBC before any consideration thereof.

**11.12** As ECNF's comment in Table 4 in paragraph 18.1 below about 'Replacement parking for residents' shows, the developers' response is inadequate.

**11.13** Eddisons' Highways Consideration of Masterplan Note (referenced at paragraph 10.7.4 above) speaks at paragraphs 1.41 to 1.43 to the Market Street/Northstone Site Access junction, but the Local Plan is clear that the Northstone site would take access from Blackburn Road.

**11.14** The Note goes on to consider the 'Market Street/Blackburn Road/Burnley Road signalised junction' at paragraphs 1.44 to 1.46. This junction has four arms under signal control. An accurate Note would have included Guide Court in the description. Table 4 at paragraph 1.45 refers to the 'Blackburn Road (S)' approach, which we take to mean the approach from south of the junction, but Blackburn Road does not lie on the south side of the junction. The options for traffic from the south are: right/ahead/filter left giving way to right-turning vehicles from Burnley Road, but the Note does not show this. The Note states two options for traffic from Guide Court, but in fact there are three.

**11.15** It is therefore apparent from the Note that the compilers lacked a clear understanding of the subject.

## **Section 12 Compensatory improvements to Green Belt; Pedestrian and cycle connectivity**

**12.1.1** The Executive Summary (Criterion 7) claims:

*The Masterplan confirms that applications will improve accessibility to wider Green Belt through enhancement of PROWs and local recreation facilities. Off-site compensation for improvements to the wider PROW network and local recreation facilities are noted at **page 48** and can be secured through S106 contributions from individual applications.*

**12.1.2** It is disputed that the MDC confirms anything of the sort. Furthermore, it is unclear what is meant by "wider Green Belt". The expression "the wider PROW network" suggests that the sentence preceding it is concerned with on-site PROWs. If the MDC is suggesting that PROW enhancements within H66 (outside the Green Belt) count as a compensatory improvement within the Green Belt, the authors are misdirecting themselves. What is clear is that they are in persistent denial of the requirements of national, local and site-specific policy, where green belt designation is removed, for compensatory improvements in the remaining

green belt. The sentence “Off-site compensation . . . are noted . . . ” makes no sense, as the subject “compensation” does not relate to the verb “are”. No specific improvements to the PROW network and local recreation facilities are noted at page 48. All that page 48 says on this subject is

*Off-site Green Belt compensation measures for improvements to the wider PROW/Bridleway network and local sports and recreation facilities can be secured through proportionate S106 contributions from individual applications.*

Page 48 does not make clear that those improvements must be made within the remaining Green Belt.

**12.2** We question why the plan on pages 7 and 51 shows “Proposed pedestrian/cycle access” at the junction of FP126 with Market Street and at its junction with FP127 when the plan shows that Footpath 126 at these points and Footpath 127 at its junction with FP126 are outside H66. There is no PROW for cycles on these footpaths, and that would continue to be the case unless the relevant authority reclassified them or the owner re-dedicated them. The MDC does not assert that any of the owners of H66 owns the footpaths at these points and is thereby in a position to re-dedicate them.

**12.3** The statement in the text on unnumbered page 68 -

*Existing PROW routes through the site should be made suitable for cycling where viable to act as an informal expansion of the local cycling network -*

fails to acknowledge that, whilst within the site the owner might re-dedicate public footpaths for use by cyclists as well, outside the site there is no public right to cycle on FP 126 and FP127.

**12.4.1** The plan ‘Strategic Principles: Pedestrian and Cycle Connectivity on unnumbered page 48 differs from that on pages 7 and 51 in its treatment of proposed pedestrian and cycle routes, as shown in Table 1 below.

| Reference | Location of route in H66   | Caption on plan on page 48   | Caption on plan on pages 7 and 51   |
|-----------|--|--|---|
| 1         | Exchange Street to Woodlands Road  | Proposed pedestrian connection   | Indicative pedestrian/cycle route   |
| 2         | Recreation ground towards: north-west part of TW land (page 48) OR top north-west corner of TW land (pages 7 and 51) | Captions at both ends: Proposed pedestrian and cycleway connection.<br>Caption at south end adds: to land ownership boundary | Indicative pedestrian/cycle route. (Co-extensive with estate road for part length). |
| 3         | Top north-west corner of TW’s land to Church Lane  | [Not marked]   | Potential pedestrian/cycle route’   |
| 4         | North-west part of TW land to Market Street via the driveway serving Alderwood                                       | [Not marked]   | Potential pedestrian/cycle route’   |
| 5         | Church Lane to Blackburn Road via western edge of H66  | Potential future (sic) pedestrian link   | Indicative pedestrian/cycle route   |

Table 1: Comparison of plan on unnumbered page 48 with plans on pages 7 and 51

**12.4.2** The marking of routes within H66 as ‘Potential pedestrian/cycle route’ demonstrates that the respective owners of the potential routes are not on board with the MDC.

**12.4.3** The variety of adjectives - proposed, potential, indicative - is confusing.

**12.4.4** The plan on unnumbered page 48 marks two routes as for pedestrians, but the other shows them as pedestrian/cycle. This is despite the fact that the main sub-heading on page 48 is 'Pedestrian and cycle connectivity'. The confusion alone renders the MDC unfit for purpose.

### **Section 13 Landscape Design Principles and SUDS**

**13.1** The second bullet on unnumbered page 60 needs to allow the removal of invasive, poisonous or dangerous plants and the removal of vegetation in accordance with good horticultural and arboricultural practice.

**13.2.1** In the penultimate bullet on unnumbered page 60 insert after "pond/s" "in strict accordance with a design previously approved in writing by the Lead Local Flood Authority and by National Highways or other body responsible for maintaining the adjacent A56".

**13.2.2** The last bullet on page 60 is nonsensical as it avoids a crucial point - the Green Belt boundary is now the A56. It is hard to understand the purpose of the word 'retained' in the bullet - land is either Green Belt or it is not. The bullet, which is inconsistent with the new woodland structure proposed on unnumbered page 42 (see paragraph 7.1 above), states:

*Development proposals that interface with retained Green Belt land will need to consider and justify an appropriate boundary treatment of dry stone walls, native hedgerows or open boundaries depending on the character of the development and views towards the boundary interface.*

**13.2.3** It is probably the case that the Green Belt boundary is entirely on, and short of the boundary of, land within the ownership of National Highways. In that case, no development proposal on H66 will interface with Green Belt. If the bullet means development proposals in proximity to the A56, it should say so.

**13.2.4** The Response by National Highways to the application posted on the RBC website pages for the application on 25th September 2023 (repeating comments posted on 26th June 2023 and 8th December 2022) stated:

#### *Landscaping and Safety*

*Notwithstanding the comments in the section above, we welcome the fact that the proposed development would include a significant area of landscaped separation between the dwellings and the A56 boundary. Besides the SUDS pond, the landscaping is shown to also include a children's play area, areas of planting as well as incorporation of the existing public rights of way and access to the Chatterton Hey accommodation bridge.*

*The applicants need to be aware that the adjoining landowner has responsibility for fencing the boundary with the trunk road, not National Highways, and that the existing wooden post and rail boundary fence (which is in relatively poor condition) is their responsibility to maintain. The existing fence is of a stock-proof type typically associated with adjoining agricultural use and is not suitable where adjoining land is developed and where the risks of pedestrian or animal intrusion onto this high-speed trunk road dual carriageway are greater and of a different nature.*

*National Highways will therefore be requesting that the existing wooden post and rail boundary fence with the A56 is replaced for the entire length of the development boundary with the trunk road with a close-boarded or mesh type of fencing of an appropriate height so as to prevent children, or dogs not on a lead, from wandering onto the A56; something that may have catastrophic results. The likelihood of this is much greater due to the presence of the dwellings themselves, a children's play area and the landscaped public open space (as opposed to private farmland at present that is some distance from existing residences in the area).*

*We also suggest that the lines of planting shown on the detailed layout (colour) drawing are widened and made denser, especially along the boundary zone with the A56 to act as a further barrier and natural deterrent to unauthorised access onto the trunk road. Care will however need to be taken to ensure that any buried highway drainage is unlikely to be damaged by tree roots. We also suggest that these planted areas should also be fully enclosed with appropriate fencing on all sides (at least temporarily for the first 10 years or so to protect the planting whilst it establishes.*

*There is presently no continuous verge safety barrier on the A56 southbound adjoining this site. In light of the change in land use from agricultural to housing / public open space, National Highways requires that a Road Restraint Risk Assessment safety barrier requirements assessment is carried out by the applicants under the Road Restraint Risk Assessment Process in accordance with standard CD377 of the Design Manual for Roads and Bridges.*

**13.2.5** It is thoroughly dishonest for the MDC to present a supposed landscape design principle that completely ignores National Highways' well-publicised requirements for the closest fence to the Green Belt.

**13.2.6** Unnumbered page 38 of the MDC states that acoustic fencing might be a way to mitigate noise from the A56. The source of the noise is marked on the 'Site constraints and opportunities' plan on page 39. An 'A56 acoustic mitigation corridor' is marked on the plans on pages 7 and 51. Therefore the last bullet on unnumbered page 60 needs to own up to and discuss the likelihood of an acoustic barrier, its height and its appearance, as this too is a candidate for the closest fence to the Green Belt.

**13.3** The text and Codes on unnumbered page 62 must be amended to show that any SUDS must be constructed in strict accordance with a design previously approved in writing by the Lead Local Flood Authority and by National Highways or other body responsible for maintaining the adjacent A56 and maintained in strict accordance with arrangements previously approved by those bodies.

**13.4** Criterion 8 of the SSP requires "[Geotechnical investigations to confirm land stability and protection of the A56, and suitability of locating SUDs close to the A56](#)". The note in the Executive Summary (page 9) that

*The Masterplan accounts for ground conditions and land stability. The TW Phase 1 application includes a detailed Site Investigation worked up in dialogue with relevant consultees, as will subsequent applications to allow detail to be refined/agreed.*

is misleading. The MDC does not demonstrate compliance with the SSP. The suitability of the proposed SUDS has yet to be ascertained. National Highways are yet to be satisfied that the application will not adversely affect the A56. RBC's consultants continue to investigate geotechnical issues.

**13.5** On page 63 Code NA 06 should be amended by the addition of 'or, in the case of an application made before this Masterplan and Design Codes were approved, at the date of approval of the application'. Otherwise, a developer could take advantage of submitting an application before the MDC is approved, despite the fact that the application should conform with the latter.

**13.6** Unnumbered page 38 states:

*The lowest lying land within the allocation is generally located along the western site boundary. This is the most suitable location to accommodate sustainable drainage ponds associated with development.*

That might be so, but the text needs to be qualified by noting that it has yet to be demonstrated that H66 can safely accommodate one or more SUDS without detriment to the safety and stability of the A56.



**13.7** Likewise, unnumbered page 42 stating:

*Additional space is allowed along the south western edge of the site to provide surface water attenuation areas in the lowest lying parts of the site*

needs to be qualified by noting that it has yet to be demonstrated that H66 can safely accommodate SUDS and that any such pond will need the approval of LCC as LLFA.

**13.8** If we accept the definition of 'spring' as 'place where water naturally flows out of the ground', it is hard to understand the statement on unnumbered page 38 that

*Another small spring passes through the southern part of the allocation site, located to the rear of Eden Avenue and Oaklands Road.*

Similarly difficult is the key's description "Spring" for the long green dotted lines on the map on page 39.

**13.9** In respect of criterion 5 v, the Executive Summary claims:

*Existing landscape features are retained throughout the allocation and green corridors permeate larger development parcels.*

That is arrant nonsense - it is obvious that the existing landscape will be obliterated by large-scale housing development. The one landscape feature that should be removed, the artificial mound (paragraph 7.5 above), is retained. Brief reference to the plan on pages 7 and 51 confirms that it is wild exaggeration to state that the larger parcels are permeated by green corridors.

## **Section 14 Area Types**

**14.1** The proposed use of reconstituted stone (or fake stone, as the Places Matter assessment called it) as the building material in Edenfield Core (unnumbered page 82) is unacceptable. The reasoning is said to be:

*Should complement the aesthetic of building materials found in the historic centre of the village due to visibility from Market Street, the immediate PROW network and wider views from the west of Edenfield.*

We take this to mean that the building material is required to complement the aesthetic of the village centre, but fake stone will simply appear incongruous with the built environment, as the image (of FP126 bounded on one side by a drystone wall and on the other by a wall of reconstituted stone) at the top of page 83 shows.

**14.2** The philosophy behind the Village Streets area type (unnumbered page 84) appears to be: 'It can't be seen, so design and appearance don't matter'. The fact is that it will be seen, from the A56, from the opposite side of the valley, from the churchyard, from properties along Market Street, from Exchange Street and the Recreation Ground and from higher ground to the east. It would also be seen from the Edenfield Core area.

**14.3** The use of red brick on such an extensive development is out of keeping with the built environment. It would immediately stigmatise Village Streets as the 'cheap streets', an inferior part of the development compared with Edenfield Core. In the area bounded by Exchange Street, FP 127, the A56 and the B6527 there are only thirteen brick buildings: 43 and 45 Market Street, Alderwood, 1-9 Alderwood Grove and a small electricity substation. If Randall Thorp consider that the Alderwood Grove development, dating from the late 1970s, serves as a precedent or some sort of justification for extensive brick development in their Village Streets Area Type, they must think again. The Alderwood Grove development is very small in comparison with H66 and its building material may be regarded as anomalous. It must be noted also that it

was not subject to strict policies such as those that require high-quality development at H66. As the MDC states at page 28 -

*New development should be influenced by the positive architectural elements found in the village. Avoid recreating less successful architectural styles which have crept into the setting over time.*

**14.4.1** The claimed reasoning and influences for the red brick are

*The area will be less visually prominent in the wider landscape resulting in increased potential to use varied building materials, drawing inspiration from post-1930's development in the southern part of Edenfield. This will add interest and variety to the wider development.*

In this context “varied” seems to be a euphemism for “cheaper”. There is no reason to use development in the southern part of Edenfield, which is more distant from the Village Streets area than largely stone-built Market Street, as an inspiration - this just appears to be a poor excuse. Criterion 5 vi of the SSP requires materials and boundary treatments to reflect the local context.

**14.5.1** The “Key views to be considered” for Village Streets are identified as “Quality of views to and from recreation ground”. This is simplistic and incomplete, but on Code AT/VS 08’s limited terms the claimed reasoning and influences are:

*Ensure development provides a characterful and attractive elevation to the interface with Edenfield Recreation ground.*

A mass of redbrick elevations is unlikely to be characterful and attractive. It is essential to consider also views across the valley to the west and to preserve them as well as views to and from the Parish Church.

**14.5.2** In Edenfield Core, Code AT EC 08 needs to refer to views to and from the Parish Church and Churchyard.

**14.6** Notwithstanding the warning on unnumbered page 80 -

*Where relevant, accompanying vignettes are not intended to be taken as literal representations of the different area types and are for the purpose of providing an illustrative view of each area -*

the image on page 85 captioned “*Indicative character of the Village Streets*” is extremely misleading in showing brick detached houses with front lawns and side parking, flanked by properties in fake stone, since

- the depicted scene is not consistent with a density of 35-40 dph;
- the only building material proposed by the MDC for houses in Village Streets is red brick; and
- there is no indication of the red brick front boundary walls.

**14.7** A glaring omission from the Codes for both Edenfield Core and Village Streets is any reference to designing the layout of the housing parcels to allow views to the Church to continue, although this is required by criterion 5 ii of the SSP. See also paragraph 14.10 below.

**14.8** Unnumbered page 36 identifies the listed building and non-designated heritage assets of direct relevance to H66. These are the Parish Church, the former Vicarage, Mushroom House and Chatterton Hey. Under the heading “Design Influences”, the page states:

*Heritage assets act as local landmarks that contribute to sense of place. Guide pedestrian movement routes to pass alongside heritage assets to allow visual appreciation*

*Ensure adjacent housing is complementary in architectural style and materials.*

That is a simplistic approach. There needs to be a distinction between buildings that are public (the Church) and those in private occupation (the other three). The Churchyard, bounded on two sides by a public

highway or right of way, is open to the public and anyone can walk round the exterior of the Church. The other three are all adjacent to rights of way, and there is no need for new routes, which would be likely to impinge on the privacy and security of the properties.

**14.9** It might legitimately be expected that ensuring that new housing adjacent to heritage assets “*is complementary in architectural style and materials*” would be carried forward to the Site Wide or Area Codes. Unnumbered page 38 says that

*Development must ensure that the setting of these buildings is conserved, and where possible enhanced,*

but the Codes completely ignore heritage issues. They do not conform with paragraph 122 of the Local Plan, which requires development to consider the effect on the significance of heritage assets and to safeguard their setting.

**14.10** Doubling down on the omission of views to and from the Parish Church from the Area Codes (see paragraph 14.7 above), the Executive Summary is dismissive of the need to comply with criterion 5 ii ([Layout of the housing parcels to allow views to the Church to continue](#)) of the SSP. All it says (unnumbered page 8) is:

*The Masterplan will have minimal impact on existing views to the Church as they will be above the roofline of the new houses. Detail be refined through subsequent individual planning applications.*

Criterion 5 ii needs to be embedded in the Site Wide and Area Codes. For all the reasons in this paragraph and paragraphs 14.7 to 14.9 above, the Executive Summary is wrong to claim (unnumbered page 8):

*Masterplan fully accounts for existing heritage assets (pages 36 - 39)*

**14.11** The key characteristic of the key views to be considered for Chatterton South is the “*Visual quality of development interface with PROW route*”. The reasoning and influences are:

*PROW passes along the perimeter of the area. Development should ensure high quality design at this interface to ensure the route remains pleasant and usable.*

This is good, except for the implication that, away from the interface, design might not be of high quality. Paragraph 125 of the Local Plan is clear that development of H66, that is, all of H66, “*must be of a high quality design*”.

**14.12** For Edenfield North, buff brick is one of the building materials proposed (unnumbered page 88). Natural stone would be the only acceptable building material at the approach to Edenfield. The proposed brick buildings might be out of view from Blackburn Road but would be an incongruous sight from the A56, from adjacent PROW and from across the valley.

**14.13** The image of Burnley Road on page 89 with nos 101-105 in the foreground is captioned “*Proposed materials to complement existing local vernacular - white render*”. This is odd, because

- render (a coat of cement on an external wall of a property) is not a building material proposed for Edenfield North;
- nos 101-105 have a coat of white masonry paint, not cement; and
- the scene is at some distance from H66.

**14.14** In the light of paragraphs 14.1 to 14.12 above, the suggestion on unnumbered page 58 -

*Across the allocation building materials should broadly comprise a mix of natural stone, reconstituted stone, brick (of different shades), timber, render, slate (or suitable modern equivalent) -*

must be withdrawn, as it disregards the fact that building materials suitable in one Area Type might be unsuitable in others.

**14.15.1** All the Area Types propose a percentage of 2.5-storey dwellings “where appropriateness can be demonstrated”. That qualification is too weak. At the least, the words “to the satisfaction of the local planning authority” need to be added in each case. Crucial issues are whether higher buildings would have a detrimental impact on key views or glimpses of the countryside. Paragraph 125 of the Local Plan is relevant:

*The layout should be designed to allow glimpsed views towards the Church to continue, for example, by aligning the principle road(s) along a north- south or north east – south west axis, and building heights restricted.*

**14.15.2** Therefore a proviso needs to be added to the applicable Area Type Codes - “provided that no building of 2.5 storeys shall be permitted where it would obstruct or reduce a view of the distant landscape or the Parish Church”. The sentence in the Reasoning and influences for Code AT/VS 04 -

*Appropriately located 2.5 storey development can add interest to the roofscape and street scene at this central village location -*

must be deleted, as it wrongly implies that adding interest to the roofscape and street scene (or building bigger houses) is of importance equal to or greater than preserving views of the landscape and Church

**14.16.1** In all the Area Types, in the subject “Key views to be considered”, the word “considered” should be changed to “protected”.

**14.16.2** RBC have raised concerns about the MDC’s failure to deal adequately with preserving key views. ECNF share those concerns. The inadequacy of the MDC’s response is noted at Table 4 in Section 18 below in ECNF’s comment about the subject ‘Layout and a key view’.

**14.17** The front boundary treatments (Area Type Codes AT/xx 07) for Edenfield Core and Village Streets, but not Chatterton South or Edenfield North, include railings as front boundary treatments. It is not clear whether they would be set in the ground or wall-mounted or how high they would be. In the absence of any illustration, it is not clear whether their appearance would be ornamental, utilitarian or industrial. No explanation for their proposed use is provided under “Reasoning and influences”. The lack of detail is unacceptable.

**14.18** Historically, dwellings in Edenfield, particularly in the central and northern parts, have been built individually or in batches of up to ten. In the case of terraced houses, rows or blocks built in different styles are common. The MDC should be promoting this local characteristic as a reference for development proposals but simply ignores it.

## **Section 15 Land use and density**

**15.1** In the Local Plan, Policy HS2: Housing Site Allocations proposed 400 homes for H66 on a net developable area of 13.74ha at a density of 29 dph. In contrast, unnumbered page 44 states:

*The masterplan indicates a residential net developable area of 13 hectares. Delivery of 400 dwellings across the allocation site equates to an overall development density of 31 dwellings per hectare.*

Having regard, *inter alia*, to paragraphs 120 and 125 (quoted at paragraphs 2.3 and 5.5.1 above and 15.4 below) of the Local Plan, it is strange that the MDC is proposing to increase the density from that proposed in the Local Plan. As the residential net developable area is now found to be less than that stated in the Local Plan (the net developable area of the TW site is only 7.1ha, down from 9.12ha in the SHLAA - *per* Planning Statement, paragraph 3.9), the number of dwellings proposed needs to be correspondingly reduced and to take account of the ten which have already been built at Pilgrim Gardens / Market Street (Horse & Jockey site).

**15.2.1** In stating “a residential net developable area of 13 hectares” for H66, unnumbered page 44 conflicts with unnumbered page 22, which claims:

*Current ownership and control for the 'developable' areas of the H66 allocation is as follows:*

*. . . Taylor Wimpey are freehold owners of largest central part of the allocation (totalling 12.5 hectares). . .*

*Anwyl Land control the southern parcel (measuring 4.75 hectares). . .*

*Peel are freehold owners of the majority of the northern part of the site (measuring 2.2 hectares). .*

*Richard Nuttall controls the land (measuring 1.85 hectares) to the far north of the allocation . . .*

*David Hancock controls land [actually he does not - see paragraph 3.1.5 above] (measuring 1.01 hectares) at Alderwood bungalow, located off Market Street.*

Those numbers add up to 22.31ha and would appear to refer to the gross site areas rather than the developable areas. Unnumbered page 22 is also wrong to suggest that TW own all the central part of H66, which, as the Policies Map shows, includes the completed Pilgrim Gardens development (Horse & Jockey site) and land at and around the bungalow called Alderwood and the former Vicarage.

**15.2.2** Table 2 below summarises the relevant information in the SHLAA, which formed part of the evidence base for the Local Plan.

| SHLAA ref     | Owner                                    | Gross area (ha) | Available area (ha) for development | Net development area (ha) | Dwellings yield at 30 dph |
|---------------|--|-----------------|-------------------------------------|---------------------------|---------------------------|
| 16263         | Methodist Church (Agent - Anwyl)         | 4.75            | 3.1                                 | 2.32                      | 70                        |
| 16262         | TW                                       | 12.5            | 12.16                               | 9.12                      | 273                       |
| 16256         | Peel L&P (some) & Richard Nuttall (some) | 3.69            | 2.79                                | 2.09                      | 63                        |
| <b>TOTALS</b> |  | 20.94           | 18.05                               | 13.53                     | (406 'rounded' to) 400    |

Table 2: Summary of information in SHLAA about H66

**15.2.3** Table 7 in Policy HS2: Housing Site Allocations shows the net developable area of H66 as 13.74ha rather than 13.53 ha, but this is probably explained by the inclusion of the Horse & Jockey site. Table 7 contemplates a yield of 29 dph at H66, resulting in 400 dwellings. It seems not to take into account any developable land at Alderwood or the former Vicarage.

**15.3** The density of 35-40 dph for Village Streets (unnumbered page 84) is extremely concerning, as it is up to 38% more than the density for H66 in the Local Plan. The stated reasoning and influences are:

*Reflects proximity to services & public transport network*

That looks as if the authors of the MDC are seeking to take advantage of a potential ambiguity in the Local Plan, about which ECNF made representations during the Examination. The ambiguity lies in Policies HS2 and HS4 and paragraphs 120, 125, 140 and 141 of the Local Plan.

**15.4** Table 7 in Policy HS2: Housing Site Allocations posits a density of 29 dph for H66. Paragraph 120 says that H66 will require a well-designed scheme that responds to the site's context and makes the most of the environmental assets. Paragraph 125 of the Local Plan provides:

Any proposed development must make a positive contribution to the local environment and consider the site's form and character, reflecting the setting of features such as the Grade II\* Listed Edenfield Parish Church and incorporating appropriate mitigation. Development must be of a high quality design using construction methods and materials that make a positive contribution to design quality, character and appearance. The development must contribute towards the sustainable use of resources. Implementation of development must be in accordance with an agreed Design Code/Masterplan across the whole development. The layout should be designed to allow glimpsed views towards the Church to continue, for example, by aligning the principle road(s) along a north- south or north east – south west axis, and building heights restricted.

**15.5** Policy HS4: Housing Density provides:

Densities of at least 40 dwellings per hectare should be provided within town and district centres.

The density of the development should be in keeping with local areas and have no detrimental impact on the amenity, character, appearance, distinctiveness and environmental quality of an area.

The first sentence of that policy is not applicable to Edenfield, as it is not a town or district centre, as defined in Strategic Policy R1: Retail and Other Town Centre Uses, but the second applies to all housing development. Paragraphs 140 and 141 read as follows:

140 Densities in excess of 40 dwellings per hectare will be expected to be delivered in town centres within Rossendale. Other sustainable locations where higher densities will be expected include sites within the urban boundary and within reasonable walking distance to bus stops on key corridors such as the X43 and 464 bus routes. Inclusive Mobility – Gov.uk propose that 400m walking distance to a bus stop as (*sic*) a suggested standard. High quality design can ensure that high density proposals are good quality schemes.

141 It is recognised that housing densities will be lower in other areas of the Borough because of physical constraints and on site issues, for example, topography, areas at risk of flooding and landscape.

Site promoters might be arguing here that paragraph 140 supports high-density development at H66 because it is within the urban boundary and within reasonable walking distance of bus stops on another key corridor and because the paragraph points out that high density and good quality are not mutually exclusive.

**15.6** However, the fact remains that, taking the Local Plan as a whole,

- it clearly identifies a density of 29 dph for H66
- paragraph 120 says that H66 will require a well-designed scheme that responds to the site's context and makes the most of the environmental assets
- paragraph 125 requires development of H66 to make a positive contribution to the local environment and consider the site's form and character, and to be of a high quality design using construction methods and materials that make a positive contribution to design quality, character and appearance

- Policy HS4 requires development to have no detrimental impact on character, appearance, distinctiveness and environmental quality of an area, and
- paragraph 141 recognises that densities may be lower because of physical constraints and on-site issues, for example, topography and landscape.

**15.7** In short, the proposed density of 35-40 dph for the Village Streets Area Type -

- does not respond to the site's context and fails to make the most of H66's environmental assets.
- does not make a positive contribution to the local environment
- has a detrimental impact on character, appearance, distinctiveness and environmental quality of the Area, and
- fails to recognise on-site issues of topography and landscape.

The stated reasoning (*Reflects proximity to services & public transport*) is irrelevant.

**15.8** Table 3 below summarises the densities of development clusters near H66 as shown on pages 29 to 31. Additionally it shows the densities of a couple of recently approved developments nearby and the density shown in the Local Plan for site H65 on the other side of Market Street. Only three of the sites have a density of more than 30 dph. Two of these (49-77/58-82 Market Street and Bolton Road North) are distinguishable as they feature long terraced rows on a main road. The Pilgrim Gardens development includes a short terrace fronting a main road. Pilgrim Gardens should not be regarded as a precedent for a high density on H66. It is easily distinguished from H66 (although RBC wrongly insisted at the Local Plan Examination that it was part of H66 and the Policies Map wrongly shows it as such), as it was a windfall brownfield site with a disused public house, it was very small compared with H66, it was never in the Green Belt and, when planning permission for housing was granted, it was not subject to stringent policy requirements such as those in the SSP.

| Location  | Density (dph) | Source                          |
|---|---------------|---------------------------------|
| Moorlands View, 14/16 Crow Woods and 57-61 and 97/99 Burnley Road | 30            | MDC, page 29                    |
| 24/26 Blackburn Road, 21/23 Burnley Road and Esk Avenue           | 13            | MDC, page 29                    |
| Church Court and 2 Church Lane                                    | 21            | MDC, page 29                    |
| Alderwood Grove and 115-129 Market Street                         | 25            | MDC, unnumbered page 30         |
| 49-77 and 58-82 Market Street                                     | 45            | MDC, unnumbered page 30         |
| 24-46 & 69-95 Eden Avenue and 2-6 Highfield Road                  | 28            | MDC, page 31                    |
| Acre View and 1-45 & 30-58 Bolton Road North                      | 39            | MDC, page 31                    |
| Site of Hawthorn House, Rochdale Road                             | 18            | Planning application 2021/0454  |
| Pilgrim Gardens and 79-85 Market Street                           | 43            | Planning application 2015/0238  |
| Land east of Market Street (H65)                                  | 29            | Local Plan, Policy HS2, Table 7 |

Table 3: Selected comparative densities of development near H66

**15.9** The Chatterton South Area Codes (unnumbered page 86) contemplate a density of 36-45 dph, up to 55% more than the Local Plan indicated. The reasoning and influences for this are:

*Visually discrete setting within Edenfield provides opportunity to maximise density in a location close to services & public transport.*

It is not clear why a visually discrete setting should be an acceptable reason for cramming dwellings together. The density is excessive. Nor is proximity to services and public transport any justification for over-development. Paragraphs 15.3 to 15.8 above apply to Chatterton South as well as to Village Streets.

**15.10** Unnumbered page 88 identifies a density of 30-34 dph in Edenfield North. That seems excessive, given the Local Plan's expectation of 29 dph in H66 as a whole. It means that the MDC proposes a potential density of more than 29 dph in all four Areas. The reasoning and influences for the density in Edenfield North are said to be

*Lower density than Edenfield Core to reflect position at northern fringe of Edenfield*

This makes no sense, as the proposed density of Edenfield Core is the lowest of the four Area Types at 26-30 dph.

## **16 Equality and Human Rights**

**16.1** In addition to the specific plight of disabled residents in existing houses raised at paragraph 11.8 above, there are wider equality and human rights implications for Edenfield as a whole.

**16.2** The masterplan focuses on the proposed development and protected characteristics (including but not limited to age and disability) of prospective residents of H66 to the detriment of existing village inhabitants. For example, disability access is mentioned for new houses, as are width of streets, vehicular access and driveway widths, but residents who are elderly, frail or disabled in existing houses face potential safety risks from new junctions to facilitate development of the site and the general increase in traffic.

**16.3** No account is taken in the MDC of the effect on people's physical and mental well-being arising from worry about or caused by the development, which may be exacerbated by a protected characteristic.

**16.4** The issue of schools for children and young people is also neglected within the Masterplan and affects both current and prospective residents. The probability is that as development of H66 progresses, not all Edenfield children of primary school age will be able to attend a local school (Edenfield CE PS or Stubbins.) The reality is that, if children are forced to attend PS up to two miles away, they will be taken there by an unsustainable mode of transport.

**16.5** RBC has an obligation under section 149 of the Equality Act 2010 (the Public Sector Equality Duty) to have due regard to equality considerations when exercising their functions. As a way of facilitating and evidencing compliance with that duty, RBC is urged to conduct an Equality Impact Assessment of the MDC. to ensure that this is undertaken and that measures are considered: -

- to eliminate unlawful discrimination
- to advance equality of opportunity between people who share a protected characteristic and those who do not
- foster good relations between people who share a protected characteristic and those who do not.

**16.6** There is an inherent danger of becoming fixated on development of H66, to the exclusion of the duty under the Equality Act 2010.



**16.7** The Equality Impact Assessment should be informed by evidence of impact, with all design decisions (and the reasons and evidence behind them) documented contemporaneously and transparently, making it clear how the needs of all modes and users have been considered. This should incorporate the whole of Edenfield, not just H66 and have full regard to existing residents as well as prospective residents of H66.

**17 Possible extension of Edenfield CE PS**

**17.1** In respect of criterion 9 the Executive Summary claims:

*The Masterplan identifies the land to the rear of Edenfield CE PS for potential expansion (page 51) and makes a commitment that this land can be made available should the local education authority identify a need, with detailed arrangements to be agreed through subsequent planning applications.*

It may be doubted whether a masterplan can make any such commitment, but, even if it were an appropriate vehicle, the MDC does not actually contain one. Apart from marking a plot on the plan on pages 7 and 51 “Potential school expansion land”, all the MDC says (unnumbered page 22) on the subject is:

*Peel also control land to the east of Burnley Road, some of which can be made available for school expansion land, public open space and/or community car parking subject to planning requirements in accordance with the Rossendale Local Plan.*

At the very least, a commitment would have said “will”, not “can”. Whilst this of itself is not a reason to reject the MDC, it is yet another example of its misrepresentations.

**18 Table of responses to Council comments**

**18.1** Separately from the MDC, an anonymous Table of the Developers’ Responses to RBC’s Comments about Version V13 of the MDC has been produced, purporting to demonstrate how the MDC addresses comments from RBC. It was publicised by RBC in September 2023. By reference to the numbers in the left-hand column of that Table, ECNF consider in Table 4 below selected responses and comment as follows:

| Reference number | Subject of response                          | ECNF comment   |
|------------------|--|--|
| [PAGE 1]         |  |  |
| 1                | Dwellings at junctions and nodal points      | The response should refer to unnumbered page 72, not 74, although the muddle is understandable owing to the intermittent numbering of pages in the MDC.  |
| 3                | House types                                  | The response says the RBC comments are included in paras 2 & 3 on page 77.<br>In reality, nothing in that para 3 addresses the RBC concerns. ‘Should incorporate innovative designs and feature glazing’ is ignored. |
| 6                | Boundary treatments in all areas             | The cited Area Type Codes relate only to Front boundary treatments. RBC’s comment about retaining walls is not addressed.  |
| 9, 10            | Quality paving, not tarmac                   | In defiance of RBC’s ‘No tarmac’ stipulation, tarmac is the first option in the Surface materials palette for driveways and private drives.  |
| 11               | Public open space within developed areas     | ‘Development proposals should consider’ (page 60, 5th bullet) is well short of the requirement RBC seek, and RBC’s examples should be reproduced in full. See also paragraph 9.2 above.                              |
| 13               | Long views to Peel Tower and Emmanuel Church | Inadequate response to RBC - see paragraphs 7.4.2 and 7.4.3 above and Section 14 above.  |

| Reference number | Subject of response                        | ECNF comment  |
|------------------|--|---|
| 14               | Green Belt boundary treatment              | See paragraphs 13.2.2 to 13.2.6 above. RBC sought clarity. They received a thoroughly misleading response.  |
| 18               | Coloured chippings, explanation of images  | Another wholly inadequate response.<br>The second bullet on unnumbered page 46 might have been changed, but is contradicted by the unchanged legends about chippings on the 'Off site highway improvements' plans on unnumbered page 46 and on page 47. As the plans purport to have been updated after '29/08.23', there is no excuse or perpetuating the obsolete wording. The MDC must be rejected for ambiguity. The request to explain the images has been treated with contempt; such explanation as is given is unchanged from Version V13 of the MDC.   |
| [PAGE 2]         |  |   |
| 1. i             | All owners to be involved.                 | MDC is claimed to be endorsed by all 5 owners, but this is not apparent - see paragraph 1.2 a) above and paragraphs referred to therein.  |
| 1. ii            | MDC must provide overall framework         | Still too much 'to be agreed' and 'to be confirmed through planning application'. See, for example, page 46.  |
| 1. iii           | No programme of implementation and phasing | The response is outrageous. See paragraphs 3.2.1 to 3.2.10 above.   |
| 2. Context i     | Edenfield Neighbourhood Plan               | See Section 5 above.  |
| 2. Built form i  | Layout and a key view                      | <p>a) RBC's comment related to the view from the NE-SW internal road in TW's southern parcel, marked on the plan on pages 7 and 51. The comment refers to the plan on unnumbered page 48 which does not show that road and to an 'Annotation and arrow' thereon relating to 'Potential views' from FP126 and the NW corner of TW's northern parcel. RBC's comment is therefore simply not addressed.</p> <p>b) RBC asked for the key view to Peel Tower to be highlighted in the key characteristics for 'this area', which the plan on page 49 identifies as mainly in Village Streets, partly in Edenfield Core. Area Type Code AT/VS 08's Key characteristics are simply: Key views to be considered - Quality of views to and from recreation ground. There is no mention at all of the view to Peel Tower.</p> <p>c) Area Type Code AT EC 08 refers to key views of Peel Monument and Emmanuel Church but only from PROW, not from the NE-SW internal road.</p> <p>d) The response refers to Code AT CF 08 for Chatterton South, but this is not germane.</p> <p>e) The response refers also to unnumbered page 26. It claims that the second paragraph of 'Westward views' on that page contains a general requirement to protect key views. That is wrong. It requires nothing. It is purely descriptive. Nor does it identify any views as key views.</p> <p>f) The response cites the 'Design influences' box on unnumbered page 26 as requiring key views to be protected. It is weakly worded and any value it has is diminished by the failure of the Area Type Codes (also weakly worded) to recognise all the key views.</p> <p>g) See also paragraphs 14.5.1, 14.5.2, 14.7, 14.16.1 and 14.16.2 above.</p> |

| Reference number                       | Subject of response   | ECNF comment  |
|--|---|---|
| 2.<br>Built form<br>ii                 | Building heights  | The response refers to the Area Type Codes on Height and quotes them inaccurately. By prefacing “where appropriateness can be demonstrated’ with the word ‘or’, the response makes the Codes sound as if the percentages may be exceeded. Please see paragraphs 14.15.1 and 14.15.2 above.  |
| 2.<br>Built form<br>iii                | Boundary treatments   | RBC’s request was for dry stone walls and hedges along Market Street and Blackburn Road. The response refers to unnumbered page 58 (but that page says nothing about dry stone walls or hedges) and the Area Type Codes AT/xx 07. Those are concerned only with front boundary treatments and do not mention dry stone walls. The reference to AT/CS 07 is irrelevant to Market Street and Blackburn Road. In short, a complete failure to address the issue.   |
| 2.<br>Active travel<br>ii              | Improvement of PROW   | The response refers to pages 9 and 48, which are discussed at paragraphs 12.1.1 and 12.1.2 above.<br>There are no statutory limitations on the content of a masterplan, and it is therefore legitimate for it to include such information as will contribute to effective development of H66. Discussion of its content should not be shut down by bandying the expression ‘high level document’.   |
| [PAGE 3]                               |   |   |
| 2.<br>Nature<br>iii                    | Biodiversity  | There are no statutory limitations on the content of a masterplan, and it is therefore legitimate for it to include such information as will contribute to effective development of H66. Discussion of its content should not be shut down by bandying the expression ‘high level document’. See also paragraph 7.6 above.  |
| 2.<br>Uses<br>i                        | Affordable dwellings  | The response refers to Site Wide Code US 01. See paragraph 7.8 above for criticism of that Code.<br>The response does not address RBC’s request for details of tenure.  |
| 2.<br>Uses<br>ii                       | Custom/self-build   | The response refers to Site Wide Code US 01. See paragraph 7.8 above for criticism of that Code.  |
| 2.<br>Homes & buildings Resources<br>i | Dwellings orientated to maximise use of solar technology and preserve key views | The response refers solely to Site Wide Code RE 01 and evades the orientation issue.  |
| [PAGE 4]                               |   |   |
| 3                                      | Replacement parking for residents   | The response claims that the seventh bullet on unnumbered page 74 confirms that the level of new visitor/community parking will exceed that displaced as result of the development. That statement is questionable. What the bullet says is that ‘[car parking will] Include kerbside visitor/community parking in appropriate agreed locations (with the level of new parking provision to exceed that displaced as a result of the development). If the locations are yet to be agreed, that is hardly confirmation of the new provision. The bullet promises kerbside parking, but the emphasis of the plans on unnumbered page 46 and page 47 is on off-street parking in locations of varying unsuitability. See Sections 10 and 11 above. |

| Reference number      | Subject of response                               | ECNF comment  |
|-----------------------|---|---|
| 4. Design & layout i  | Natural stone to be part of the materials palette | The response claims natural stone is included in all character areas - Area Type Codes AT/EC 06, AT/VS 06, AT/CS 06 and AT/EN 06. That is untrue: stone is not mentioned at all in AT/VS 06, and AT/CS 06 speaks only of stone/stone effect detailing.  |
| 4. Design & layout ii | Boundary wall treatments                          | The response claims unnumbered page 58 provides for use of stone for boundary walls in prominent locations. The truth is that it says: Boundary treatments should include stone walls. Retaining walls which are visually prominent should also be stone faced.   |
| 6                     | Compensatory improvements in Green Belt           | The response refers to pages 9 and 48, which are discussed at paragraphs 12.1.1 and 12.1.2 above.<br>There are no statutory limitations on the content of a masterplan, and it is therefore legitimate for it to include such information as will contribute to effective development of H66. Discussion of its content should not be shut down by bandying the expression 'high level document'.                         |
| 7                     | Geotechnical investigations                       | There are no statutory limitations on the content of a masterplan, and it is therefore legitimate for it to include such information as will contribute to effective development of H66. Discussion of its content should not be shut down by bandying the expression 'high level document'. It is obviously essential to determine as early as possible whether H66 is suitable for SUDS. See also paragraph 13.4 above. |
| 8                     | Expansion of primary school                       | The response claims a commitment in the MDC at page 51 to making land available for expanding Edenfield CE PS. This is an exaggeration - see Section 17 above. Citing unnumbered page 44, the response adds that detailed arrangements would be made through planning applications. That page does not actually mention planning applications in the context of school expansion.   |

Table 4: Observations on the Table of the Developers' Responses to RBC's Comments about Version V13 of the MDC

**18.2** The analysis in paragraph 18.1 above demonstrates that the Table of the Developers' Responses is an unreliable document.

Richard W. Lester for self and on behalf of Edenfield Community Neighbourhood Forum

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6th November 2023

## APPENDIX 1

Extract of map of Public Rights of Way in Edenfield

Paragraph 7.4.1



## APPENDIX 2

Letter dated 9th August 2023 from SK on behalf of ECNF responding to consultation about Version V13 of the MDC

Paragraph 11.1

<https://edenfieldcommunityforum.uk/wp-content/uploads/2023/08/RBC-MAK-090823-FINAL-RESPONSE-SK-TRANSPORT-Aug-2023.pdf>

090823/SK21941/EDENFIELD/MK  
BY EMAIL



SK Transport Planning Ltd

Rossendale Borough Council  
Room 120  
The Business Centre  
Futures Park  
Bacup

www.sktransport.co.uk

9 August 2023

Dear Sir/Madam,

**RE: PLANNING APPLICATION 2022/0451 – LAND WEST OF MARKET STREET, EDENFIELD**

We are writing to you again on behalf of the Edenfield Community Neighbourhood Forum (ECNF), following the submission of a revised full planning application by Pegasus Group for the erection of 238 no. residential dwellings (Use Class C3) and all associated works, including new access, landscaping and public open space at the above-mentioned site.

You will recall we wrote to you in January with our technical review of traffic and transport matters, the majority of which covered the information requests that were set out in the Local Plan Examination, alongside the volume of additional questions and information that the Inspector requested on the proposed housing site allocations during the life of the Examination.

We made the point at the time that the level of additional information requested by the Planning Inspector at that time on fundamental technical matters did not inspire confidence to the group that the Draft Local Plan, which has now been adopted, has been assembled in a robust and accurate way. The group's position remains unaltered now that the above planning application has been submitted. Even with the submission of additional technical information there are a significant number of technical matters that have not been addressed and, in our professional opinion mean the application cannot be determined in a positive manner. We expand on these technical points later in this formal response.

As a reminder RBC, as the Local Planning Authority, were very clear that with regard to traffic and transport matters the residential development proposals could only be supported if:

- 1) *the comprehensive development of the entire site (our emphasis) 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:*
  - a. *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;*
  - b. *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.*

The explanation for releasing this land for residential development was set out by RBC as follows:

*“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*

smarter transport solutions.  
1/16

*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.*

*Rossendale Council therefore requires a Masterplan and will work in partnership with key landowners and key stakeholders, including the Edenfield Community Forum, to ensure a Masterplan is prepared."*

RBC went on to confirm that as part of any future planning application the development proposals would need to 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."*

In our previous response we, along with a number of other consultees set out our frustrations with respect to the level and quality of supporting information contained within the original planning application. RBC and LCC, as Planning and Highway Authorities could not have been clearer as to what technical information would need to be submitted with an application, and the thresholds that would need to be reached to make the development acceptable, including an expected package of mitigation works for the Market Street corridor. This requirement is not only set out in RBC's allocation of the site, but it was also verbally confirmed by Mr Neil Stevens, representing LCC at the Local Plan Examination in Public.

Alongside the ECNF's formal representations to the application, we are but one of a number of consultees who have questioned the level and quality of supporting information submitted with the planning application. To date other negative traffic and transport responses to the application have been received from:

- Rossendale Borough Council - Planning Department
- Lancashire County Council - Highways Department
- National Highways
- Bury Council

The frustration here is that the LPA set out exactly what was required in terms of a comprehensive masterplan, a Design Code, a Transport Assessment covering an impact assessment of both the 238 residential units and the other allocated residential sites, along with clear and concise information on the access strategy for the development. Even now, after the second tranche of technical traffic and transport information has been submitted with the application there are technical queries and information gaps that have to be addressed to meet both RBC and LCC's requirements.

This formal response has been prepared by SKTP to assess the additional technical submission documents for traffic and transport matters against the Planning and Highway Authorities requirements. Each technical matter is set out and discussed in detail below.

### **Development of a Comprehensive Masterplan, with an Agreed Programme of Implementation and Phasing**

As set out in our January 2023 submission the first, and most obvious requirement from RBC and LCC was that the 400 residential unit allocation had to be considered in a comprehensive manner, and not 'salami sliced' by site promoters to avoid a cumulative assessment of the impacts of the allocation on the village.

The masterplan was expected to show:

- a) a comprehensive access strategy for the whole site, for all travel modes
- b) detailed assessment of all access points to and from the surrounding highway network
- c) a clear assessment of the impacts (in traffic and transport terms) of the 400 residential unit allocation on the surrounding highway network

- d) a robust and deliverable mitigation strategy, to both promote sustainable travel to and from the site, and also mitigate the impacts of the development on the village, the surrounding highway network and the Market Street corridor, as stipulated by LCC at the EiP

The level of disappointment from ECNF that the applicant failed at the first hurdle to present this information in their September 2022 planning application was set out in our January 2023 response.

The latest technical submission does now include a Masterplan and Design Code, prepared by Randall Thorpe in June 2023, nine months after the original information was submitted to the LPA. Whilst this additional level of information is welcomed, the detail contained within it raises a number of questions, including:

- the detail of the main site access onto Market Street
- the delivery of the emergency access from the Taylor Wimpey to the Anwyl development parcel
- the corridor strategy for pedestrians, cyclists, buses and vehicular traffic on Market Street
- the delivery of the above-mentioned works as part of the various residential development proposals

As set out on page 46 of the Design Code the off-site highway improvements are directly linked to the residential allocation as a whole, and as such it is not possible to rely on the approach set out by the applicant, where they have stated:

*“...off-site highway improvement measures which will be delivered alongside the development of the H66 allocation site (in line with criterion 3ii of Policy H66). Full detailed proposals will be worked up as part of subsequent individual planning applications.”*

Put simply, if the development is reliant on the off-site highway works to deliver a safe and appropriate access from the Market Street corridor then a detailed design, that can be properly assessed needs to be clearly presented in the submission. The various elements of the strategy need to also be linked to the different development parcels too.

For example, the Taylor Wimpey development parcel is clearly linked to the need to develop a new on-street parking strategy on Market Street, but the submission documents offer no clarity over what off-site works will be delivered at each phase of the overall allocation works. Clarity is sought on this matter, along with confirmation on the detailed proposals for this corridor. Until this level of detail is provided the impacts and mitigation strategy cannot be fully assessed and confirmed.

Further detailed comments on the additional submission information is provided below.

#### **Vehicular Access Matters – Market Street**

The additional technical submissions provide further clarity of the Taylor Wimpey access strategy from Market Street. The scheme presented in the Design Code and on drawing 3806-F04 H show the access proposals but fail to take on board a number of the technical design points that were raised in January 2023 that should have been incorporated into the scheme.

We present the key design points again that need to be shown with the access design.

#### **Widening of Eastern Footway on Market Street**

Whilst ECNF are encouraged that the applicant noted the technical points made by the group during the Local Plan EiP, the ghosted right turn priority junction presented in drawing 3806-F04 H continues to omit the recommended widening of the footway on the eastern side of Market Street from 1m to 2m. This was shown in the ECNF submissions to the EiP and should be a requirement of any access design proposal.

This footway widening on the eastern side of Market Street is required to ensure that pedestrians and those with impaired mobility using this footway have an appropriate width to pass and not step onto the carriageway of Market Street. This requirement is amplified by the latest proposals showing on-street



parking formalised on the eastern side of Market Street. As proposed, the parallel parking bay, when used, will involve passengers opening vehicle doors onto a narrow 1m footway.

As previously set out this footway should be widened to 2m, to provide an appropriate width for pedestrians, and also a corridor that when used by motorists for parking will allow car doors to open across the footway without interfering with pedestrian access. As part of the overall junction design this pedestrian corridor improvement should be included, as the 'golden thread' of the NPPF is to promote sustainable travel. The applicant is of course fully aware of the requirement to enhance access by sustainable modes, as they reference Local Transport Plan (LTP) 3 in paragraph 4.3.4 in the TA, which states:

*"In relation to improving people's quality of life and wellbeing the document recognises that 'fears about road safety and traffic speeds can deter people from walking and cycling' and suggests that this can be addressed by 'creating environments which are attractive for walking and cycling which also benefits social inclusion and cohesion.' Where appropriate the Council will expand the existing network of footways and cycleways to assist in creating quality neighbourhoods."*

By ignoring the matter of widening the eastern footway on Market Street the access proposals cannot be considered compliant with LTP3.

Whilst it is not ECNF's responsibility to design the access arrangements for the applicant, it was previously identified at the EiP that the combination of widening Market Street to accommodate the ghosted right turn access arrangement, along with the requirement to provide 2m footways on both sides of the carriageway may result in challenges providing a continuous 2m footway at the northernmost point of the site frontage adjacent to nos.115 Market Street. We reiterate the need for this to be checked and confirmed in the submission documents.

### **Junction Visibility Splay Validation**

In our previous submission it was recommended that the "Y" distance visibility splay dimensions should be calculated using recorded 85<sup>th</sup> percentile speed survey data, in line with CA185. With no speed survey data presented in the TA or additional submission documents there is still a requirement that the applicant validates their proposed 2.4m x 43m visibility splays against actual recorded speed survey data for this section of the adopted highway. The ECNF look forward to reviewing this data when it becomes available.

In the absence of any evidence presented by the applicant to date, reference is drawn to the ECNF seven day ATC data presented in their submissions to the EiP, which confirmed that in both directions on Market Street the 85<sup>th</sup> percentile speeds were in excess of 30mph, without any adjustment for wet weather speeds.

### **Displaced Parking on Market Street**

During the Local Plan EiP ECNF made the technical point that any new access on Market Street would need the existing kerbside parking on the eastern and western side of the carriageway to be permanently removed, to achieve the required running lane and right turn pocket lane widths, as set out in CD123 Geometric Design of At-Grade Priority and Signal Controlled Junctions.

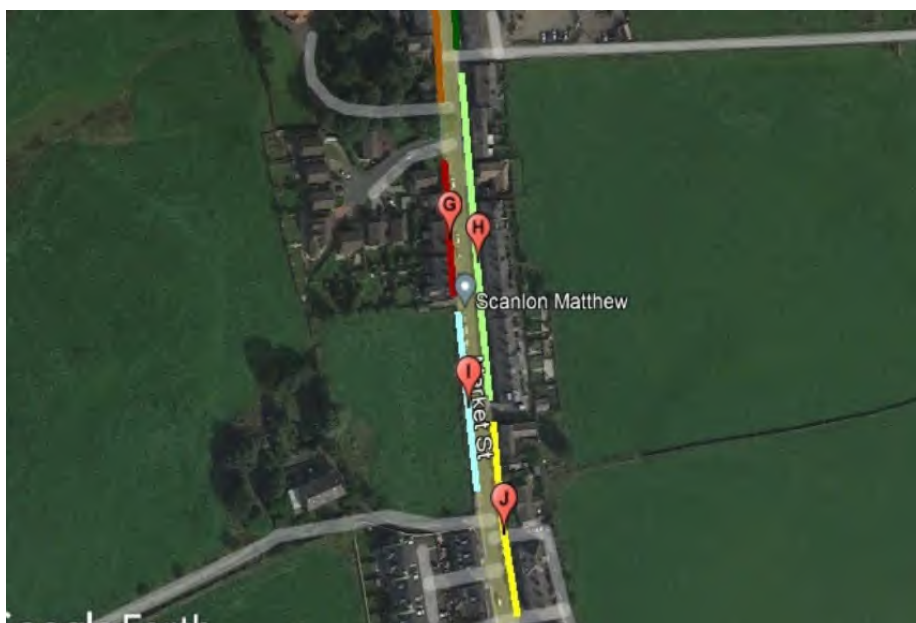
At the time members of ECNF who live locally in the village confirmed that the occupiers of the terraced properties parked on Market Street outside where they live, and as required would also park on the western side of the carriageway, on the opposite side of the road.

The submitted TA attempts to quantify the level of kerbside parking that takes place on this section of adopted highway and the latest parking beat surveys, undertaken between 20<sup>th</sup> and 22<sup>nd</sup> April 2023 confirm the significant volume of on-street parking that takes place on this corridor. As an example, the following on-street residential parking demand (recorded at 0730 hours on Saturday 22<sup>nd</sup> April 2023 was recorded in the following parking beat zones:

- G – 6 vehicles
- H – 20 vehicles

- I – 5 vehicles
- J – 8 vehicles

This equates to a total of 39 parked vehicles parked on-street in the immediate vicinity of the proposed main site entrance on Market Street. Applying a 6m bay space length would mean 234m of kerbside parking would be required in this location to accommodate this parking demand.



**Figure 1:** Extract from Applicant's Parking Beat Survey Data

Drawing 3806-F04 H shows a formalised parking bay on the eastern side of Market Street, from No.102 to 136a. This bay measures circa 86m in length. Further south an additional bay measuring 30m is provided in front of nos. 76 to 82 Market Street. Even with this combined kerbside parking this only equates to parking for circa 19 cars, a shortfall of 20 parking spaces against the existing parking demand on this short section of Market Street.

Whilst it is noted that the applicant is now proposing a 13 space car park for Market Street residents to use, this parking provision does not even meet the shortfall calculated on this limited section of the Market Street corridor.

Based on the above we request that the applicant confirms the following information, so an informed decision can be made on the impacts of the proposed main access to the development, and the impacts on parking for existing residents on this corridor. This review should confirm:

- the existing legal kerbside parking areas along the corridor (by length)
- the current parking demand in each of these parking areas (by vehicle)
- the proposed kerbside parking bay areas along the corridor (by length)
- the net surplus/shortfall in kerbside parking generated by the access proposals and required TROs

Until this information is provided it is not possible for RBC, LCC or ECNF to assess the overall impacts of the displaced parking on the local highway network, or the implications for existing residents on the Market Street corridor.

There is also a need to confirm that in order to maintain both the eastern and western kerblines free from parking and waiting of vehicles, and the provision of formal parking bays along the Market Street corridor

a Traffic Regulation Order (TRO) will need to be introduced. As these works are a prerequisite of the delivery of the access strategy there will need to be a TRO consultation undertaken and progressed outside of the planning application.

This is of course a separate risk for the applicant, and to avoid a situation where the scheme could be granted planning permission, only for the TRO to not be delivered it is recommended that the applicant undertakes the consultation in parallel with the planning application.

The required TRO, relocation of the bus stop, new formalised on-street parking bays and the application of one-way corridor proposals on Exchange Street will all require consultation with the Police, emergency services, local residents, bus companies, and local sustainable access groups. ECNF encourage RBC, LCC and the applicant to undertake this consultation during the life of the planning application, to ensure that the TRO can actually be implemented if the development proposals were to be granted planning permission.

### **The Need for a Comprehensive Corridor Assessment**

ECNF are pleased that the applicant has looked to progress the development of a corridor assessment for Market Street. The proposed access, parking and traffic calming measures on drawing 3806-F04 H move this requirement forward and provide some level of scheme design for both RBC and LCC to consider.

The combination of gateway traffic calming measures, informal crossing points, formalised on-street parking and the ghosted right turn junction are the measures expected to make up the corridor improvement works. As highlighted earlier in this response there is a lack of clarity as to what elements of the corridor strategy will be delivered by each development parcel/phase, or whether all the works will be delivered before first occupations. As required by the RBC Local Plan clarity on these points would be welcomed by ECNF.

Notwithstanding the above there remain concerns over the delivery of the measures shown on drawing 3806-F04 H. As set out earlier the following matters do not appear to have been addressed when preparing the corridor proposals:

- a) that the corridor forms part of the local bus network, and needs to accommodate passing vehicles of this size
- b) Market Street has to accommodate diverted traffic from the A56 if there is ever a road closure on this section of the strategic highway network, and also has to cope with additional traffic when the A56 is busy and modern Sat Nav systems seek it out as an alternative route
- c) Market Street already accommodates a significant level of on-street parking (as confirmed in the applicant's parking surveys) related to the residential properties fronting this corridor and in respect of visitors to local shops and businesses
- d) The proposed ghosted right turn priority junction to the Taylor Wimpey site should be designed to CD123

Commentary on points a) to c) would be welcomed by ECNF, as there are concerns that the volume and on-street parking demands on this corridor have not been fully considered and assessed when preparing the corridor proposals.

In addition there is a lack of detail on the final measures that will be delivered if planning permission is granted. All the proposed measures need to be clearly defined, and in the case of works requiring a TRO consulted on during the life of the application, to ensure all the works and access strategy are deliverable.

Of even greater concern is that the proposed ghosted right hand turn priority junction to serve the Taylor Wimpey development has not been designed to the requirements of CD123. Whilst it is not the responsibility of ECNF to design the access for the applicant, we have previously highlighted the physical width constraints along Market Street, and the challenges delivering a design compliant junction in this location.

For ease of reference we provide an extract of the access proposals below, also with the detailed design requirements on running lane and right turn pocket widths for new accesses on the public highway. In summary CD123 states:

Paragraph 6.8 - *At ghost island junctions on roads other than WS2+1 roads, the through lane widths in each direction shall be a minimum of 3.0 metres and a maximum of 3.65 metres wide, exclusive of hard strips.*

Paragraph 6.10 - *The minimum widths of right turning lanes (excluding those on WS2+1 roads), shall satisfy one of the following:*

- 1) 3.5 metres; or,
- 2) 3.0 metres for new junctions; or,
- 3) 2.5 metres for improvements to existing junctions.

*Note - A narrow right turn lane down to 2.5m wide is only for improvements to existing junctions where space is limited and it is not possible to widen the carriageway cross section, e.g. in urban areas where the carriageway is bounded by buildings.*

Paragraph 6.10.1 - *The widths of the right turning lanes should be in accordance with 1) for both new and existing junctions.*

Paragraph 6.10.2 - *Where it is not feasible to provide the widths of the right turning lanes fully in accordance with 1), the widths should be as close to 1) as practicable, but no less than 2) or 3) depending on whether the junction is new or existing.*

As shown in **figure 2** below the proposed design does not meet the design requirements set out above for the width of the ghosted right turn lane. Paragraph 6.10 confirms 3m is the minimum width for a new junction, and is required to ensure a motorist can safely wait whilst turning right clear of oncoming traffic and to avoid vehicles blocking southbound ahead movements.

A 2.2m wide right turn pocket does not meet the requirements of CD123. It is 0.8m narrower than the minimum 3m wide pocket for a new junction.

In addition, with the access proposals not delivering a 2m wide footway on the eastern side of Market Street, the design as proposed cannot be considered appropriate to serve a new residential development of any scale.

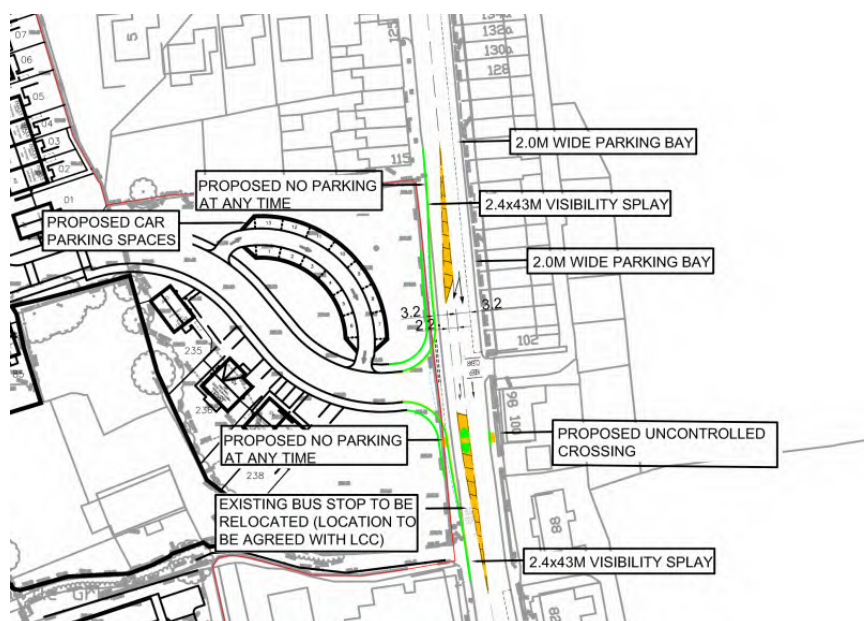


Figure 2: Extract from Applicant's Corridor Improvement Strategy

We believe the reason why the applicant has chosen not to present an access design that complies with CD123 and shows the widened 2m footway on the eastern side of Market Street, the 2m wide parking bay and a 3m wide right turn pocket width is because this cannot be physically accommodated along the site frontage.

This matter was raised during the EiP discussions, in our original submissions to the planning application and are now presented again. It is essential that at some point during the life of the application the applicant confirms whether a CD123 compliant access scheme can be delivered on Market Street.

**The Need for a Road Safety Audit**

Based on the significance of the access proposals, and now the presentation of a corridor strategy for Market Street on this strategic route through the village, it seems appropriate that as part of the technical information submitted with the planning application a Stage 1 Road Safety Audit (RSA), along with a Response Report is required for all the access points and corridors where the development proposals will have an impact, or deliver mitigation measures. We would expect an independent RSA team to be appointed by the applicant, and their report to be circulated along with a Response Report. In parallel with this we also expect LCC's Highway Safety Team to also undertake their own independent RSA of the corridor strategy, and their findings to be reported back as part of the planning application review process.

As set out above, with the main development access from Market Street not being compliant with the junction design requirements set out in CD123 it is perhaps not surprising that a RSA has not been submitted with the application.

The combination of the design as presented not showing the widening of the eastern footway, the "Y" distance visibility splay dimensions not being validated, the right turn pocket not meeting the requirements of CD123 or a clear and robust assessment of the level of displaced parking not being presented confirms highway safety matters have not been satisfactorily considered in the submission material prepared to date.

### Other Access Matters

As set out earlier in this report, the expectation was that any submitted planning application would include a full and comprehensive assessment of all access arrangements to the site. At the present time the only access that has been the subject of any level of detailed scrutiny is the proposed ghosted right turn access on Market Street, whereas the TA confirms that as part of the wider assessment a vehicular access will be required from the northern development parcel onto Blackburn Road, and likewise from the southern development parcel onto Exchange Street. The Taylor Wimpey proposals also place a reliance on an emergency access to the Anwyl land, which then will connect with Exchange Street.

From our review of the additional submission material presented by the applicant there are no GA drawings showing how these access strategies will be delivered, suitability of these access points to serve development traffic or the impacts on any existing on street parking in these locations.

The TA is also silent on the development phasing and the associated construction traffic movements associated with building out the different sites that make up the total residential allocation. As in ECNF's previous submissions it is requested that a clear and concise Construction Management Plan (CMP) is prepared and submitted to RBC and LCC for consideration. This document should clearly show the proposed access routes, compound locations, internal access routes and any mitigation measures required during the construction phases.

### Exchange Street Assessment

ECNF has previously raised significant concerns regarding the use of this corridor approach, as matters relating to the use of Exchange Street to access the southern sector of the development allocation were flagged up during the Local Plan EIP.

The assessment presented by ECNF confirmed the eastern section of Exchange Street is narrow, experiences kerbside parking on both sides and has substandard visibility when exiting from the minor arm onto Market Street. This visibility from the minor junction arm cannot be improved due to the position of adjacent buildings in both the leading and trailing traffic directions.

This corridor also has the recreation ground adjacent to it, along with the recently constructed bike/skateboard pump track which has a direct pedestrian access onto the Exchange Street carriageway. On the other side of Exchange Street is a children's playground. All these uses generate significant pedestrian movements on this corridor, and by their very nature will attract vulnerable road users, in particular children/cyclists.

Concerns about using Exchange Street as a development access point were identified by LCC in their submissions to the Local Plan EIP, where they stated:

*"there are a number of issues with the use of Exchange Street" as a development access route."*

This matter has also been raised by RBC in their latest response to the applicant.

The matters that the Highway Authority raised at the time were:

1. The width is approximately 5 m with evidence of on street parking close to the junction with Market Street and further along which is possibly associated with the adjacent recreation ground and children's play area. This parking restricts traffic flow on the street.
2. There is no continuous footway to the site on either the north or south side of Exchange Street. There provision is considered essential for the development site to progress but may require third party land acquisition and dedication.
3. The junction of Exchange Street with Market Street is close to an existing zebra crossing and any additional movements at this junction are likely to increase the potential conflict between turning vehicles and pedestrians using the crossing facility.

As expected and highlighted in previous ECNF submissions it is noted that the applicant is now promoting an access strategy which requires the eastern section of Exchange Street to become a one-way street.

This expected access proposal was highlighted at the EiP, RBC, LCC and the site promoters, based on the existing sub-standard visibility at the Exchange Street/Market Street junction, along with the lack of continuous footways and on-street parking in this location.

This requirement now forms part of the corridor strategy for the village and will require a TRO to change the eastern section of Exchange Street from a two-way to one-way trafficked route. The additional material submitted with the planning application is silent on any consultation or detailed review of the implications of this proposal on residents and nearby local businesses.

As set out earlier in this response a full consultation on the required TROs to deliver all the measures contained within the corridor strategy, including the one-way access arrangements on Exchange Street must be undertaken before any decision is made on the planning application.

In addition, and of relevance to this technical point during the Local Plan EiP the site promoters discussed an alternative access strategy for the southern development site, whereby all development traffic would be routed onto the local highway network via the ghosted right turn priority junction on Market Street.

Clarification is sought as to whether this is still a consideration if the one-way access arrangements are not deliverable on the Exchange Street corridor, and whether this would affect the ability to deliver an emergency access between the Taylor Wimpey and Anwyl land.

It has been noted that the applicant's Transport Consultant has stated in their report that there is no junction or capacity assessment to undertake in this location. We dispute this and remind all parties that if a new vehicular access is to be provided in this location it will have a direct impact on traffic flows on Exchange Street, Highfield Road, The Drive, Eden Avenue and Bolton Road North.



**Figure 3:** Example of Existing Residential Parking on Highfield Road

These routes often experience a high level of on-street parking, and coupled with direct pedestrian access from the play area, pump track and recreation ground should be appropriately assessed, and form part of the RSA study area.



**Figure 4:** Bike/Skateboard Pump Track Access Directly on to Exchange Street

Until this technical matter is resolved, and the correct development traffic assignment data prepared it is our professional opinion that the full impact of the Local Plan allocation cannot be considered.

#### **Access Matters relating to the “North of Church Lane” Site**

As set out in the ECNF January 2023 submission alongside the lack of clarity on the proposed access strategy for the residential allocation via Exchange Street for the Anwyl land, it was highlighted that the TA was silent on the access strategy and potential impacts of the “North of Church Lane” site. The report also remains silent on the proposal for a new car park adjacent to the school, which creates a new access point close to the signalised junction, and may require the removal of existing on street parking, the impact of which should be assessed.

In the original submission the applicant focused heavily on assessing the development impact of the 238 residential units in the TA. It has taken both ECNF, RBC and LCC to remind all parties that the allocation was made “as a whole” to avoid the potential risk of a piecemeal development assessment. Whilst the latest submission documents have moved the assessment forward, there are still matters such as the overall allocation access strategy, the final detailed makeup of the corridor strategy, the separate consultation on the required TROs and other impacts, such as the impacts of any displaced parking on existing highway corridors.

Turning to the access arrangements for the “North of Church Lane” site, the comments made by RBC and LCC to the proposed access arrangements for this scheme are provided below, for ease of reference.

*“To the north of Church Lane is a smaller site; it is proposed to form an access onto Blackburn Road in the field adjacent to 5 Blackburn Road. There are site constraints associated with any potential access namely the visibility splay in either direction and the proximity of the signalised junction consequently the junction design and positioning will need careful consideration to achieve an acceptable design” (our emphasis).*

ECNF raised the technical matter in their submissions to the Local Plan in August 2019 and again in their January 2023 representations that delivering a new development access in this location onto Blackburn Road would require on-street parking to be permanently removed, and visibility splays would need to cross the adjacent field and stone wall.



The submissions also highlighted the level of existing on-street parking on this section of adopted highway generated by the local school. The point was made at the time that the on-street parking in this location will be made up of teacher and staff parking, along with parent and carer drop-off/pick up at the start and end of the school day, and that the proposed 81% increase in school capacity would be expected to increase on-street parking demand in this location, close to the existing signalised junction.

Whilst the applicant may consider their focus still needs to be on presenting an access strategy and assessment of their element of the wider allocation, to accord with the RBC Local Plan allocation requirements, the scheme needs to be considered as a whole, not in smaller allocations or phases to ensure the cumulative impacts of the 400 unit allocation is appropriately assessed and mitigated. As a consequence we highlight to RBC and LCC that GA drawings should be provided of all the proposed access arrangements to the full site allocation, so an appropriate assessment can be undertaken.

### Off-Site Modelling Appraisal

The final technical matter that we would like to raise at this point is the approach to the off-site junction modelling presented in the TA.

As set out in our previous submission RBC and LCC will recall the significant amount of technical modelling work undertaken by all the site promoters on the Market Street corridor, which included detailed assessment of the Rochdale Road/Market Street mini-roundabout junction. Mott MacDonald, RBC's own transport consultants, previously highlighted capacity issues at this junction and commented that because of the geometric alignment of the junction, and third-party landownerships around the junction there is very limited scope for any capacity improvements at this location.

At the time RBC's transport consultants went on to say that due to capacity constraints the overall quantum of residential development in the village may need to be revisited. These capacity constraints were also highlighted in ECNF's technical submissions to the Planning Inspector.

Based on the clear and transparent position set out by all parties above (including ECNF and the applicant's transport consultants) through the Local Plan, the outputs from the off-site junction modelling appear to be completely at odds with both RBC's and LCC's agreed position. Whilst it is not intended to provide all the evidence previously presented by the various parties, it is sensible to remind RBC and LCC that during the EiP the Council's own transport consultants stated in their Highway Capacity Study (section 6.5):

*"The Rochdale Rd / Bury Rd junction in Edenfield was noted to be operating over capacity on the Rochdale Rd arm of the junction in the morning and the Bury Rd South arm in the evening, in the 2034 Local Plan scenario. It should be noted, as is stated in Chapter 4, that those results are providing an over exaggerated understanding of the forecast operation of the junction, due the assessment methodology adopted, in particular the distribution and assignment element.*

*Consideration has been given to the formalisation of the existing uncontrolled crossing on the Bury Rd North arm of the junction into a demand controlled signalised crossing. This has been tested in the ARCADY model and the results are provided in Table 60 overleaf."*

**Table 60. Junction 11 Rochdale Road / Market Street Edenfield Upgrade Option Results**

| Lane Description | 2034 AM LP |      |     | 2034 PM LP |      |     |
|------------------|------------|------|-----|------------|------|-----|
|                  | Q (pcu)    | RFC  | LoS | Q (pcu)    | RFC  | LoS |
| Bury Rd North    | 9.09       | 0.92 | E   | 1.63       | 0.63 | A   |
| Rochdale Rd      | 27         | 1.04 | F   | 3.72       | 0.8  | C   |
| Bury Rd South    | 2.63       | 0.73 | C   | 54.0       | 1.11 | F   |

“The results in Table 60 demonstrate that provision of a formalised signalised crossing could provide some benefit to the operation of the Bury Rd South arm of the junction, particularly during the evening peak when delay is noted to be at its worst.

It is noted that the Rochdale Rd (morning peak) and Bury Rd South (evening peak) arms are still operating over capacity compared to the Reference case position. This would suggest that further mitigation measures are required in order to deliver the Local Plan up to 2034.

In order to determine the level of Local Plan demand that the junction can accommodate, analysis has been undertaken to adjust the Local Plan traffic volumes, which have found that at 2034 the following additional demand in Table 61 can be accommodated at the junction, by turn movement. This analysis has been undertaken using the proposed controlled crossing version of the model reported in Table 60 above.”

**Table 61. Junction 11 Rochdale Road / Market Street Edenfield Demand Accomodation**

| Lane Description to from | 2034 AM LP    |             |               | 2034 PM LP    |             |               |
|--------------------------|---------------|-------------|---------------|---------------|-------------|---------------|
|                          | Bury Rd North | Rochdale Rd | Bury Rd South | Bury Rd North | Rochdale Rd | Bury Rd South |
| Bury Rd North            | N/A           | 28          | 105           | N/A           | 33          | 75            |
| Rochdale Rd              | 48            | N/A         | 2*            | 20            | N/A         | 7*            |
| Bury Rd South            | 99            | 7*          | N/A           | 74            | 4*          | N/A           |

\* Unadjusted values

“The demands shown in Table 61 above can be accommodated by the junction if the proposed crossing upgrade is implemented. Any further demand beyond those values shown reduces the performance of the junction away from that of the 2034 Reference Case position.

Any further mitigation solutions considered valid for this junction should only be determined in consultation with LCC, given the extremely land locked nature of the junction and it’s (sic) proximity to a number of residential units.”

The capacity matter raised by Mott McDonald at this location remains a live issue, and there is very limited scope for any physical improvement works at, and on the approach arms to this junction. As an example Bury Road is subject to significant levels of on-street residential parking, which often reduces the carriageway down to a single lane width. No parking data has been provided for this link, which we consider to be an omission in the technical submission.



**Figure 5:** Looking North on Bury Road – an Example of Existing On-Street Parking Challenges

The applicant's position is that since COVID traffic flows on this corridor have reduced, effectively creating "capacity headroom" on the network to allow the full residential site allocation to come forward. The 2023 traffic flows presented by the applicant are not disputed, but there is the obvious concern that if, over time, traffic flows return to pre-pandemic levels the "capacity headroom" will no longer be available, and the development impacts, in traffic and transport terms, would be expected to be in line with the Mott McDonald assessment considered at the EiP.

ECNF have noted that LCC has already rejected the applicant's approach to use the reduced baseline traffic flow data, to carve out capacity headroom on the network. This is confirmed in the submitted TA, which states:

*"During pre-application discussions, LCC expressed the view that it does not, at present, solely accept current traffic information as a true reflection of the operational situation of the highway network, due to the effects of Covid and the depressed levels of travel demands."*

To this end, it is quite clear that until an agreed position is reached on baseline traffic flows, the need for the assessment to consider the full allocation (including all access arrangements, implications for displaced parking), capacity assessments and the required corridor-based mitigation strategy for Market Street it is not possible for either RBC or LCC to fully assess the impacts of the proposed housing allocation.

In this instance there is perhaps the opportunity to prepare a sensitivity test by applying the predicted development traffic flows for the full allocation on the previously presented traffic flows presented by the applicant during the EiP. That way a "worst case" assessment would be presented to allow a clear appraisal to be considered of the development impact if traffic flows on the local highway network were to return to pre-pandemic levels.

## Conclusions

On behalf of ECNF SKTP has always raised concerns with the allocation of 400 additional dwellings in Edenfield village. The point that has been consistently made through the Local Plan process is an allocation of this scale has to be supported by an appropriate level of technical assessment, review and application of due diligence.

Unfortunately the supporting information to the planning application confirms that RBC's requirements for a full, cumulative assessment of the allocation as a whole have still not been fully submitted for consideration. All the technical assessment work produced during the Local Plan process by RBC, ECNF and the site promoters confirmed there would be a material level of degradation to the performance of the local highway network through the village. In terms of traffic impact, the scheme appears to be wholly reliant on the "capacity headroom" created on the network post-pandemic to avoid any material impact on the TA study area. It is certainly an "unknown" as to what level traffic flows on the highway network will eventually return to, but a pragmatic approach would be to test the impacts of the development using pre-pandemic baseline flows.

We have highlighted that the proposed access strategy for the allocation as a whole still has not been clearly set out or appropriately assessed. Examples of this include the lack of detailed assessment of the required one-way traffic flow proposal on Exchange Street, the lack of any detailed designs for the northern and southern land parcels, and a lack of clarity on the delivery of the emergency access route through the Anwyll land, and the effects of displaced parking in these locations.

With regard to the proposed vehicular access strategy from Market Street, the previously identified matters where the proposed access arrangements should widen the eastern footway on this corridor have not been included, or justification for the use of standard "Y" distance visibility splay dimensions. This latest review has also confirmed that the design is not CD123 compliant, and a more detailed assessment of the implications of the loss of kerbside parking on Market Street, in the vicinity of the proposed ghosted right turn junction, is still required. The review of the Market Street access proposals suggest a CD123 compliant scheme cannot be accommodated along the development site frontage. The applicant needs to confirm to RBC and LCC if this is the case, and we would also expect the corridor proposals to be the subject of a Stage 1 RSA.

Finally, ECNF remain of the opinion that all parties are already fully aware of the existing capacity constraints on the Market Street corridor, including the Rochdale Road/Market Street mini-roundabout junction that were discussed in detail at the EiP. This was set out in supporting documents through the Local Plan process. Previous assessment work undertaken by RBC's and ECNF's transport consultants have confirmed existing and future year capacity constraints in this location, which is not borne out by the assessment work in the submitted TA.

The TA presents an approach where baseline traffic flows are reduced to carve out "capacity headroom", as well as a lack of clarity on the final traffic distribution in the peak periods. The findings from the 2023 traffic surveys are not disputed, but as highlighted by LCC and recorded by the applicant in the TA whether current traffic flows reflect the long term operational situation of the highway network remains an unknown.

To this end, it is quite clear that until an agreed position is reached on baseline traffic flows, the need for the assessment to consider the full allocation (including all access arrangements, implications for displaced parking), capacity assessments and the required corridor-based mitigation strategy for Market Street it is not possible for either RBC or LCC to fully assess the impacts of the proposed housing allocation.

As set out in our January 2023 response we look forward to LCC and RBC's response on the technical matters highlighted in this letter. In the meantime if you require any further information ECNF will be pleased to assist you on any technical matter.



Yours sincerely,

[Redacted signature]

MICHAEL KITCHING

Director

## APPENDIX 3

### ECNF Transport submission in MDC (Version V13) consultation of June – August 2023

#### Paragraph 11.1

#### EDENFIELD COMMUNITY NEIGHBOURHOOD FORUM (ECNF) JULY/AUGUST 2023 CONSULTATION TRAFFIC SUBMISSION re TAYLOR WIMPEY MASTERPLAN and PLANNING APPLICATION 2022/0451

##### GENERAL

An initial point to appreciate is that the issue of transport/traffic in conjunction with the H66 site has been raised many times by ECNF over recent years, in particular the need for firm proposals. It is true that the recent submissions have, at long last, provided some more detailed information but it is still very much short of a comprehensive plan. In many ways little has changed and the concerns raised both by ECNF and Edenfield residents still apply such that comments and objections previously made are still relevant and should be considered alongside any further comments/objections submitted in response to the latest proposals.

The comments in this document have been produced to reflect the views of Edenfield residents and are supplemental to the more technical points made on behalf of ECNF by SK Transport. A Residents event was held in the Edenfield Community Centre where feedback on the proposals was requested either verbally or in writing. The responses received in writing are attached to this submission (names and addresses have been redacted for the purposes of maintaining privacy).

##### PUBLIC TRANSPORT

There seems very little information supplied on the issue of Public Transport other than that it is clear there is no intention of expanding bus routes into the new areas of housing. The only actual comment made in respect of Public Transport is that the Pilgrim Gardens bus stop is to be moved to an unidentified location which, realistically, means it is to be removed altogether. No new facilities other than houses, roads and a small car park are proposed so all requirements of the new residents will involve off site travel. Whilst there are bus services through the village the usage thereof is very low compared to car usage. This position will deteriorate further with houses some distance from bus stops, one bus stop to be, at best, moved to an inconvenient location and the opportunity being missed to improve local facilities such as healthcare, schools (as far as this application is concerned) and retail outlets.

##### TRAFFIC CENSUS

It is noted that a Traffic Census was undertaken in April 2023. It is really not helpful to the credibility of the data collected that it doesn't cover a whole seven day period of activity. What about Monday, considered by many to be the busiest travel day and what about Sunday, the busiest day in Edenfield for on street parking?

There is also concern that "It is anticipated that the allocation will be completed by 2030" (paragraph 1.15 of the Highways Consideration of Masterplan). This seems extremely optimistic and it is felt that a more realistic view would be achieved by using 2040.

A further concern is that to predict trip rates "the highways officers at LCC have requested that the trip rates as per those used for North-West Preston should be adopted" (paragraph 1.25 of the Highways Consideration of Masterplan). The comparison area needs to be identified more specifically for any meaningful interrogation as to its suitability to be used in the case of Edenfield. A general comment at this stage would be that the North West Preston area seems potentially to be much more of an urban area than Edenfield and is likely to be far better served by bus and rail services than those available to residents of Edenfield. As such there is concern that the number of projected additional vehicle journeys is being underestimated.

## MARKET STREET

As is well documented the Market Street corridor in Edenfield is a funnel for traffic with routes in the South converging from Rochdale, Bury and Ramsbottom at the Market Place mini roundabout and with routes in the North from Haslingden and Rawtenstall converging at the traffic light junction close to the PS and church. If the A56 is closed, blocked or experiencing slow movement then traffic leaves the A56 and the only viable alternative route is through Edenfield.

At the Southern end of Market Street are local businesses (including a bakery, butchers, two hairdressers, pharmacy, food takeaway and The Rostron Arms public house). Along Market Street are the Drop Off Café and several other businesses located in the former Co-op building. At the Northern end are The Coach public house/restaurant, the local PS and Grade 2\* listed church. Market Street is mainly a street of traditional terraced properties many of which do not have private parking arrangements and consequently on street parking is essential for residents to safely and comfortably enjoy their homes. This road has the highest level of traffic use in the vicinity of the H66 site but is a B road in terms of its standard classification. However it is part of Lancashire County Council's Resilient Road Network and is the only route available for local traffic to journey from North to South of Edenfield and vice versa. It is a bus route, gritter route, refuse collection route, cycle route and, as well as motor cars, is used by agricultural vehicles, delivery vehicles, post office vehicles, milk delivery vehicles, heavy goods vehicles both on Market Street itself and for obtaining access to adjacent minor roads. It will also have to deal with construction traffic for the Taylor Wimpey site and potentially some of the construction traffic for other H66 sites. This usage is in an area that is the location of a considerable number of residential properties which, due to their high density level, generate a high number of both vehicle and pedestrian journeys.

Into the above scenario it is proposed that 400 dwellings be constructed immediately to the West of Market Street of which approximately 240 will access on/off Market Street by way of a single access point. There are also proposals in the near vicinity of the Taylor Wimpey site access point for a further 18 properties needing vehicular access onto Market Street from the site at Alderwood (planning application ref 2022/0577) and the site opposite Alderwood referenced as H65 in the Rossendale Borough Council Local Plan. The Applicant has rightly recognised the enhanced importance of Market Street by including in its proposals a gateway feature at either end. Taking all these factors into account **Market Street should not be regarded as low traffic residential estate route and therefore the very best design practice should be followed in respect of any proposed changes.**

In and within fairly close proximity to Market Street are approximately 600 dwellings. The proposed Masterplan under consideration involves the construction of about 400 new dwellings so a simple calculation indicates that traffic usage originating in the immediate vicinity will increase by 50% so a considerable intensification of usage on all local roads and junctions in respect of both vehicle and pedestrian journeys.

As reported in the SK Transport submission for ECNF a traffic survey in 2019 indicated about 8000 vehicle movements along Market Street per day. The information submitted by Eddisons (weekday am surveyed peak flows) indicates about 1500 vehicle movements between 7.45am and 8.45am and that 90%+ of these vehicle movements are in respect of through traffic. Some movements (maybe 5%) arise from residents departing from a parked position on Market Street and some movements (maybe 2.5%) arise from vehicles joining from side streets (Exchange Street, Gincroft Lane, Heycrofts View, Alderwood Grove, East Street and Church Lane and from land situated between terraced blocks of houses used for parking and in the case of 51 to 77 Market Street garages located behind the terraced housing.

The above indicates Market Street peak am traffic of one vehicle every 2.5 seconds (3600 seconds divided by 1500 movements) most of which travel the whole length of the road. Traffic joining Market Street arises at the rate of about one every 90 seconds (3600 seconds divided by (1500\*2.5%)) which residents advise is already very difficult to safely achieve. The TW site is projected to generate an extra 107 weekday am departures onto Market Street so one vehicle about every thirty seconds (3600 seconds divided by 107) which raises the issue of how this will be achieved safely.

#### HIGHFIELD ROAD PARKING

Highfield Road and adjacent/connecting roads (Eden Avenue and The Drive) are also residential locations and were designed as access routes for local residents to their homes and not as thoroughfares for traffic to/from other areas. The number of houses in this area is approximately 180. No information has been provided on the number of new dwellings proposed for this area but a figure of 90 has been previously mentioned so a likely increase in journeys of 50%. There is, therefore, concern that significant additional traffic will arise on these routes from the Anwyl site which may affect safety and the availability of on street parking.

It is noted that details of current parking capacity for Highfield Road have been supplied in Appendix 1 of the Response to LCC Report Note. There is no reference to this location in the Highways Consideration of the Masterplan document. In view of the increased traffic which will arise from the Anwyl site on Highfield Road (and also Eden Avenue and The Drive) it seems reasonable to expect to see in the Masterplan the information to support the conclusion that these roads can cope with the increased traffic expected and retain all existing on street parking. This needs to be part of the Masterplan and not something left to be found necessary at some future date.

#### EXCHANGE STREET

The proposal to make it one way is presumably in recognition that exiting onto Market Street, close to the pedestrian crossing and where there are severely restricted views, is far from ideal. There also seem to be parking proposals but these are far from clear but, based on the faint yellow line shown on the Applicant's Proposed Highways Improvement Plan document, seem to involve the loss of residents' on street parking. Sadly the proposals on this corridor are far from clear and again the credibility of what is proposed is not helped in that the Proposed Highways Improvement Plan document does not include the Edenfield Pump (bike/skateboard) Track and its entry/exit onto Exchange Street. In respect of the Pump Track it should be noted that it has proved very popular and this means more cyclists using not only the Track itself but also the local road network, in particular Exchange Street, Highfield Road, Bolton Road North and Market Street.

#### EXCHANGE STREET JUNCTION WITH HIGHFIELD ROAD AND ANWYL DEVELOPMENT

It seems likely that this junction will see a significant increase in activity. Using the figure of 90 as the likely number of dwellings which may be built on the Anwyl site it is thought that a fair rough estimate of the number of daily journeys passing through this junction would be approaching 500. There are serious concerns about its direct proximity to the Pump (bike/skateboard) Track (in particular its entry/exit point) and close proximity to the Children's play area and Recreation Ground. The Forum believes this arrangement should be considered as a brand new junction and potentially would fail a Road Safety Audit so therefore such an audit should be undertaken before any Masterplan/Planning Application is considered any further.

#### BURY ROAD/BOLTON ROAD NORTH

As with the Highfield Road area, issues in connection with Bury Road and Bolton Road North appear to have been ignored. These routes are also the location of terraced properties and similar issues arise for residents as for those on Market Street. These areas should be considered as part of the Masterplan process and issues of traffic flow and parking resolved now.

#### MARKET PLACE MINI ROUNDABOUT

This is already a busy junction at peak times and has to accommodate traffic on the Primary Route (A680/A676) and Lancashire County Council's Resilient Route Network. In view of the increased traffic arising from the proposed three new significant developments in Edenfield it seems reasonable to expect a Road Safety Audit to have been performed on this location at the Masterplan stage to demonstrate its ability to operate safely by reference to current standards. Issues already arise in respect of

- (i) the pedestrian crossing near to this junction
- (ii) queuing traffic arising on the approach from Rochdale Road
- (iii) traffic leaving the junction struggling to travel south down Bury Road
- (iv) visibility issues for traffic arriving at the junction from Rochdale Road
- (v) visibility issues for traffic arriving at the junction travelling north from Bury Road and



(vi) difficulties experienced by heavy and sometimes quarry vehicles turning from Rochdale Road into Bury Road and vice versa.

#### FOOTPATH 126

This footpath (from Market Street, west past Mushroom House and across the centre of the Taylor Wimpey site and then by bridge over the A56 to farmland and properties at Alderbottom) is likely to be used to a much greater extent than at present such that its mixed use by vehicles and pedestrians is likely to cause safety issues. To reiterate information previously supplied the first part of Footpath 126 is used by Mushroom House as its access route. In addition there is farmland and two residential properties (Alderbottom Farm and Swallows Barn) situated on the west side of the A56 which use the whole length of Footpath 126 as an access route.

In addition no consideration appears to have been given as to how Footpath 126 will interact as it crosses the North/South traffic primary vehicle access road which the Adoptable Highways Plan indicates will take place adjacent to the point an East/West estate road also crosses the primary vehicle access road. What will stop residents from the Taylor Wimpey site accessing Footpath 126 with vehicles to access Market Street especially at busy times?

#### MARKET STREET PARKING

It is disappointing that the Highways Consideration of the Masterplan makes almost no comment on the issue of increased parking restrictions on Market Street other than to indicate that they are proposed. Similarly, the Response to LCC Report Note document also makes very little reference to parking issues other than to repeat the information in the Highways Consideration of the Masterplan and provide in Appendix 1 some Google Earth screenshots of various parking zones and a summary of the Total Number of Spaces (337) broken down into 21 zones of which 10 are on Market Street. Reference is made to parking survey data in paragraph 1.18 which is that presumably on page 66 but no interpretation thereof appears to have been made.

Of the ten existing parking zones on Market Street it seems that it is proposed three will be lost (E, I and M) involving 51 spaces out of a total of 147 so roughly 35%. It is acknowledged that three new parking areas are proposed. However two of these (off Burnley Road adjacent to the school and at the bottom of Exchange Street) are geographically removed from Market Street and there is very little detail as to how these will be delivered. A third parking area is proposed with thirteen spaces in the field adjacent to the Taylor Wimpey site access road. This is certainly more relevant to Market Street residents but it will not replace the on street parking they have enjoyed over many decades outside their front door. The provision of only 13 spaces is also clearly inadequate especially when some spaces may well be used by visitors to the Taylor Wimpey properties, some may well be used by day commuters from elsewhere using bus services from Edenfield to travel to work and some may be used by visitors to The Coach/The Drop Off Café. Furthermore the 13 spaces proposed are located in an unsecure open area with limited lighting and there are no spaces identified for use by those with disabilities.

It is also unrealistic to rely on parking restrictions in a heavily populated residential area to improve the flow of traffic and/or improve traffic safety since such restrictions do not apply to blue badge holders/those dropping off or picking up passengers/those unloading/loading or, in practice, to those ignoring the restrictions especially for short periods of time.

The use of the above mentioned field for a parking area detracts from the Applicant's claim that it represents an open space and it may adversely interfere with the operation of the Market Street junction (see below). There is also the issue of electric vehicle charging facilities to which, in the not too distant future, access will be required for all residents.

#### MARKET STREET JUNCTION

This is the most significant change proposed and involves a priority right turn to ease traffic flow. Traffic will enter from both directions on Market Street onto the proposed Taylor Wimpey development. A detailed

plan of the proposed layout is included at page 18 in the Response to LCC Report Note. Yet again, it is not helpful to the credibility of this document that it is out of date as it does not include the properties located very close by to the proposed junction at Pilgrim Gardens or the junction from Pilgrim Gardens onto Market Street.

The site access is proposed to be directly opposite an access area (adjacent to 102 Market Street) to properties opposite the proposed junction on the East side of Market Street. How is this access area supposed to operate when travelling northbound along Market Street without potentially encountering a vehicle in the ghost island of the site access? This will result in crashes!

The site access is also very close to private driveways located at 98/100 and 115 Market Street. These driveways are narrow and not easy to enter/exit at the best of times so the proposal that residents at these locations will also have to deal with the effects of increased traffic and a right turn junction is most unwelcome and potentially dangerous. Similar issues also arise in respect of vehicles using the Footpath 126 exit onto Market Street and such issues may also affect vehicles using the Alderwood Grove and Pilgrim Gardens junctions.

A number of houses get their bins collected from the roadside end of the above mentioned access area (adjacent 102 Market Street) once a week. The refuse vehicle would have to park in front of the pedestrian crossing (blocking the road), putting residents in danger as pedestrians would no longer be visible using the pedestrian crossing. This must be a highly dangerous arrangement.

The site access is proposed onto Market Street, a highly trafficked, heavily parked upon, Designated Diversion Route for National Highways (when the A56 shuts), informal diversion route for modern sat navs when the A56 is experiencing slow traffic and key route for the many agricultural and large vehicles in the area. Market Street is also a bus route, gritter route, refuse collection route and key route for cyclists that is used by both commuters and for recreational purposes (being a hub for mountain biking in the area and also the location of the Drop Off Café a destination specifically promoted as cycle friendly).

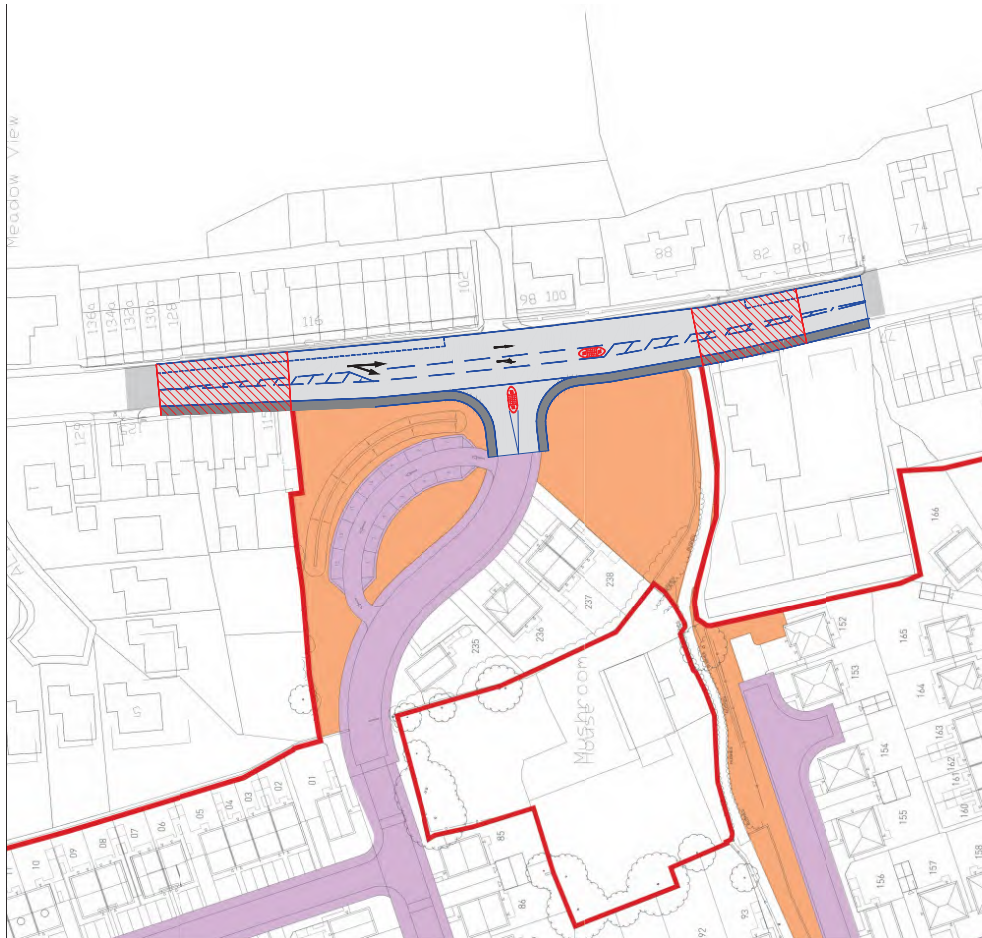
A site access from a heavily trafficked road into a development of such a large scale should be constructed to meet the very best design practice. If Rossendale Borough Council/Lancashire County Council don't ensure that this is the case, they are putting the lives of residents, vulnerable road users (cyclists) and pedestrians including the PS children (accessing the school just 250m from the site access), at serious risk/danger of fatalities. In particular it has been suggested the following should occur:-

- Due to the number of houses on the site and the number of vehicle trips per day generated the site access must have an absolute minimum of a 35m ghost island.
- The access must have safe crossing for pedestrians and therefore must provide a minimum 2m wide pedestrian island, both across the access and across Market Street
- Due to Market Street being a Bus Route, Refuse Collection Route, Heavy Goods Route, Agricultural Vehicle Route, Strategic Highway Diversionary Route, and Gritter Route, the through lanes of the ghost island must be at or near the maximum width of 3.65m in order for buses/commercial vehicles to pass safely
- The eastern side footpath needs to be widened to 2m to allow safe usage.
- Any changes to the western side footpath need to adhere to it being 2m wide.
- The priority turning lane must be a minimum of at least 3m wide.
- Because Market Street is a 30mph route, all tapers should be a minimum of 1:20.

All of the above are the **absolute minimum requirements** that need to be achieved for the traffic types involved on Market Street and must be able to fit into the development or adopted highways. **UNDER THE CURRENT PROPOSALS THESE MINIMUM REQUIREMENTS ARE CLEARLY NOT ACHIEVABLE.**

The sketch below shows the absolute minimum design requirement on the (out of date but as used by the Applicant) OS mapping and the site layout. The area hatched in red is where the ghost island would have to tie into in advance of the junction. The areas hatched in blue/red shows where the widening would need to

run through private houses. The minimum requirement would be extended far beyond this and is outside of the development and adopted highway. It is thought the current proposals would fail a Road Safety Audit so therefore such an audit should be undertaken before any Masterplan/Planning Application is considered further.



Lancashire County Council/Rossendale should not approve the current proposed layout because they would be approving of something that is undeliverable and is going to potentially result in serious injuries and even DEATHS!!!!

If Rossendale Council/Lancashire County Council are to truly maintain the safety of their road users and residents, they must not just accept the minimum design requirements, but they should be requiring a 3m

wide ghost island, with a 45m long access and with maximum width through lanes and a 3m wide pedestrian island.

#### MARKET STREET/CHURCH LANE/EAST STREET/BLACKBURN ROAD/BURNLEY ROAD

Obviously a complicated area of the road network already partly controlled by traffic lights, adjacent to the church/PS and subject to heavy on street parking especially at school opening/closing times (subject to a potential significant increase if, as may occur, the school is expanded to accommodate additional children from the H66 development). A proposed uncontrolled crossing is suggested presumably in response to increased traffic and increased numbers of school children needing to cross the road at this location. However the design of the crossing will potentially interfere with the ability to enter/exit East Street and Church Lane.

It is acknowledged that additional parking is proposed adjacent to the school accessed from Burnley Road but this creates a further junction close to the existing junction. It also would be located in a Green Belt area and is not in accordance with the Local Plan. It is also doubtful whether it would provide sufficient parking to deal with the needs of parents/carers at the beginning/end of the school day.

None of the above is considered in the revised Masterplan when what is required is a detailed analysis, reasoned proposals and a safety audit of such proposals.

#### EQUALITY ACT/HUMAN RIGHTS etc

Residents are feeling badly treated over the whole process and that much of the current proposals are focused on the needs of potential new residents to the extreme detriment of current residents. Surely existing residents should be considered equally alongside new residents.

There is no indication as to how long construction work will take and no plan in respect of phasing construction work or for how the village will cope with such work on three and up to possible five different sites at the same time (and also quite likely coinciding with significant construction work very close by to be undertaken by United Utilities on the Haweswater Aqueduct). Such an imposition seems totally unreasonable and contrary to the right to a peaceful enjoyment of an individual's property.

There is also no plan as to how construction traffic will be managed and how Blackburn Road, Market Street, Bury Road, Bolton Road North, The Drive, Eden Avenue and Highfield Drive will cope with heavy goods vehicles trying to access the various construction sites all potentially at the same time. The village has already had to deal with significant disruption as a result of construction works at Pilgrim Gardens and on Rochdale Road which have yielded less than 20 properties. It is now faced with years of disruption, noise, road chaos and pollution followed by parking restrictions, one way street arrangements, more traffic on already congested roads, safety issues and local education/health services being overwhelmed.

There is, or there is certainly perceived to be, discrimination against existing residents in respect of the proposed parking arrangements (and in respect of other issues) which may contravene the provisions of the Equality Act 2010.

The hardship caused by the removal of on street parking (and indeed other aspects of the proposals put forward) could also be a breach of the Human Rights Act 1998. These issues need to be addressed. It is appreciated that the rights of the individual (or group of individuals) has to be balanced against the public good but the proposals as put forward are considered to be too much weighted in favour of development. Many residents feel that, in overall terms, the public good could be better served by much less development in Edenfield and development elsewhere on more suitable sites.

As a Public Body it is incumbent on RBC that at the appropriate time it will review these issues in the prescribed manner as part of its decision making process.

#### SUMMARY

- Still no Masterplan other than in name only.
- Credibility issues in respect of key documents.

- Insufficient consideration of traffic/transport issues on a holistic basis.
  - Insufficient details in many respects.
  - Road safety concerns.
  - Pedestrian safety concerns.
  - Market Street proposed junction fails to comply with regulations.
  - Unfair treatment of existing residents in respect of on street parking.
  - High levels of construction traffic on busy roads in existing residential areas.
- 
- Overall impact causing excessive hardship for existing residents.
- 
- 11 August 2023 compiled by M J MacDonald on behalf of Edenfield Community Neighbourhood Forum based on feedback and comments received from Forum members and the residents of Edenfield.

**APPENDICES attached**

Written comments from attendees of residents' event held 15th July 2023.

*[NOTE: Those written comments are not reproduced here but are available to view at [edenfieldcommunityforum.uk/2023/08/30/ecnf-objections-august-2023/](https://edenfieldcommunityforum.uk/2023/08/30/ecnf-objections-august-2023/) ]*

## APPENDIX 4

Letter dated 25th August 2023 from LCC

Paragraph 11.1

[https://edenfieldcommunityforum.uk/wp-content/uploads/2023/10/2022\\_0451-HIGHWAYS\\_-\\_RESPONSE\\_2-420569.pdf](https://edenfieldcommunityforum.uk/wp-content/uploads/2023/10/2022_0451-HIGHWAYS_-_RESPONSE_2-420569.pdf)

## APPENDIX 5

### Note by SK of transport issues for RBC/ECNF/SK meeting on 28 September 2023

#### Paragraph 11.1

270923/SK21941/EDENFIELD/MK

#### MEETING NOTE

Date: 27<sup>th</sup> September 2023

Project: Land West of Market Street, Edenfield – RBC Meeting

#### 1. INTRODUCTION

1.1 This Meeting Note (TN) has been produced by SK Transport Planning Limited (SKTP) on behalf of the Edenfield Community Neighbourhood Forum (ECNF) to assist discussions with Officers at Rossendale Borough Council (RBC) at the scheduled meeting on the 28<sup>th</sup> September 2023. This MN covers off the key traffic and transport matters that we would like to raise with the Council, and should be read in conjunction with the August 2023 submissions to RBC in 2019.

1.2 These are broken down into three key areas, as summarised below:

- a) the traffic, transport and sustainable access assessment process
- b) the ability for Lancashire County Council (as Highway Authority) to resource and provide technical responses to RBC
- c) progress on the extensive list of outstanding technical traffic, transport and sustainable access matters

1.3 Each point is summarised in turn:

#### a) The Traffic, Transport and Sustainable Access Assessment Process

- RBC are aware that ECNF have played an active and positive role in the planning process, with SKTP's involvement going back as far as the EIP into the Local Plan
- At the EIP, having raised an extensive number of technical matters ECNF was told by the site promoters that all technical matters raised would be considered at the planning application stage
- This position was reinforced by Neil Stevens (LCC) confirming to the Inspector and interested parties that:
  - 1) all technical matters would be carefully reviewed
  - 2) a full cumulative impact assessment would be required
  - 3) a full corridor based assessment along Market Street would be required

1.4 At the time ECNF made the point that because of the extensive number of technical issues the site(s)/scale of residential development in Edenfield should not be allocated in the RBC Local Plan. The point was made that allocating sites that had not been demonstrated or tested in terms of accessibility/suitability at the site promotion/EIP stage was always going to result in the situation that has now emerged.

**b) the Ability for Lancashire County Council (as Highway Authority) to Resource and Provide Technical Responses to RBC**

1.5 We aware that LCC, as Highway Authority are struggling to resource formal responses to planning applications. At the time of writing this is amplified by:

- Rob Hancock, who has led the day-to-day management of the applications from LCC's perspective being on extended leave from work
- Having requested Neil Stevens involvement (as he represented LCC at the EiP) we have been told he is unavailable due to other work commitments
- Ryan Derbyshire (Assistant Engineer with LCC) has taken over the day-to-day management of the application, but has confirmed he has no knowledge of the site and due to his current workloads will have to bring himself up to speed with the application

1.6 Clearly losing Rob Hancock has added resourcing pressure at LCC. Both ECNF and RBC now have a "knowledge continuity" issue with the applications, with the risk that matters 1, 2 and 3 listed above will not come to fruition. These points underpinned the residential site allocations in the Local Plan.

1.7 There is an expectation from ECNF that LCC and RBC will need to provide additional resources to deliver what was promised at the EiP.

**c) Progress on the Extensive List of Outstanding Technical Traffic, Transport and Sustainable Access Matters**

1.8 The formal responses to RBC from SKTP, citing the raft of deficiencies with the scheme and planning application have always been made within the required timescales. To demonstrate the quality of the planning application submission, and the deficiencies with the scheme we are still waiting to see:

- a. a comprehensive Masterplan
- b. a comprehensive access strategy
- c. a clear assessment of all the impacts (in traffic and transport terms) of the full allocation on the surrounding highway network
- d. a robust and deliverable mitigation strategy

1.9 All the above points were stipulated by LCC at the Local Plan EiP.

1.10 In addition we also continue to raise issues and concerns on a raft of technical matters, which include (but are not limited to):

- e. detail and delivery of the main site access onto Market Street
- f. delivery of the emergency access from the Taylor Wimpey site to the Anwyl development parcel
- g. the corridor strategy for pedestrians, cyclists, buses and vehicular traffic on Market Street
- h. the delivery of the above-mentioned works as part of the proposals
- i. the lack of widening of the eastern footway on Market Street

- j. minor arm junction visibility splay validation (no speed survey data provided in the submission)
- k. the impact of displaced parking from Market Street to deliver the main development access
- l. the continual need for a comprehensive corridor based assessment
- m. any form of final detailed measures at key locations along the corridor
- n. delivery of a design-compliant ghosted right turn junction to the development
- o. the absence of any form of independently prepared Road Safety Audits for the access strategy and mitigation measures
- p. impact assessments of the access strategy to the southern land parcel
- q. the absence of any GA drawings showing how the access routes will be delivered, and the impacts on any existing parking/local facilities in the area
- r. a lack of information on development phasing and construction access information
- s. no draft Construction Management Plan
- t. a lack of detail on the Exchange Street access strategy/assessment, and design considerations with regard to the skatepark/childrens playground etc
- u. the latest design change and requirement for part of Exchange Street to become one-way
- v. confirmation on the final access strategy for the "North of Church Lane" site, and displaced parking elements
- w. discrepancies in the off-site modelling appraisal, with the applicant's assessment being at odds with RBC's Mott MacDonald assessment (see page 12 of SKTP's August 2023 letter)

1.11 The above summary list is just a snapshot of the key issues that have been previously raised, with all the technical matters summarised in the SKTP submissions prepared since 2019.

—oooOOOooo—



## APPENDIX 6

### Email dated 30th August 2023 from SK to LCC

#### Paragraph 11.1

On 30 Aug 2023, at 21:55, Michael Kitching <[REDACTED]> wrote:  
Evening Rob,

Firstly I hope you are well and workloads remain manageable at your end.

We are writing to you on the Edenfield scheme. We've been following the progress of the application, the previous robust responses from LCC and RBC and the latest information submitted from the applicant on traffic, transport and sustainable access matters.

We have seen the LCC response dated 25<sup>th</sup> August (attached for ease of reference) and are alarmed that a number of the previous technical matters that LCC raised seem to have fallen away based on the information submitted. These technical matters were set out in our response to RBC and LCC on the 23<sup>rd</sup> August, and as such can only assume that the two responses have crossed.

Whilst LCC has the responsibility of reporting their own findings on the technical aspects of the application, the SKTP 23<sup>rd</sup> August response is directly in line with the previous submissions and the technical matters raised by the Community Group and LCC. We are alarmed that many of these matters appear to no longer be considered material, albeit that no technical detail on the Market Street access proposals or Road Safety Audits have been submitted.

As an example we are struggling to understand how LCC are prepared to accept a 2.5m right turn lane on a route where interested parties were promised at the Local Plan examination that a detailed corridor-based strategy would be developed. At the present time we have yet to have the opportunity to see a clear access strategy and review of the corridor, including the implications of displaced parking and the lack of enhancements for pedestrians on the eastern side of Market Street.

We could go on with our concerns, but these are all set out in our most recent response. Based on this can we set up a meeting with you, RBC and representatives from the group as a matter of urgency please? Next week would suit us well, if you and Mike Atherton are available please?

I have copied in the Rossendale BC Forward Planning email, and trust this will reach Mike in the appropriate way.

Look forward to hearing from you shortly.

Kind regards,

Michael

**Michael Kitching**  
BSc (Hons) MSc CMILT  
Director

<image001.jpg>

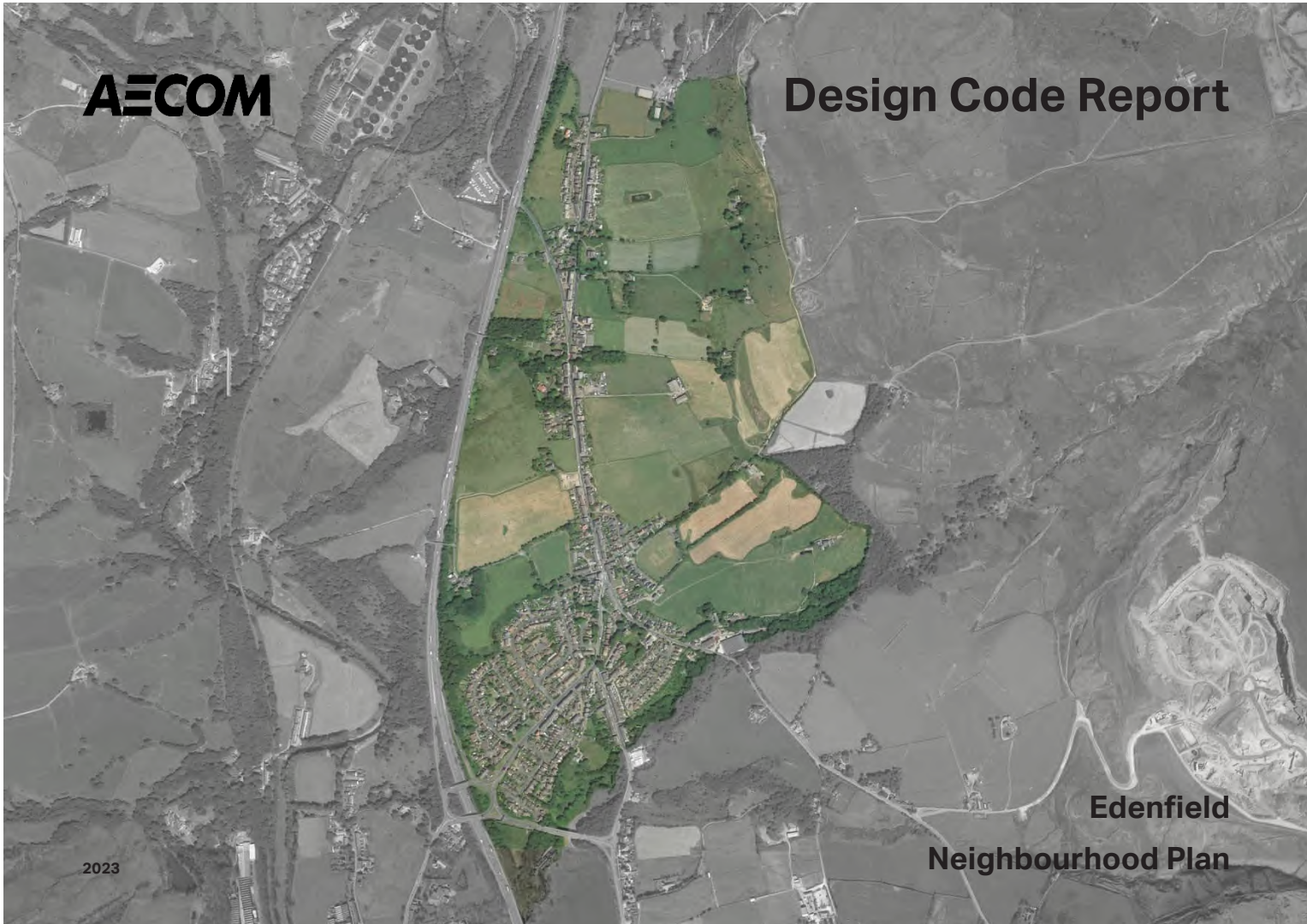
SK

[REDACTED]

[sktransport.co.uk](mailto:sktransport.co.uk)

Registered in England & Wales 06001445

**NOTE:** References in the email to 23rd August 2023 should be to 9th August 2023.



**AECOM**

**Design Code Report**

**Edenfield  
Neighbourhood Plan**

2023

**Quality information**

| Document name                            | Ref      | Prepared for                            | Prepared by  | Date       | Reviewed by |
|--|----------|---|--|------------|-------------|
| Edenfield Neighbourhood Plan Design Code | DR-10391 | Edenfield Community Neighbourhood Forum | Pratibha Bhatt,<br>AECOM<br><br>Lucy Sykes,<br>AECOM | 29/09/2023 | BM          |

| Document Name                                 | Revision | Date       | Alterations   |
|---|----------|------------|---|
| DR10391_Edenfield NP Design Codes Early Draft | 001      | 19/07/2019 | Initial draft report for comments/feedback from QB and Planning Consultants |
| DR10391_Edenfield NP Design Codes Draft       | 002      | 20/12/2019 | Address comments made by QB and Planning Consultants                        |
| DR10391_Edenfield NP Design Codes Draft       | 003      | 18/02/2020 | Further QB comments incorporated  |
| DR10391_Edenfield NP Design Codes Final       | 004      | 01/06/2022 | Final document updated following comments from the QB.                      |
| DR12414_Edenfield NP Design Codes Final       | 005      | 28/09/2023 | Updates to final document following adoption of Local Plan                  |

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Views towards Peel Tower

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  - 5.13 Cycle Parking and Storage (Code-CPS)
- 6. Next Steps**



*Aerial view of Edenfield Neighbourhood Area and surroundings*



Introduction

# 01

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## 1.1 Background

The village of Edenfield within Rossendale, Lancashire has formulated a Community Neighbourhood Forum to shape and influence development within their neighbourhood area. The Neighbourhood Forum is in the process of writing the Edenfield Neighbourhood Plan.

Locality is the national membership network for community organisations that brings local people together to produce neighbourhood plans. Through the Locality framework, the Neighbourhood Forum has approached AECOM to develop design guidance to be applied across the neighbourhood plan area. The design codes will provide guidance and clear design principles for new development to adhere to, helping to protect and enhance the rural character and setting of Edenfield.

## 1.2 Purpose

The purpose of this design code report is to raise an appreciation for Edenfield's existing village character, and to use this understanding to provide design guidance to strengthen and protect the village setting. It will identify the various character areas of the village, and provide a set of guidance to frame the objectives for the Neighbourhood Plan and the ambitions of the Neighbourhood Forum, as reflected within workshop engagement sessions.

## 1.3 Methodology

The process that was undertaken in order to produce this report was as follows:

- The Neighbourhood Forum appointed AECOM's Design team to produce a design code report;
- AECOM representatives attended an inception meeting and walk about in Edenfield with Forum representatives to define the brief;
- An engagement workshop was held in Edenfield to capture local opinion;
- AECOM developed an understanding of the design principles that will protect the rural setting and character of Edenfield, and produced a draft design code report; and
- The group and their appointed planning consultants reviewed the draft and feedback from the report was incorporated. A final report has been signed off.

## 1.4 Document Structure

This document is divided into sections:

- 1. Introduction:** Outlines the background, purpose, process, study area and design code document structure;
- 2. Baseline review:** Identifies relevant policies on a national and local level relevant to the neighbourhood plan area. This section also discusses the village-wide principles which set the context for the area, and introduces the four identified character areas;
- 3. Workshop Engagement:** An overview of the engagement process and how the local community have been consulted as part of the design code report;
- 4. Character area assessment:** Provides a granular review of the character areas which include housing styles and details, relationship to building scale and massing, level of enclosure, access to views, relationship to open space, street scene etc. This section also provides a framework for the application of the design guidance;
- 5. Design Codes:** Offers guidance on how to deliver appropriate design quality within the character areas, based around a number of themes. The themes align against the policy objectives of the Edenfield Neighbourhood Plan; and
- 6. Next Steps:** Provides the following steps for the forum.

## 1.5 Study Area

The design code report is considered to be applicable across the entirety of the Edenfield Neighbourhood Plan Area. Figure 1.1 indicates the boundary of the study area.



Figure 1.1: Edenfield Neighbourhood Plan Area  
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Edenfield Parish Church

## Baseline Review

# 02

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## 2.1 Policy documents

### National Planning Policy

#### National Planning Policy Framework (NPPF), September 2023

The National Planning Policy Framework (NPPF) outlines the Government's overarching economic, environmental and social planning policies for England. The policies within this framework apply to the preparation of local and neighbourhood plans, and act as a framework against which decisions are made on planning applications.

The NPPF states that the purpose of the planning system is to contribute to the achievement of sustainable development, which will be achieved through three overarching objectives. One of these is an environmental objective, which seeks to protect and enhance the natural, built and historic environment. The parts of particular relevance to this Design Codes report are:

**Part 12 (Achieving well-designed places)** states that design policies should be developed with local communities, so that they reflect local aspirations and are grounded in an understanding and evaluation of the areas defining characteristics. It states that Neighbourhood planning groups can play an important role in identifying the special qualities of each area and explaining how this should be reflected in development, both through their own plans and by engaging in the production of design policy, guidance and codes by local planning authorities and developers. It encourages development which is visually attractive, sympathetic to local character and history including the surrounding built environment and landscape setting.

**Part 13 (Protecting the Green Belt Land)** states that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open, as the essential characteristics of Green Belts are their openness and their permanence.

#### National Design Guide 2019

The National Design Guide sets out the characteristics of well-designed places and demonstrates what good design means in principle and in practice. It supports the ambitions of the NPPF to utilise the planning and development process in the creation of high quality places. It is intended to be used by local authorities, applicants and local communities to establish the design expectations of the Government.

It identifies ten characteristics which underpin good design; Context, Identity, Built Form, Movement, Nature, Public Spaces, Uses, Homes and Buildings, Resources and Lifespan. The principles identified in the National Design Guide have been used to support the codes of this report.

#### Design: process and tools, Planning Practice Guidance (PPG), 2019

The Government has provided further guidance on how to achieve quality design within the updated Design PPG, which is intended to be read alongside the NPPF and the National Design Guide. This guidance encourages the engagement of local communities within the design and planning process. It recognises the importance of local design policies and guides which are established by neighbourhood planning groups.

## Local Planning Policy

### The Adopted Rossendale Local Plan 2019-2036

The local plan sets the ambitions of the Local Authority and provides the statutory planning framework to guide development in the Borough to 2036, helping to define a strategy and help to determine the distribution of development. The Local Plan 2019-2036 was adopted by Rossendale Borough Council in December 2021. The policies of relevance to this design codes report are identified below:

**Policy HS4 (Housing Density)** states that the density of development should be in keeping with local areas, and have no detrimental impact on the amenity, character, appearance, distinctiveness and environmental quality of an area.

**Policy HS6 (Open Space Requirements in New Housing Developments)** requires housing developments of 10 or more new dwellings to make provision for open space having regard to the most up to date evidence on the quantity, accessibility and quality of open space in the Borough. Where there is no identified local deficiency in quantity or it is demonstrated to be inappropriate due to site specific circumstances a financial contribution will be required to off-site provision or improvements to existing open spaces.

**Policy HS8 (Private Outdoor amenity space)** sets out that the size of garden spaces should have regard to the size and type of dwelling proposed and the character of the garden sizes in the immediate neighbourhood. It also requires all boundary treatments to be appropriate to the character of the area.

**Policy HS9 (House Extensions)** requires extensions to respect the existing house and surrounding buildings in terms of scale, size, design, fenestration and materials without innovation and original design features being stifled.

**Strategic Policy ENV1 (High Quality Development in the Borough)** expects all proposals for new development to take into account the character and appearance of the local area including safeguarding and enhancing the built and historic environment, being sympathetic to surrounding land uses and occupiers, avoiding demonstrable harm to the amenities of the local area, providing landscaping as an integral part of development and appropriate boundary treatments'.

**Policy ENV3 (Landscape Character and Quality)** seeks to protect and enhance the distinctive landscape character of Rossendale. Development proposals will be expected 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.

**Policy ENV5 (Green Infrastructure networks)** encourages the incorporation of new green infrastructure in new developments which should integrate with the existing network.

**Policy ENV9 (Surface Water Run-Off, Flood Risk, Sustainable Drainage and Water Quality)** requires all development proposals to consider and address flood risk from all sources and manage surface water in a stated order of priority.

**Policy TR4 (Parking)** requires parking to be conveniently located in relation to the development, safe and secure, not impede the highway network, not detract from the character of the area, and benefit from natural surveillance.

### Lives and Landscapes Assessment for Rossendale Borough Council (December 2015)

The report considers all sites which have potential landscape sensitivity within the Borough, several of which fall within the Edenfield neighbourhood area.

The report concludes that the dramatic topography of Rossendale means that there is much inter-visibility between the sites across the Borough, so cumulative effects of development need to be taken into account. With regard to the sites in Edenfield, the combined effect of development might have a much greater effect on the landscape character and visual receptors than elsewhere. The report describes how sites within the urban boundary, on previously developed land and adjacent to development tend to be the least sensitive on landscape grounds.

The assessment reinforces the pattern of ribbon development which is common across the Borough as a characteristic. It also raises the importance of long views and how these should be protected, along with development edges, contours, skylines and open countryside. The recommendations of the report will be incorporated into this design code report, in particular within the Landscape Character and Open Space Code (LC).

### Highway Capacity Study (Oct 2018)

The study was undertaken to support the transport evidence base for the emerging Rossendale Local Plan, and outlines the transport impacts of potential developments. Some highways infrastructure falls within the Edenfield neighbourhood area. Understanding the potential impacts of this infrastructure can be used to help inform design guidance.

The Rochdale Road/ Market Street Roundabout, which connects Bury Road, Rochdale Road and Market Street, is identified as a location for traffic delays, as experienced along Market Street (in both directions) and north along Rochdale Road. The design code report will have awareness of these potential congestion points.

### Alterations and Extensions to Residential Properties (June 2008)

The Supplementary Planning Document provides design guidance to domestic extensions within Rossendale, helping to secure a level of design quality and consistency. While it has a focus specifically on the extension of existing units, it also sets the guidance to ensure compatibility with the local area. It states that development applications should not detract from the character of neighbouring properties, should uphold the appearance of the street-scene and local area, and should not harm the outlook of neighbouring properties.

Recommendations which are applicable to the neighbourhood area have been incorporated into the guidance of this report.

### Rossendale Green Belt

Figure 2.1 shows the land still designated as Green Belt in the Neighbourhood Area following adoption of the Rossendale Local Plan 2019-2036

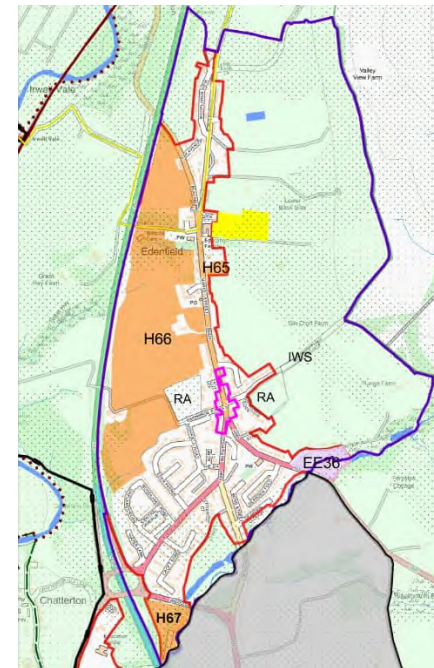
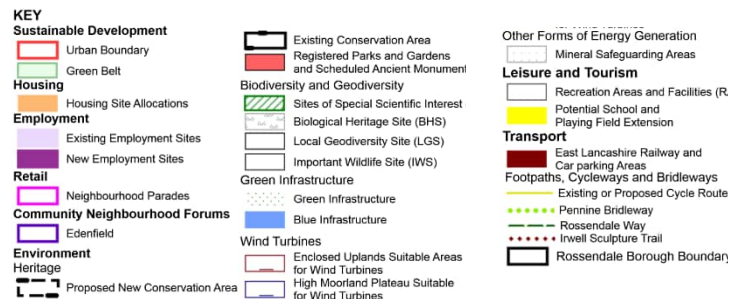


Figure 2.1: Rossendale Policies Map

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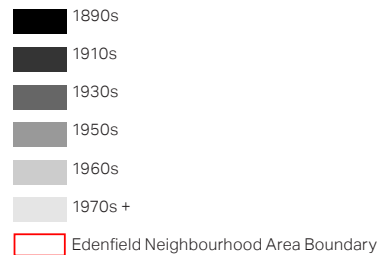
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## 2.2 Village structure and growth

Edenfield is considered a discrete settlement in functional terms, but also forms part of the extension from the Ramsbottom urban area. Historically, Edenfield was a small settlement which comprised a number of dispersed farmhouses. The original village core focused around the Parish Church and Primary School, to the north of Market Street. With the growth of the wool industry in the late 18th/ early 19th century, the village extended southwards. Victorian terraces and cottages were built to accommodate the local mill and quarry workers, establishing the traditional stone vernacular which is expressed along Market Street.

With its valley side position, Edenfield is a classic example of ribbon development which is common across the Rossendale landscape. Whilst this linearity is strong in the north, the south of the village has a more expanded structure, due to significant post-war development which saw the settlement grow around Bolton Road North, Bury Road and Rochdale Road.

Parcels of piecemeal development of varying architectural styles have contributed to the burgeoning nature of this southern section. These later additions have been developed with a vernacular which is quite different from Edenfield's historic village character but which offers a rich variety to the local landscape.



12

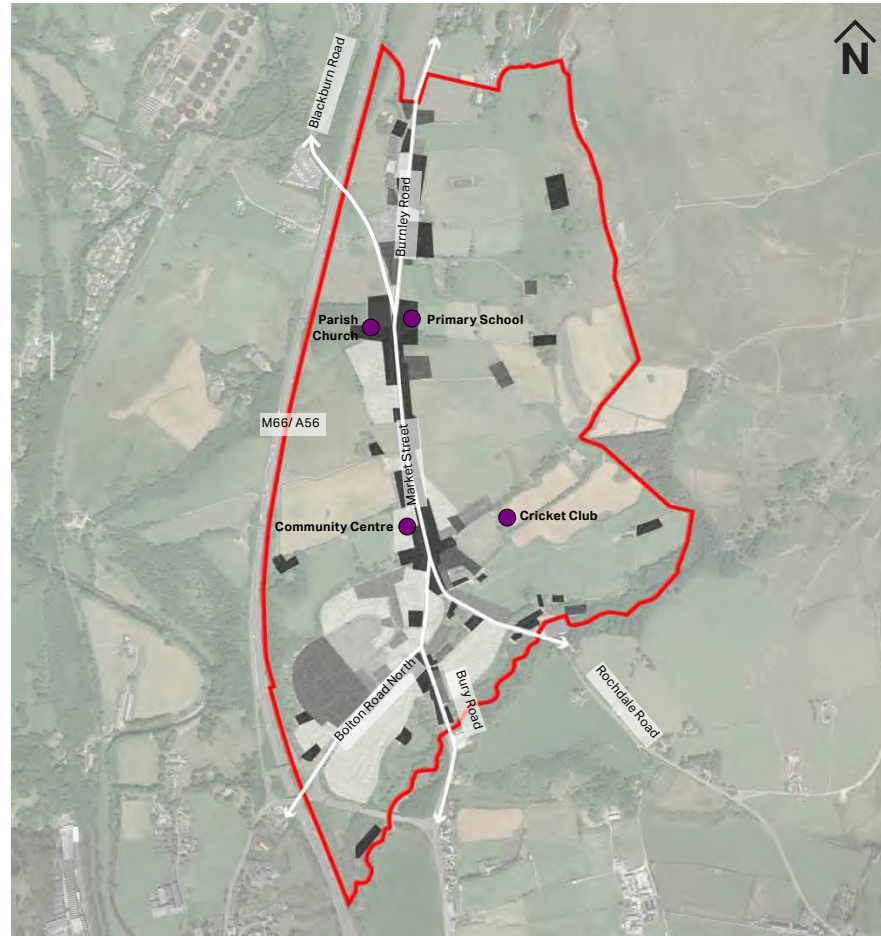


Figure 2.2: Village Structure and Growth

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## 2.3 Open space

A handful of both formal and informal open spaces are present in the village, including the recreation ground adjacent to the community centre, the cricket club, the churchyard/ cemetery, the memorial garden, and the primary school playing field.

According to the Lives and Landscapes Assessment for Rossendale Borough Council (December 2015), Edenfield falls within the Settled Valley Landscape Character Type (LCT) 8b Irwell Valley South. This is defined as below:

- The valley opens out and the profile of the lower valley sides becomes less steep
- The density of housing and industry becomes much less, with extensive areas of open pasture and woodland within the valley bottom
- Some ribbon development continues along main roads but is not continuous
- Views across the valley are rural in character with a lesser proportion of the view being made up of built development



Figure 2.3: Formal and Informal Open Space



## 2.4 Heritage assets

Within the Edenfield Neighbourhood Area there are a number of Grade II listed buildings, and one Grade II\* listed building. There is no designated conservation area within the Neighbourhood Area, however, a number of other buildings have been identified as being of local interest, despite not having statutory protection. These have been proposed by Rossendale Civic Trust to be included within a list of local heritage assets being compiled by Rossendale Borough Council. Furthermore, the Rossendale Local Plan 2019 - 2036 identifies some non-listed heritage assets in the Neighbourhood Area. These are Chatterton Hey (Heaton House), Mushroom House and the former Vicarage (paragraph 4 of the site-specific policy for housing allocation reference H66 Land west of Market Street) and Edenwood Mill (paragraph 1 of the site-specific policy for site H67).

These non-listed and nationally listed assets are concentrated predominantly along Market Street, but also capture some of the outlying farmhouses. There are also other buildings which help to build the historic identity of the village, notably the traditional terraces units built from Pennine stone with slate roofing. Together, these assets help to establish the historic and traditional character of Edenfield.

Many of the listed assets are strongly defined by their position in the open landscape. How these features can be protected in this context and be safeguarded against the impact of development will need to be considered as part of the design guidance process.

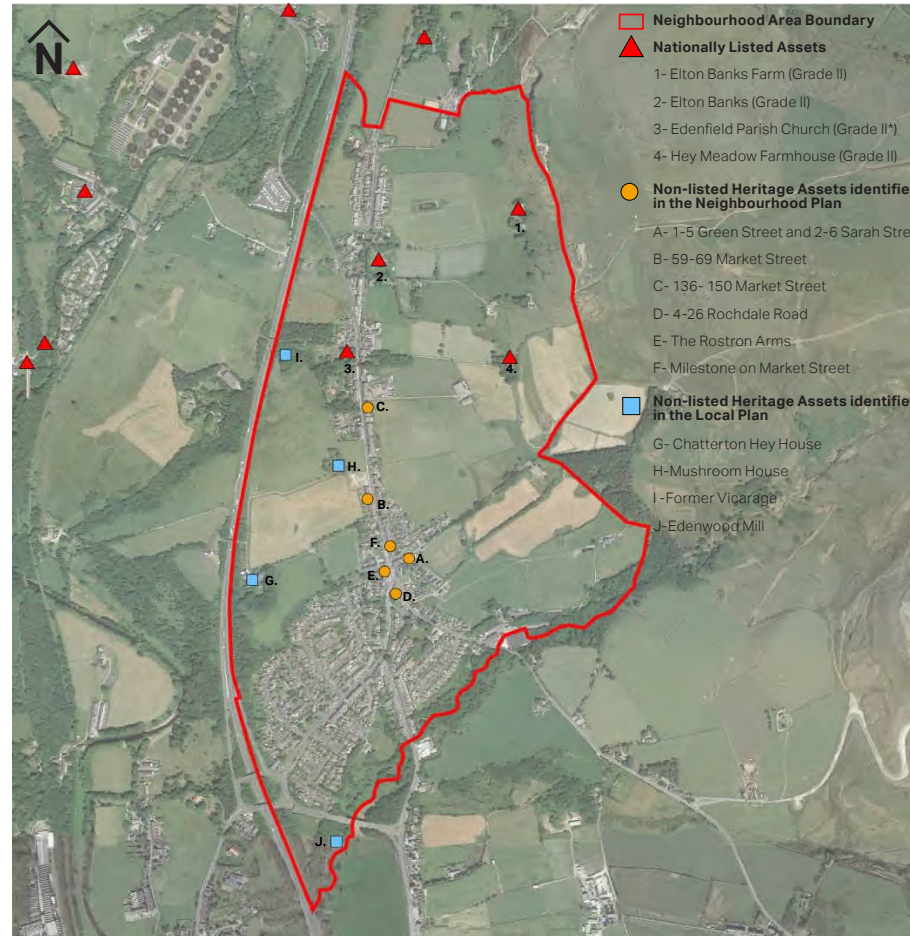


Figure 2.4: Heritage Assets

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Map Reference 2: Elton Banks



Map Reference 3: Edenfield Parish Church

Images to be read alongside Fig 2.4



Map Reference A: Chatterton Hey House



Map Reference B: 1-5 Green Street



Map Reference C: 59-69 Market Street



Map Reference D: 136- 150 Market Street



Map Reference E: 4-26 Rochdale Road



Map Reference F: The Rostron Arms

## 2.5 Key Views

A significant part of the neighbourhood area falls within land designated as Green Belt by Rossendale Borough Council and excludes only the defined settlement edge. One of the fundamental characteristics of a Green Belt is its openness. The openness and the elevated position of Edenfield affords attractive views into and out of the neighbourhood area.

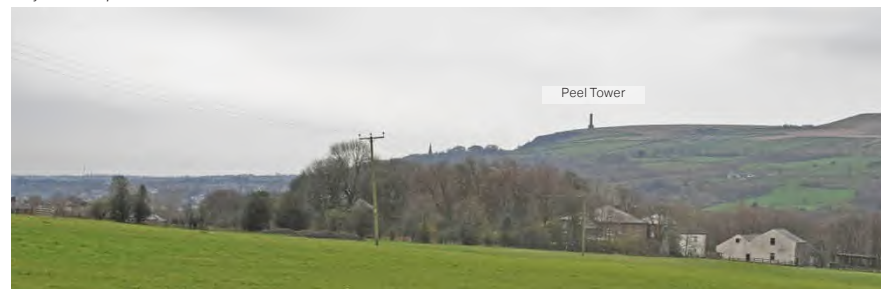
As per the Lives and Landscapes Assessment for Rossendale Borough Council (December 2015), the landscape character type of Rossendale is defined as a series of interlocking valleys, with ribbon development extending along the primary valley between Rawtenstall and Bacup. The southern part of the borough is considered to be more rural in character.

The local topography also enables long views from surrounding listed assets into the neighbourhood area. This is especially true with the long views from Peel Tower, a monument located to the south west atop Harcles Hill. As well as protecting views out, these long views into Edenfield also need to be considered when determining the impact of any development, especially that which could affect the skyline of the settlement against the landscaped ridges.

Various Key Views to the surrounding landscape have been identified for protection, as shown on the page opposite.



Key View 1- Hope View



Key View 3- Long views to Peel Tower



Key View 8- From Church Lane across churchyard to south-west

**Key Views**

**KV1**-Market Street, adjacent to its junction with Footpath 14-3 FP 126

**KV2**-Market Street, adjacent to no 117 Market Street

**KV3**-Lane leading west off Market Street by Mushroom House (Footpath 14-3 FP 126)

**KV4**-Lane leading west off Market Street by Mushroom House (Footpath 14-3 FP 126)

**KV5**-Gin Croft Lane adjacent to Gin Croft Farm 14-3 BOAT 275

**KV6**-Footpath leading south from Hey Meadow Farmhouse 14-3 FP 136

**KV7**-Footpath leading south from Hey Meadow Farmhouse 14-3 FP 136

**KV8**-Church Lane and the Churchyard

AECOM

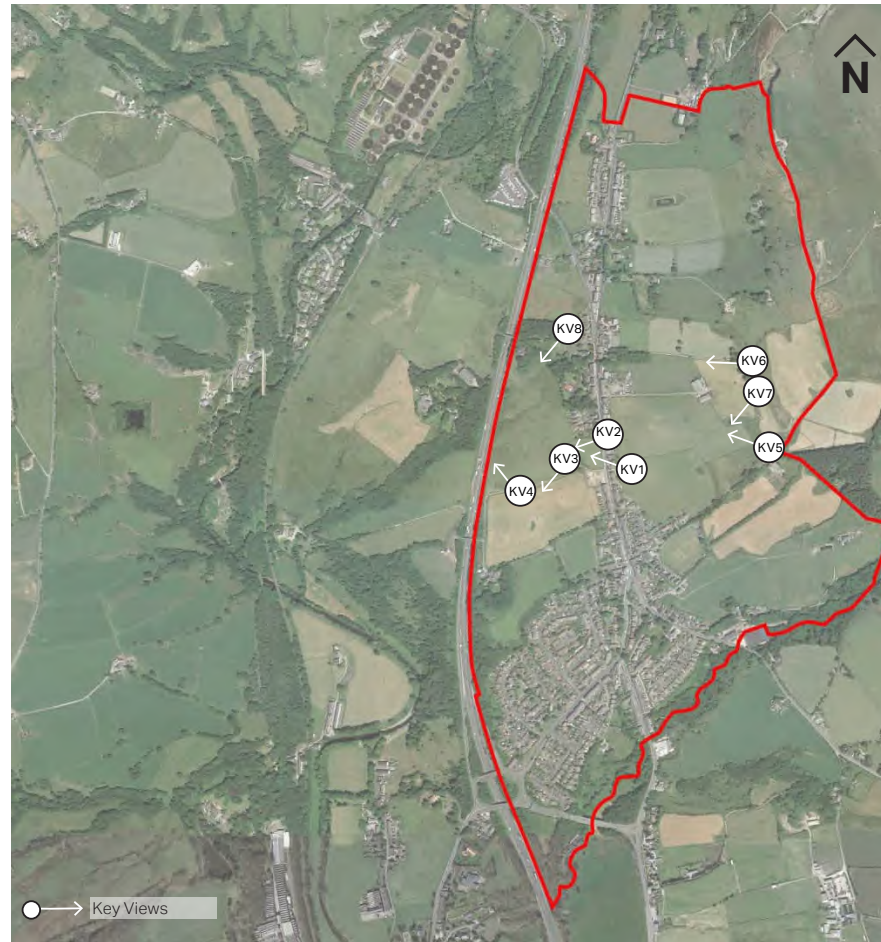


Figure 2.5: Key Views








## 2.6 Movement Network

Edenfield sits adjacent to the M66/A56 regional distributor, which connects Manchester to Rawtenstall, Blackburn and Burnley. This strategic route borders the western edge of the neighbourhood area. Northbound access onto this route is achieved adjacent to the south west of the neighbourhood area at the Bolton Road North/ A56 roundabout, whilst southbound access is achieved approximately 2 miles from the neighbourhood boundary.

There is a hierarchy of streets in Edenfield which shows the accessibility of the village, and also how it has grown over time.

Rochdale Road, Burnley Road, Blackburn Road, Bolton Road North, Bury Road and Market Street are the primary vehicular routes and maintain movement into and out of the village. These routes form a spine to the wider street network and connect the lower tier routes. Most of the community and commercial facilities are located along these routes.

A small number of secondary, circulatory streets exist, defined as those with more than one access or egress point. These are at the Oaklands Road/ Woodlands Road estate and the Eden Avenue/ Highfield Road estate.

-  Regional distributor
-  Primary route
-  Secondary route
-  Tertiary route
-  PROW
-  National Cycle Network
-  Edenfield Neighbourhood Plan Area Boundary

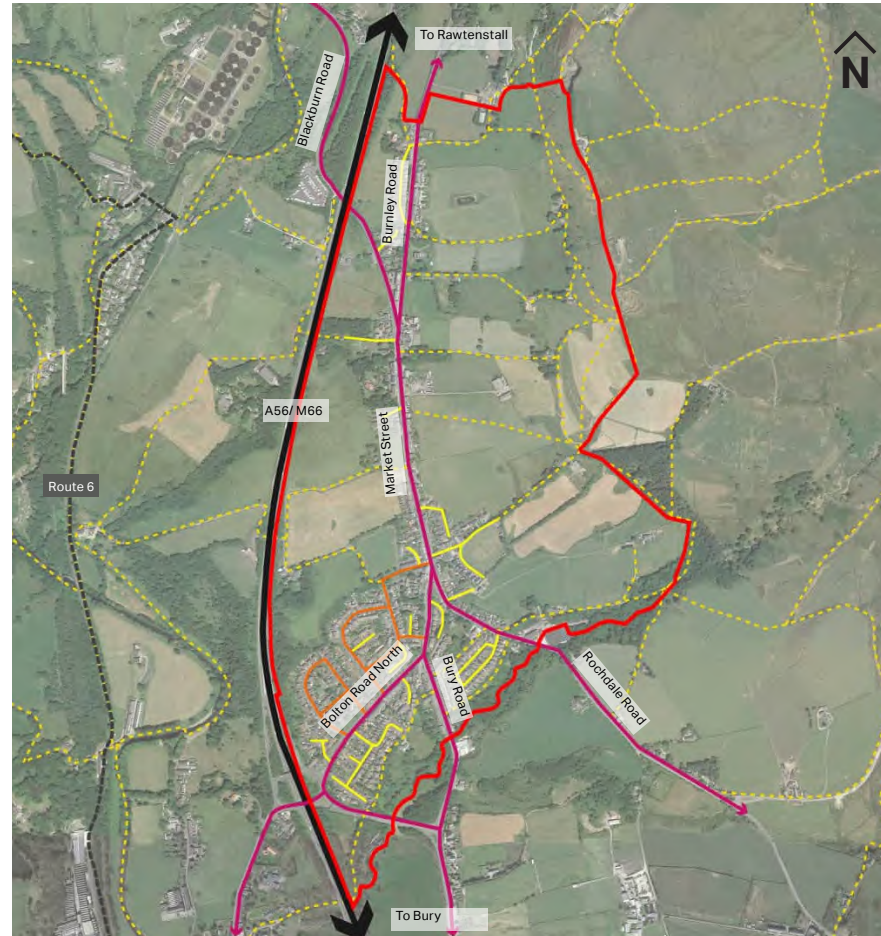


Figure 2.6: Existing Movement Network

Edenfield's historic ribbon development along Market Street obviously drives the hierarchy of routes in the village. Market Street serves clustered parcels of infill development via a series of tertiary routes. Given the piecemeal nature of growth in the village, many of the roads are tertiary, with only one access and egress point, and serve only access purposes. These adopt a similar aesthetic to the secondary routes. Whilst relatively disconnected in vehicle terms, these cul-de-sacs are sometimes connected through the pedestrian movement network.

The village is well connected for pedestrians with a considerable number of Public Rights of Way (PRoW) which help to achieve access to the surrounding countryside. These recreational routes create a pleasant walking network across the neighbourhood area, and are considered valuable assets by the Neighbourhood Forum. Although no national cycle routes exist within Edenfield, Route 91 and Route 6 are located across the valley to the west.

## 2.7 Street scene and parking

The Edenfield Factbook (2019) tells how car ownership is higher on average within Edenfield than it is across the Rossendale Borough. These levels of ownership combined with the rural nature of the neighbourhood area, and the fact that many traditional terraced units are not served by on-plot car parking, means that some areas suffer from congestion and interrupted traffic flow. These areas are typically on the primary routes and can impede traffic flow as vehicles are reduced to one-way movement.

These areas are indicated in Figure 2.7 alongside the areas where this street parking causes problems for congestion.



Primary Route: View looking south-west Bolton Rd N



View looking south down the A56/ M6



Figure 2.7: Congestion and car parking



Pinch point 1: Market Street north



Pinch point 2: Market Street south





*Views across the local landscape*

## Workshop Engagement **03**

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## 3.0 Workshop Engagement

| Summary of Session  | Strengths  | Weaknesses   |
|---|--|--|
| <p>AECOM led an engagement session with members of the Edenfield Community Neighbourhood Forum. This was a platform to show the work undertaken to date, and ensure that the understanding of place is correct. Exercises were undertaken to help AECOM understand what should be protected and encouraged within the village, and what the potential threats to the village are. This information has helped to inform the guidance of the design codes document and define what is and isn't allowed in the village in terms of design and development.</p> <p>The following strengths, weaknesses, opportunities and threats were established to be addressed within the design codes:</p> | <p>The following features are considered to be strengths within Edenfield and will be supported within this design code document:</p> <ul style="list-style-type: none"> <li>• The physical and visual connections to the countryside are valued, locally distinct, and should be preserved;</li> <li>• Important community assets include the Parish Church, the Primary School, the Cricket Club and the Recreation Ground. These should be protected from development impacts;</li> <li>• The two ends of Market Street act as local hubs of activity, and encourage people into the village</li> <li>• The traditional stone and slate vernacular establish the local village character;</li> <li>• The rural nature of the settlement and its countryside setting are key to Edenfield's character;</li> <li>• The piecemeal and organic nature of village growth has created architectural diversity and variety. This organic growth is welcomed and encouraged.</li> </ul> | <p>The design code report acknowledges the following weaknesses, as identified by the group within the engagement session:</p> <ul style="list-style-type: none"> <li>• Traffic and congestion issues are prevalent along the primary route network, especially Market Street. When cars are parked either side of the road this is limited to a one way street. It is not fit to serve the current size of the village and needs addressing. Traffic flow in and out of the village is a key problem which needs addressing;</li> <li>• Affordable housing is limited in the area, and forces people to move away from the village. There needs to be proportional provision of such new homes;</li> <li>• Certain developments have had no regard for the impact of building height on views</li> <li>• Narrow footpaths and on-street parking have created inaccessible areas of the street network. This also limits the potential to extend cycle infrastructure across the village;</li> <li>• Not all housing is supported by adequate on-plot parking facilities, which contributes to congestion. It also means parking outside any community, commercial and civic spaces are restricted.</li> </ul> |

### Opportunities

To prioritise the use of brownfield land over greenfield land, and more efficiently use the available sites and spaces;

- To ensure adequate parking is provided for both residents and visitors, rather than these being in conflict (as is currently the case);
- There is potential to encourage further walking/ recreational opportunities with linkages to the countryside;
- To strengthen the character of Edenfield through the delivery of high quality developments which reflect the traditional materials and character, but also offer diversity and variety in type and tenure, so long as it is complementary;
- To ensure that the settlement blends more effectively into the surrounding countryside through appropriate boundary treatments;
- Ensure the open nature of Edenfield is protected by encouraging open/ shared/ communal space in new developments;
- There is potential to explore restricted/ timed parking arrangements to allow more flexible use of spaces.

### Threats

The design codes report will seek to mitigate the potential threats to Edenfield including:

- Further housing is likely to increase pressure on the existing highways network and parking and exacerbate problems of congestion. All new development should recognise and seek to address this problem;
- Certain highways mitigation (like double yellow lines) could restrict residential parking, which has no other alternative to park on-street. Any parking solution needs to be aware of these residential needs;
- There are concerns that local facilities and services will be unable to support the demands of new development;
- Views are valued within the local community, and there are concerns that certain views could become blocked by development;
- The problem of parking could deter people from visiting and investing in Edenfield;
- Large scale housing developments could homogenise the settlement in a way which is out of keeping with the current patchwork of development styles, undermining local character which is integral to the village;
- Building on the Green Belt will undermine this designation as a resource. Any new development should seek to avoid this where possible.



Workshop engagement at Edenfield 3rd June 2019





*Traditional terraces of Bury Road*

Character Areas

04

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## 4.0 Character areas

Based on the baseline spatial analysis of Edenfield, the following character areas have been identified within the neighbourhood.

### Character Area 1 Village Cores

The Village Cores character area represents the two cores of Edenfield; the traditional village core to the north of Market Street, and the more recent village core to the south of Market Street. Together, these areas serve the commercial, civic and educational needs of Edenfield, and are more mixed-use in nature than the rest of the village. The cores have similar spatial experiences and, while separated, exhibit similar characteristics to one another.

### Character Area 2 Traditional Terraces

The Traditional Terraces character area captures the traditional Victorian terraced housing of Edenfield. This tends to follow a linear north-south trajectory down the village and includes both long and short terraced arrangements. This is the strongest principal character within Edenfield, and the one which most strongly reflects its historic character.

### Character Area 3 Piecemeal Domestic Development

More recent domestic developments have been delivered in a piecemeal fashion, with very little commonality in style or vernacular. While varying in appearance, these other residential developments are considered together in the Piecemeal Domestic Development character area, and provide a tapestry of character and architectural richness. There are some commonalities in building form, layout, and relationship to the street which allows some generalisations to be made about this group. The overriding character of this group is the smaller scale nature of the development parcels which build up to form a mosaic of vernaculars and styles.

### Character Area 4 Rural Fringe

The Rural Fringe Character Area comprises the more rural aspects of the neighbourhood area, substantially outside the settlement boundary edge and substantially within the Green Belt designation. A number of buildings exist in this character area which is defined by its agricultural and countryside setting.

### Character Area 5 Former Rural Fringe

Rural Fringe areas allocated for development in the Rossendale Local Plan 2019-2036. These comprise site H66, land west of Market Street, site H67, Edenwood Mill and land south of Wood Lane and site H65, land to the east of Market Street.

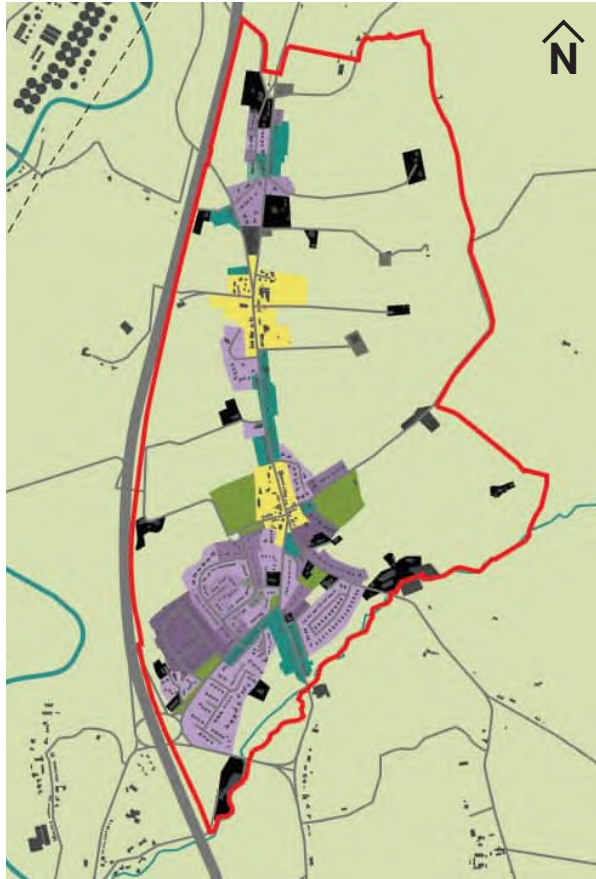


Figure 4.1: Existing mosaic of character area



Figure 4.2: Character area for application of design codes

## 4.1 Character Area 1- The Village Cores

The Village Cores character area has mix of functions, with a combination of residential, commercial, civic and educational uses. There are two areas of concentration;

- **Village Core A:** Traditional core to the north of Market Street. This captures the Parish Church, Primary School, the Coach public house and employment land-uses.
- **Village Core B:** Community core to the south of Market Street which captures the various commercial units around the Bury Road, Market Street and Rochdale Road roundabout.

Although varied, commonalities can be seen across the two cores. Together, the Village Cores stand as hubs of social activity within the neighbourhood area. Residential units within these areas are a mixture between traditional terraced housing stock and more recent developments. Dwellings are also present above the retail units of the ground floor.

### Block structure, orientation and rhythm

The buildings in both village cores are orientated towards Market Street. Each core has a concentration of mixed-use functions, whereby residential units are interspersed with local services and open spaces which exist in relative proximity to each other. The variety of units and varied density provides a sense of rhythm when moving through the cores. The larger scale or height of certain units also helps to confirm the cores as being central to the village.



Village Core A (north of Market Street)

### Boundary treatments and gardens

Many units within the Village Cores character area face directly onto Market Street, with no boundary treatments or front gardens. This creates a close relationship to the street and a sense of enclosure.



Village Core B (south of Market Street)

## Parking and street scene

On-street parking is prevalent within this character area. There are also more instances of formalised parking facilities, highways management, and crossing points than apparent in other character areas. These exist to support the functioning of the various facilities and services which are concentrated here. Given the mixture of functions, it is likely that a number of different parking solutions will be required to support these activities.

The street-scape is animated with more street furniture than other character areas, including planters, crossing infrastructure, and areas of landscaping. However this is limited due to the narrow relationship between the residential units and the highways system.

## Access to views and open space

The buildings predominantly orientate towards Market Street rather than towards the views of the surrounding landscape. In this sense, the cores are quite internally facing, with the rear of buildings more commonly having exposure to the local views.

However, this is not the case with formalised open space. In comparison to the other character areas, there are more instances of formalised open/recreational space in the village core. In many cases these are located to the rear of the cores, and are strongly set in the landscaped surroundings.

## Materials and details

Whilst exhibiting different sizes and styles, buildings within the village core character area are typically constructed of the traditional Pennine stone. Commercial units are often differentiated with either a painted façade, painted detailing, or the presence of store front signage. This comes in the form of flat signs, extruding signage boards or traditional storefront awnings, indicating this non-residential use.



Edenfield Parish Church, located in Village Core A



Edenfield Church of England Primary School, located in Village Core A



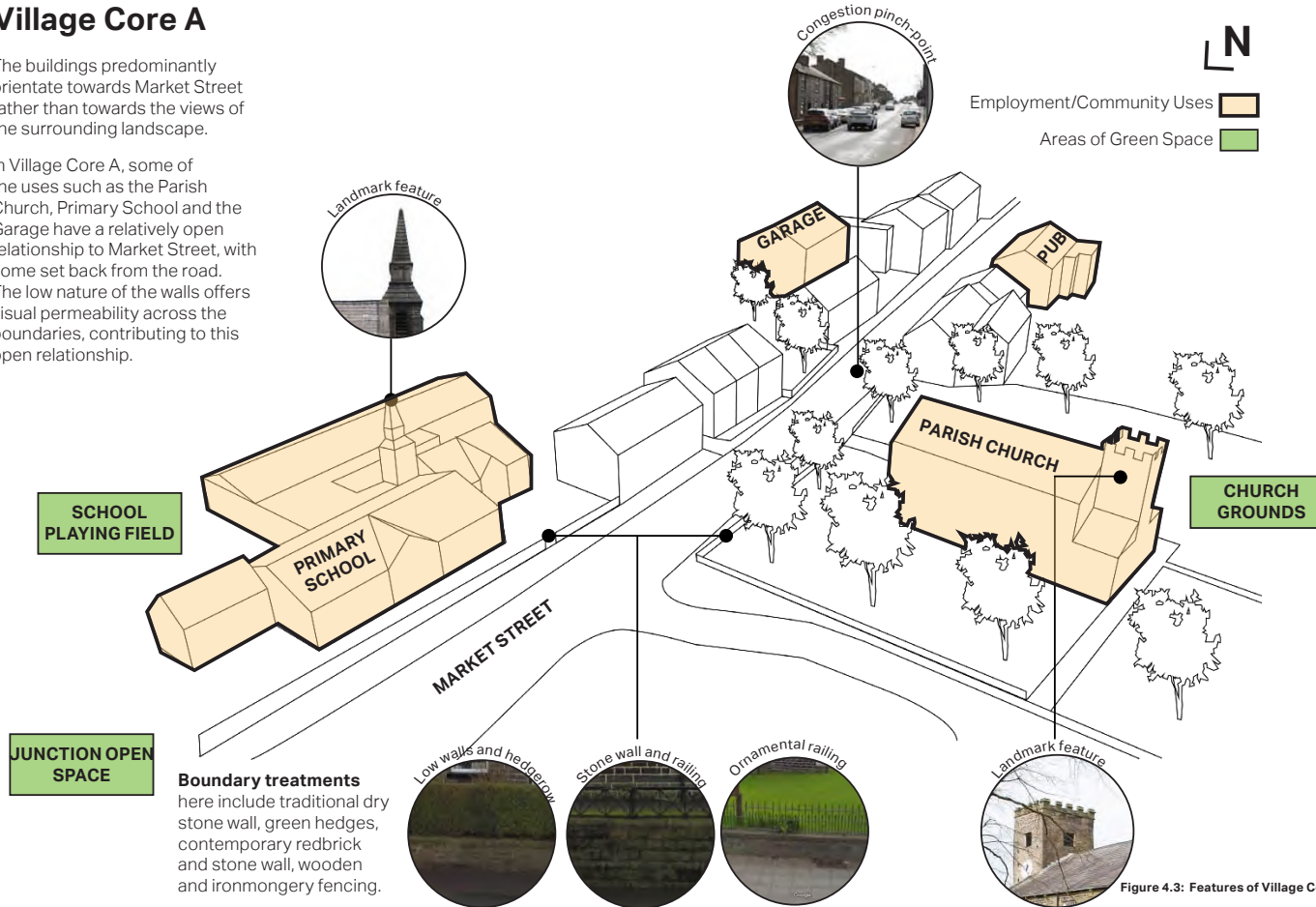
Rostron Arms, located in Village Core B



## Village Core A

The buildings predominantly orientate towards Market Street rather than towards the views of the surrounding landscape.

In Village Core A, some of the uses such as the Parish Church, Primary School and the Garage have a relatively open relationship to Market Street, with some set back from the road. The low nature of the walls offers visual permeability across the boundaries, contributing to this open relationship.



**Boundary treatments**  
here include traditional dry stone wall, green hedges, contemporary redbrick and stone wall, wooden and ironmongery fencing.

Figure 4.3: Features of Village Core A

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## Village Core B

Within Village Core B, boundary treatment is varied, either in the form of low walling or hedgerow, or non-existent. Although there is some set back of units away from Market Street, this village core generally feels more enclosed than Village Core A, however it achieves openness through the accessibility of formal green space, at the grounds of the Community Centre and the Cricket Club. The Memorial Garden also offers a breathing space along the otherwise narrow stretch of development within this core.

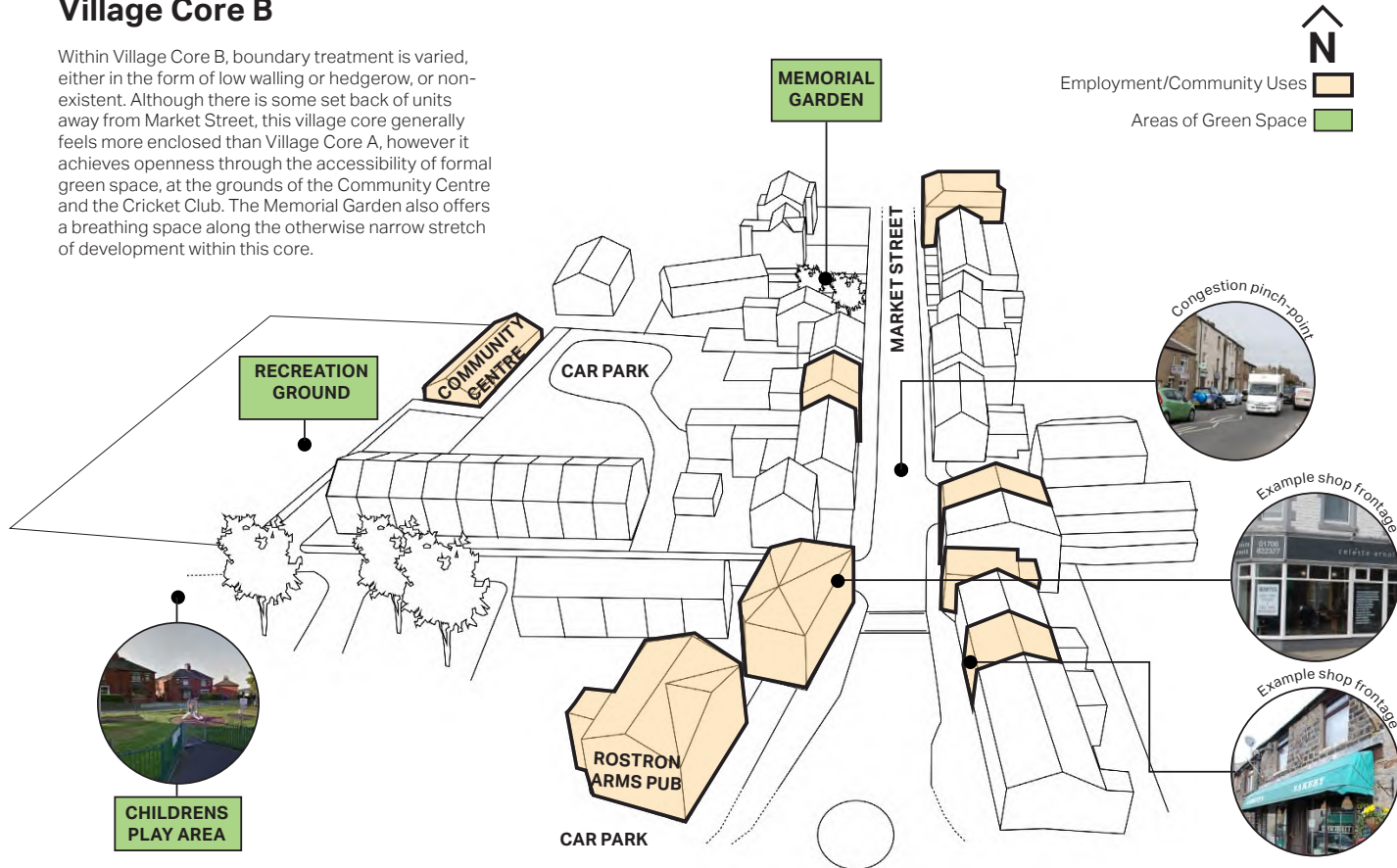


Figure 4.4: Features of Village Core B

## 4.2 Character Area 2- Traditional Terraces

The traditional domestic buildings of Edenfield are typically aligned in a terraced fashion, constructed of stone, and have a strong identity when considered as a whole. They appear in blocks of either long or short terraces, and represent the oldest form of housing within the village. They affront the primary routes of Edenfield and, in most cases, only extend one block deep on either side of the road. In some cases, these exist on adjoining access roads, such as at Moorlands View, Gincroft Lane, Exchange Street and Green Street/ Sarah Street. These units are considered to significantly contribute to the local character and heritage of the area, and are valuable in preserving the traditional identity of Edenfield.



*Traditional Terraces with low boundary wall and minimum setback*



*Traditional Terrace on sloped topography*



*Traditional Terraces facing directly onto the street*



*Traditional Terraces with varied facade and boundary treatment*



*Different coloured Pennine stone facade adding to the local character*



*Continuous row of traditional terraces along street*

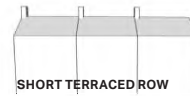
## Block structure, orientation and rhythm

The Traditional Terraces character area is of a higher density compared to the more recent residential developments of the village. All units are orientated towards the road, with little sideways references. Gable ends typically do not have much detail, and sit against the street or adjacent to the next block of terraces. There is typically a high level of enclosure between the units, with units facing each other across a narrow street. Each unit typically defined with a chimney, which provides a rhythm to the row.

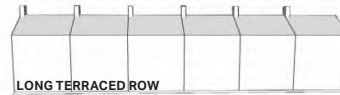
The housing has a low roof pitch, with a continuous roof line which helps to define the terraces within a block. The roofline might step where it reaches the end of a row, which is also confirmed by misaligned gable ends. If the buildings are positioned on a slope the roofline will also slope, rather than step, down the units.



High density structure of Traditional Terraces  
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SHORT TERRACED ROW



LONG TERRACED ROW



Figure 4.5: Traditional-Terraces structure and features

### Short terraced row

A local distinctive arrangement of the traditional terraces is the presence of a short terraced row, whereby three terraced units exist as a block alongside each other. These tend to be two storeys, of a low building height, with a narrow width.

### Long terraced row

More common than the short terrace row are the longer terraced rows of housing. Extending beyond the three units of a short terrace, these tend to be taller in height and vary between two and three storeys. The rhythm of these units is sometimes interrupted by gable ends which do not directly adjoin, and which indicate a new block of units.

## Boundary treatments and gardens

The traditional terraces have a close relationship to the street, in some cases facing directly onto it. Where boundary treatment does exist, it tends to be in the form of a low level stone wall with flat coping stones. Intermittent hedgerow, fencing or a small front garden creates some degree of buffering beyond this wall, and access to the units is achieved either through a short path or a small series of steps. Some units, although not all, have extensions to the rear, accompanied by a small courtyard garden.

## Parking and street scene

Given the close relationship to the streetscape, there is no forecourt parking within this character area. In some cases there are rear access points for parking (along Bond Street in the south and Louis Street in the north). Otherwise, these units are dependent on on-street car parking to the front of the property, which often narrows the pedestrian experience when walking along pavements. This closeness dominates the street scene.

The majority of streets within this character area affront onto primary routes. These are formal, tarmacked roads.

## Access to views and open space

Whilst in most cases the traditional terraces face onto other units within the character area, there is a stretch of un-mirrored units which face out over Market Street to the views in the west. These occupy an important ridgeline, and are visible in long views into the village from the west. Given the linearity of these units along primary streets and the lack of depth, it is common for the rear of these units to back directly onto the surrounding countryside. The relationship of these traditional units in proximity to this open space helps to build the rural character.

Despite the enclosed nature of the character area, the strong linearity of the traditional terraces helps to channel long views, rather than the visual interruption which could be caused by a more informal layout with varied building lines and roof lines. With a clear structure of rows, and little deviation from this lineage, views to the surrounding countryside are somewhat protected rather than blocked and undermined.

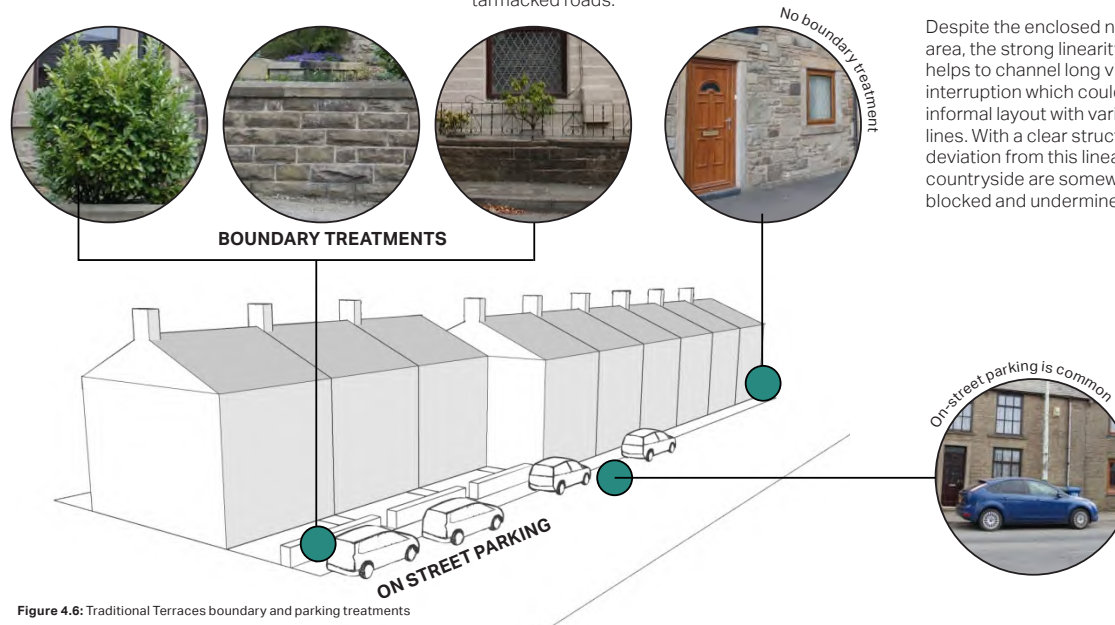


Figure 4.6: Traditional Terraces boundary and parking treatments

## Materials and details

The buildings in this character area are defined by the use of Pennine stone. No rendering exists, aside from a few exceptions where it detracts from the character of this typology. In all cases, the roofing is covered with slate which complements the stone.

There is a clear consistency to the arrangement of doors and windows on each unit, which builds the strong character. There tends to be one or two upstairs windows, and one downstairs window adjacent to a door. Given the small frontage of terraces, the arrangement feels close. Windows generally white or wooden framing, and are defined by simple stone windowsills and lintels.

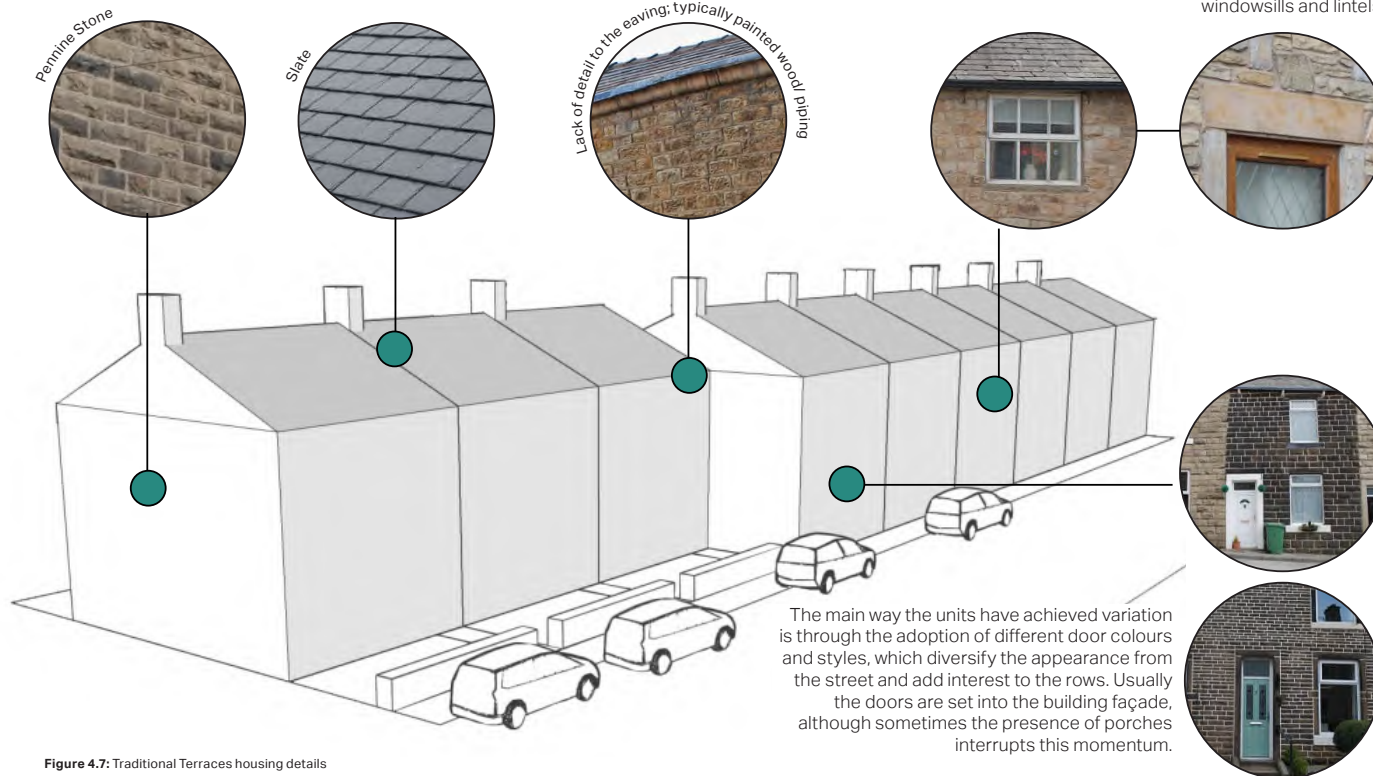


Figure 4.7: Traditional Terraces housing details

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### 4.3 Character Area 3: Piecemeal Domestic Development

The village in the post-war era has been subject to a more piecemeal style of development. Clusters of residential units have been developed incrementally over time and in a relatively organic fashion. In many instances the developments have been delivered in blocks of up to ten units at a time, each with their own character and style which contributes to a mosaic of varying vernaculars and styles.

The differing, small-scale parcels of development create a rich built environment. Although each parcel of new development differs significantly from each other, the descriptions below outline the general characters of these more recent parcels and the commonalities they share.

#### Block structure, orientation and rhythm

The recent residential units are of a considerably lower density than the traditional terraces. They are often arranged in a cul-de-sac layout, and are either detached or semi-detached. They orientate around the roads which are used to access them, and also around the local topography, with no clear rhythm between the units. The infill nature of the developments mean there is sometimes an irregular relationship to the surrounding units.

In most cases the units are two-storeys high; however bungalows are also prevalent within this character area.



Medium density structure of Piecemeal Domestic Development

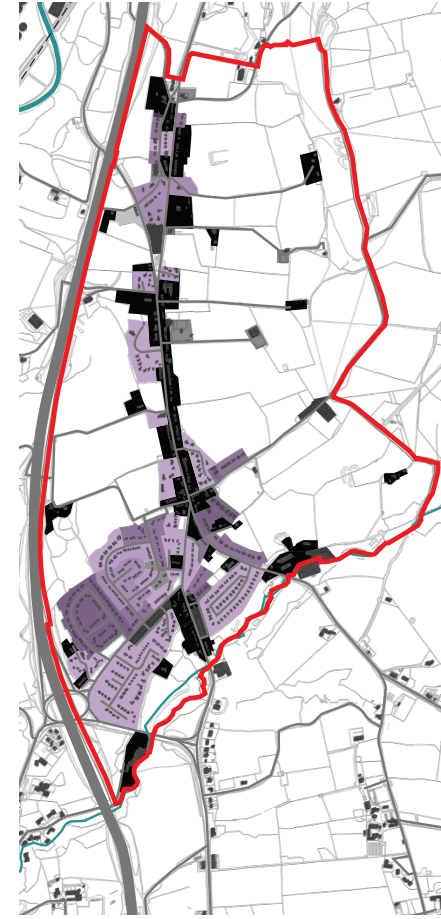


Figure4.8: Map showing incremental parcels of domestic development within Neighbourhood Area based on period of delivery. AECOM



Example of detached dwelling style



Pre-war red brick semi-detached domestic development



Painted brick finish post-war domestic development



Pre-war domestic housing style



White rendered housing



Render finish semi-detached housing



Detached development within domestic character area  
AECOM



Red brick domestic style with low levels of detailing



Different application of external material on first and ground floor facade



## Boundary treatments and gardens

Unlike the Traditional Terraces character area, the units of this character area are set back from the road network, with a much clearer separation from the public realm. Boundary treatment is varied, and includes hedgerow, ornate planting, fencing and low level walls. Whether grassed or paved, front gardens exist and provide this clear separation of public and private space. All units also have access to a rear garden.

## Parking and street scene

Parking is typically captured on-plot, either to the front or the side of the property, however some on-street parking does exist. This is varied and also includes garaged units.

## Access to views and open space

With orientation of the properties towards the street network, the rears of the properties generally have access to the views of the surrounding landscape. However, the lack of structure which defines the orientation of these units means that often views from the streetscape are blocked, unless the topography allows for visual permeability.

## Materials and details

A wide range of façade styles and features are prevalent across the character area. Materiality, roofing, windows and detailing are consistent to the parcel of development within which the building is located, but usually has little reference to the style of the surrounding built units. The result is an expression of many different styles and architectural vernaculars which appear in a piecemeal fashion. The rich variety between different the parcels is what defines this character area.

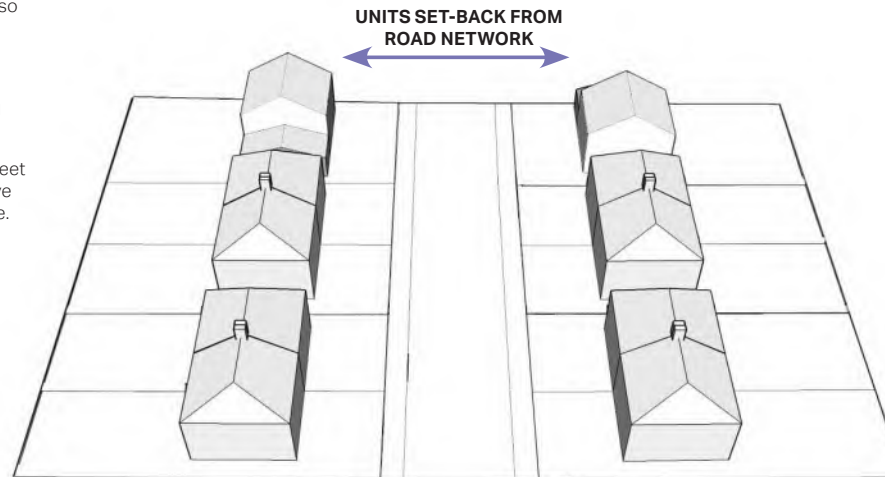


Figure 4.9: Enclosure of piecemeal domestic development character area

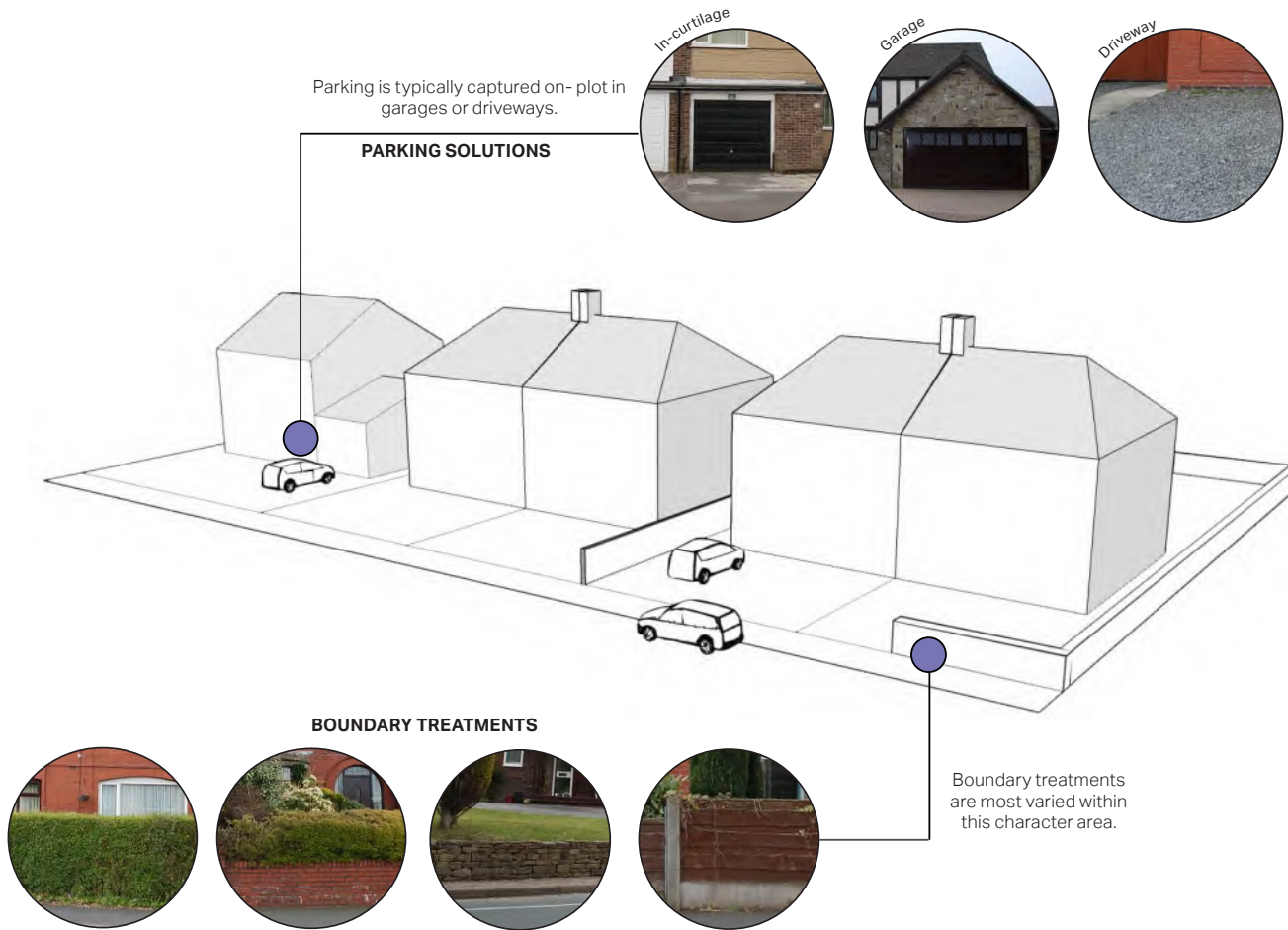


Figure 4.10: Piece meal domestic development boundary and parking treatments

## 4.4 Character Area 4: Rural Fringe

The Rural Fringe character area is almost in its entirety located within designated Green belt land. Landscape and topography dominate this character area, with only intermittent presence of buildings, which typically exist in the form of isolated units which are served by access tracks from the primary road network. The character area fades out to the surrounding rural landscape and is the focus of long views into the village.

### Block structure, orientation and rhythm

The structure of this character area is largely dispersed. Large scale buildings with their associated units exist in relative isolation within a low density landscape.

Other character areas generally have a passive relationship to the Rural Fringe, with the rear of properties and their domestic gardens backing onto the area. This results in a character area which isn't particularly activated from the street-scape. However it is settled in this landscaped setting, and exhibits the most rural character of the village as a result.



Low density arrangement of Rural Fringe character area

### Boundary treatments and gardens

Development in the rural fringe is limited to isolated units, typically of an agricultural nature, with each unit contained within its own plot and relatively enclosed by some degree of vegetation or formal boundary. Agricultural practices in some instances surround the unit and create some boundary to the contained farmstead units.

The character area itself bleeds out into the surrounding countryside and landscape. Some tracks and access routes cut across and define the landscape. Small pockets of woodland and vegetation provide some screening and definition to the area but otherwise this is a very open and non-enclosed character area.

### Parking and street scene

The road network in this character area is limited to long, narrow access tracks which serve each farmstead and dwelling unit. Many of these access tracks also serve as PROW. The quality is varied and informal. There is very little connection between these tracks, with most having only one access/egress point onto the primary road system.

## Access to views and open space

The character area is defined by an expansive, predominantly open countryside with agricultural fields. There are many long and wide views out to the surrounding countryside, especially to the west given the nature of the local topography. Some of the identified Key Views of the village are located within this Character Area. Likewise, many of the views into the village have this character area as a backdrop.

Some treelines do exist but these are limited along the road network and some field boundaries. These provide some enclosure to the fields, but only intermittently.

Many PROW permeate this area and provide visual and physical access to open space, confirming the rural setting of the Neighbourhood Area.

## Materials and details

Traditional style of housing, with listed (locally/nationally) units present. Outlying farmsteads and agricultural buildings.



*View west to Market Street*



*View from Hey Meadow*



*Rural fringe character area with sparse buildings within green belt*

## 4.5 Character Area 5: Former Rural Fringe

The Former Rural Fringe character area comprises the three sites (H66, H65 and H67) removed from the Green belt in the Rossendale Local Plan 2019-2036. As with the Rural Fringe Character Area landscape and topography dominate this area, with only intermittent presence of buildings, which typically exist in the form of isolated units which are served by access tracks from the primary road network.

## Features and assets

### Topography and Water

The landscape slopes towards the River Irwell to the west of Edenfield. This change in level affords many vantage points where views can be appreciated of the valley landscape and include key features such as Peel Tower situated on Harcles Hill. None of the three sites within the character area are identified as flood zone 2 or 3. However, surface water flooding is identified on H66 owing to the sloping nature of the site. Surface water flood mapping also appears to show Great Hey Clough as a key drainage corridor taking water from the site towards the River Irwell. Dearden Brook is another watercourse with influence on this character area as it runs along the southern edge of site H67.

### Routes and connections

Existing routes through the sites include Church Lane and Footpath 127 within site H66 and Rosebank within site H67. Public rights of way also run across the sites. Adjacent to site H66 bridges provide crossing points over the A56 allowing east to west movement.

### Boundaries

Boundaries within the former rural fringe character area predominantly take the form of agricultural field boundaries. These tend to be drystone walls but in some cases are defined by hedgerows and trees. These natural boundaries contribute to the rural character of the landscape and the colour and texture of the stone used to construct the drystone walls creates a strong connection with the local geology.

### Edges

The sites have a variety of edge conditions which will be key considerations for their development. The A56 and M66 corridor runs along the western edge of both sites. This has both a visual and acoustic impact on the sites.

There are areas of existing residential development at the edge of site H66. The south and eastern edges of the site have numerous back gardens with rear boundaries forming the edge of the existing settlement.

### Trees and woodland

The sites feature several pockets of dense woodland as well as areas of more scattered tree planting. Prominent wooded areas include on both sides of Church Lane, the south west corner of site H66, and a large portion of site H67.

### Existing Buildings

Existing buildings within the sites include the former Vicarage, Mushroom House, Chatterton Hey House and Edenwood Mill. Each of these are identified as non-designated heritage assets in the Local Plan.

## Development implications

### Topography and Water

Site H66 has a change in level of approximately 25m. Understanding the gradient of the site will be crucial to manage surface water drainage within any new development. An optimum location for a suds feature / attenuation pond should be identified at low level to collect rainwater runoff resulting from any development. It should be demonstrated to the satisfaction of the relevant highway authority and the local planning authority that any such feature / pond will not have a detrimental impact on the A56 as it currently exists and as it would exist if widened on its eastern side to accommodate an extra lane in both carriageways.

Where possible views to the valley landscape from the village should be preserved.

### Routes and connections

The sites' gradient should also be carefully considered when designing the movement network, using the contours of the landscape to create routes that are comfortable for pedestrians, wheelchair users and cyclists.

The existing public right of way routes running through the sites present the opportunity for development to tie in with the existing local movement network.

### Boundaries

It is essential to retain existing boundaries that contribute to the character of the landscape such as stone walls, hedgerows and trees.

### Edges

The acoustic and visual impact of the A56/M66 will need to be addressed in any proposals on both sites. A landscape buffer running along the corridor could

help to alleviate the negative impact of the route on any residential development. A survey and modelling should be undertaken to provide an understanding of the measures that may be required to reduce the acoustic impact on the sites.

The existing residential development to the south and east of site H66 will require careful consideration. Designs will need to consider privacy and overlooking between existing and proposed development with consideration to the gradient of the site. The use of landscape buffers between existing and proposed dwellings should support designs to reduce any visual impact.

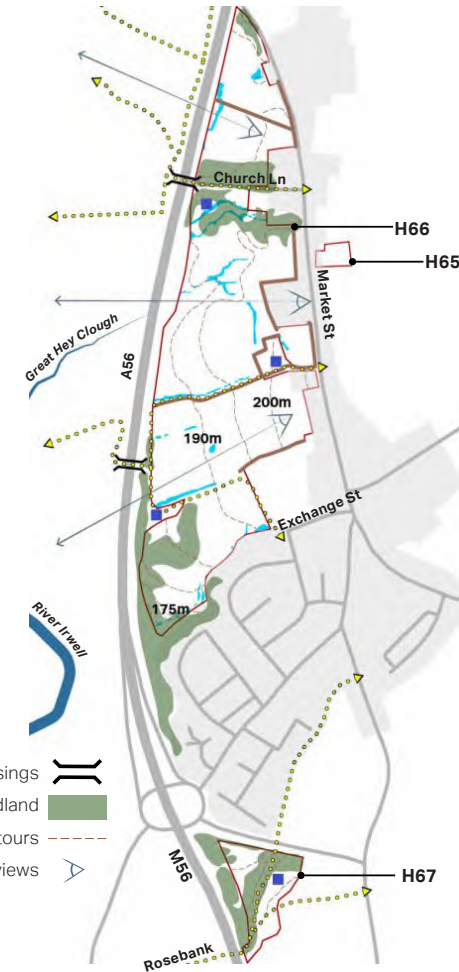
### Trees and woodland

The areas of woodland found across the sites should be incorporated within the landscape design of any proposed scheme. Where possible trees should be retained and where not possible a suitable replacement of each tree lost as a result of development should be provided.

### Existing Buildings

The non-listed heritage assets within and adjacent to the sites will require careful consideration. The setting of these assets may require mitigation measures such as offsets or landscape screening to avoid having an adverse impact on a building and its immediate surroundings.

|                                |  |                      |  |
|--------------------------------|--|----------------------|--|
| Settlement area                |  | A56 bridge crossings |  |
| Site boundaries                |  | Trees and Woodland   |  |
| Public right of way            |  | 5m Contours          |  |
| Roads                          |  | Landscape views      |  |
| Non-listed heritage asset      |  |                      |  |
| Stone boundary walls           |  |                      |  |
| Surface water flood risk areas |  |                      |  |





**Design Codes**

**05**

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## 5.1 The Code Guidance

The following design guidance has been produced to guide future development in Edenfield. The design principles in this section will apply to the Neighbourhood Area including future housing sites.

The guidance is based on the appreciation of the local character of Edenfield, the understanding gained in the baseline, and feedback captured in the engagement workshop. It is intended to align to the objectives of the Edenfield Neighbourhood Plan:

- 1. Heritage and Character (Code HC)**- this will detail appropriate design detailing to ensure that any new developments help to strengthen the traditional, rural character of Edenfield, rather than detract from it.
- 2. Urban Structure and Built Form (Code USB)**- this will detail appropriate layout, massing, scale and building heights appropriate within Edenfield.
- 3. Housing Densities (Code HD)**- This will provide guidance on appropriate housing densities that reflect and preserve the rural character of Edenfield.
- 4. Landscape Character and Open Space (Code LC)**- Provides advice to help preserve the landscape character of Edenfield.
- 5. Key Views (Code KV)** - This provides guidance to protect, create and preserve the views of the open countryside and surrounding landscape.
- 6. Green- Blue Infrastructure (Code GBI)**- This provides guidance on inclusion of green -blue infrastructure to create sustainable developments.
- 7. Boundary Treatment (Code BE)**- Provides guidance on appropriate boundary treatments within the area.
- 8. Settlement Edges (Code SE)**- Provides guidance on the treatments and relationships of the settlement edge with its countryside to retain and enrich the rural character of Edenfield.
- 9. Movement Network and Street Typologies (Code MST)**- this will provide guidance on the different street typologies and the different types of street layouts appropriate to Edenfield.
- 10. Street Scene and Parking (Code SSP)**- this will illustrate the elements of design which have an impact on the street scene, and will demonstrate ways to include parking within the development to reduce the visual impact of the car.
- 11. Cycle Parking and Storage (Code CPS)** - guidance on the storage of cycle and waste within developments.

## 5.2 When to use the Codes

The table identifies when each of the codes should be used. A prefix has been created for each code to allow simple application of the design codes.

| CODE                               | Prefix | Character Areas |                      |                                |              |                     |
|------------------------------------|--------|-----------------|----------------------|--------------------------------|--------------|---------------------|
|                                    |        | Village Core    | Traditional Terraces | Piecemeal Domestic Development | Rural Fringe | Former Rural Fringe |
| Heritage and Character             | HC1    | ✓               | ✓                    | ✓                              | ✓            | ✓                   |
|                                    | HC2    | ✓               | ✓                    | ✓                              | ✓            | ✓                   |
|                                    | HC3    | -               | -                    | ✓                              | ✓            | ✓                   |
| Urban Structure and Built Form     | USB1   | ✓               | ✓                    | ✓                              | ✓            | ✓                   |
|                                    | USB2   | ✓               | ✓                    | ✓                              | ✓            | ✓                   |
|                                    | USB3   | ✓               | ✓                    | ✓                              | -            | -                   |
|                                    | USB4   | -               | -                    | ✓                              | ✓            | ✓                   |
| Housing Densities                  | HD1    | ✓               | ✓                    | ✓                              | ✓            | ✓                   |
| Landscape Character and Open Space | LC1    | ✓               | ✓                    | ✓                              | ✓            | ✓                   |
| Key Views                          | KV1    | ✓               | ✓                    | ✓                              | ✓            | ✓                   |
|                                    | KV2    | -               | -                    | -                              | ✓            | ✓                   |
| Green- Blue Infrastructure         | GBI    | ✓               | ✓                    | ✓                              | ✓            | ✓                   |

| CODE                                   | Prefix | Character Areas |                      |                                |              |                     |
|--|--------|-----------------|----------------------|--------------------------------|--------------|---------------------|
|  |        | Village Core    | Traditional Terraces | Piecemeal Domestic Development | Rural Fringe | Former Rural Fringe |
| Boundary Treatments                    | BE1    | ✓               | ✓                    | ✓                              | ✓            | ✓                   |
|  | BE2    | ✓               | ✓                    | ✓                              | ✓            | ✓                   |
|  | BE3    | -               | -                    | -                              | ✓            | ✓                   |
| Site and Settlement Edges              | SE1    | ✓               | ✓                    | ✓                              | ✓            | ✓                   |
| Movement Network and Street Typologies | MST    | ✓               | ✓                    | ✓                              | ✓            | ✓                   |
|  | ST1    | ✓               | ✓                    | -                              | -            | -                   |
|  | ST2    | -               | ✓                    | ✓                              | -            | ✓                   |
|  | ST3    | -               | -                    | ✓                              | ✓            | ✓                   |
| Street Scene and Parking               | SSP    | ✓               | ✓                    | ✓                              | ✓            | ✓                   |
| On-Street Parking                      | P1     | ✓               | ✓                    | ✓                              | ✓            | ✓                   |
| Garage and On-Plot Parking             | P2     | -               | ✓                    | ✓                              | ✓            | ✓                   |
| Shared Parking                         | P3     | ✓               | ✓                    | -                              | -            | -                   |
| Parking Court                          | P4     | -               | ✓                    | ✓                              | -            | ✓                   |
| Cycle Parking and Storage              | CPS1   | ✓               | ✓                    | ✓                              | -            | ✓                   |

## 5.3 Heritage and Character Codes (HC)

Well-designed places should have a positive and coherent identity, and a character which suits their context and history. The Edenfield Neighbourhood Area has a strong rural setting with a mix of architectural styles, age and treatments that help to form its local character. There are a number of listed buildings and local heritage assets which help to establish the historic character of the village, which is strengthened by the Traditional Terraced character area.

In addition to the early village development, the organic growth of the settlement has created a mosaic of architectural style, with these small scale developments also contributing to the local identity, albeit in a different way to the traditional terraces.

The codes in this section seek to safeguard and enhance this local character.

### Code HC1- Conserving Character

Development should seek to;

- Respect and respond positively to local and nationally listed heritage assets, and to conserve and enhance their setting.
- Create areas of positive character by enhancing a sense of place and complementing architectural style.
- Be complementary in height, scale and massing in relation to existing units within its proximity, and have an appropriate relationship with its surrounding context.

### Code HC2- Traditional Style

Frontages which face onto Primary routes within the village (see Figure 2.6) should seek to retain a traditional architectural style. Development here should;

- Support local distinctiveness through the use of locally relevant materials such as natural stone, slate, timber and architectural details that complement the existing vernacular of Edenfield.
- Traditional materiality and detail includes;
  - Pennine Stone
  - Slate Roofing
  - White or timber window frames
  - Chimney columns to define rhythm
  - Off-set gable ends to indicate new block
  - Small area of defensible space to front of property.

### HC3- Complementary Styles

Other development styles may be permissible on buildings which face onto Secondary and Tertiary routes, providing;

- The use of brickwork, masonry and other materials complements the buff /beige colour of the traditional natural stone.
- The use of traditional, local materials is always preferred. However, modern construction materials such as reconstituted or cast stone may be an appropriate material provided that it results in an appearance that reflects and harmonises with the local stone material palette.
- Other materials may also be appropriate. These might include on sustainably focussed, energy efficient buildings which require different material application.

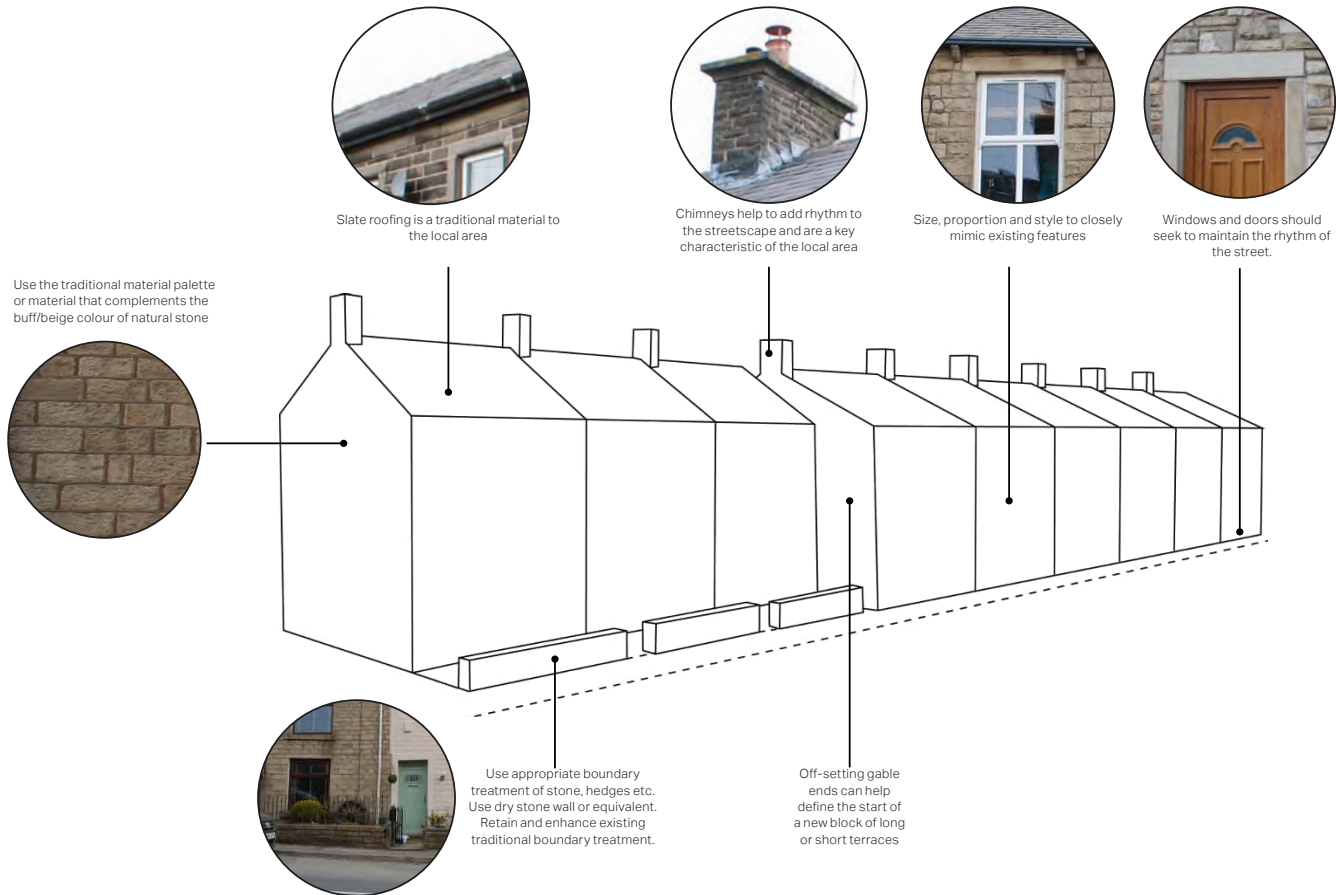


Figure 5.1: Traditional terrace housing details to be adopted within character area

## 5.4 Urban Structure and Built Form Codes (USB)

Built form is the three-dimensional pattern or arrangement of development blocks, streets, buildings and open spaces. It is the interrelationship between all these elements that creates an attractive place to live, work and visit, rather than their individual characteristics. Together they create the built environment and contribute to its character and sense of place. The existing housing stock in Edenfield is predominantly 2-3 storeys high. Typology varies between long and short terraced rows, semi-detached and detached dwellings, and bungalows.

### USB1- Building Height

New development should;

- Have regard to the building height of adjacent units, and the position of the development in relation to local topography. Three-storey development or two storey developments with dormers or loft rooms should only be permitted where local topography and views have been accounted for. Building height shouldn't undermine the presence of landmark buildings, such as the Parish Church and the Primary School
- Support the varied building heights within the Village Core helping to maintain variety within these areas
- Retain an appropriate level of enclosure along Market Street.
- Land west of Market Street identified as site H66 in the Rossendale Local Plan 2019-2036.

The greater part of this site is Area A identified by Penny Bennett, Landscape Architects, in their Lives and Landscapes Assessment for Rossendale Borough Council dated December 2015. Developments on Area A should be no more than two-storey to minimise the significant adverse affects on the landscape highlighted in the Assessment.

### Code USB2- Urban Structure

New development should;

- Respect the existing building lines with regards to continuity and setbacks. The rhythm and continuity of building line along the primary routes should be maintained, especially along Market Street.
- In the Traditional Terrace character area, respect should be given to the short and long terraced arrangements.

- Respect as far as possible the piecemeal, organic growth of the settlement and the existing village layout which has been created by this morphology. Small increments of growth are considered to contribute to the village character. Large scale developments justified in adopted Rossendale Local Plans should as far as possible take into account existing development styles.

- Be arranged in a legible layout which is permeable and complementary to the arrangement of adjoining development.
- Streets and public spaces should be overlooked to promote natural surveillance and feelings of safety.
- Be supported by infrastructure and service demands.

Developments should be incremental and integrate well with existing and future proposals.

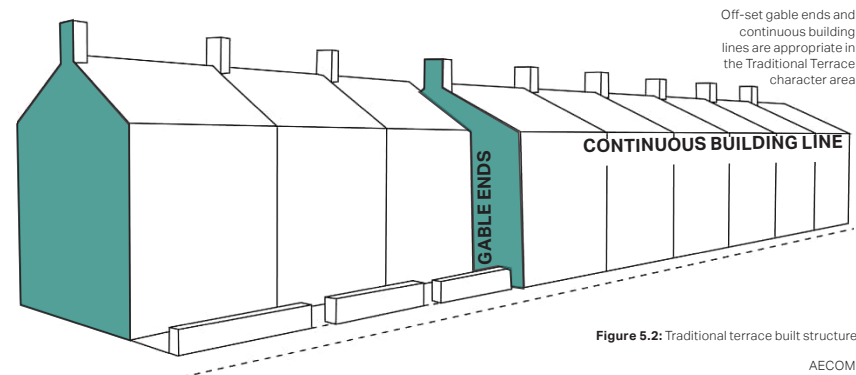


Figure 5.2: Traditional terrace built structure

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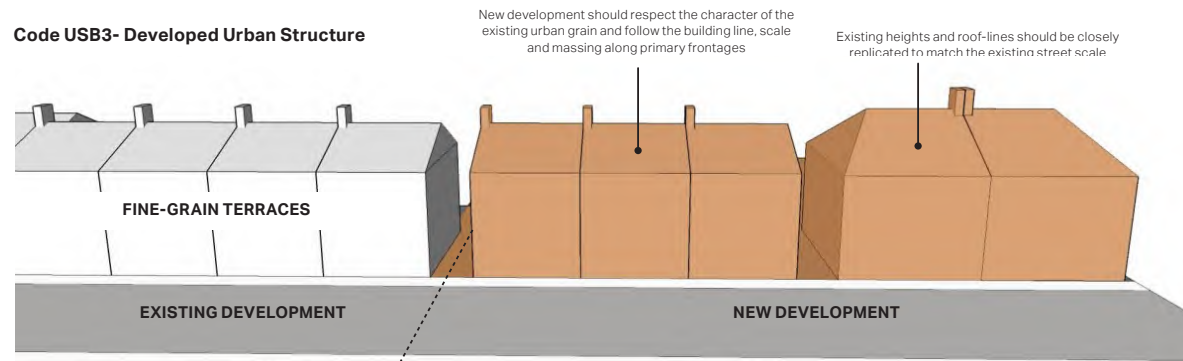


Figure 5.3: Example of development responding to Traditional Terraces structure

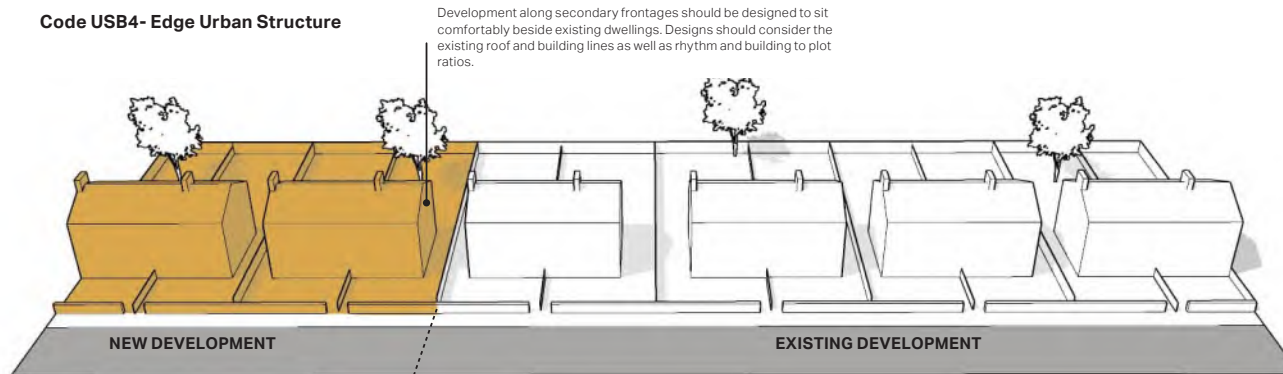


Figure 5.4: Example of development responding to Piecemeal Domestic structure

## 5.5 Housing Density Code (HD)

Housing density can play a crucial role in defining the character of a place. Density is an essential aspect of designing sustainable places. Typically, the core of settlements has a more compact, fine 'grain' with higher densities around key locations, public spaces, or where the mix and intensity of land use are high. Densities should be reduced towards areas of lesser activity with lower-densities along green corridors, settlement edges and against the countryside to assist with a soft transition.

### Code HD1- Housing Density

- Housing density must contribute positively to the character of the place and be appropriate to the context and location. Varied density is preferable to uniform densities across the neighbourhood area.
- Lower densities should be adopted near the settlement edge to effectively transition into the surrounding landscape.
- Development should respond to the density of existing development within its proximity and its character area.
- Infill development is preferable to large scale development.

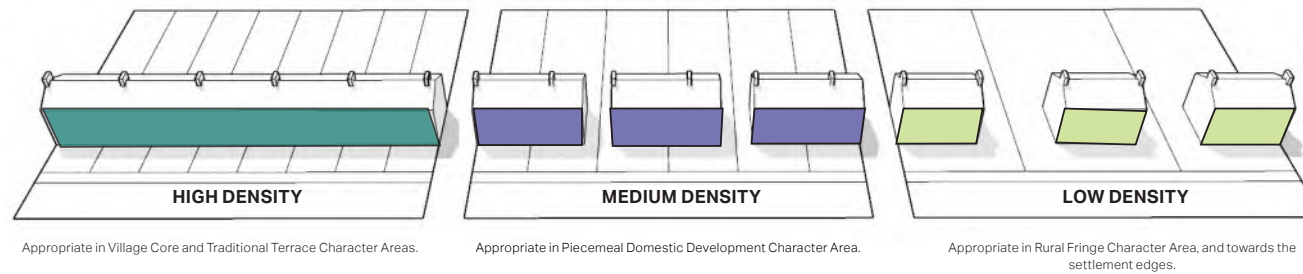


Figure 5.5 Application of density

## 5.6 Landscape Character and Open Space Code (LC)

The Lives and Landscapes Assessment (December 2015) provides some guidance and recommendations on how to safeguard the local landscape character, and has informed some of the following codes.

### Code LC1- Landscape Character and Open Space

- Building on the Green Belt will undermine this designation as a resource and should be avoided where possible.
- Existing open/green spaces such as the Cricket Club/recreation ground and children's park should be maintained to a high standard and enhanced where possible.
- Open spaces should be accessible to pedestrians and be well connected to the non-vehicular network.
- There should be a graduation in density of development in the Settled Valley character area, within which Edenfield falls. In the uppermost areas where scattered settlement is typical, and abutting the upland landscape character types only low density development is acceptable.
- Development in hillside locations should generally follow the contours horizontally around the hillsides.
- Landscape elements should be used to help screen development from long views, reducing visual impact and helping to complement the rural context of the settlement.



*Buildings should have regards to the surrounding landscape and blend into their setting.*



*Material and boundary treatments should integrate seamlessly into the rural character of Edenfield*



*Existing open spaces should be well-maintained and accessible*



## 5.7 Key View Codes (KV)

The settlement area of Edenfield is bound by Green Belt land. Its elevated position affords attractive views across the countryside and surrounding landscape. The physical and visual connections to the countryside are valued, locally distinctive, and should be preserved. It is essential that all new developments should retain, protect and enhance key views across Edenfield Neighbourhood Area.

### Code KV1 - Key Views

Development should;

- Retain and reinforce as far as possible key views and vistas (as shown in Figure 2.5) and recognise these as key features within the design of layouts and building orientation.

- Recognition should also be given to short view corridors
- Appropriate spaces between building blocks should be provided in new developments to help secure views towards the rural landscape and countryside and help frame views out to the landscape
- Views to local landmarks, such as the Parish Church and the Primary School, should be retained
- Roofscape and building heights should enhance and frame views and avoid causing visual obstructions.
- Buildings on slopes should be of appropriate heights and should not obscure views from adjacent units.
- Views to the Irwell Valley should be protected
- Views towards Peel Tower should be protected
- The roofscape, and its visibility on elevated development, should be well considered.
- Opportunities should be taken to exploit views from the road network as part of the overall consideration of development site locations.



Figure 5.6 Diagram illustrating the enhancement and framing of views to surrounding landscape

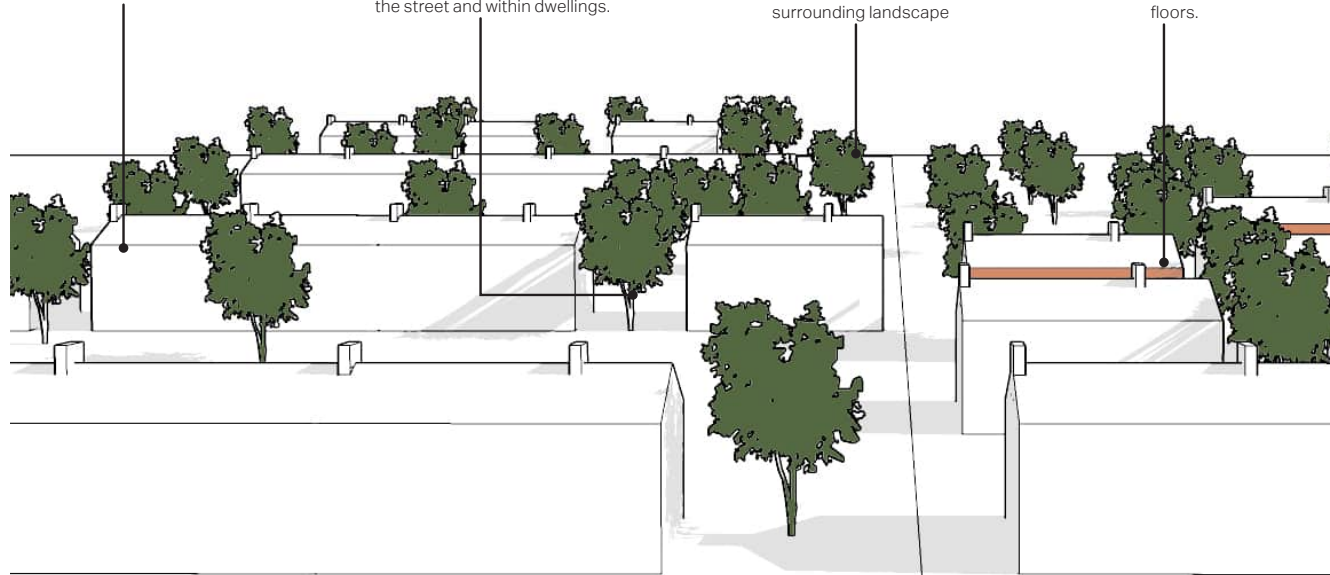
**Code KV2- Sloping views**

Buildings on a slope should be orientated to face views of the surrounding landscape.

Blocks should be organised with spaces between buildings allowing views to be appreciated from both the street and within dwellings.

Buildings on a slope should be designed to appropriate scale and massing to allow views to be appreciated to the surrounding landscape

An example of when buildings are positioned closely to each other restricting views from the upper floors.



**Figure 5.7** Diagram illustrating the protection of views on a sloping site.

## 5.8 Green-Blue Infrastructure Code (GBI)

Green and blue infrastructure is the network of existing or new, natural and managed green spaces and water bodies, together with the linkages that join up individual areas as part of a more comprehensive network of green spaces, such as PROW, footpaths, cycle paths and bridleways. Understanding the local topography, including natural drainage paths, existing water bodies and potential infiltration areas, are essential for creating sustainable developments. Green-blue infrastructure should be an integral aspect of the layout planning and structuring of any housing development.

### Code GBI1- Green- Blue Infrastructure

- Development should have regard for the topography of Edenfield and ensure any drainage impacts are accounted for and do not cumulate.
- Natural assets such as mature trees, hedgerows or watercourses should be retained and enhanced.
- Provision of rain gardens, allotments, permeable landscape treatments and open/green spaces are encouraged to create sustainable communities and contribute to local SuDS provision.
- The use of brownfield land should be prioritised over greenfield land.
- Development should contribute to the green infrastructure and support biodiversity through the integration of new wildlife habitats and open/green space provisions to support future needs.
- New development should not result in any net loss of natural assets and should seek to provide net gains.
- Where there is loss of natural assets, mitigation and compensation will be required.



Precedent examples of Green Infrastructure

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## 5.9 Boundary Treatments Code (BE)

In addition to the settlement edges, appropriate boundary treatment within the village should be used to demarcate public and private spaces. These may vary based on context.

### Code BE1-Boundary Treatments

- Ensure the nature of any boundary treatment is appropriate to its character. Closed board fencing should not be used at the landscape edge or onto the public realm. This is appropriate for garden division only
- Retention and planting of locally native trees and hedgerows along property boundaries is encouraged.
- The planting of trees and hedgerows, consisting of native species characteristic of the Neighbourhood Area, along property boundaries is encouraged.

### Code BE2- Traditional Boundary Treatments

- Where traditional boundary treatment exists, such as stone walling, it should be retained and enhanced. This type of boundary treatment is encouraged within the Traditional Terraces Character Area, Rural Fringe and Former Rural Fringe Character Areas. Local materials should be adopted where appropriate.
- Boundary treatments facing Primary streets and public areas should reflect the best examples of Edenfield Village and be visually permeable; for instance, they could be low walls made of stone or bricks according to context, or hedgerows or a combination of these.

### Code BE3-Elevated Boundary Treatments

- Good quality drystone walls as boundaries fronting the highway may be more successful than planting at higher elevations. where trees/bushes are more likely to be exposed to severe weather particularly wind.



Figure 5.8: Example boundary treatments

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## 5.10 Settlement Edge Code (SE)

Edenfield is largely rural, and its setting within the countryside is fundamental to village character. The relationship between the settlement edge and the landscape is therefore essential in retaining this rural character.

It is important that new developments should create a positive relationship with the surrounding countryside, providing an appropriate transition between the built and natural environment. Housing layout should be designed to retain, enhance and integrate key views and vistas, and also soften the edge between the built and natural landscape.

### Code SE1- Settlement Edges

- Appropriate transition along settlement edges should be an essential consideration for any development.
- Incorporate landscape buffer areas that are proportionate to the scale of the development and provide a smooth transition to the countryside.
- Hard edges onto the landscape are considered inappropriate, especially those of a suburban character which do not complement the landscaped setting.

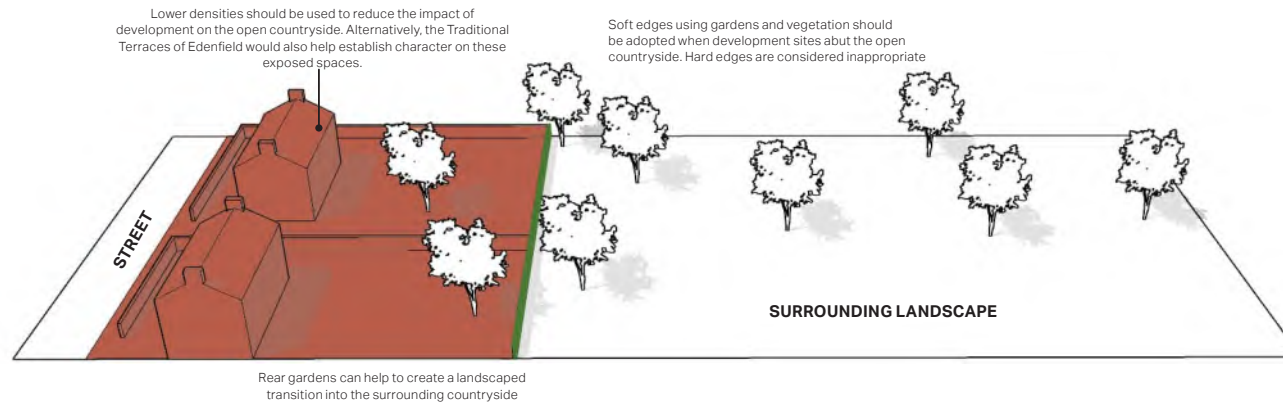


Figure 5.9: Settlement edge treatment



## 5.11 Movement Network and Street Typologies (MST)

The movement network provides the skeletal framework around which the development can be formed; it contributes significantly to making high quality places and defining local character. Traffic and congestion issues are prevalent along the primary route network and Market Street in particular. Traffic flow in and out of the village is a vital issue within the Neighbourhood Area.

Further development has the potential to increase pressure on the existing highways network and parking, and exacerbate problems of congestion. Street layout and design should be an essential consideration for any new development and should include the impacts on existing infrastructure and highways and mitigate appropriately.

The movement network should identify and prioritise streets and define a street hierarchy, with different streets having a specific character linked to their role and function. A clear layout and hierarchy helps people to find their way around.

There is some sense of hierarchy across the village, however many of the streets provide access-only functions to the residential units they serve. An appropriate street hierarchy should be created, with street typologies identified in proportion to the scale of development. The hierarchy should contribute to the sense of place and facilitate all types of movement, rather than a hierarchy that is determined primarily by traffic capacity. Rochdale Road, Bolton Road North, Burnley Road, Blackburn Road, Bury Road and Market Street form the primary routes within the village, connecting to the wider areas. Residential streets should not be seen merely as a conduit for traffic, but as places in their own right and reflect the context and character of the townscape.

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### Code MN1- Movement Network

- Street layout and design should be an essential consideration for any new development. Development should consider any impacts on existing infrastructure or highways and mitigate appropriately;
- Developments should consider an appropriate hierarchy of street typology based on its context and location;
- Street designs should adhere to guidance provided in Manual for Streets and other relevant Highways Codes.
- Walking and recreational opportunities are encouraged within the Neighbourhood Area, and provisions should be made to connect pedestrian and cycling routes to a wider green network. Existing cycle and pedestrian links should be improved and extended where possible.
- The street network should be safe and accessible for all, and should take into account the diverse needs of all potential users including cyclists and users of mobility scooters, prams and wheelchairs.

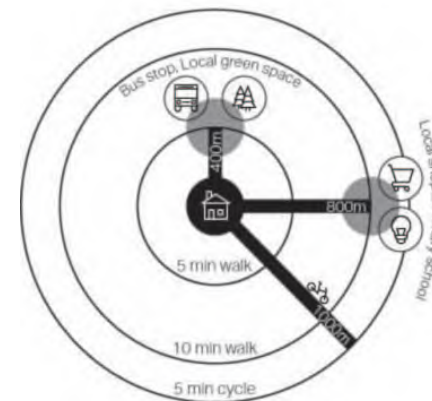


Figure 5.10: 'Walkable neighbourhood' Diagram

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The following street typologies are relevant to Edenfield Neighbourhood Area:

### Code ST1- Primary Street (ST1)

Primary streets are the main roads through the village area. They are affronted by both residential and commercial uses. Primary streets should be designed with wider carriageways to accommodate heavier traffic flows and should have wider pavements where possible. On-street parking should be well defined and suitably positioned and should not hinder traffic flow or create pinch points.

Parking should have regard to the street scene and where possible use street furniture, lighting and soft landscaping to break the visual monotony of the street. The streets should be designed to consider impacts on existing infrastructure and future demands.

Primary Street should be designed with wide carriageway and comfortable pavements to allow pedestrian flow. On-street parking should be within designated spaces and avoid creating pinch point or dominate the street scene

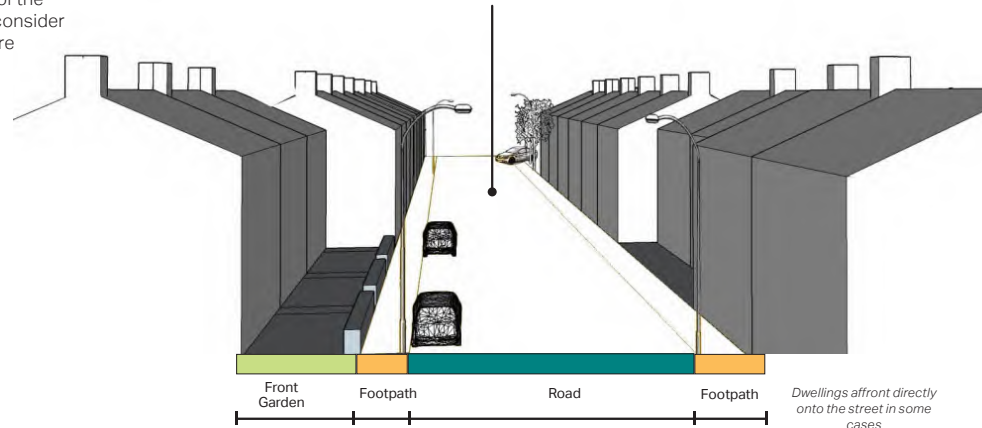


Figure 5.11: Primary street diagram



### Code ST2- Secondary Street (ST2)

Secondary Streets should have wide carriageway and comfortable pavements to allow pedestrian flow. Traffic calming should be used to help reduce speed. On street parking should not dominate street scene. Street design should include visitor parking requirements. Soft landscaping and street furniture should be used to break the visual monotony of the street

Whilst supporting less movement than the Primary Routes, Secondary Routes should be of a high quality, and still maintain notions of pedestrian safety. There should be a comfortable transition between the different route typologies, despite their design differences, and users should feel invited to explore the route network.

These routes have been designed with sufficient width for vehicular traffic to pass in either direction and footpaths either side of the carriageway. The routes will provide residential frontages which respond to the carriageway, with gardens offering semi-private/private transition space between the dwellings and the route corridor.

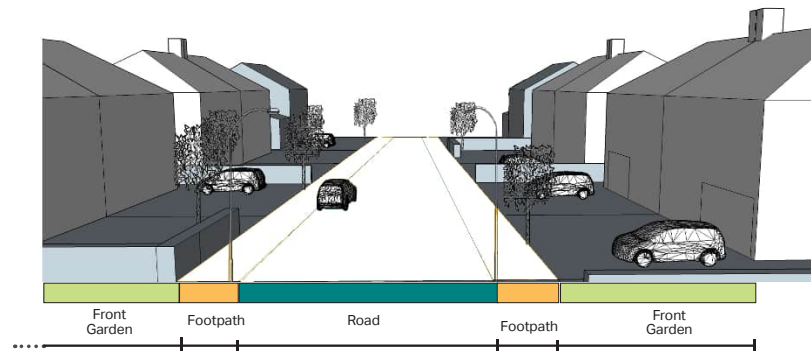
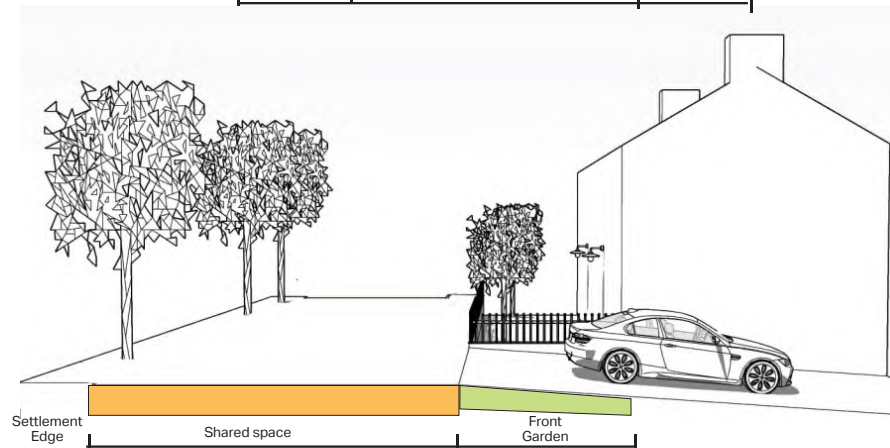
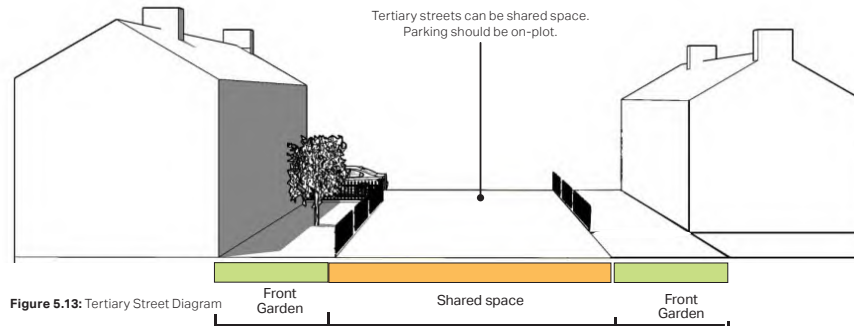


Figure 5.12: Secondary Street Diagram

**Code ST3- Tertiary Streets**

Tertiary Routes generally serve a smaller number of units and consequently can be of a more intimate scale. With limited vehicular use, these streets work well as shared spaces, and invite use by both pedestrians and cyclists. There is less of a requirement to formalise the use of these spaces. This is especially the case where residential development is accommodated on both sides of the street. Tertiary Routes could also accommodate residential development only on one side, with green space reflected on the other. This helps to integrate with the landscape context. All Tertiary Routes should be designed to enable the access and egress of waste collection vehicles.



## 5.12 Street-scene and Parking Code (SSP)

All parking strategies should seek to integrate well with the existing landscaped context of Edenfield, and have a minimal impact on the environment and local character. Provision should facilitate a balanced mix of parking solutions that are well-integrated into the design and layout of proposals. Parked cars dominate the street scene along several streets in Edenfield, including Market Street, where the presence of parked vehicles causes traffic congestion at identified pinch points.

In providing car parking, consideration must be given to the amount required, and how and where it is accommodated. Designs need to reconcile the need to provide attractive streets that include adequate parking, but without detracting from the character or visual quality of the street. New developments should ensure sufficient parking is provided for both residents and visitors.

### Code SSP1- Street-scene and Parking

- Parking solutions should have regard to impacts on traffic flow and should seek to avoid exacerbating congestion and pinch points without reducing parking provision for existing residents and visitors.
- Integrate parking into the design/layout of new development without detracting from the character of the area which it is located;
- The use of soft landscaping or tree planting can help in breaking the visual monotony of parked cars. These elements should be incorporated into parking solutions to help create an attractive street-scene and reduce the visual impact of parked cars. Appropriate landscaping and permeable paving is encouraged which can also help to intercept surface water-run off and actively contribute to sustainable drainage.
- All car parking provision should be compliant with Appendix I Parking Standards of the Rossendale Local Plan 2019-2036.
- New developments should encourage 'active travel' and include pedestrian/ cycle infrastructure and create a 'walkable neighbourhood', helping to reduce the demands of parking.



*On-street parking creating pinch points and dominating street scene*



*On-street parking creating pinch points and dominating street scene*

### Code P1- On-street Parking

- Streets should be designed in such a way to enable on-street parking, should it be required. Where on-street parking is delivered, it should be provided in small groupings to reduce its impact and presence on the street-scape. Landscape features and SuDs should be provided intermittently to help integrate it into the street-scene.
- Demarcation of on-street parking should be sensitive to the local setting, with white lines being avoided where possible in favour of more subtle and appropriate methods, such as changes in hard landscaping materials. Where possible, tree planting or other gaps between parking bays should be incorporated after every 5 continuous bays of parallel parking. Parking on footpaths, grass verges and tandem parking should be avoided.

### Code P2- Garage and On- Plot Parking

On-plot parking includes parking spaces which are within the ownership boundary of residential dwellings. The spaces are reserved only for private access, and can be presented in several forms: private garage, front and side parking and private drive. On-plot parking offers an alternative to on-street parking, and when designed sensitively can help to reduce the visual impact of cars and provide better safety and supervision for the vehicles.

- On-plot parking should consider the character of the street and be sited to avoid dominating the street scene. Driveways and garages should be located to the side of the house wherever possible to minimise visual impact. Garages should be designed so as not to dominate the main elevation of the property.
- Parking in front of dwellings should maintain the extent of the front boundary and provide a clearly defined edge to the private space and enclosure to the street. Parking on the plot (front, rear or side) should also consider adequate amenity space, and access (to front and rear of property).
- Uninterrupted banks of frontage parking should be avoided to help mitigate the impact of any parking on the street-scene, with landscaping adopted where appropriate.



*On-street parking with landscaping*

**Code P3-Shared Parking**

- Shared parking could help optimise parking spaces, especially in the Village Core character area.
- Private parking owners like pubs are more likely to be conducive to shared parking, which could help to capitalise on these spaces when not in commercial use. This could help to minimise the on-street parking of the area, and help to enhance the streetscape from its current congestion. Shared parking should be safe, secure and convenient to use and appropriately located to facilitate natural surveillance and ownership.

**Code P4- Parking Courts**

- Provisions for parking courts provide off-street parking located internally within a development block, which can help reduce the visual impact of vehicles parked on the street. Within Edenfield these can be seen at the properties on the Burnley Road/ Blackburn Road junction. Where possible, parking courts should be located in overlooked locations so as to benefit from natural surveillance, and be supported by appropriate lighting.
- High quality and subtle use of materials, integrated landscaping and trees will assist in softening the visual impact and must be incorporated into the design of the parking court to create attractive spaces. Parking courts should be easy to access.

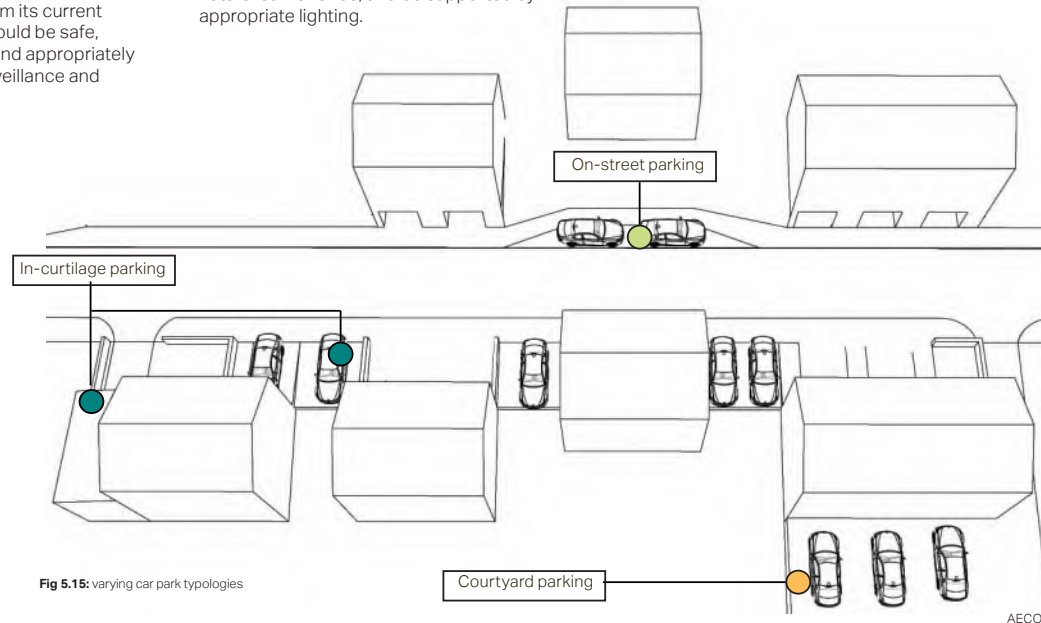


Fig 5.15: varying car park typologies

## 5.13 Cycle Parking and Storage (Code CPS)

### Code CPS1- Cycle Parking and Storage

In order to encourage cycling as an active mode of transport, cycle storage needs to be considered alongside car parking. Opportunities for private cycle storage in curtilage and communal cycle parking should be provided in suitable locations.

Any refuse storage should be sensitively designed so as not to detract from the street-scape, and should be considered within the plot design of units. Domestic refuse storage should be provided on plot, either to the rear or the side of properties.

The movement and removal of waste is important in maintaining environmental health. The road layouts need to support this movement, and ensure there is adequate room and access for waste collection vehicles. Waste collection vehicles are expected to be able to access and egress all Primary, Secondary and Tertiary Routes, with turning heads accommodating this movement. Car parking should also respond to the spatial requirements of this servicing, and be careful not block or hinder such vehicle movements.



*Precedents for external cycle and refuse storage*



## Next Steps

# 06

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## 6.1 Next Steps

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This report aims to identify the key design features present in Edenfield to retain and enhance the rural character of Edenfield Neighbourhood Area. It provides a set of guidance which aligns to the objectives of the Neighbourhood Plan and the ambitions of the community group for Edenfield.

It is recommended that the group should use this document to embed design policies within the Neighbourhood Plan.

It is important to note that the design details which have been stated in this report should be carefully interpreted and any future development should adhere to the guidance provided within the Design Codes and look to enhance the rural character and setting of Edenfield Neighbourhood Area.

**About AECOM**

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United Utilities Water Limited



unitedutilities.com



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

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

Your ref:  
Our ref:  
Date: 07-NOV-23

Dear Sir / Madam

**ROSSENDALE BOROUGH COUNCIL – LAND WEST OF MARKET ST, EDENFIELD (H66) - MASTERPLAN & DESIGN CODE – SEPTEMBER 2023**

Thank you for your consultation seeking the views of United Utilities Water Limited (UUV) as part of the above Masterplan and Design Code consultation. UUV wishes to build a strong partnership with all local planning authorities (LPAs) to aid sustainable development and growth within its area of operation. We aim to proactively identify future development needs and share our information. This helps:

- ensure a strong connection between development and infrastructure planning;
- deliver sound planning strategies; and
- inform our future infrastructure investment submissions for determination by our regulator.

We encourage you to direct developers to our [free pre-application service](#) to discuss their schemes and highlight any potential issues by contacting:

Developer Services – Wastewater



Developer Services – Water



In our previous consultation response (enclosed for ease of reference), we highlighted various elements of adopted development plan policy. Based on this review, we requested that the masterplan for H66 addresses the following matters.

- i) The Identification and assessment of all forms of flood risk.
- ii) Implementation of a holistic allocation-wide strategy for sustainable foul and surface water infrastructure.
- iii) Recognition that surface water management is a key design consideration to be integrated with the wider landscaping and design strategy and the implementation of multi-functional sustainable drainage systems.
- iv) Adoption of an innovative approach to design that is adaptable to climate change and incorporates principles of sustainable construction including the implementation of water efficiency measures.

Our consultation response expanded on each of these in detail.

Having read the latest version of the Masterplan and Design Code, our previous comments remain relevant. Whilst we welcome some changes to the masterplan (for example, principles around the location and inclusion of multi-functional sustainable drainage systems), we are very concerned that the masterplan does not set out a clear allocation-wide strategy for foul and surface water drainage infrastructure. In this regard, we wish to emphasise the explanatory text to Policy H66. Paragraph 126 states:

*'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.'*

Similarly Policy ENV 9 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 holistic allocation-wide drainage strategy for both foul and surface water for the masterplan should demonstrate how foul and surface water drainage will be delivered as part of a wider, holistic strategy which co-ordinates development and infrastructure between phases, whilst having regard to interconnecting phases. If necessary, the applicant will need to work with UUW to ensure that infrastructure in one phase is sized to accommodate flows from interconnecting phases and the drainage strategy should ensure a proliferation of pumping stations is avoided. The allocation-wide strategy for foul and surface water should not be constrained by land ownership and should demonstrate how both foul and surface water will be sustainably managed.

Having reviewed the latest version of the masterplan, we can find no detail of the proposals for foul water drainage for the allocation. It is not clear where water (foul and surface water) will discharge for each

parcel or whether there will be any interconnectivity between phases which will necessitate the appropriate upsizing of infrastructure to ensure drainage infrastructure is delivered sustainably.

With regards to surface water drainage, whilst there is reference to the location and inclusion of SuDS in the masterplan, there is no clear strategy that shows how surface water will be managed by the various phases. For example, there is no clarity in the masterplan on the likely points of outfall for foul and surface water management for each phase. This is an important point to note especially bearing in mind that UUW has commented on applications for planning permission at part of the allocation which have included proposals to discharge surface water to the public combined sewer. Indeed, in our latest response, a new potential watercourse has been identified which requires further investigation by the applicant.

This highlights the need for the masterplan to be informed by a more detailed assessment of opportunities for surface water management. This assessment should identify all existing waterbodies on and near to the site including any land drains and springs. This baseline information is critical to inform the allocation-wide surface water drainage strategy required by the development plan.

It is notable that the phasing schedule in Section 3 of the Masterplan and Design Guide makes no reference to a foul and surface water drainage strategy. As such it is not a *'phasing and infrastructure delivery schedule'* as specified in Paragraph 126 of the adopted Rossendale Local Plan.

It is clear that the masterplan does not set out a holistic allocation-wide strategy for sustainably managing foul and surface water and how this will be delivered over a phased development. As such the masterplan should not be approved and requires further revision.

Moving forward, we respectfully request that the council continues to consult with UUW for all future planning documents. In the meantime, if you have any queries or would like to discuss this representation, please do not hesitate to contact me.

Yours faithfully

Andrew Leyssens  
Planning, Landscape and Ecology  
United Utilities Water Limited

Enc. Previous consultation response dated 17 January 2023



United Utilities Water Limited



unitedutilities.com



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

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

**Your ref:**  
**Our ref:**  
**Date:** 17-JAN-23

Dear Sir / Madam

**ROSSENDALE BOROUGH COUNCIL – LAND WEST OF MARKET ST, EDENFIELD (H66) - MASTERPLAN & DESIGN CODE – CONSULTATION DRAFT**

Thank you for your consultation seeking the views of United Utilities Water Limited (UW) as part of the above Masterplan and Design Code consultation. UW wishes to build a strong partnership with all local planning authorities (LPAs) to aid sustainable development and growth within its area of operation. We aim to proactively identify future development needs and share our information. This helps:

- ensure a strong connection between development and infrastructure planning;
- deliver sound planning strategies; and
- inform our future infrastructure investment submissions for determination by our regulator.

We encourage you to direct developers to our [free pre-application service](#) to discuss their schemes and highlight any potential issues by contacting:

Developer Services – Wastewater



Developer Services – Water



## **Our Assets**

It is important to outline the need for our assets to be fully considered in development proposals.

UUW will not allow building over or in close proximity to a water main.

UUW will not allow a new building to be erected over or in close proximity to a public sewer or any other wastewater pipeline. This will only be reviewed in exceptional circumstances.

**We wish to highlight that there is a public combined sewer that passes through the northern tip of the site which is not identified as a constraint requiring further consideration in the preparation of the masterplan.**

All our assets will need to be afforded due regard in the masterplanning process for the site. This should include careful consideration of landscaping proposals in the vicinity of our assets and any changes in levels and proposed crossing points (access points and services). Applicants should not assume that works to the public sewer including diversion or a change in levels will be acceptable as this could affect hydraulic performance and therefore result in a change in flood risk from the public sewer.

We strongly recommend that the Local Planning Authority advises future applicants of the importance of fully understanding site constraints as soon as possible, ideally before any land transaction is negotiated, so that the implications of our assets on development can be fully understood. Where our assets exist on a site, we ask site promoters to contact UUW to understand any implications using the above contact details.

Plans of our assets are available from a range of providers including our Property Searches team who can be contacted at <https://www.unitedutilities.com/property-searches/>.

UUW wishes to note the importance of any approach to planting new trees giving due consideration to the impact on utility services, noting the implications that can arise as a result of planting too close to utility services. This can result in root ingress, which in turn increases the risk of drainage system failure and increases flood risk. When considering and implementing tree-lined streets, it will be important that applicants consult with us and refer to our 'Standard Conditions for Works Adjacent to Pipelines' (a copy of which is enclosed). We wish to note that the approach to any planting must have regard to the proximity to existing or proposed utility assets to ensure there is no impact on these assets such as root ingress. Trees and proposals for biodiversity net gain should not be located directly over water and wastewater assets or where excavation onto the asset would require removal of the tree or biodiversity net gain. Deep rooted shrubs and trees should not be planted within the canopy width (at mature height) of water and wastewater assets. Our Standard Conditions provide advice on working near our assets including advice on landscaping in the vicinity of our assets.

## **Adopted Development Plan**

As noted in the draft Masterplan and Design Code (November 2022), the adopted development plan includes the Rossendale Local Plan 2019-2036 (Adopted 15 December 2021). Key elements from the development plan relevant to this site include those set out below.

### ***Policy 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.*

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.*

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.'*

The explanatory text to Policy H66 also states:

*'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.'* (Paragraph 126)

*'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.'* (Paragraph 130)

#### **Strategic Policy ENV1: High Quality Development in the Borough**

*'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:*

*f) Not prejudice the development of neighbouring land, including the creation of landlocked sites;*

*l) That proposals do not increase the risk of flooding on the site or elsewhere, where possible reducing the risk of flooding overall, having regard to the surface water drainage hierarchy;*

*m) A Development Brief or Design Code (as appropriate) will be required to support major new development and smaller proposals as appropriate (this document will be proportionate to the size of the scheme). Such documents should set out the design principles, the appropriateness of the development in the context of the area and consideration of innovative design;*

*q) Designs that will be adaptable to climate change, incorporate energy efficiency principles and adopting principles of sustainable construction including Sustainable Drainage Systems (SuDS);'*

#### **Policy ENV9 Surface Water Run-Off, Flood Risk, Sustainable Drainage and Water Quality**

*'All development proposals will be required to consider and address flood risk from all sources.'*

*'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.'*

*'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.'*

*'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.'*

*Applicants will be expected to liaise with utility providers. It may be necessary to co-ordinate the delivery of development with the delivery of infrastructure improvements.'*

The associated explanatory text adds:

*'Natural methods to manage surface water run-off will be encouraged as a priority. The use of permeable surfaces/areas of soft landscaping, the use of green infrastructure, and the use of natural flood management measures in upland areas will all be supported where appropriate, working together with relevant partners. More detail on this will be contained in the forthcoming Climate Change SPD.'* (Paragraph 282).

*'Proposals for major development will be expected to incorporate multi-functional SuDS; this must be included within the early stages of the site design and involve consultation with relevant partners. Proposals for minor development should also consider the incorporation of above ground SuDS. SuDS can include a variety of natural surface water management and could include innovative approaches such as green roofs, grey water management and bio-retention tree pits. Further guidance on this will be contained in a future Climate Change SPD.'*

Therefore, we would expect the Edenfield Masterplan and Design Guide to comply with the above development plan policy requirements and address a range of matters including those set out below.

- i) The Identification and assessment of all forms of flood risk.
- ii) Implementation of a holistic allocation-wide strategy for sustainable foul and surface water infrastructure.

- iii) Recognition that surface water management is a key design consideration to be integrated with the wider landscaping and design strategy and the implementation of multi-functional sustainable drainage systems.
- iv) Adoption of an innovative approach to design that is adaptable to climate change and incorporates principles of sustainable construction including the implementation of water efficiency measures.

Each is addressed in more detail below.

**i) The Identification and assessment of all forms of flood risk**

The Masterplan and Design Code should demonstrate how all forms of flood risk have been considered. This should include (inter alia):

- What are the natural flood paths that pass through the site noting the topography of the site and the fact that the surface water flood risk map identifies surface water flow paths that pass through the site?
- Where are the watercourses on-site and are there any ephemeral watercourses that arise during wetter weather?
- Have exceedance paths from existing drainage systems and any adjacent highways been considered? It is important that this water is not displaced / constricted.
- Will surface water drain via any culverted watercourses if so do these have any associated capacity restrictions which will affect the wider surface water design?

It is not clear whether the above matters have been considered in the preparation of the masterplan. In this context, we wish to highlight the latest guidance in the Planning Practice Guidance, which states:

*‘Development or the cumulative impacts of development may result in an increase in flood risk elsewhere as a result of impacts such as the loss of floodplain storage, the deflection or constriction of flood flow routes or through inadequate management of surface water. Site-specific flood risk assessments should assess these impacts and demonstrate how mitigation measures have addressed them. Where flood storage from any source of flooding is to be lost as a result of development, on-site level-for-level compensatory storage, accounting for the predicted impacts of climate change over the lifetime of the development, should be provided. Where it is not possible to provide compensatory storage on site, it may be acceptable to provide it off-site if it is hydraulically and hydrologically linked.’*

*‘Where development proposals would result in the deflection or constriction of identified flood flow routes, a site-specific flood risk assessment will need to demonstrate that such routes will be safely managed within the site.’*

*Paragraph: 049 Reference ID: 7-049-20220825’*

**ii) Implementation of a holistic allocation-wide strategy for sustainable foul and surface water infrastructure**

We wish to emphasise that the Masterplan and Design Guide should set out a holistic allocation-wide drainage strategy for both foul and surface water for the Masterplan area to demonstrate how foul and surface water drainage will be delivered as part of a wider, holistic strategy which co-ordinates

development and infrastructure between phases, whilst having regard to interconnecting phases. The resulting infrastructure should be sized to accommodate flows from interconnecting phases and the drainage strategy should ensure a proliferation of pumping stations is avoided. The allocation-wide strategy for foul and surface water should not be constrained by land ownership and should demonstrate how both foul and surface water will be sustainably managed. Noting the availability of watercourses within the allocation site, any strategy for foul and surface water should demonstrate that only foul water will discharge to the public sewer with surface water discharging to an alternative to the public combined sewer and that the hierarchy for managing surface water should be fully investigated. The surface water drainage strategy should be informed by geotechnical investigations which demonstrate how surface water can be sustainably managed on site without impact on the adjacent A56 highway. It is noted that the land slopes down to the west and that there are watercourses present within the site, however, it is not clear how water will drain into the watercourses from each parcel or whether there will be any interconnectivity between phases which will necessitate the appropriate upsizing of infrastructure to ensure drainage infrastructure is delivered sustainably. The phasing schedule in Section 7 of the Masterplan and Design Guide document lacks detail and fails to mention the delivery of sustainable drainage systems and water management.

It is clear that the masterplan does not set out a holistic allocation-wide strategy for sustainably managing foul and surface water and how this will be delivered over a phased development.

**iii) Recognition that surface water management is a key design consideration to be integrated with the wider landscaping and design strategy and the implementation of multi-functional sustainable drainage systems**

UUW is concerned that the Edenfield Masterplan and Design Guide does not recognise water management as a key design consideration especially in the design of the landscaping and public realm. We request that the masterplan is clear that sustainable drainage should be designed in accordance with Policy EN9 which prioritises surface water management early in the design process in combination with the design of the landscaping and green infrastructure. It prioritises multi-functional SuDS that contribute to amenity, biodiversity and water quality which is reflective of the four pillars of sustainable drainage set out in *Building for a Healthy Life (Birkbeck D and Kruczkowski S et al (2020) Building for a Healthy Life)*.

UUW is concerned that the management of surface water and the delivery of multi-functional SuDS is not truly integrated into the preparation of the masterplan and design code. The document is not informed by the aforementioned assessment of surface water and flood risk constraints or any geotechnical information relating to the potential for infiltration, the impact on the A56 or the capacity of culverted watercourses.

The Masterplan and Design Guide does not set out a clear sustainable water management strategy, which should be linked to wider design principles, especially landscaping and biodiversity. It is critical that the evaluation of surface water management opportunities is undertaken early in the design process as part of the preparation of the masterplan as required by development plan policy. As the LPA will be aware, green infrastructure can help to mitigate the impacts of high temperatures, combat emissions, maintain or enhance biodiversity and reduce flood risk and improve amenity. Green / blue infrastructure and landscape provision play an important role in managing water close to its source. The masterplan and design code should highlight the link between green / blue infrastructure, surface water management, landscape design and biodiversity as a strategic requirement and provide a clear framework with examples of how source control measures for the management of surface water will be expected to be integrated within the detailed design of the development. Example surface water management opportunities include:

- permeable surfacing;
- soakaways and filter drainage;
- swales;
- bioretention tree pits;
- basins and ponds; and
- reed beds and wetlands.

Any drainage system should be designed in accordance with ‘*Ciria C753 The SuDS Manual*’ or any subsequent replacement guidance.’

UUW notes the landscaping guidance within the masterplan and design code and the proposals for the planting of new trees as part of tree-lined streets. We request that the Masterplan provides more detail and guidance on how any proposed landscaping can be integrated with the strategy for surface water management.

Street trees and landscape design present an excellent opportunity to better manage surface water at source and we request that clear principles are set out in the masterplan which demonstrate how surface water management and sustainable drainage will be integrated with the detailed landscaping design of the site. The Edenfield Masterplan and Design Code references paragraph 131 of the NPPF which states that:

*‘Trees make an important contribution to the character and quality of urban environments, and can also help mitigate and adapt to climate change. Planning policies and decisions should ensure that new streets are tree-lined, that opportunities are taken to incorporate trees elsewhere in developments (such as parks and community orchards), that appropriate measures are in place to secure the long-term maintenance of newly-planted trees, and that existing trees are retained wherever possible. Applicants and local planning authorities should work with highways officers and tree officers to ensure that the right trees are planted in the right places, and solutions are found that are compatible with highways standards and the needs of different users.’*

We request that the masterplan is clear that it will be important that the detailed design considers finished floor and ground levels, and how these relate to the public sewerage system, to ensure development is resilient to the challenges of climate change. Where the ground level of a site is below the ground level at the point where the drainage connects to the public sewer, care must be taken to ensure that the proposed development is not at an increased risk of sewer surcharge. It is good practice for the finished floor levels and manhole cover levels (including those that serve private drainage runs) to be higher than the manhole cover level at the point of connection to the receiving sewer. Similarly, applicants should ensure that external levels fall away from the ground floor level of the proposed buildings (following any regrade), to allow for safe overland flow routes within the development and minimise any associated flood risk from overland flows from existing or proposed drainage systems.

**iv) Adoption of an innovative approach to design that is adaptable to climate change and incorporates principles of sustainable construction including the implementation of water efficiency measures**

In accordance with Policy ENV1, we encourage the masterplan and applicants to adopt an innovative approach to design that is adaptable to climate change and principles of sustainable construction. We request that this includes the implementation of water efficiency measures. UUW wishes to highlight that we offer an infrastructure charge discount for sustainable development. Our 2023/24 charges scheme confirms that the water infrastructure charge for a new property is reduced from £302 to £30

where a developer can demonstrate that the property is built to use a potential consumption of 100 litres per person per day or less. Similarly, when a new property is connected to the public sewer, the sewerage infrastructure charge is reduced from £279 to £28 for foul only connections.


**Summary**

Moving forward, we respectfully request that the council continues to consult with U UW for all future planning documents. In the meantime, if you have any queries or would like to discuss this representation, please do not hesitate to contact me.

Yours faithfully

Andrew Leysens  
Planning, Landscape and Ecology  
United Utilities Water Limited

Encs. *Standard Conditions for Works Adjacent to Pipelines*



Rossendale Borough  
Council

06 NOV 2023

I certify that this is a true copy  
of the original document

SIGNED

Dear Sirs,

Revised Master Plan.

I refer to the above Master Plan and I would like to state that my objections which I sent to you on 25<sup>th</sup> June, 2023 still stand. There has been very little change from the previous application and traffic issues have still not been resolved. Edenfield's road system is stretched to the limit at peak times and the highway changes pose a real safety issue.

Obvious issues in the LCC Highways report have not been addressed including the Market Street junction, safety concerns regarding the childrens' play area and pump track.

A road safety audit should be undertaken to address the concerns raised in the first instance by LCC.

The Master Plan should address ALL the developers, not just Taylor Wimpey.

I would be grateful if you would take my comments on board when considering this latest development.

Yours faithfully,



(Mrs.) Jenifer M. Mead

The Forward Planning Dept.,

Futures Park,

Bacup, Lancs.

**bentleyal** <[REDACTED]>

To:forwardplanning@rossendalebc.gov.uk

3/8/2023

**RE: Masterplan and planning application 2022/0451**

Dear Sirs,

**We strongly object to the revised Edenfield Masterplan Design Code submitted by Taylor Wimpey alongside their planning application 2022/0451 relating to building of houses in Edenfield, Lancashire.**

We wholeheartedly agree with all the valid concerns/objections made by **The Edenfield Community Neighbourhood Forum** and other concerned residents, relating to

- 1.NORTH : Church and School end of village\_ proposed Peel/Northstone Development
- 2.CENTRAL: Market St corridor - Proposed Taylor Wimpey development
- 3.SOUTH : Village centre to South edges of village -Proposed AMWYL development

We would also refer you to our letter of planning objections sent to you on 17<sup>th</sup> Jan 2023 and stand by those existing points of objections as it would appear that this amended application is indeed worse than previous with many things slipped in, presumably hoping that because they are so very vague that the residents would not notice.

This proposal to build 238 new houses on land off Market St should be rejected by Rossendale Borough Council due to the following:

There is still no detailed Master Plan for the whole of the H66 site. **No such Master plan has been submitted.**

**The revised version only represents** Taylor Wimpey.

It does not comply with Local Development Plan.

It does not consider the design code produced by Edenfield Community Neighbourhood Forum.

**The scale, density and character** is not in keeping with the existing style of the village. An additional 238 houses (*plus the others of Peel AMWYL and now Alderwood*) will have a **huge negative impact for existing residents**, in terms of disruption to how people go about their ordinary lives, devaluing houses or making them unsalable for several years, particularly in the construction years and then forever after.

**The construction phase of ten years** the noise, construction traffic chaos, dust, pollution and increased CO2 emissions, the physical and mental effects on existing residents has not been addressed and that is aside from the **major concern of access to the site** (see later)

There is no mention of how phasing of building works would be done, how the disruption would be sorted, nor of the infrastructure that would be required to basically serve this new TOWN... well, it certainly wouldn't be our village any more!

**The scale** is hugely disproportionate in relation to the existing number of dwellings in Edenfield and is far in excess of the Borough's targets.

**Housing density** is TW's primary concern in their application. More houses means more profit for them. However, that should not be a driving force for development. The roads within the

development are too narrow, the driveways not big enough for the number of cars that may be at each house, and the size of the garages shown are not big enough to get most family saloons in let alone the more rural suitable vehicles that are common around here. People are being encouraged to enjoy the psychological and physical health benefits of green spaces, plant up their gardens, plant trees etc, yet the gardens of these new houses are minimal... not what you would expect in a rural location.

Plus not enough green/landscaped communal areas.. yet again ignoring the Design Review done by Places Matter.

The Plan talks about Edenfield CORE, but that does not appear to relate to what is presently the centre!

Where is **the mixed tenure** approach for new local businesses?

**Shops** would be non-existent within a short space of time not increased, if the parking restrictions shown on the plan are instigated...i.e. if there is no parking people will go to shop elsewhere. Restricted parking i.e.8am to 6pm is laughable... that's exactly when the shops would be open! This would ruin several people's livelihoods.

**Doctors**, dentists and other health services are presently inadequate, particularly for those that do not drive such as the elderly. However, With **no parking** throughout Market St, how will **community** nurses, care workers, podiatrists, doctors etc be able to visit their patients?.

**Bus services** or lack of - also apparent. Bus stop to be moved... where to? No detail!

**Schools** ; Edenfield and Stubbins Primary schools are at capacity. The Master Plan states that there needs to be provision for schools but does not address what this provision should be. Not satisfactory!

**Outdoor areas** play areas for children are dated and limited already but are there any new ones? A provision of 4 benches ! The green space is on the western edge of development, way away from the existing heart of the village.

There is no joined up thinking regard linking **pedestrian pathways/cycleways/bridleways** together i.e. routes that people can use for exercise or to go from one end of the village to the other without going out onto the main road... this would be much safer and pleasanter for everyone. (kids going to school in particular, but also the disabled) The Plan shows a Mown grass path at the bottom of the estate... how long before that is an overgrown muddy mess? How does a Wheelchair navigate down a grass path?? And what about horse riders (yes -they do exist here! We are a rural location !)

**Ecology and environmental impact** is not addressed. The application clearly shows a net loss of green space and habitats. Protected species, namely orchids and probably others are present in these fields, They were flowering in June. I saw them myself in multiple places.

I note there has been a substation slipped in.

**Energy Efficiency.** – or lack of it. There are no details or provisions I can see for these houses to be built to 21<sup>st</sup> century energy efficient standards. I.e. Triple glazing, solar panels, insulation standards, waste water and heat recovery systems, heat pumps, Electric charging points etc etc. Surely a major planning consideration now.

**Flooding** The H66 land west of Market Street absorbs significant amounts of rainfall, with climate change increasing the risks. Covering such a large area in concrete & tarmac will have a huge detrimental effect. The *A56 Edenfield, homes, businesses and farm land to the lower slopes beyond Edenfield*, and beyond to *Irwell Vale, Strongstry, Chatterton and Ramsbottom* will all be put at extreme risk of flooding. These areas are already recognised as Flood Risk Zones, therefore any development in Edenfield will make the problems far worse.



The application shows the proposal of a SUDS in the south west of the site, in very close proximity to the A56 Edenfield bypass. The siting of such a facility so close to the A56 is unsafe. There is already an identified failure of that embankment. What happens when those repairs are needed and all the bypass traffic has to be diverted through the village!

There is also a health and Safety 'drowning danger for children' to be addressed.

In my previous objection I mentioned a **spring to the central western part**, that comes down under the village. There is nothing in the plan to investigate it and its effect on water flow.

Plus there is no detail with regard to the sewers. That could affect everyone.

**Traffic** No workable solution has been provided to the question of traffic in the village or neighbouring areas that would arise from the development.

The traffic situation is totally underestimated for both present and future traffic flow through Edenfield nor is the impact on the wider local road network considered.

We already have traffic jams on a regular basis where roads become gridlocked, closures of the bypass sends diverted traffic thru the village often at great speed and in the night. Market Street and Bury Road, Bolton Road West nor Rochdale Road, a HUB of 4 roads are clearly not capable of taking the level of traffic that the proposed plans would generate.

Plus the extra traffic coming through the village due to the new housing developments being done now between Edenfield and Shuttleworth.

**Parking** The main road of this village and others like Exchange St are mainly lined with Victorian terraced houses mostly with no front gardens or driveways, nor any rear entrances or garages. Most of the houses have at least 2 people needing cars for work etc, some can have up to 4. Where will they go?

The plans have nowhere near enough spaces to provide parking for those on Market St who will lose their on Street parking in the vicinity of the new junction (ghosted right turn).

The average number of cars parked **overnight** on Market St just from **Alderwood to the new Pilgrims Garden is 39.**

TW's application includes **13 car parking places** on the new road into their site. (For use of new houses as well and no electric charging points!)...That is to put it mildly, laughable

A proper back **lane/parking area behind those terraced houses is required** at the very least.

The amount of double yellow lines shown would make this village totally unvisitable... how would people be able to unload their shopping, have deliveries, have family visits, community healthcare workers???

Crossing places are not sufficient

#### **Access to the site**

We can still see no satisfactory solution with regard to the access points to and from the proposed sites.

Site access and exits, both **during construction and afterwards** is most certainly untenable. There are very serious traffic, pedestrian and cyclist road safety concerns. There is no suitable route for normal traffic into that site, let alone for the heavy duty construction traffic that will require access.

The new plan for new junctions, double yellow lines everywhere, parking restrictions, gateway features, central hatching, coloured aggregate, etc etc do not solve the problems that will be caused.

Gateways shown on plans –coloured tarmac to delineate a particular area would have little effect on the amount of traffic going through the village or its speed. Therefore of little value to safety.

The Entry/Exit junction on Market St ‘a ghosted junction’ has serious safety concerns for a number of reasons. Access is directly opposite a private lane with vehicles coming in and out regularly, plus is the main pick up point for the refuse collection wagons who pick up for 20 houses. His stopping there would block the road and cause hold ups.

It would be dangerous for pedestrians crossing particularly children going to and from Edenfield Primary School. There are line of sight issues, pavement not wide enough. TW’s new little car park is one way so anyone turning into the Entry road would be turning right into the parking and would have to wait until traffic waiting to exit onto Market St had gone. This would cause a back up of traffic to the junction and possibly along Market St.

I now come onto the area of most personal concern to ourselves – **the South part of the plan** i.e. Junction of Rochdale Rd, Market St, and Bury Rd (which residents consider the Centre of the Village!) and Exchange St, The Drive, Highfield Rd, Eden Ave and Bolton Rd North.

There are serious safety concerns for traffic, pedestrians, cyclists, horse riders, children, at all these road junctions and of making Exchange St a one way system. This is certainly not to help the existing residents. Do you not have a Public sector equality duty under the Equality Act 2010 ?...

Turning into exchange St from Market St is difficult anyway because it’s a blind left turn and near a zebra crossing coming straight off a very fast flowing mini roundabout.

Double yellow lines... again where are residents or village visitors to park?? On Saturday morning there were 17 cars parked on right side of street and 6 on top left. Where can they possibly go?? The proposed additional parking at the ANWYL site is obviously not meant for those residents and provides no details as to its size or what it is for.

A one way system with yellow lines will encourage speeding which is a safety concern as it goes right past the children’s play area and the recreation field. The traffic calming feature mentioned I doubt will have much effect.

At the bottom of Exchange St, there is a controlled emergency access with no details as to how this would work. How long before this became another free entrance to go through the new estate?

There should be no access to these areas from Exchange St, Eden Ave, or The Drive and along through Highfield Rd. These are built up residential areas not fit for the purpose of through flow of traffic of this magnitude. The area is already a 20mph area, and is sometimes a rat run when the A56 is shut to avoid the junction at the top of Bolton Rd North.

Many of the houses on these roads have a minimum of 2 cars each, and whilst many park on their drives there are still numerous cars all along the road and there is nowhere else you could provide parking along there if you put yellow lines.

**In conclusion**, This application quite clearly does not comply with many of the 11 conditions described in the **Local Development Plan Housing Policy H66 in the Rossendale Local Plan 2019-2036** adopted on 15 December 2021 and as such the development should not be supported.

Edenfield is not the place for a large urban style development such as this and as such the application should be rejected.

**The proposals are contrary to paragraph 130 of the National Planning Policy Framework in most respects.**



To whom it may concern

It's a disgrace, to have to spend time re-logging my objections to the proposed plan.

I work full time, have a family, and feel tricked to miss important deadlines diluting the chance for Edenfield to win.

Quite simply previous objections should be carried forward. However my objections:

- 1) Traffic increase. An already congested village the addition traffic will make it impossible for the people of Edenfield to pass through the village - peak times being already difficult especially in these dark wet days
- 2) Parking, in particular Market and Exchange Street are already parked on both sides of the road. Additional houses will increase traffic and add to the already difficult passing of traffic through the village (as per point 1)
- 3) Site build/Heavy good vehicles. Our existing streets are inadequate, the daily passing will deteriorate the existing condition and there will be no thought to future proof.
- 4) Build longevity. The chaos could last for years

Sincerely

Caroline Edwards

>

I wish to send my objection again to the masterplan by Taylor Wimpey as I feel the following points have still not been met.

I am strongly against the plan for what will eventually be 400 houses. Again this plan hasn't been put through as one plan for the 400 houses and has been split and doesn't give a true impact on the village.

Traffic is already a problem in Edenfield, Market street in particular has now been reduced to single file traffic nearer to the mini roundabout due to high traffic. Double yellow lines isn't a solution to this, why should existing residents be impacted in such a negative way? I would like to ask the planners, if this was their house, would they be happy to lose their parking which some people have had for nearly 30 years?

Market street and all the way onto Burnley Road is used like a race track already, the on road parking somewhat acts as traffic calming. Removing this parking will only make this problem worse and I have great concerns over the safety of residents who already live here. In that respect you would need something like an average speed check to counter this.

Flood risk is also another worry, take a trip along the A56 and you see numerous signs stating "road liable to flooding". Building houses adjacent to this section of road will only increase water onto this already terrible section of road.

Take a look over the last 18 months at how many overnight motorway road closures (one for 2 and a half months) along the A56 have resulted in Large volumes of traffic, especially lorries being diverted through a small village that cannot cope with this type of traffic. This has personally caused damage to my property due to HGV's passing in Large amounts.

Dentists, doctors and lack of school places have not been catered for in this plan either.

What will the impact be on utilities? Will infrastructure be upgraded?

Residents of the village and visitors to the area will know of the large amounts of wildlife in the area, this year in particular large volumes of deer can be seen. Removing greenbelt and animal habitats can only have a negative impact on what wildlife we have here.

I think people can understand the need for houses, but such a high quantity in a village which would nearly double the size of Edenfield is ludicrous. I can only come up with one answer as to why Edenfield has recieved such a large allocation of houses compared to other areas in rossendale and that can only be greed!

Thankyou Darrell

Dear Sirs

I feel all related parties to this application are not being fair to the residents of Edenfield. It is a full time job to follow procedures and then we are asked to write or objections which then are not addressed just ignored.

The parking for this development is my main concern and all point made previously still are relevant. Out of all main road streets in Rossendale market Street in Edenfield is the most congested with the least width. Access to sights are woefully inadequate with a rat run through estates with children playing and past a children's playground and bike track.

Residents parking had not been addressed for those who are to lose parking outside their property.

I cannot understand how the Council think this is a good idea when any reasonable person can clearly see the village cannot cope with the new development.

Sincerely

Simon Edwards