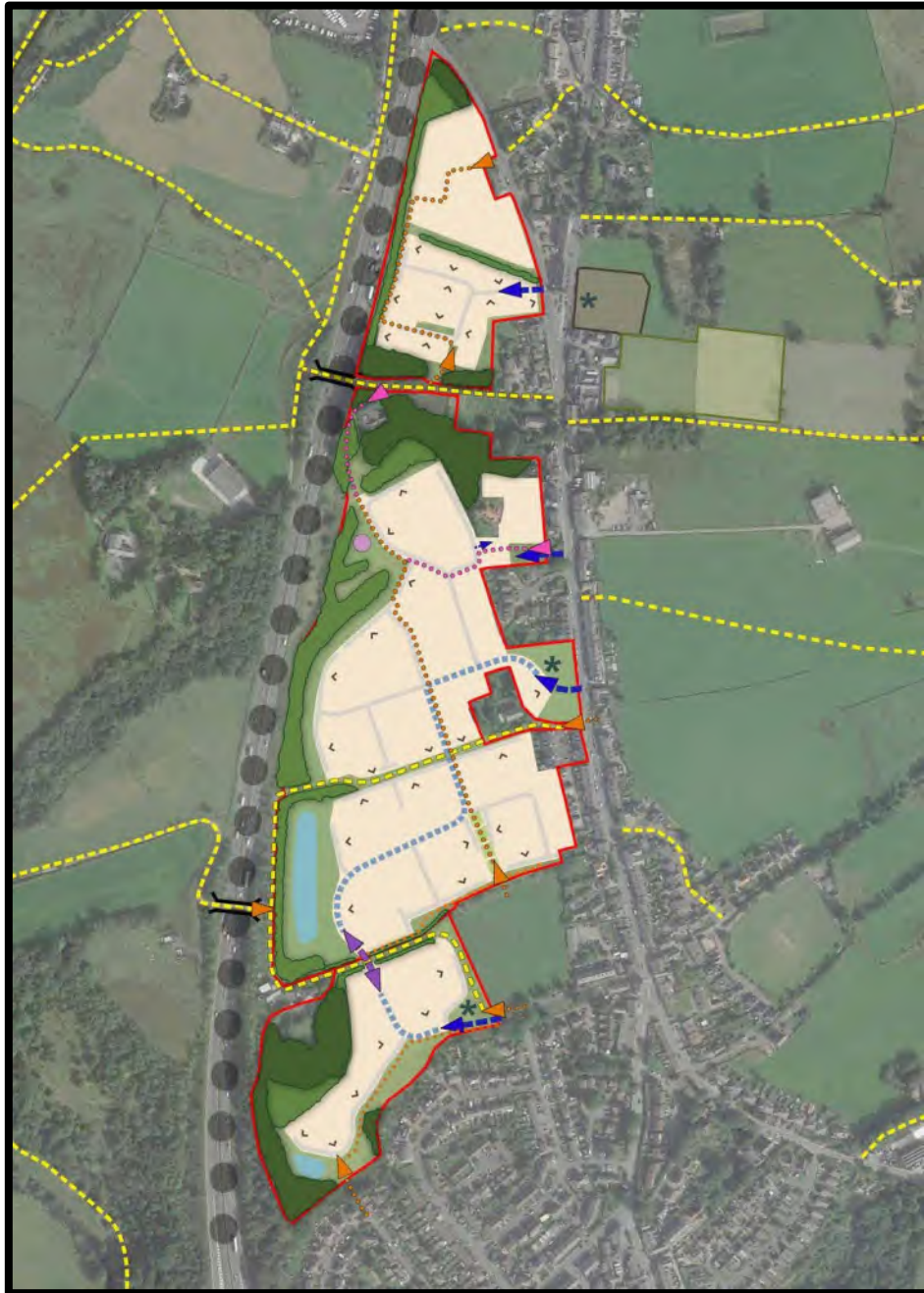


Land West of Market St, Edenfield (H66)  
Revised Masterplan (Version 4) submitted in May 2024  
**Responses Received**



H66 Masterplan (Taylor Wimpey, 2024)

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Michael Varlow, [REDACTED]

My wife and I have just returned by bus from Manchester to our home address and the chaos on Market street has to be seen to be believed as this is the only access to the land west of Market street planning permission should not be granted.





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

Direct Dial: [REDACTED]

Our ref: PL00794121

10 May 2024

Dear Sir/Madam

### **Edenfield (H66) Masterplan & 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.

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

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

Yours sincerely,

Emily Hrycan  
Historic Environment Planning Adviser (North West)



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

Telephone 0161 242 1416  
HistoricEngland.org.uk



Hello

I am writing to objection the recently revised Edenfield Masterplan and Design Code prepared by the developers of site H66.

Again like previous plans put forward, it has no bearing on the local area.

Areas that still remain major problems going forward for myself are -

**Amount of houses** - will kill the village, feel and outlook of this community. Any green spaces that Edenfield has will be crushed making what is a special/ beautiful place in Rossendale, overcrowded. Money making at it worse!

**Constant traffic** - this is small village, that is current over crowded with vehicles, making Market Street overly narrow to travel along. Although the new houses will have access points off market street, their will still be an increased number of extra traffic using the road. Making this area bigger traffic nightmare.

**Julie Fortune**

Dear sirs

I'm writing to strongly object to the above proposed planning objection.

I have two major concerns.

#### PARKING/TRAFFIC

I live in Edenfield on Market St and currently park outside my house when there is space.

on the plans (which are v hard to read}, it refers to many parking restrictions on Market St. it is already quite difficult to park near my home (particularly when the Drop Off cafe is open), so where would i park if there are new parking restrictions put in place? And would the cafe clients be allowed to park in parking areas, which would restrict even further residential parking. Can the change of parking on a main busy road be legal if it means residents end up with nowhere to park near there home, having previously had parking? (and of course there will be many more cars in the area with all the new houses planned).

Also the unavoidable massive increase in traffic would bring noise/dust/pedestrian hazards - children going to and from school, people of all ages crossing the already busy roads. I cant even imagine it.

The proposed restricted parking is very worrying. no parking in the village center? disabled or elderly - having to park away from the shops and walk? many people have expressed worries about this.

My second major concern is directly connected to my property.

The proposed building would come right up to my back-garden wall - currently it is GREEN BELT fields behind me. i have many concerns/questions should this go ahead. How near would the house behind me be? How tall - 1/2/3 stories? would the house immediately behind my garden have a fence or grassy mound, these are all of great concern to me. Sun blocked for the back of my house? Would a screen be effected whilst building is taking place? what about the total disruption?, dust noise, would we receive compensation?

The proposed plan would affect me, my neighbours and my property greatly and although I understand the council/builders are looking at this as an attractive financial opportunity, Edenfield is a very desirable area, but at a great cost to residents and the village. new houses are needed but there are many other areas that could be an alternative surely?

Other issues such as pollution, utilities, loss of green space which are so very important for mental health.

I could go on. this proposal is very negative for Edenfield, and i strongly object!!

Yours sincerely

Angela Ashworth

From: David Clements  
Pauline Clements

Address: [REDACTED]

Version 4 of the Masterplan & Design Code in association with Housing Allocation H66 of the Adopted Rossendale Local Plan 2019 to 2036.

Document Reference: 610E Doc 01-V23

Address of Site: Land West of Market Street, Edenfield, Lancashire (Allocation H66)

**We wish to OBJECT very strongly to this Planning Application and wish the Planning Application to be REFUSED for the following valid reasons:-**

### **HIGHWAY SAFETY**

#### **Roads:**

Currently it is a struggle to drive through Edenfield (B6527) at the best of times, as the road system is inadequate with numerous parked cars and bottlenecks at each end of the Village where the road narrows. At the Rawtenstall end (north end) of the Village is located Edenfield Primary School with traffic from Rawtenstall meeting with traffic from Irwell Vale, Haslingden and Helmshore at the traffic lights next to the Primary School. At the other end of Market Street, the Bury end (south end) of Edenfield Village, there is a very small, dangerous, roundabout where traffic from Rochdale, Ramsbottom, Stubbins and Bury meet.

With the proposed increase in houses, increase in parking and increased volume of traffic through the 'Village' this will become gridlocked, and it will be virtually impossible to drive through, compromising safety, through the whole length of the Village, by a dangerous roundabout, and next to a Primary School.

We know currently that when there is a problem on the A56 by-pass, traffic is diverted through Edenfield and the whole area comes to a virtual standstill.

When houses were built on the comparatively very small development (10 properties) on the site of the Horse & Jockey (Pilgrim Gardens) there were additional delays and serious problems driving through Edenfield, exacerbated when temporary traffic lights were installed. What chance with a proposal of approximately 400 houses.

The A56, Edenfield by-pass, was built in the 1970's to alleviate congestion through the Village, yet these plans are effectively taking away that benefit and recreating a problem worse than before the by-pass was built.

An additional consequence of this development is that it will seriously affect local businesses as people will be unable to park, which will also have a knock on effect to driving through to other local townships, in particular, Rawtenstall and Ramsbottom, both of which already suffer very badly from Congestion, and at times are in a state of Gridlock.

Utility Services in the Valley are already 'creaking', particularly Gas Supplies over Winter. The building of all these extra houses will only increase pressure on services such as Water, Sewerage, Gas, Electricity etc. and when they fail, apart from the problems that will cause Residents, the consequential digging up and further ongoing repairs to the roads, will exacerbate the situation still further. A number of roads in the Edenfield area are in a very poor state, with very rough and uneven surfaces at best, with more and more potholes appearing. Where is the Highway Safety?

## **LANDSCAPE IMPACT**

### **Holistic Approach to include ALL Planning Applications for Land Adjacent to Market Street and Other Sites in Edenfield:**

The Council should implement a Holistic Approach to Planning Applications for Edenfield, by looking at ALL the various plans for ALL Developers in Edenfield at the same time, and not individually, in order to assess the full impact of all these properties on the Local Community and Infrastructure before any individual decision is made.

### **Green Belt Land:**

We accept that many new Homes are required and need to be built, but these should be built on Brownfield Sites of which there are ample in Rossendale, and not on Green Belt Land. Green Belt Land is designated as that for very good reason, and should only be used as a very last resort, and not when there are ample Brownfield Sites in the Rossendale Area.

The current Conservative Government (as at May 2024) has also stated that we don't need to find Greenfield Land for Housing as highlighted by Michael Gove the Secretary of State for Levelling Up, Housing and Communities of the UK, so Rossendale Borough Council should not be considering ANY Green Belt Land for development.

### **Drainage & Flooding:**

We are all aware of the information around the effects of New Developments with numerous Roofs, Roads, Paths & Patios etc and the consequential effects they have on and Ground Water. These excesses will inevitable flow to lower levels, i.e. to the bottom of the Valley and hence into the River Irwell, and therefore will have a very significant impact on the Communities of Irwell Vale, Strongstry & Chatterton, and possibly further down the Valley to Communities such as Ramsbottom etc.

**An Environment Agency Report for "Irwell Vale, Chatterton and Strongstry Flood Risk Management Scheme" titled "Funding Strategy" for sharing externally in October 2021 stated "The communities have a long history of flooding, with the most recent event occurring during Storm Ciara in February 2020 where 43 number of properties were flooded. The communities were also impacted in 2008, 2012 (twice), 2015 and 2017".**

This Report doesn't mention the flooding of properties during the 1990's or the 2 very near misses since 9<sup>th</sup> February 2020, at the end of October 2020 and on 20<sup>th</sup> January 2021 (Storm Christoph) when Families from at least 5 properties in Meadow Park, Irwell Vale that we know of, including ourselves, moved out for the night during a Covid Lockdown, and one bungalow was only saved from flooding by the initiatives and help of local Residents.

Since we were last flooded in Irwell Vale on 9<sup>th</sup> February 2020 we have been corresponding with The Environment Agency involved with the Project to prevent flooding in Irwell Vale, Strongstry & Chatterton and they have told us that:-

"the Lead Local Flood Authority (LLFA) is a statutory consultee in the planning process for major developments (where more than 10 dwellings are proposed). The developer has to undertake a site specific Flood Risk Assessment (FRA) which is considered and approved by the LLFA (i.e. Lancashire County Council)."

They have also told us that "The Flood Risk Assessment (FRA) must demonstrate the development will not increase flood risk either on or off site in their supporting documentation. If they cannot show this the Environment Agency objects to the planning application."

We know that with the rainfall over the last few Winters, normally experienced at that time of the year, that the ground leading down to the bottom of the Valley becomes saturated, and in some places flooded (see pictures attached taken in January 2023) in the Valley below the 'Land West of Market Street, Edenfield' i.e. this planned development. Meadow Park, Irwell Vale with many

properties, is effectively a Flood Plain. On this basis, **IF** the various Authorities are doing their jobs properly, then this Planning Application will need to be rejected.

Following the small development on the Site of the Horse & Jockey in Edenfield (10 properties in total, 4 properties on Market Street Nos 79 to 85 and 6 behind Nos. 1-6 Pilgrim Gardens ) we understand there is still water running down the lane and eroding it. What have the Authorities done about it when we are told that following a new development there is to be no increase in the flood risk.

Also we know from our experience locally, that Approved Planning Applications are not followed up, and no action taken when they are not complied with.

What hope is there then, with a significant development by a multi-million pound company, to ensure that the Local Community is being looked after, that we are not placed at any additional flood risk.

#### **Land Slippage:**

We are all aware of the work carried out during the past year on the land opposite Horncliffe Mansions to stop the land slipping down into the Valley below, which if not undertaken could result in serious damage to various assets and services. A similar Land Slippage is also taking place on the land further to the south including in the Valley below the 'Land West of Market Street, Edenfield' i.e. this planned development.

### **LOCAL AMENITY**

#### **Community Support Facilities & Services:**

The current Local Infrastructure is not capable of supporting all these additional Homes. It is common knowledge that the local Primary Schools in the area (Edenfield & Stubbins) and Secondary School (Haslingden High School) are oversubscribed each year and currently already full. While they have each expanded their facilities over recent years they are now at breaking point. Currently there are serious logistical problems outside all of the Schools which currently is dangerous for both Pupils and Parents and would only be exacerbated with increased numbers.

There are no Doctor or Dentist Practices in Edenfield, NHS Dentists in Rossendale are virtually non-existent, and trying to obtain a quick appointment currently with a Doctor or a Dentist in the local Rossendale area, Haslingden & Rawtenstall, is almost impossible.

#### **Parking Restrictions:**

With the proposed new development there will be additional parking restrictions in Edenfield with the use of more yellow lines such that some Edenfield Residents will be unable to park cars outside their own properties.

This is also incompatible with the plans to move to Electric Cars over the next few years and the need to charge Electric Cars from home as per Government Policy.

#### **Local Businesses & Shops:**

As an additional consequence to the issue of more cars and less parking facilities this will seriously affect Local Businesses and Shops.

#### **Utility Services:**

Utility Services in the Valley are already 'creaking', particularly Gas Supplies over Winter. The building of all these extra houses will only increase pressure on them and could result in failure to supply essential services to Residents in the area at critical times.

## **CONSERVATION AREAS**

**Loss of Environment for Wildlife:** With the many varieties of Wildlife inhabiting the area such as badgers, foxes, deer, barn owls, buzzards etc., the removal of Green Belt / Countryside will result in the removal of their natural habitat some of which could be protected species.

For the above reasons please reject the Proposed Planning Applications.

Regards

David & Pauline Clements









Dear Sir/Madam,

We strongly object to the revised "Masterplan" dated 8<sup>th</sup> May, 2024.

Our primary objection relates to the traffic on Market Street which is already regularly gridlocked and cannot accommodate the increase in traffic which would be generated by the proposed developments.

The Masterplan proposals would completely change the character of Edenfield village.

The infrastructure of Edenfield is not adequate to accommodate the proposed additional houses i.e. doctors, dentists, schools etc.

Yours faithfully,

Stephen and Carole Higginbotham

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

Dear Sir/Madam,

We strongly object to the revised "Masterplan" dated 8<sup>th</sup> May, 2024.

Our primary objection relates to the traffic on Market Street which is already regularly gridlocked and cannot accommodate the increase in traffic which would be generated by the proposed developments.

The Masterplan proposals would completely change the character of Edenfield village.

The infrastructure of Edenfield is not adequate to accommodate the proposed additional houses i.e. doctors, dentists, schools etc.

Yours faithfully,

Mark Higginbotham,

[REDACTED]  
[REDACTED]  
[REDACTED]

Dear Sir/Madam,

We strongly object to the revised "Masterplan" dated 8<sup>th</sup> May, 2024.

Our primary objection relates to the traffic on Market Street which is already regularly gridlocked and cannot accommodate the increase in traffic which would be generated by the proposed developments.

The Masterplan proposals would completely change the character of Edenfield village.

The infrastructure of Edenfield is not adequate to accommodate the proposed additional houses i.e. doctors, dentists, schools etc.

Yours faithfully,

Mrs. Elizabeth Dalby,

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

Dear Madam or Sir:

I cannot believe anyone in their right mind could consider building at that density in Edenfield on that specific site. This is clearly done with one objective in mind, money. A number of people along this process will make a great deal of money from this to the detriment of everyone living in the area. Greed overcomes a basic decent quality of living.

Road traffic increase:

Edenfield Road is a heavy traffic area at regular times of the day during the week and at weekends. I am sure this has been measured. People living along that road have no specific parking areas by their houses and therefore can only park on the road. Does the council propose to withdraw that facility? If so, what has been arranged in its place. If none, it must be provided and agreed before any population of those proposed properties. If parking will still be allowed, their vehicles will be in greater danger of damage. Also pedestrians will be at significantly increased danger when crossing the road. What has been done to arrange their safety in the light of significantly increased traffic flow.

Road quality/repairs:

The main road, Market Street and all the approaching roads, are not in good condition. They will have to be dug up again for cable, electricity, gas, etc. This will further break down the surface and structure of the roads. What is the cost to us in repairs and upkeep? What traffic measures will be put in place whilst the road is being dug up.

Public Transport:

There is very little and infrequent public transport to Bury, Ramsbottom, Rochdale, Bolton etc. This means that it is likely each house will have at least one car. Whilst there are good arterial roads to certain destinations, et Burnley, Blackburn, etc, the roads to those places I mention in the first sentence are small and increased population will case even more traffic jams.

Emergency Services:

The issues with road traffic will mean even more difficult access by the Emergency Services. This puts people with major health issues at even greater risk and those in danger will be further imperiled.

Flooding:

The council is well aware of the causes of flooding in the area and how it is exacerbated by land that is heavily built upon. You are endangering life in Irwell Vale and Meadow Park by building here. There are long established residential areas (mid 19<sup>th</sup> Century onwards) and there appears to be no true consideration of this. What is the opinion of the Environmental agency?

Medical Care:

It is increasingly difficult to find doctors and dentists in the area. What is being done to attract more to the area? What are the exact plans?

Schools:

What provision has been made for children of all ages to get a high standard of education?

Policing:

Such a development will no doubt attract more criminals to the area, what additional policing and security resources have been put in place?

I have other objections but they are personal, not relating to the community. But what does disgust me is this is clearly an example of large corporations exploiting a cheap piece of land for their own benefit, for their own greed. True Tory principles.

Yours faithfully

Shelley Dawson



Good Afternoon,

I have already submitted an objection to the planned housing development in Edenfield on the official "Planning Portal" website, but I have been advised that I need to email my objections to this email address too, before the 10th June.

I strongly feel that the plan to build 450 houses in Edenfield need to be completely scrapped. It is going to cause chaos and misery for everyone in the local area.

The reasons for my objections are as follows:

-Local schools are already over subscribed. I am a high school teacher and we are struggling with class sizes already. Sometimes I have to bring extra chairs or little exam desks into the room to fit everyone in (sometimes 32 or I've even seen 33 in a class), there aren't enough computers, and the corridors are also dangerously too small. 450 new houses could potentially mean (approx) 900 kids, give or take. That would require a WHOLE new high school to be built somewhere (in ADDITION to the Haslingden High rebuild). And there is no mention of this in the plan. I am not really involved with primary schools but I imagine it is going to cause chaos for the local primary schools too.

-The road going in and out of Edenfield is not suitable for so many more cars and traffic. From Edenfield Primary school to the Rostron Arms pub, traffic is already [almost] 1 lane. If a bus or a large car is coming the other way, you have to pull over and let them pass. This is very close to the area they are planning to build. To me it seems absolutely bonkers and I can't believe /understand how anyone could think it is a good idea or how the idea was approved in the first place.

-Thankfully I don't commute on the M66 but it's going to cause daily gridlock on there and cause misery for motorists, increasing thousands of commuters' journey times by hours on end.

-There aren't enough doctors, dentists etc for so many more people. (It's already incredibly difficult to get appointments for either).

-It is going to destroy the countryside in Edenfield. I've seen aerial shots of the plan where they are planning to build the houses and it's really clear from seeing this plan that they are trying to pack far, far too many houses into too small an area.

-Surface water drainage and flooding is going to be a big problem if this plan goes ahead. Water which would normally absorb into the grass will be washed away down the hill side, potentially causing problems on the motorway and even as far down as Irwell Vale, which already suffers from flooding. This is inevitably going to become even worse due to the increased frequency of severe weather events caused by climate change.

-It will cause the significant loss of habitat for birds, badgers, deer and other wildlife in the area.

Edenfield is simply not big enough for such a large development.

PLEASE don't let it happen!

Kind Regards,  
Matt Collis

██████████  
██████████

To whom it may concern

I live at [REDACTED] and would like to submit my objection to the planning of 450 properties at Market Street, Edenfield, Rossendale.

As a resident I have been subject to:

1. Flooding to my property, which I believe will become more severe should properties be build in the area. This will create far more run off water and subject my property to far more and more regular flooding.

2. The road infrastructure in Edenfield is already at capacity making it difficult to pass through the village. Adding an additional 900 vehicles is going to make the passing through near impossible.

In addition, this will make the road unsafe for pedestrians, in particular children travelling to and from school. Parked vehicles and moving traffic will increase the likelihood of accidents and potentially fatalities.

3. There is no primary school capacity to accept additional children without a detrimental effect to our children's education. The school itself cannot expand further and I ask where are they all going to go?

Please can you confirm receipt of my objection

Many thanks

Maya Buchanan

Sent from my iPhone

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

Cc: [neillooker@rossendalebc.gov.uk](mailto:neillooker@rossendalebc.gov.uk)

---

Rossendale Borough Council, Futures Park, Bacup, Rossendale OL12 0BB

From: Heidi Moran [REDACTED]

26 May 2024

Ref: Objection to the Revised Planning Application Ref. No. 2022/0451 Edenfield Version 4

Ref: Doc 610E 01-V23

Masterplan H66 V4 Address and Site: Land West of Market Street, Edenfield, Lancashire

*For the urgent attention of the Planning Officers and Councillors*

Dear Sir / Madam

The revised plan must be rejected in its entirety as it remains unsuitable due to the various stresses on the local infrastructure such as:

1) Unsuitability and danger to Highways

- a) very busy Market Street Edenfield
- b) Edenfield Primary School
- c) totally 'parked up' in all directions during the School Run
- d) Causing traffic jams towards Helmshore/Irwell Vale on one end of Market Street and Stubbins/Ramsbottom/Bury on the other.

Edenfield cannot absorb a housing development of such a magnitude with the inevitable additional traffic. Edenfield also lacks the necessary infrastructure such as doctors, dentists, residents' on-street parking, shops, charging facilities for electric cars etc. and will add stress to over-stretched utility services. Please refuse this Application.

2) Unsuitability due to increased risk of Flooding

The impact of the revised Masterplan V4 will have disastrous consequences regarding future flooding in Irwell Vale, Strongstry, Chatterton, Stubbins and Ramsbottom.

The change in our weather pattern (Global Warming) with long spells of drought followed by increased rain and rain storms is a serious danger to our communities. Severe flooding has occurred more and more frequently. The combination of surface water plus the rise of the water level of the rivers Irwell and Ogden transform the river Irwell to a Torrent in severe weather and constitute a high flood risk with danger to the lives and the living space of the people in those villages.

The on-going efforts of the Environment Agency and their Report in "*Irwell Vale, Chatterton and Strongstry Flood Risk Management Scheme*" are commendable and appreciated, but remain insufficient.

Irwell Vale residents can testify to the terrifying experiences of flooding caused by additional surface water from the hills and river flooding on several occasions in recent years.

Please, for our and our children's future –

Please reject the Proposed Planning Application

Thank you.

Objection from: Heidi Moran

Address: [REDACTED]



Good Afternoon,

I am sending my strong objections to the proposed housing development in Edenfield, known as "Location - Land West of Market Street Edenfield (Allocation H66)"

My reasons are as follows-

Traffic. The increased number of cars which will accompany these new homes is going to cause an unbearable strain on the local road infrastructure, which is inadequate as it stands already. There is only one road in and one road out of Edenfield village and at peak times this road is already gridlocked with traffic. The planned housing estate according to the plan is going to be right on this busy stretch of road.

Parking is going to be almost impossible, taking its toll on local businesses. Customers are not going to be able to park. I have seen the proposed car park on the plan but I do not think this is sufficient.

Edenfield is Greenfield/green belt land: We should not be building on greenfield land. Other brownfield areas should be considered first.

There is already a problem with flooding in the local area and such a huge development is going to make this a lot worse. We have already seen land slips and the bursting of the banks of the river Irwell in Feb 2020. Laying so much concrete in this area is going to be disastrous.

There are not enough doctors surgeries or dentists to accommodate such a large influx of people.

The building of so many homes is going to cause devastating consequences to local wildlife.

The biggest high school nearby is full to capacity, with a waiting list. Local primary schools are also full. Are there plans to build both new secondary and primary schools to accommodate all these new residents?

Traffic on the M66 is going to become a lot worse, especially for commuters to Manchester. With no rail network to ease the burden, it is going to cause misery for motorists.

These are my objections.

Regards  
Gregory Collis

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

Sent from [Outlook for iOS](#)

From: Mrs Kelly Parkinson and Mr Kevin Parkinson

Version 4 of the Masterplan & Design Code in association with Housing Allocation H66 of the Adopted Rossendale Local Plan 2019 to 2036.

**Document Reference: 610E Doc 01-V23**

Address of Site: Land West of Market Street, Edenfield, Lancashire (Allocation H66)

We have a number of concerns regarding the proposed development above and wish to OBJECT to this planning application. I have listed below a number of concerns that we have and hope the council take serious note of this and reject the proposal.

I have lived in and around this area my whole life, My late Grandmother lived on Oaklands Road and I spent many happy days in the greenbelt land you are considering decimating. Edenfield has always been a quiet village, I cannot believe that the council would even think of building another 400/450 houses in this quaint village!! This would double the size of Edenfield alone, when the infrastructure just simply is not there!

**Highways**

The road through Edenfield (Market Street) is at times dangerous to drive through. Let alone for the children of the village to navigate through. I have witnessed a number of vehicles being hit due to the sheer lack of space on the road. Cars park on both sides of the road for the existing properties, which creates a bottle neck through the village. This proposal will increase the amount of traffic significantly, for each household in todays climate there is at least 1 car per household, many having 2 if not 3. This proposal could see upwards of 700-800 cars coming through a village that already cannot cope with the large volumes of traffic.

The proposal also suggests roads through already existing housing estates where a number of children live, a recreational ground and a park. This amount of traffic in such a small village will significantly increase the possibility of road traffic accidents and a potential danger to the children that play in this area.

We know currently that when there is a problem on the A56 by-pass, traffic is diverted through Edenfield and the whole area comes to a virtual standstill. This will be utterly intolerable if this ridiculous development is allowed.

The A56, Edenfield by-pass, was built in the 1970's to alleviate congestion through the Village, yet these plans are effectively taking away that benefit and recreating a problem worse than before the by-pass was built.

I commute to work currently in Bury, which should take me 15-20 minutes at the most. I come through Edenfield village and pick up the M66 at Red Hall. The amount of congestion on this route at 07.30am is already intolerable, with it taking upwards of 40 minutes. Adding this amount of traffic will make the situation even more dire than it already is.

### Parking Restrictions:

With the proposed new development there will be additional parking restrictions in Edenfield with the use of more yellow lines, which will mean that some Edenfield Residents will be unable to park cars outside their own properties.

This is also incompatible with the plans to move to Electric Cars over the next few years and the need to charge Electric Cars from home as per Government Policy.

### Green Belt Land

We accept that many new Homes are required and need to be built, but these should be built on Brownfield Sites of which there are ample in Rossendale, and not on Green Belt Land. Green Belt Land is designated as that for very good reason, and should only be used as a very last resort, and not when there are ample Brownfield Sites in the Rossendale Area.

The current Conservative Government (as at May 2024) has also stated that we don't need to find Greenfield Land for Housing as highlighted by Michael Gove the Secretary of State for Levelling Up, Housing and Communities of the UK, so Rossendale Borough Council should not be considering ANY Green Belt Land for development.

### Drainage & Flooding:

We are all aware of the information around the effects of New Developments and the consequential effects they have on Surface and Ground Water. These excesses will inevitably flow to lower levels, i.e. to the bottom of the Valley and hence into the River Irwell, and therefore will have a very significant impact on the Communities of

Irwell Vale, Strongstry & Chatterton, and possibly further down the Valley to Communities such as Ramsbottom etc.

An Environment Agency Report for “Irwell Vale, Chatterton and Strongstry Flood Risk Management Scheme” titled “Funding Strategy” for sharing externally in October 2021 stated:

*“ The communities have a long history of flooding, with the most recent event occurring during Storm Ciara in February 2020 where 43 number of properties were flooded. The communities were also impacted in 2008, 2012 (twice), 2015 and 2017”.*

Since the last flood in Irwell Vale on 9th February 2020 we have been corresponding with The Environment Agency involved with the Project to prevent flooding in Irwell Vale, Strongstry & Chatterton and they have told us that:-

*“the Lead Local Flood Authority (LLFA) is a statutory consultee in the planning process for major developments (where more than 10 dwellings are proposed). The developer has to undertake a site specific Flood Risk Assessment (FRA) which is considered and approved by the LLFA (i.e. Lancashire County Council).”*

They have also told us that:

*“The Flood Risk Assessment (FRA) must demonstrate the development will not increase flood risk either on or off site in their supporting documentation. If they cannot show this the Environment Agency objects to the planning application.”*

We know that with the rainfall over the last few Winters, normally experienced at that time of the year, that the ground leading down to the bottom of the Valley becomes saturated, and in some places flooded in the Valley below the ‘Land West of Market Street, Edenfield’ i.e. this planned development. Meadow Park, Irwell Vale with many properties, is effectively a Flood Plain. On this basis, this Planning Application MUST be rejected.

This significantly impacts our small village of Irwell Vale, by building on these sites you are giving the water nowhere else to go other than directly towards our properties, putting us directly at risk of further flooding and heart ache.

### **Local infrastructure**

The current Local Infrastructure is not capable of supporting all these additional homes and the families that will inevitably reside in them. It is common knowledge that the local Primary Schools in the area (Edenfield & Stubbins) and Secondary School (Haslingden High School) are oversubscribed each year and currently already at capacity. While they have each expanded their facilities over recent years they are now at breaking point. Currently there are serious logistical problems

outside all of the Schools which currently is dangerous for both Pupils and Parents and would only be exacerbated with increased numbers. Where do you propose for the children that will potentially live in these homes to go to school? There simply IS NO room for potentially another 600+ children to get an education. That is if all the children are able to access mainstream education, as the provision for SEND children in the area is even worse, with Tor View not able to offer places to children that desperately require SEN places already.

There is no Healthcare or Dental Practices in Edenfield, NHS Dentists in Rossendale are virtually non-existent, and trying to obtain an appointment currently with a Doctor or a Dentist in the local Rossendale area, Haslingden & Rawtenstall, is almost impossible. My husband has been on a waiting list for an NHS dentist for a number of years. Where do you propose the residents of the proposed residential development will access healthcare services? GP surgeries in the area are already closed to new patients as they simply do not have the capacity as more and more houses have been allowed to be built in the local area, with little to no regard in how this will function once the bulldozers have rolled away and the multi-million pound companies pockets are lined even further.

The reasons I have given are not exhaustive and aside from this development being a complete eyesore on an area of already outstanding natural beauty, I am sure there will be many more objections from the local community.

I feel you are not allowing some of our more elderly residents to voice their disapproval for this site, as they do not have the technology available to them to be able to email in.

For the above reasons, we implore you, to please reject the Proposed Planning Applications and assess the full impact of all these properties on the Local Community and Infrastructure before any individual decision is made. My husband works in the construction industry and feels this decision has already been made and what we say will not bare any importance, but we as a community will have to live with the consequences of this going forward, once the council and the building contractors have made a healthy profit from our upheaval.

Kind Regards

Article 18 consultation - No comments to make.

Kind regards

**Development Management Team** | Business, Growth and Infrastructure | Bury Council

[REDACTED]

[REDACTED]

For more information on your enquiry please refer to our frequently asked questions webpage:

<https://www.bury.gov.uk/index.aspx?articleid=16363>

Under the General Data Protection Regulation as supplemented by the UK Data Protection Act 2018, by providing your personal information you are giving your consent for us to use and collate your personal data to enable us to perform the contract we have entered into with you to process your planning application, enquiry or representation and comply with our legal obligation to carry out a public task/function and provide a planning service. To find out how we process your personal information please read our Privacy Notice at <https://www.bury.gov.uk/index.aspx?articleid=14263>

Dear Sir/Madam,

My name is Ken Parkes and myself and my wife live at [REDACTED] We are aged 71 and 68 respectively and we are writing to express our strong objection to the latest planning proposal for 238 dwellings 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 the current levels of traffic we experience problems when 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 am convinced things will only get worse once the volume of traffic increases exponentially. Even with a conservative estimate 238 dwellings will create a further 300 to 400 vehicles all potentially attempting to access Market Street inevitably at key times of the day, competing with the existing rush hour traffic. I am very worried that our once rural community will end up as an enormous car park for set periods of the day, or worse that the incidence of accidents will increase.

In addition we have a separate problem in that we currently have off street parking and need to pull out onto Market Street turning left towards Rawtenstall or left for Ramsbottom. This manoeuvre is already extremely precarious as on street parking vastly reduces visibility and with a significant increase in traffic this problem 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 homes, which at our age would be a great sadness to us both.

I freely understand the need for additional housing both nationally and locally, and that Edenfield is an attractive place to live and grow, but these current plans for the volume of houses and consequent traffic management issues 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 implore you as planning officers to reconsider these measures and the adverse effect they will have on the village and come up with a compromise which the village can absorb whilst maintaining its integrity and essence and at the same time satisfying the need for additional dwellings.

Your future deliberations will be difficult I imagine but I hope my comments will help to form your ultimate judgement.

Sincerely  
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 Whittake

██████████  
██████████  
██████████



Dear sir,

Re: Edenfield Master Plan Design Code (ref Version 4 or V4)

I have been resident in Edenfield since the summer of 1972 and my experience of living in Edenfield leads me to object to the proposed construction of a large number of houses on the land adjacent to Market Street and also adjoining the Edenfield bypass.

Even before the proposed houses are occupied, the current population of Edenfield would suffer the daily traffic of lorries accessing the building sites. In addition to the normal traffic, scheduled buses and the existing traffic from the quarries at Turn, this would compromise the safety of residents, including children attending Edenfield School. This cannot be dealt with by separate, individual plans (from the separate contractors) but must be dealt with as a whole site approach as per the requirements of the Local Plan.

The capacity of local schools is insufficient to accommodate the inevitable increase in the child population of the proposed developments. No plan to expand this capacity exists. This would force residents to transport their children out of the area, putting a further burden on roads that are already busy at rush hour times. The environmental impact of this would not benefit the environment of Edenfield - which leads to my next point.

I made this point early on in the discussions about the proposed developments. The Edenfield bypass carries significant traffic, especially at morning and evening rush hour. The majority of the development lies to the east of the bypass and the typical prevailing wind (from the west) carries pollution to east of the bypass. The proposed houses would receive this pollution regularly and continuously. There are several studies from around the world, illustrating the point that people living within 100 metres of heavily trafficked routes, suffer from noise pollution and the harmful pollution from vehicles (NOx and particulates). These cause respiratory diseases and aggravate conditions such as asthma and COPD.

I suggested that the local authority should investigate the medical records of people who already live close to the Edenfield and Haslingden bypass, and compare the incidence of respiratory illnesses with incidence in properties remote from such trafficked routes. I am aware of no such investigation and feel it is negligent of the local authority to allow the development without this investigation. If the proposed development goes ahead, it would be a simple matter to leaflet the new houses, advising them to monitor the health of their families, with a view to seeking compensation from the local authority for wilfully exposing their homes to the traffic pollution.

Green belt land has a clear purpose, providing relief from the blight of housing that spoils views of countryside, leaving views only of rooftops and small gardens. It also plays a part in the absorption of polluting gases.

I have seen proposals to restrict parking on Market Street, to improve traffic flow. The residents who live on Market Street have no alternative parking, in many cases.

Restriction on parking would damage the few shops we have, resulting in loss of local facilities, thus forcing residents to travel to the local towns - an increase in traffic which we ought to avoid. This would disproportionately affect elderly and physically less able residents and can be viewed as discriminatory.

You should be well aware of the problems caused by the Edenfield Bypass when its traffic is brought to a near standstill by accidents and/or the effects of poor weather.

Standing traffic is more polluting than flowing traffic. Drivers seek alternative routes and often try to cut through the village to rejoin the bypass at Gollinrod. The village can become gridlocked, to the detriment of scheduled bus services and increasing risk at school times to children and their parents.

I understand that only limited consideration has been given to brownfield sites elsewhere in Rossendale. I realise that development of such sites can involve higher costs, due to regulations about the prior use of the land. These costs, borne by the developers, will reduce their profits, but what are the costs of spoiling a village and inflicting construction traffic on its daily life? Ah, yes - I see - these costs have no effect on the developers' profits.

I am envisaging now, the advertising of the proposed new houses. It is likely these adverts will show views of the Rossendale valley and some open fields - how disappointed will the new residents be when they find that they live in an estate, with views of rooftops and neighbours' gardens - with a noisy, polluting bypass within a hundred metres?

I urge my local authority to think again, and again - and accept that the proposed development is destructive of an established and cherished location.

Your sincerely,

Alex JS Marsh

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

Sent from my iPad

Dear Sir/Madam

The revised masterplan continues to be nothing more than a plan to suit the developers. The needs and wishes of the Edenfield community continue to be disregarded and there will be a 7 year period of chaos and congestion.

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 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? There is no clear plan to address what will be a major issue for existing residents and the proposed 'compensatory parking' is unclear and woefully inadequate.

Existing residents are to be seriously disadvantaged and discriminated against in favour of incoming residents. Has an equality impact assessment been carried out? If so, please publish it. If not, why not?

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 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 drainage etc demands of a further 400 properties will increase the risk of flooding onto the by-pass and beyond, to Irwell Vale.

Kathleen Shaughnessy,  
Richard Shaughnessy,  
Chad Shaughnessy

██

Sent from my iPad

As a resident of Edenfield, I would like to submit my objection to proposed site H66 for the following reasons:

- Serious traffic and pedestrian safety concerns
- Infrastructure in terms of schools and healthcare for such a large development
- Negative effect on local economy in relation to proposed parking restrictions.
- Flood risk and land stability issues

Chris Jacques

[REDACTED]

[REDACTED]

Sent from my iPhone

Good afternoon,

As we receive yet another version of the "plan" my objections remain firmly in place.

Any house building should not be to the detriment of current residents, businesses and home owners.

This plan negatively affects and disrupts everybody who lives here which should be planning's major concern.

Double yellow lines on market street preventing parking of residents, destroying the nature of the village as a community. Not to mention making those houses all but impossible to sell not to mention the disruption to lives.

Double yellow lines which will increase the speed of traffic which is already a major problem. It will be horrific.

Then to mitigate the the increase in speeds caused by the double yellow lines, then having "slow" signs on the road! That makes no sense at all.

The parking naturally slows traffic although really we could do more to restrict traffic rather than less. LTN anybody?

None of this is logical or thought about but will have the effect of ruining people's lives for the benefit of the wealthy people buying the houses that TW etc want to build. (Much more intelligent to build 100 2/3 bedroom council houses with no impact on residents).

Exchange street as one way. Why? Again, illogical nonsense.

No need at all and also the removal of parking. Why? Who gains from that? Certainly not the residents and will just lead to people speeding along the road where the play area is. More disruption to fit the builders weird plan to ruin Edenfield for profit, not to mention the danger to children caused by the same.

I walked across this land today and it was glorious, don't ruin it for money because that's all it is, it's nothing to do with cutting housing waiting lists in Rissendale. This "plan" will do nothing to alleviate that.

More learned people will pull the different aspects of this to pieces but I implore you..

Don't do it.

Graeme McDonald

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I'm writing to express my concerns regarding the Edenfield master plan v4. I believe this would have a massively negative effect on existing and potentially new residents as many will not be able to park outside their house. This would be discrimination against elderly frail people and also against families with young children/babies as these people would struggle getting in and out of their house.

Not only that the existing schools in Edenfield would be under immense pressure as it has recently increased their numbers and I can't see how it could accommodate more children than it already does.

Also I struggle to get drs appointments as it is so with an extra 800+ people in the village this would put GPs in a highly stressful situation trying to care for new residents.

On a personal level this would affect work as I would have to drop even more hours at work to walk to drop my child off at school which would leave us in financial difficulty.

Kind regards,

Jodie Davies

Dear sir/madam

I'm writing yet again to voice my objections to the edenfield masterplan west of market street. My objections remain the same as every other time I've objected and have not been addressed at any stage. I'm fully behind the edenfield village residents association position on the matter. I also object to having to repeat my objection every time the masterplan goes through minor changes, an underhand tactic that unfairly manipulates the planning process.

The development must not go ahead and such greed and backwards thinking cannot be allowed to prevail Yours sincerely Henry Botham

Sent from my iPhone

I don't know how many times I have to send a separate objection when none of the concerns I've raised prior have been resolved in each "new" version. It's absurd. So know that this is now a formal rant to object as I am through with formalities after the hundredth objection.

Edenfield will die if all of these houses are built. There will be no fields left literally, but also how on earth can a small village sustain this amount of people and cars?

How can you build an estate where there is no safe place for an entrance and exit to it? You think putting the exit by the bike track and park where the kids play on a tiny street is a good idea?

The pollution. The noise. The lack of an actual want or need for these homes!! There are two very small new build sites (one is actually IN Edenfield and the other is 1.3 miles away) and they cannot sell all of the homes after being finished for over 2 years!!!! This is a site with between 10-15 homes!!

Unsafe for my children. You're not increasing primary school places enough so what will happen there? And there already is no local secondary school - so where do all the thousands of children go??

Do you plan on removing all parking for terraced houses? That'll be nice for the residents when you lower their house values dramatically. And for us with a drive? Ah, thank you for lowering my house price considerable while you turn my village into an actual building site for... 6 years? Probably longer.

I don't have time to repeat my long objections I've submitted before. But know that it's an absolute disgrace if you allow yourselves to be bought out by housing companies. The greed for council tax is not worth destroying a village and people's homes. If you can't be bothered to empty my bins every week, that I pay for, then you have absolutely no right in attempting to organise permissions for T/W homes and more.

I OBJECT. And I'm unsure how any sane person would think otherwise, unless it was in their own vested interest ££££

Regards,

Melissa Mukuna



Strongly object to the latest Edenfield development plans due to impact on village life, is this a village or a suburb of Rossendale!!

Dear Sirs,

I wish to raise the following objections to the revised application seeking planning permission to build on site H66 in Edenfield.

My reasoning is that the previous concerns have still not been addressed and therefore the proposed development presents in imposition upon the residents of Edenfield.

There should be a Masterplan for the whole development for site H66, in particular addressing the following:

- The Design Code as detailed in the Neighbourhood Plan produced for ECNF continues to be given very limited consideration, ignoring the community voice.
- Serious traffic, cycle and pedestrian safety concerns remain, particularly in respect of the Market Street mitigation measures. There is still no traffic assessment for the whole site and no reassurance that the site can be safely and suitably accessed by all users, including disabled people. The Local Plan requires a whole site approach, not by individual planning applications.
- Proposed parking restrictions, particularly on Market Street and Exchange Street would be to the detriment of existing residents. Compensatory parking remains unclear, being referred to as community/visitor parking, and is clearly insufficient to meet the needs of current residents.
- Phasing of building works continues to suggest simultaneous development of the two main sites, Taylor Wimpey and Peel/Northstone, this could lead to chaos, further road congestion and safety concerns for the 7 years of construction.
- Flood risk and land stability issues have not been resolved with the SUDS Drainage Pond being located close to the A56 continuing to pose serious road safety concerns as raised by National Highways.

The voices of the residents of Edenfield

Dear Sirs

You have invited comment on the Edenfield Masterplan and Design Code (V4).

The revised plan does not appear to address any of the previous concerns regarding traffic / parking in the village. It appears to remain the case that many villagers already resident will lose the capacity to park outside their houses and instead have to commute to a remote car park in order to enable residents of the new development to have access to park outside their new houses. This does not seem equitable but aside from that will cause difficulties for those with children, disabilities or business people with a need to load and unload at their houses. Remote parking may also be viewed as less secure and affect insurance premiums. Proposed one way systems will add a further inconvenience to existing residents.

Presumably the main commuter route from Edenfield will remain towards Manchester. The plan does not appear to address congestion at the exit from the M66 at junction 1, through to Bury new Road Ramsbottom, through Shuttleworth and into Edenfield however it would be reasonable to expect a large increase in the number of vehicles travelling this route at peak times. The alternative would be the new commuters travelling north to join the By-pass at Haslingden or Rawtenstall to then travel South to join the M66 each morning and making the same detour in reverse in the evening. This sounds highly unlikely to be adhered to by commuters. Has any further study been done as to the impact on junction 1 M66 and on Shuttleworth or is the new version focussed purely on Edenfield itself?

Alan Lumsden

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██████████  
██████████

3 June 2024

Dear Sirs

**Objection to Revised Edenfield Masterplan/Design Code- (version 4)**

**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?
- 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 as a result of accepting this proposal.
- Parking restrictions along Market Street / Exchange Street, wholly unacceptable and clearly will have a detrimental impact on existing residents.
- 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.
- The suggested solution re mitigation measures for Market Street and the proposed new junctions, fail to address the traffic, pedestrian and increased cyclists adequately. There appears to be no comprehensive

traffic assessment or road safety audit. These need to be provided to enable all residents to fully consider the risks that have been considered and in particular whether any proposals are adequate in addressing these risks.

## **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, 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.** ....."*
- **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.
- Development ignores the recommendations regarding green space as per the Places Matter Design Review report.

## **Phasing of building works**

- 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 Taylor Wimpey and Peel/Northstone may run simultaneously. At the control of the developers not the council.
- The Design Code produced by ECNF with support of RBC has still not been fully considered
- The Taylor Wimpey proposal still fails to address the recommendations in the Places Matter Design Review report.
- Concerns on ecology, drainage and flood risk are still not addressed.
- 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.

- Negative affect on local businesses due to potential parking restrictions.

We ask Rossendale Borough Council to reject the Masterplan v 4.

Yours faithfully

**Claire Jewell & Graham Jewell**

Dear Sir/Madam,

I write with regards to the latest master plan for Edenfield.

I still object to this plan as there is still no detailed consideration given to the infrastructure.

How are the extra houses going to be serviced in areas such as healthcare, schooling and for provisions?

Edenfield is a village without a doctors, dentist or a supermarket. With limited parking already meaning double parking along its main access road, Market Street. This plan is proposing 400 new houses, which could bring an additional 800 cars based on the average of 2 per household to an already congested area for parking. Potentially an extra 400 children requiring somewhere to go to school!

The additional traffic will serve to worsen road safety in the area, an area without any healthcare and no proposals in place to provide any! It just doesn't make sense that none of these critical issues seem to be being considered, other than to suggest where schools may be extended! Where does the money come from for such a proposal? Why only proposed, why is it not something that has to happen if an extra 400 houses are built?

Kind regards

Roger Ince



My objection to the above-named and my support to the objection by Edenfield Community Neighbourhood Forum. In addition I would like to add my personal objections as to why the proposal should be stopped.

As a native of Rossendale bred and born in the Valley for some 80 years now I feel strongly that its history and, where possible its ancestry should be preserved.

I could give you countless mistakes and demolitions that have robbed the Valley of its heritage. However, the part of the Valley I am addressing in my objection is Edenfield the end of the Forest of Rossendale and the Royal Hunt.

Market Street is steeped in history. Some sadly already [lost.lt](#) is my view that a building proposal the size in dispute would drown the village and sadly destroy the community.

The businesses that remain are run by determined individuals who not only need village residents, possibly disabled, cars to park beside their establishments but also passing trade.

Enough of our heritage has disappeared please don't go on to ruin the Rossendale Valley for the present and future generations.

Yours most sincerely

Trevor Cunliffe

Dear Forward Planning

We, the residents of [REDACTED] hereby submit our objections to the aforementioned Revised Master Plan

### **Objection to the Masterplan/Design Code ref Version 4 for H66**

We object to the above recent submission for the following reasons

1. There are still serious concerns regarding the movement of traffic, pedestrian and cycle in the location of the Market Street proposed new junctions. This is of more concern for people with visual disabilities, infirm or have mobility issues.
2. There is still no traffic assessment for the Whole Site as required by the Local Plan
3. Regarding the construction period of 7 years, where we have multiple developers phasing the works this will only add to the traffic congestion and impact to local businesses could be an issue, has this been considered
4. There is still no further support for improved services such as education, healthcare.
5. There still appears to be little consideration to the voice of the community being taken into account as per our consideration in the Neighbourhood Plan presented by the ECNF
6. There is limited green spaces available within the site
7. Risk of flooding is still of a concern as highlighted by National Highways, this should be addressed by the developers and alternative SUDS plans submitted, approved and resolved prior to any approval by the Local Authority
8. Market Street parking is still of a major concern for local residents who are affected by this. Proposing to take more greenbelt to suit their commercial and profit benefits should not be accepted whatsoever. The developer should be more considerate in this matter rather than putting profit ahead of local residents

Regards

Mr Jason Horsfall

Mrs Julie Horsfall

Re the proposed new plans, I wish to register my objection.  
The transport infrastructure for one will not cope.  
Edenfield village will lose all its character and charm .

Kind Regards,  
John Rogers

██████████ Active message only (no call) WhatsApp number.

Sent from my iPhone. Please excuse typos.

Mr Mike Atherton  
Head of Planning  
Rossendale Borough Council

[REDACTED]  
[REDACTED]  
Your ref: H66 / 2022/0451  
Our ref: MB/RBC/V4  
Date: 29<sup>th</sup> May 2024

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

Dear Mr Atherton,

**Edenfield Masterplan - Land West of Market Street Edenfield (Allocation H66) Masterplan and Design Code Version 4**

Thank you for consulting Lancashire County Council on the above planning document. The School Planning Team has responded previously to the original draft on the 17 January 2023 as part of a Lancashire County Council's One Council response and then on the 2 November as a School Planning Teams individual response. The comments below use those original comments from the revised version as the basis for an updated response on behalf of LCC/the LEA as follows.

The draft Masterplan identifies the following requirements for education at paragraph 9, 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 National Planning Policy Framework.'

The LEA/CC is pleased to see that the land identified on drawing no. would be transferred to the LEA at Nil cost however the LEA would need clarification on what "subject to requirements being met" means in planning terms. The LEA would be obliged if the specific criterion referred to for schools' provision were formerly set out within the masterplan document or appendix.

Further under criterion 9 in the draft Masterplan and Design Code April 2024 it states, "and makes a commitment that this land **can** be made available (at nil charge to the Local Education Authority) should the local education authority identify a

need," should this not say this land **shall** (subject to viability) be made available should the local education authority identify the need.

## Primary

The Edenfield strategic site is not included within the County Council's current 0–5-year forecasts, however, these forecasts (updated Spring 2024) already project a shortfall of primary places in the Ramsbottom primary planning area from 2025/26, without the inclusion of Edenfield. Therefore, Edenfield is expected to generate a need for additional primary places.

Assuming a 4-bedroom pupil yield the following pupil, need is projected:

Phase	Dwelling No	Primary Places	Secondary Places
Phase 1 A	238	90	36
Phase 1 B	9	3	1
Phase 2	65	25	10
Phase 3	90	34	14
Phase 4	6	2	1
<b>Total</b>	<b>408</b>	<b>155</b>	<b>62</b>

\*the 65 for phase 2 is based on number on page 58 in the key deliverables

As part of the Local Plan engagement process the County Council identified a potential need for additional places in the Ramsbottom primary planning area, projected to result from the proposed 400 dwelling development at Edenfield.

The draft Masterplan and Design Code April 2024 does now clarify that land that land has been identified and that it would be transferred at nil cost to the Local Education authority, we obtained Counsel guidance that advised that the funding mechanism for both construction contributions and provision of school land should be addressed within the Masterplan. Without confirmation of the mechanism for the provision of the required school land it is not clear that a development is sustainable.

The Schools Planning Team is in the process of engaging with Edenfield Primary School and their diocese, Manchester Church of England Diocese, to enquire about interest in expansion. Should Edenfield Primary not be interested in expansion we will approach Stubbins Primary School.

With regards to the potential expansion of Edenfield Primary School, we would like to make you aware of engagement between the developer and the school. The County Council understands that the school has been approached about being provided with some additional land for car parking/an outside classroom. **I would be pleased if the developers could clarify that any arrangement between the developers and the school would be separate to the developer contributions required by any forthcoming planning approval for education that would be sought by the County Council.**



## Secondary

The Spring 2024 five-year pupil projections identify a shortfall of secondary places from 2025/26, and at this time the impact of Edenfield has not been included, with Edenfield expected to come forward in years 6 to 10. Therefore, this development is expected to generate the need for additional places, to be delivered through developer contributions and school expansion. Based on a 4-bedroom pupil yield the following additional place need has been identified: See table above

I trust that you find the above comments valuable and should you require further information or clarification on the contents of this letter please contact me at the email address provided.

Yours sincerely

*Martyn Ball*

CC Martyn Ball – School Planning Principal – East Lancs  
Head of service  
Paula Durrant- School Place Planning Manager



Dear sir or madam,

I am writing to submit my comments on the latest proposal.

Whilst I acknowledge some houses need to be built I am strongly against the sheer number that are proposed for the small village of Edenfield.

The traffic and infrastructure is already the worst I have seen. Building so many houses without addressing these needs is lunacy. I have seen no proposal to include retail/health outlets therefore all new residents will be using transport to get elsewhere and this is not sustainable. This will add to the already ridiculous amount of traffic that is in this village and make an unsafe situation even more dangerous. Restricting parking for existing residents is not the answer and does not address the issue and would give an unfair priority to new residents over existing residents.

I cannot fathom the design I saw for Exchange St as an emergency access route as this would not only make it more dangerous to children due to the proximity of the playground but the street itself is narrow and not suitable for emergency access.

I am concerned about the length of time and the impact the works will have on existing residents and the environment.

I am not happy that green belt is being used when there are brown sites that could be utilised. I cannot see any detail regarding potential flood or rainwater runoff on the new location and this has to be taken seriously not only for the environment but also the bypass that runs below the proposed development.

I would like to see a much smaller , more considered development which looks at the village as a whole to improve it rather than simply to add profits to a building company. Such as 50 houses (to start with) with no car parking outside - either none at all or a satellite car park or underground for electric vehicles only, one space per house along with units for retail (grocer, cafe etc) and a health centre and a dentist, a square, and a new playground and an all weather sports area (basketball/tennis etc)

I sincerely hope that the aim will be to improve the village, not just add homes to make up numbers and destroy a village.

Yours sincerely,  
Steve Woodburn

Hi,

Thanks for consulting the Lead Local Flood Authority on the revised masterplan. I've reviewed the revisions and there don't seem to be any changes to the surface water drainage aspects of the document, so I've no further comments to make in this regard. However, a section on foul drainage has been added to page 76, which states that details of the foul drainage are 'to be agreed with LLFA/United Utilities'. For the avoidance of doubt, we do not comment on foul drainage. This is outside of our statutory remit and should be corrected in the document.

The applicant should also take into account the county council's new [Ordinary Watercourse Regulation Policies](#) which were adopted on 1<sup>st</sup> March 2024. I don't expect these will have much impact on the masterplan, but the applicant should ensure any opportunities to daylight/restore existing culverted ordinary watercourses are taken, and should avoid crossing, diverting and/or culverting an ordinary watercourse.

Best wishes,  
Phil

**Phil Wadley** (he/him)  
Flood Risk Officer  
Flood Risk Management Team  
Lancashire County Council

W: [www.lancashire.gov.uk](http://www.lancashire.gov.uk)



Dear Sir/Madam,

## **Objections to Land West of Market Street, Edenfield, Further (Allocation H66) Masterplan & Design Code, Version 4, dated April 2024**

### **Traffic and road safety for all users, motorists, cyclists and pedestrians:**

- Although a requirement of the Local Plan, a comprehensive traffic assessment of the entire H66 site addressing the impact of the proposed developments on traffic volumes, parking and safety, has still not been provided. Dealing with traffic issues piecemeal as part of individual planning applications will not provide the necessary overview of the risks and measures to address these risks required to demonstrate that the entire H66 site can be assessed safely by all users including pedestrians, cyclists and the disabled. Traffic and safety issues in north area (as defined in the Masterplan) of Edenfield already have knock on effects in the central and south areas.
- The fingerpost junction at the north end of Edenfield is already busy with traffic and pedestrians, particularly at the start and end of the day. The proposals for a new car park on greenbelt land adjacent to Burnley Road and the access point to the Northstone site off Blackburn Road will increase the hazards at this junction.
- The proposed uncontrolled pedestrian crossing adjacent to Edenfield Primary School is opposite the entry/exit to Church Lane and almost opposite East Street. Has the impact of an uncontrolled crossing on motor vehicles, cycles and pedestrians in this area been completed? For example, 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**

- Parking restrictions proposed for Market Street would disadvantage current residents many of whom are frail and disabled. It is not clear who will benefit from the compensatory 'community/visitor' parking areas. Even if these include designated spaces for existing residents displaced from parking outside their homes, this would not address the needs of the frail, elderly and disabled. This could result in direct or indirect discrimination if the duty under the Equality Act 2010 to eliminate discrimination is not considered.

- The proposed parking restrictions are likely to impact negatively on the viability of established local businesses, key assets for Edenfield residents which include a pharmacy.

**Phasing:** the proposed simultaneous development of the two main sites by Taylor Wimpey and Peel/Northstone with all construction traffic routed north out of Edenfield, risks additional traffic congestion and adds to our concerns about safety around the fingerpost junction and on Blackburn Road. From the diagram in the Masterplan v4 (page 63) it appears this disruption will continue for 7 years.

### **Green spaces and biodiversity:**

- Masterplan proposals to release further greenbelt land adjacent to Burnley Road 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 and water drainage, as well as raising further safety issues at an already busy junction next to the school.
- The Masterplan v4 (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 their response to the previous version of the Masterplan in August 2023, also included in the 'Table of Developers Responses to the Council's Comments', RBC's Forward Planning Team noted that the woodland along Church Lane is shown as a '**Deciduous Woodland – Priority Habitat**' on the Magic Map website. And stated that:

*"...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. It is however considered that the provision of a cycle way / pedestrian link from the central parcel of the allocated site to the northern parcel, via this woodland, could be acceptable providing that the minimum number of trees are felled and each tree is replaced to the ratio of 1 tree felled to 2 trees replanted.*

*It appears that the area of woodland between the central and northern parcels has been reduced. Can this be clarified?"*

Regarding retaining and strengthening of woodland to the north and south of Church Lane, the Masterplan v4 Executive summary (table on page 8 point 5i) states under 'Masterplan & Design Code Compliance' "*The Masterplan*

*shows how existing woodland has been retained and strengthened where necessary/practicable (including selective thinning and replacement). To be refined through subsequent planning applications.”*

However, the diagram on page 43 of the Masterplan v4 includes an area labelled “*Some tree cover to be removed*” from the woodland to the north of Church Lane. We have compared the area north of Church Lane shown as a ‘Deciduous Woodland - Priority Habitat’ on the Magic Map website with this diagram and other diagrams of the proposed development north of Church Lane in the Masterplan, and with the plan included in Northstone’s planning application 2023/0396 for this area. Our comparisons suggest Northstone propose removing ‘tree cover’ to build houses. Given the small scale and limited detail of the diagrams in the Masterplan it is difficult to assess what proportion of ‘tree cover’ Northstone propose removing from this area of ‘Deciduous Woodland – Priority Habitat’, we would estimate around half. **We request that RBC’s forward planning team seek further clarification of these proposals for the woodland north of Church Lane.**

**Geological suitability, land stability and flooding:** these issues have still not been resolved. Flooding is 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, increase the risk of flooding communities in the valley below and the A56, raising serious road safety concerns as already identified by Highways England.

**Overall design:** overall impression is one of a cramped development with little green space which ignores the recommendations of the Places Matter Design Review report and gives little consideration of the Design Code in the Neighbourhood Plan produced for Edenfield Community Neighbourhood Forum.

**Infrastructure to support the development:** the continued lack of attention to the need for nursery and school places, GP and other general health and community services is concerning.

In addition, please note that we support the objection submitted by Edenfield Community Neighbourhood Forum (ECNF).

For the reasons above we ask Rossendale Borough Council to reject the Masterplan v 4.

Yours faithfully,

Ann E Durie and Nigel S Stacey

A thick black horizontal bar used to redact the signature area of the document.

To whom it may concern.

Once again I'm amazed that a Shambolic Master Plan has been put forward for the H66 site in Edenfield by a so called Building Design company without addressing the major points which have been discussed with ECNF representatives over the last 4 years.

This leads me to think that Rossendale Borough Council are playing lip service only to the current Council Tax payers of Edenfield as the Design hasn't resolved any of the previous concerns raised earlier.

Without question no consideration has been put forward in the latest Master Plan regards to

1- Road safety along MARKET Street for both drivers and for resident parking conditions. Also for the safety of our children whilst crossing the road on the way to school or playground areas.

2 The plans to use Exchange Street as an enter or exit to the H66 site is idiotic and shows no concern about the already over used facility for this minor side street that exist already.

3 The village already is starved of food shops and services and the reduction of parking places and footfall to the existing shops can only lead to more closures.

4 Last but not least neither of the increase housing proposals take into account in the Design code any infrastructure to enhance the quality of life for current resident by means of health care or increased school provision without developing on even more green belt land.

In conclusion may I request that the Planning department reject this so called Master Plan and concern themselves with the development of facilities to enhance the quality of life for the current rate payers of the Eden Ward who pay far too much already for the service and facilities supplied by Rossendale Council.

Yours Sincerely

Mr Stuart Dearden

[REDACTED]

[REDACTED]

[REDACTED]

Sent from my iPad

## Edenfield Masterplan (ref Version 4)

Dear Sirs

Re: the above plans.

I am a recent resident of Edenfield having downsized (as the government has asked us to do) from nearby Greenmount. I have lived in the area for over fifty years. We chose Edenfield as a quiet area, close to friends and family and well connected by buses for future times when we would be wise not to drive. We were aware that some building may take place at the other end of the town. I also understand we are in need housing.

I do live in a new house built on a brown field site so I understand the irony of this email but I also feel that I am therefore well qualified to make the following observations and you should note what I have to say as genuine reflections of the infrastructure of this small town and the capacity to cater for such a huge development.

- We have been unable to move doctors as there is no GP in this area so our GP is a considerable distance away.
- *This is also true for our dentist.*
- The parking on all roads is already an absolute nightmare for local residents , at peak school times I do not travel by car because school parking is often inconsiderate.
- *Where can I find the traffic assessment? The traffic on Rochdale Road is horrendous – mid morning I have had to wait ten minutes to cross before now. How on earth the elderly and infirm manage I do not know. This is not just quarry lorries, although they greatly contribute, but many cars, often speeding up. It starts early in the morning when I believe SAT Nav directs drivers to the motorway via Rochdale. **Had we foreseen this we would not have bought this house because of the noise alone!** I cannot imagine the increase in traffic such a huge development would cause to the residents on the route.*
- Driving on the main road when a lorry or bus is coming in the opposite direction is already difficult, making the centre in effect one direction at a time. Currently local drivers are considerate.
- *Often I feel I put myself at risk leaving our road end as cars park right up to the road junction and I cannot see to the left or right to get onto Rochdale Road – compounded by the speed that cars and huge lorries fly up the hill.*
- The roundabout at The Rostrons Arms is a danger in terms of very poor road surface and lack of coherent road markings. It is beyond my understanding how it is allowed to be in such a state. The huge amount of heavy traffic must contribute to this. I cannot imagine seven years of building and the effect on the roads. Not to mention the thousand or so cars added to the mix. In my observation it is already a serious accident waiting to happen.
- *The primary school has no reasonable place for parents/carers to park already and there is little close by, this makes certain times of the day extremely dangerous for all pedestrians and drivers. This is compounded by the fact that the school is beside a very busy junction. Another accident waiting to happen. The crossing patrol takes his/her life into his/her hands every day! This junction would be many times more busy if the proposed huge development goes ahead. I'm not sure a car park built, not mentioned in the local plan, on green belt land is the answer to this. Just more congestion getting in and out at peak times and possibly more danger to children.*

I hope you consider the points I have made and the views of the Edenfield Community Neighbourhood Forum.

Yours faithfully  
Morven Hudson

Rossendale Borough Council  
Forward Planning  
Futures Park  
BACUP  
Lancashire  
OL13 0BB

**Our ref:** NO/2022/114944/02-L01

**Your ref:**

**Date:** 05 June 2024

Dear Sir/Madam

**MASTERPLAN AND DESIGN CODE (V4)**

**LAND WEST OF MARKET STREET, EDENFIELD (ALLOCATION H66)**

Thank you for re-consulting us on the following document:-

- *Land West of Market Street, Edenfield (Allocation H66) – Masterplan & Design Code April 2024*

We have considered the above document in relation to our remit and are pleased to see that all points raised in our previous response NO/2022/114944/01 dated 13 January 2023, have been taken into consideration in the updated Masterplan & Design Code (V4).

Yours faithfully

**Mrs Dana Binns**  
**Planning Advisor**



Dear Sirs

I am writing once again to express my concerns about the plans to build on site H66 as my previous concerns have not been addressed.

The same issues/problems are still relevant and require attention. This, for some reason does not seem to be happening. Once again I list below the issues which particularly worry me.

- The Design Code as detailed in the Neighbourhood plan produced for ECNF still is given limited consideration and therefore ignores the view of the community.
- Serious traffic, cycle and pedestrian safety concerns remain, particularly in respect of the Market street mitigation measures. There is still no traffic assessment for the whole site, despite the requirements of the Local Plan for a whole site approach.
- Yet again the effect on local residents does not appear to be a concern of RBC if one looks at the proposed parking restrictions on Market Street and Exchange Street. Clarification is needed as to why parking restrictions in these areas is needed and how this is going to be sensibly mitigate for these residents.
- It would seem that the two sites, Taylor Wimpey and Peel/Northcote, are to be developed simultaneously over a period of 7 years, which could lead to serious safety issues for residents of both the existing properties and the new builds.
- Flood risk and land stability issues, as raised by National Highways, should be taken seriously and promptly addressed.

In addition to these concerns, the issue of providing affordable homes for local people seems to have been lost completely and there is no concern for cohesion.

Sincerely

Mrs Gaynor Brady

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

Sent from [Mail](#) for Windows



Firstly I wish to point out that this council was elected by the people.. so your positions are at the behest of the people, yet you seem to think you can act independently and override the wishes of these same people that elected you despite your pretence of consultation.

Who are you lot to presume that you can simply redesignate an area of green belt land into a grey site to allow fat cat developers to come into our village and completely ruin it for self greed under the guise of enrichment for the village.

You have consistently ignored the issues and genuine concerns raised and expressed by the majority of the residents, you have attempted placate us with the meaningless gestures of surveys designed to fall in your favour from traffic flow around Highfield Rd to suggested yellow lines on Market St, which will create major issues in respect of the residents of these areas but also create major issues elsewhere for other residents from speeding vehicles and parking through Highfield Rd, Eden Avenue and Market St.

You clearly have no concerns for the residents, the children and elderly who will be severely affected by the plans you are allowing to occur.

Your ignorance and complete disregard for the residents of the village is in abundance as in allowing a pump track to be built on what will definitely become a rat run, thus endangering the children who use it... speaking of the pump track, you built it on an area that is unfit for playing on, it's completely waterlogged, what on earth were you thinking... but that's the problem you didn't think because you don't care, you have no regard for the village, the council have never invested in the village, you don't care what detrimental impact building further housing will have on the village, the residents and the environment.

I hope it all was worth it for you and I'm sure you won't lose any sleep over the unimaginable damage you have allowed to happen by giving these plans the go ahead to kill our village and home.

We vehemently disagree and object with what is being allowed to occur by Rossendale council.

Judith Aquino  
Dominic Buggie

Edenfield residents.

[Yahoo Mail: Search, organise, conquer](#)

## Masterplan 4 Objection

The overarching premise was that a Masterplan was to be in place prior to planning applications being submitted. I find it astounding that Taylor Wimpey are advertising properties for sale, off-plan, with a potential occupation within 2 years. I am therefore of the opinion that the developers have approached this entire project with a cynically profiteering viewpoint, under the assumption that all aspects are a foregone conclusion.

There are no details contained within this latest attempt that were unknown 2 years / 3 attempts ago and I would contend that the drip-feed of details are a ploy to wear down and / or confuse anyone who would wish to object.

I will now detail some observations that form my objections:

1. The SUDs proposal is still included (although diagrammatically it appears to have increased in size). There are no additional, or even any, measures in regard to security of this open water area. The appearance of additional proposals (in regards to water run-off) being underground storage, over-sized pipes, and a pumping station to the main sewer, would indicate the presence of a serious problem. No details of these are provided.

2. The 'green space' proposal sited adjacent to Market Street and its intention to prevent development obstructing "valued long views to the distant hill tops" reads like a fantasy when 400 properties are to be constructed. The inclusion of 'community car parking' within this area is also fanciful as a diagrammatic illustration indicates 13 possible spaces. If parking restrictions are applied as per the plan, upwards of 30 cars will be displaced which means 17 or more cars will have to find alternative parking in the area.

3. Highway proposals are the one area most cynically dealt with. MP4 reiterates all that was contained within MP3, but adds certain other measures. These being that the 3 (North, Central and South) parking sites will be provided when Phase 1A is constructed – i.e. after restriction on parking is in force.

Again, none of this benefits current residents and is detrimental to many.

The proposed change to Exchange Street to one-way now comes with a traffic calming measure in the form of a huge table top style encumbrance. The nature of the street itself would preclude speeding (it is c. 150 metres long with a 20mph limit in force). There is, however, no mention of a physical barrier at the area of the Pump Track / open field.

In contrast Highfield Road (c. 400 metres long) was only designed as an access road for the existing properties and is now shown to have 4 split traffic calming measures. Highfield Road is also subject to a 20mph limit as are other access roads to Highfield Road. No explanation is given as to why these traffic calming measures are deemed necessary.

None of the traffic proposals address the increase in traffic of all types during or post build. The totally inadequate traffic assessment (3 days in April 2023) is again quoted. It's contention that traffic has decreased compared to pre-pandemic levels I would contend is factually incorrect.

There are also quoted some assumptions of vehicle turning points from each build sites. These coincide approximately with the numbers of projected builds. Therefore, one could interpret these figures as meaning that only 1 vehicle movement per house per day will take place.

4. The phasing, finally detained in this plan, again surely known at the point of MP1 shows construction scheduled from 2–7 years, with a rider that all construction may be undertaken simultaneously. This is not a phasing statement, but has only been added because none was contained in MP1-MP3.

In view of these points raised and without looking at infrastructure, design-code, build density, effects on local businesses, and overall safety levels in the village, I would submit that this latest document is still incomplete in so many aspects and, should again, be rejected.

Peter Dawson

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████████

██████

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## Masterplan 4 Objection

It would appear that the planning application (which should not have been submitted without an agreed Masterplan being approved) has been agreed by Taylor Wimpey and someone with authority in the council as the properties are being advertised for sale, off-plan, with a potential occupancy within 2 years. I am therefore of the opinion that the developers have approached this entire project with a cynically profiteering viewpoint, knowing / assuming that all aspects are a foregone conclusion.

Future residents need to be aware that Taylor Wimpey knows this land to be a flood plain containing contaminated waste within it from the construction of the A56. I only add this paragraph as this should be recorded for their benefit in the future (for any claims etc).

Now to detail my objections:

1. The SUDs proposal is still included and appears to have increased in size looking at the diagram – again with no measures in regard to security of this open water area. Taylor Wimpey are admitting that there are issues with this site as they have now included additional proposals (in regards to water run-off). These include underground storage, over-sized pipes, and a pumping station to the main sewer. These are all indicators of a serious future problem. No exact details of these are provided. Who deals with the flood water causing problems to existing properties and to the A56 when the flood water overflows onto this, already accident-laden, stretch of road?

2. The 'green space' proposal sited adjacent to Market Street mentions it's intention to prevent development obstructing "valued long views to the distant hill tops". The properties are being built on a green field and, with 400 properties being constructed, this clearly cannot be achievable. The inclusion of 'community car parking' within this area is also fanciful as a diagrammatic illustration indicates 13 possible spaces. If parking restrictions are applied as per the plan, upwards of 30 cars will be displaced which means 17 or more cars will have to find alternative parking in the area. Where?

3. Highway proposals are the one area most cynically dealt with. MP4 reiterates all that was contained within MP3, but adds certain other measures. These being that the 3 (North, Central and South) parking sites will be provided when Phase 1A is constructed – i.e. after restriction on parking is in force. Taylor Wimpey have no consideration or concern for existing residents in the village but insist on their parkwork that their build is for the current resident's benefit. How?

The proposed change to Exchange Street to one-way now comes with a traffic calming measure in the form of a huge table top style encumbrance. The nature of the street itself would preclude speeding (it is c. 150 metres long with a 20mph limit in force). There is also no mention of a physical barrier at the area of the Pump Track / open field where children openly play and are encouraged to do so.

Highfield Road (c. 400 metres long) is now shown to have 4 split traffic calming measures but it was only designed as an access road for the existing properties and subject to a 20mph limit (as are other access roads to Highfield Road). No explanation is given as to why these traffic calming measures are deemed necessary when you can barely travel 10mph without risking hitting a parked vehicle or an on-coming vehicle as only 1 can pass at a time. The only way you could use this as an access road is to place double yellow lines on it. Where do the c. 50 residents cars go if this is the case (not including visitors to the area)?

None of the traffic proposals address the increase in traffic of all types during or post build. The totally inadequate traffic assessment (3 days in April 2023) is again quoted. It's contention that traffic has decreased compared to pre-pandemic levels, we now know this to be incorrect as people (including myself) have returned to the office environment.

There is a quote of 'vehicle turning points'. The definition of this is not included but the numbers coincide approximately with the numbers of projected builds. Does anyone seriously believe that there is only 1 vehicle movement per house per day taking place on full occupation?

4. The phasing, finally detailed in this plan, again surely known at the point of MP1 shows construction scheduled from 2–7 years, with a rider that all construction may be undertaken simultaneously. This is not a phasing statement, but has only been added because none was contained in MP1-MP3.

Taylor Wimpey needs to be honest when dealing with the local community. They need to make it clear that they have not, nor will they, give any consideration to existing residents and their only concern is in maximising profits leaving current and potential residents with insufficient infrastructures and future problems to contend with (not excluding injuries / deaths caused by increased traffic by the playing field / children's playground; dangerous parking caused by lack of sufficient legal parking; and foreseeable danger from unprotected 'open water' i.e. SUDs.

In view of these points raised I would submit that this latest document is still incomplete in so many aspects and, should again, be rejected.

Joanne Ash

████████████████████

██████████

██████

████████

Dear Sir/madam

I have recently moved back into Edenfield having been away for 10 years or so.

I got quite a shock at the large amount of traffic moving through the village, particularly at 'rush hours'. So to be told that there is a planning application for even more houses seems to me to be ridiculous.

How many years ago was the dual carriageway built and commonly referred to as the 'Edenfield bypass'. Traffic then was a fraction of what is on the road now, yet it was deemed necessary to build the road to relieve traffic going through the village.

So to my major concerns;

There does not seem to be a viable plan to mitigate for extra traffic coming from any new builds,

the mini roundabout is a particular problem already (personal experience) as access on/over it does not at times seem to follow the general rules of the road. No doubt caused by frustration at having been held up.

The proposed building land can at best be described as 'wet', Where is any water going to be diverted to? I seriously doubt a drainage pond close to the A56 will be sufficient in any future weather/rainfall event, as I believe, does the Highways Agency.

Safety of existing residents, cyclists, pedestrians and the disabled must be of paramount importance.

These are my main concerns but may I refer you to the objections of Edenfield Community Neighbourhood Forum which I wholeheartedly support!

Thank you for taking the time to read this.

Regards

Ina Smith



[REDACTED]  
[REDACTED]  
[REDACTED]

### **To Whom It May Concern**

I support the representations by ENCF to V4 of the masterplan.

We all know the government has tasked councils to build new homes, in some cases to ignore what the residents say, not in my back yard etc, unfortunately, the two developments Taylor Wimpey and Northstone are not affordable housing which is what the government and the local people want building.

I have been a resident of Edenfield for 18 years, I cannot get an NHS dentist in this or the surrounding area, I rang my doctors last week at 8 am I was told I was 36<sup>th</sup> in the queue, by 8.31 there was no appointments left, this occurs every day, my friend is on the waiting list for her son to attend the Edenfield C.E Primary school as they put siblings first, so there are no school places.

### **Taylor Wimpey Development**

The proposed parking restrictions on market street is unfair and insulting, just so the developer can make a tidy profit, then leave us villagers inconvenienced without a second thought, how they expect disabled and elderly people to have to struggle back to their houses, not to mention women in dark nights having a long walk back as well. If the site is not right and accessible as it is, it should be their problem and not become ours.

### **Northstone Development**

As nearest neighbours we were invited to look at the plans for the development, we went along and looked at the drawings, we were surprised as they had included the green belt field at the north end of the village, as a car park and recreational area, this led us to believe permission was already granted. I'm sure the 7 cars they want rid of, that currently park where their development will be, will find somewhere else to park. This field is green belt for a reason, in heavy rain it is like a swimming pool, it is at least 2 foot and 6 foot below the road service in places, if that was to be levelled off to road level, this would risk the houses in front of the field and the road to flood, when the grids are overloaded from the Quarry Man's inn, the water makes its way down towards our houses on Burnley road, the culvert backs up in heavy rain and has caused flooding to our homes, if you check your records, we have had to call out the highways in heavy rain and storms many times. The biggest issue, we can't have people messing on that field, if rubbish is left behind, this could block the culvert altogether creating a flood disaster, many residents shown the developers videos and pictures of the flooding, the worrying thing is the representatives from Northstone had been on the field, but were not aware there was a culvert, we thought it was poor really as they had not done their homework at all. They could not answer questions on who will look after the field, security etc, it would be a magnet for anti-social behaviour or the travelling community, asked about the traffic chaos it would cause on both sides of the traffic lights, no solution given.

On a final note, we voted for this council, hope you listen to our voices.

[REDACTED]

**Dianne Jarvis**

Sent from my iPad. I strongly disagree with the proposed planes for Edenfield the village is already congested with traffic. and impossible



As a member of the Edenfield Community Neighbourhood Forum Committee I fully support its detailed submission on this matter. However I am also submitting my own comments covering my major concerns and reasons why this latest version of the Masterplan for Edenfield should not be accepted as follows:-

1) it falls well short of what is required to lead to the High Quality and Well Designed development of site H66 envisaged in the Local Plan. Page 6 headed Executive Summary states that in respect of Site Specific Policies 3 - 11 that “these are to be refined and confirmed through subsequent planning applications”. As such they are largely ignored in the Masterplan yet the Explanation of the Site Specific Policies in the Local Plan refers to the land released from Green Belt and the site as one entity. Therefore the Site Specific Policies must be applied on a wholistic basis and not left to ad hoc arrangements of individual planning applications. As such the Masterplan as currently presented should be rejected.

2) many of the proposals are vague, incomplete and uncertain. The word indicative is used 34 times, proposed 52 times, potential 39 times and guidance 20 times. Many of the Masterplan policies are caveated as being subject to variation if “otherwise reasoned” or “otherwise justified”. The Masterplan is not in a sufficiently definitive form at the present time and therefore should be rejected.

3) there is no agreed programme of phasing and implementation. Indeed exactly the opposite is put forward being that all individual landowners involved in site H66 will be permitted to proceed as and when they see fit and potentially all at the same time. Page 6 headed Executive Summary claims Site Specific Policy 1 (The comprehensive development of the entire site is demonstrated through a masterplan with an agreed programme of implementation and phasing) is fully addressed but this seems to be far from being the case as there is no agreed programme but just some suggestions as to when certain events might happen. Page 58 claims this is all fine because of “the independent nature of each developer’s landholding, ensuring each parcel can be delivered independently without prejudicing any other”. However much developer’s may wish this to be true the Local Plan dictates otherwise as it treats site H66 as one “entire site” requiring a one site approach. It was on this basis that the H66 land was released from the Green Belt following an independent examination. Developers/Landowners were part of this process and accepted the one site

approach at the time. As such the Masterplan as currently presented should be rejected.

4) there is still no Transport Assessment covering the whole site. There is a Transport Note referred to on page 116 which I am told can be found with the Taylor Wimpey planning application documents in June 2023 but this information has not been made generally available so this Transport Note will not have been subject to any real scrutiny by many reading the Masterplan. What can be seen from the Masterplan are proposals for an additional site access point off Exchange Street not envisaged by the Local Plan plus an access point on Burnley Road in respect of a car park and school access. Even assuming such additional access points are necessary/desirable/possible then the Transport Assessment required by the Local Plan needs to be extended to fully cover the implications of these new access points, be produced on a village wide basis and attached as a proper addendum to the Masterplan itself. The Masterplan as currently presented should be rejected.

5) there is considerable disruption proposed to current on street parking arrangements for existing residents. It is true that some communal parking spaces are proposed but the majority of these are within the existing green belt off Burnley Road which is outside of the H66 site area, are hardly convenient or suitable for Market Street residents and there is no certainty that these spaces will ever be provided. Proposals are needed which are much less disruptive to existing residents and with a clear mechanism for delivery. In the meantime the Masterplan as currently presented should be rejected.

6) the Design Code for the draft Edenfield Neighbourhood Plan independently produced for Edenfield Community Neighbourhood Forum has been largely ignored notwithstanding it having been updated to reflect Regulation 14 Consultation responses (including that received from Taylor Wimpey and bearing in mind that no other H66 landowner participated). As a Design Code produced on behalf of the local community it should be given much greater weight than it has been given and therefore the Masterplan as currently presented should be rejected.

7) I cannot see any consideration of the site wide issues regarding the impact on flood risk/mitigation in particular west of the site towards the River Irwell and the potential impact on riverside locations at Irwell Vale,

Strongstry, Stubbins and Ramsbottom. I also cannot see any site wide proposals as to how foul water drainage will be dealt with. In the absence of such information the Masterplan as currently presented should be rejected.

8) Page 10 of the document submitted sets out a vision for “Land West of Market”. 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 plans on page 7 and 43 show 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 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 currently presented should be rejected.

Sadly the latest Masterplan seems to be yet another missed opportunity to produce a quality plan for Edenfield. It’s difficult to identify exactly who has been involved in its production but previously Peel/Northstone have gone on record to say they don’t wish to participate in the process and Taylor Wimpey have indicated the opinion that a Masterplan isn’t really required as it’s conditions as set out in the Local Plan are “low bar”. Consultation with local residents has been minimal and integrating the proposed new properties with the existing village/its residents largely ignored. The focus seems to be on the Council’s commitment in the Local Plan to support the construction of approximately 400 houses (providing certain conditions are met) as meaning support for the construction of a minimum of 400 dwellings whatever the implications of that may be. The Masterplan as currently presented should be rejected and all landowners/developers

should be encouraged to come together with all stakeholders to produce a Masterplan with “Quality” at its core rather than simple maximising the number of dwellings which can be built.

Mervyn MacDonald of [REDACTED]

6 June 2024.

Sent from my iPad

To whom it may concern,

We are residents of Edenfield and live at [REDACTED] We strongly object to the masterplan for the following reasons,

- The proposed site plan lacks a comprehensive masterplan and hasn't been approved by RBC or all developers.
- Traffic, pedestrian safety, and cycling concerns persist, especially with the new junctions in Edenfield.
- There's no site-wide traffic or road safety assessment.
- The infrastructure needs, including schools and healthcare, are unaddressed. The design codes of the Neighbourhood Plan and landscaping are given minimal consideration.
- Issues such as ecology, rainwater pollution, flood risk, and SUDS near the A56 are ignored.
- Local businesses will be adversely impacted by the proposed parking restrictions.
- Greenbelt release for school, play area, and car park isn't aligned with the RBC Local Plan and would cause environmental and safety issues.
- The infrastructure for existing resident's in relation to gas and water supply will be compromised.
- There has been no consideration of the impact on the health and wellbeing of existing residents due to increase flow of traffic, noise and pollution.

Yours sincerely

Paula and Lee Munro and Tom Beaney.

John Entwistle

06/06/2024

To Whom It May Concern,

Subject: Edenfield Revised Masterplan / Design Code (v4) for H66

I am writing to express my serious concerns and strong disapproval regarding the proposed housing development in Edenfield. After reviewing the current plans, I believe that several critical issues have not been adequately addressed, posing significant risks and negative impacts on the community.

**1. Traffic, Cycle, and Pedestrian Safety:** The proposed mitigation measures for Market Street and the new junctions in the North, Central, and South of Edenfield fail to adequately address serious safety concerns. The absence of a comprehensive traffic assessment for the entire site raises doubts about whether the development can be safely accessed by all users, including disabled individuals. This approach contravenes the Local Plan's requirement for a whole site evaluation.

**2. Phasing and Construction Impact:** The proposed simultaneous development of the Taylor Wimpey and Peel sites could result in prolonged chaos, increased road congestion, and heightened safety risks over the projected seven-year construction period.

**3. Infrastructure Deficiencies:** The development proposal neglects essential infrastructure requirements, particularly in terms of educational and healthcare facilities. The existing difficulty for Edenfield residents to secure GP appointments is likely to be exacerbated by the influx of new residents.

**4. Design Code and Community Voice:** The Design Code outlined in the Neighbourhood Plan, which was positively referenced in the Places Matter Design Review report, has been largely ignored. This disregard undermines the community's voice and the recommendations aimed at ensuring a harmonious and well-integrated development.

**5. Cramped Development and Limited Green Spaces:** The proposed layout appears cramped with insufficient green and landscaped spaces, contrary to the recommendations of the Places Matter Design Review report. Such an approach would negatively affect the quality of life for residents.

**6. Flood Risk and Land Stability:** The unresolved issues of flood risk and land stability, particularly concerning the SUDS drainage pond near the A56, pose serious road safety hazards as highlighted by National Highways.

**7. Parking Restrictions and Impact on Residents:** The proposed parking restrictions on Market Street and Exchange Street are detrimental to existing residents. The lack of clarity on compensatory parking exacerbates these concerns, especially for frail and disabled residents who would be directly and indirectly discriminated against, contrary to the Equality Act 2010. As a resident of Market Street, this is a huge concern, not only for those mentioned, but also for the many families in these areas who have young children and newborns. Crossing a busy road with youngsters and / or babies in prams, is not a safe option - especially when considering the fact they currently have parking outside their house.

**8. Economic Impact on Local Businesses:** The proposed parking restrictions could lead to decreased footfall, negatively affecting local businesses and the broader local economy. This potential reduction in commerce may lead to business closures, further harming the community.

**9. Greenbelt Release and Environmental Impact:** The proposal to release additional greenbelt land for a school, play area, and car park at the North end of the village is misaligned with the Local Plan. This move would adversely impact the environment, ecology, and water drainage, and exacerbate safety issues at the already congested junction near the school.

Given these significant concerns, I strongly urge the Planning Department to reconsider the proposed development. It is essential to address these issues comprehensively to ensure the safety, well-being, and sustainability of the Edenfield community.

Thank you for your attention to these matters. I look forward to your response and hope that the concerns of the community will be given due consideration.

Yours sincerely,

John Entwistle

Good evening

I'm sure every scenario has been put forward.

What about the wildlife deers owls bats light pollution water pollution etc this is the eco system which we and they need to live and sustain the area, country and planet.

We will be living in a permanent building site in which the construction companies care not one jot. Its not on their door step they just want money, greed is consuming their plans.

Edenfield will become a concrete non description area, devoid of habitat and natural native animals. Just a man-made mess left for our children.

It's disgusting and will be a blot on our landscape.

Regards

Nicola Ross



To whom it may concern:-

I wish to object to the building of the new houses in Edenfield.

Market Street is already difficult to negotiate without the additional hundreds of cars these houses will bring. Why should people who already live here not be able to park outside their own houses? Why should people have to walk a distance to their own property, possibly carrying a supermarket shop? Market Street will NOT cope with all the additional traffic. Just look at it when the bypass gets closed - carnage, but that is how Edenfield will become on a daily basis.

No real consideration has been given to additional children requiring school places, doctors, dentists or even their safety. It's near on impossible to get a doctors appointment now without hundreds of new people registering.

Edenfield is unable to cope and why should we give up our green fields just to accommodate greedy builders wanting to just build to make fast money without them having to live with their consequences. It's about time the local council said NO and supported the people, that after all, pay the council taxes every year.

IT IS NOT WHAT WE WANT. LISTEN TO THE PEOPLE OF EDENFIELD FOR ONCE.

Regards

Elizabeth Dalby

██████████

Sent from my iPhone

**Forward Planning Team,**

Thank you for inviting National Highways to make further comments on the May 2024 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 stand.

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]

[Redacted]

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

[Redacted]



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/>

## Representations against the Revised Masterplan & Design Code [MDC] (April 2024) for the Land West of Market Street Edenfield.

### Summary of Points

- 1) Page 8 RMPDC: Criterion 2: Masterplan with agreed Design Code: Claim *fully addressed*.** Claims to be in full agreement with the Design Code but housing density proposed is higher than the 29dph in the Local Plan that justified the lands release from the Green Belt. Refer paragraphs 8-9 and 10-15 in AGA's Representation for detail.
- 2) Page 8 RMPDC: Criterion 3: A Transport Assessment (TA): *TA provided demonstrating safe and suitable access for all users*.** There are numerous safety issues relating to the Exchange Street access point with serious dangers to children playing and residents on Highfield Road, The Drive and Eden Avenue. Additionally, there are serious traffic queuing issues with the entrance to Exchange Street from the north. Refer to paragraphs 1.2 & 10 in AGA's Representation for detail.
- 3) 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's Representation paragraph 1.3 for detail.
- 4) 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's Representation paragraphs 2.1.1 to 2.1.4 & 2.2-2.4 for details.
- 5) 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's Representation paragraphs 2.2 and 8 for details.
- 6) Page 14 RMPDC: Section 15 of NPPF: *protecting and enhancing valued landscapes*.** Developers have made no real effort to retain the key long views or glimpsed views. Refer to AGA's Representation paragraph 2.3 for detail.
- 7) Page 14 RMPDC: Third Column: Claim *proposals consistently follow the principles set out in the NPPF*.** Clearly not the case if you refer to AGA's paragraphs 4 to 6 above.
- 8) Page 15 RMPDC: Claim *that the proposed development of the site accords with the PPG*.** With the excessive density, proposed plot heights, massing etc this plan cannot be considered to accord with PPG. Refer to AGA's Representation paragraph 3.
- 9) Page 16 RMPDC: Local Planning Policy: H66:** The revised plan does not meet either Criterion 2 or 3. Refer to AGA's Representation paragraphs 1.1 – 1.3 and paragraph 4.
- 10) Page 26 RMPDC: Visual Context-** Photograph selected and the text downplays the importance of the view. Replace photo in the RMPDC with one that reflects the real situation. Refer to AGA's Representation paragraph 5.

**11) Page 38: Column 3: 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’s Representation paragraph 6.

**12) Page 38: Column 3 Final paragraph:** Relationship to open space: *Development should seek to retain and frame glimpsed 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’s Representation paragraph 7.

**13) 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 and the justification to release the land from the Green Belt-*‘Density should be reduced to the Edenfield Core level and reduced even further in front of existing properties’.* Refer to AGA’s Representation paragraphs 8 & 19.

**14) Page 50: Landscape-led Masterplan:** *‘Preserve and enhance what is already there’.* The RMPDC is clearly not complying with this. Refer to AGA’s Representation paragraph 9.

**15) Page 72: 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 AGA’s Representation paragraphs 11-16 for Site wide Codes and & 19 to 26 for Area Types.

**16) Page 74: 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 the village and particularly in Market Street and Alderwood Grove. Refer to AGA’s Representation paragraph 12.

**17) Page 90: 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’s Representation paragraph 14.

**18) Page 90: 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’s Representation paragraph 15.

**19) Page 90: 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’s Representation paragraphs 16 & paragraphs 19 to 26.

**20) Page 91: Homes & Buildings:** *“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** *All homes should be designed to maximise internal daylight and have appropriate privacy distances in accordance with Local Plan policies.* The Developers must also ensure that the daylight, spacing and privacy **of existing properties and residents are not compromised** by the development. Refer to AGA’s Representation paragraphs 17 & 18 for a proposed amendment to **HB 02** to ensure its **compliance with SP ENV1**.

**21) Page 98: Area Types: Village Streets: AT/VS 01: Density:** Originally 29dph, with no justification other than greed the Developers increased this to 35-40. (Actual density behind number 5 Alderwood Grove is 47.7dph.) Developers should reduce the density proposed to 29. Refer to AGA's Representation paragraph 19.

**25) Page 98: 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's Representation paragraph 20.

**26) Page 98: 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's Representation paragraph 21.

**27) Page 98: 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 or indeed Alderwood Grove where existing houses adjoin Village Streets. Refer to AGA's Representation paragraph 22.

**28) Page 98: 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's Representation paragraph 23.

**29) Page 98: Area Types: Village Streets: AT/VS 08: Key Views: Key Characteristics** are *"Quality of views to and from recreation ground. Views to Peel Tower, Emmanuel Church and Edenfield Parish Church from within the development."* **Masterplan response: Under Reasoning and Influences:** *"Ensure development provides a characterful and attractive elevation to the interface with Edenfield Recreation ground."* The Masterplan makes no reference to Edenfield Parish Church and Grounds; they just increase the density from 29 to 35-40 despite **Site-Specific Policy-5(ii)**. **Action: Change Village Streets to Edenfield Core in the entire field adjacent to the Church to reduce the impact on the views.** Refer to AGA's Representation paragraph 24.

**30) Page 102: 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 still incorrect **despite our previous representations at every stage.** Refer to AGA's Representation **paragraph 25.**

**31) Page 102: 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's Representation paragraph 26.

**32) Page 112: Design Quality Checks:** For comments on all five of these checks refer to AGA's Representation 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] (April 2024) 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 2:** *Development is implemented in accordance with an agreed design code.*

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

Claims to be in full agreement with the Design Code; however, the housing density proposed is higher than the 29dph in the Local Plan that justified the land's release from the Green Belt. Refer also to Pages 8-9 & 10-15 in AGA's Representation for detail.

**1.2) 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. "*

There are numerous safety issues relating to the Exchange Street access point with serious dangers to children playing and residents on Highfield Road, The Drive and Eden Avenue. Additionally, there will be serious traffic queuing issues with the entrance to Exchange Street from the north. Refer also to page 10 in AGA's Representation for detail.

**1.3) 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 fourth 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. The document also fails to highlight the proposed widening of the A56 which is the real reason for the 'substantial buffer'.

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

**2.1) Page 14: 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, 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 with the removal of the two terraces. Refer to (AGA) paragraph 8 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 (5 Alderwood Grove) there are to be six + houses built directly behind my property with a density per hectare of 47.7dph and at close to the minimum interface distance. 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 is close to the minimum interface distance from one of the windows in the Sun Room of no 5 Alderwood Grove.

When you consider this along with the proposed Plot heights and Plot densities this cannot be acceptable in terms of NPPF's 126, 130 and 134 and/or the protection of the residential amenity of existing dwellings and sympathetic to the existing built environment.

**2.1.3)** The heights of Plot numbers 6 and 7 are greater than Number 5 Alderwood Grove (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 all my responses to the previous consultations following the change made to replace a detached and a pair of semi detached houses with a terraced block of 4. This action is in direct conflict with Strategic Policy ENV I, especially paragraphs (a) to (d), in Local Plan page 108.

Additionally, the change in house type proposed in the first revised plan and retained in the more recent ones 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 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) Page 14: NPPF: Paragraph 134** emphasises that *‘development that is not well designed should be refused’*

All the revisions of the MDC like the initial version are not sympathetic to the surrounding built environment or existing residents, they are poorly designed and therefore approval should be withheld. Refer to comments above in (AGA) paragraph 2.1 under NPPF 130 which indicates 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) Page 14: 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 previous Consultations and the points made in (AGA) paragraphs 1.1 to 1.3 and (AGA) paragraphs 2.1 to 2.3 it is **clear the claim that it follows the principles set out on page 14 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 PPG.”*

How anyone can make a statement that *“this site accords with PPG”* beggars belief when directly behind number 5 AG the proposed housing density is 47.7dph, house numbers 6 and 7 are higher than number 5 AG and the Interface distance between plot 5 and 5 AG is very close to RBC’s minimal requirement 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 PPG is clearly not factually based.**

**4) Page 16: Context: 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 for Criteria Number 2:** Claims to address Design Code fully; however, the housing density proposed is higher than the 29dph in the Local Plan that justified the lands release from the Green Belt. Refer also to Pages 8-9 & 10-15 in AGA's Representation for detail.

**5) 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 deliberately 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.

**6) Page 38: Context: Column 3 First 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 5 Alderwood Grove is 47.7dph leading to appalling massing/ cramming. The height of plots 6 and 7 are higher than Number 5 Alderwood Grove and the interface distance is close to the minimum allowed.

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

**7) Page 38: Context: Column 3: Relationship to open space and context: Final Paragraph:** *"Development should seek to retain and frame glimpsed 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 some residents of Market Street and Alderwood Grove it will virtually disappear.

**8) Page 44: Masterplan:** *“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.”*

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.

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 the Site-Specific Policy (Criterion 5.ii) requires views to the Church to continue. 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 and change the northerly Village Street section to Edenfield Core.

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.

**9) Page 54: 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 continued to disregard 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/ maximum profit 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.

**10) Page 62: PHASING:** *“The below gives an indicative timeline for the implementation of the allocation in terms of housing delivery and the associated infrastructure works. **This recognises that all phases can be delivered independently and/ or simultaneously**, subject to the infrastructure phasing provisions set out.”*

**The fact that this statement remains in the Masterplan suggests that despite the phasing data that follows there is no binding agreement between the Developers. RBC needs to clarify this to avoid total chaos going forward.**

**10.1) Page 64: Phasing: INFRASTRUCTURE PHASING PLAN: PRIOR TO ABOVE GROUND CONSTRUCTION:**

The proposed uncontrolled crossing close to the Site entrance seems ill thought out and adds a serious danger point being so close to the site entrance for children and pedestrians when using it. **This must be reviewed.**

**10.2) Page 64: Phasing: INFRASTRUCTURE PHASING PLAN: PRIOR TO OCCUPATION:** The uncontrolled crossing close to the School is similar to the present arrangement which hopefully will still be Warden controlled for children to and from School.

The plan highlights the 'ghosted right turn' to the main site entrance to avoid traffic delays but only moves the problem to the pinch point between Gincroft Lane and Exchange Street particularly in view of the one way access to Exchange Street.

This proposed access point to the Methodist Church Land is a disaster waiting to happen for all the points made below:

- i) There will be severe traffic delays due to vehicles from the north turning right into Exchange Street across heavy traffic from both Rochdale and Bury Roads.
- ii) The local shops will go out of business, nowhere nearby to park, a problem for all, particularly the elderly and disabled.
- iii) Children are playing on both sides of Exchange Street and the approval of the Pump Track attraction only added to the danger to all concerned.
- iv) Significantly increased traffic levels on Highfield Road, Eden Avenue and The Drive are all serious danger points, particularly for children on the way to the Playground and Pump Track as this will become a 'rat run' for vehicles from the Methodist Church land development.
- v) Why are there are no speed cushions proposed for Eden Avenue or The Drive as these will become the main exit points for this development?

**Surely, the sensible action would be to utilise the main site entrance for this development and eliminate any access or exit via Exchange Street, Highfield Road, Eden Avenue and the Drive.**

**11) Page 72: 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 document. 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.

**12) Page 74: 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 the village and particularly in Market Street and Alderwood Grove where loss of privacy, light and views, as well as the lack of protection for the residential amenity of their existing dwellings have all continued to be disregarded despite being highlighted from the outset.

**13) Page 78: Site Wide Codes; Play Provision:** The proposed LEAP cannot have been fully thought through; its location will be in 'touching distance' of the A56 when the proposed widening of the dual carriageways is implemented in the early 2030's. **This needs to be re-positioned**

**14) Page 90: 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 applied in the application 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 or a strong sense of place.**

**15) Page 90: 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 90: 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 are first of all agreed by all parties and they include consideration of the comments made in (AGA) paragraphs 11 to 16 as well as the Area Type Identity comments in (AGA) paragraphs 19 to 26 along any with others received before any final approval is given.

**17) Page 91: 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 91: HOMES AND BUILDINGS: HB 02:** *“All homes should be designed to maximise internal daylight and have appropriate privacy distances in accordance with Local Plan policies.”*

**HB 02** should be amended as follows:- All homes should be designed in accordance with Strategic Policy ENV 1: High Quality Development in the Borough and all other relevant Policies of the Local Plan to maximise internal daylight and have appropriate privacy distances.

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 98: 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 8 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 5 Alderwood Grove, 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 number 5 AG as plot numbers 6 & 7 are higher than number 5 AG and they are directly behind the Lounge, Dining Room, Utility, Master Bedroom and Guest room. Additionally, plots 2 to 5 which are of a similar height will dramatically reduce the light, privacy, residual amenity protection and views from the 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 98: 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.*

As this Area Type refers to the Taylor Wimpey site only it is highly misleading, if not plainly wrong, of the MDC to say Village Streets sits internally to the central parcel. It is on nearly the full length of the northern and southern boundaries of the developable area and most of the eastern boundary. Thus, there is a fundamental flaw in the reasoning behind this Area Type.

The proposed massing leaves virtually no gaps in the new builds for glimpsed views behind the existing properties in Alderwood Grove. This was highlighted in many of the submissions made to previous MDCs and Planning Applications. Note we refer again to the density of 47.7dph and the overbearing height of the new builds.

Additionally, the Interface Distance between number 5 AG and Plot 5 is close to the 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 recommended that 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 roofscape 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 5 Alderwood Grove in our submission to the previous consultations but it would appear that the Developers have once again just disregarded the comments as they have with virtually all 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 98: 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. Nor does it complement the character of Alderwood Grove, where the houses actually adjoin the Village Streets Area.

**23) Page 98: 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 98: Area Types: Village Streets: AT/VS 08: Key (glimpsed) views to be maintained.**

**Key Characteristic:** *“Quality of views to and from recreation ground. Views to Peel Tower, Emmanuel Church and Edenfield Parish Church from within the development.”*

**Reasoning and Influences:** *“Ensure development provides a characterful and attractive elevation to the interface with Edenfield Recreation ground .”*

The fact that there is no reference in the Reasoning & Influences section to the retention of views to Peel Tower, Emmanuel Church or Edenfield Parish Church this is yet another example of the Developers/Agents trying to ‘muddy the water’ and steer attention away from three of the most important views. This, despite the views being highlighted by RBC’s Consultants, Penny Bennett Landscape Architects (PBLA), as well as being protected in the Executive Summary of Policy H66 under S.S.P. Criterion 5 (ii).

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 along with 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 *“hills from Market Street and PROW. **These are locally valued and provide a sense of place.**”*

Market Street and Alderwood Grove residents along with others under the original and previous MDCs 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 as they have done once again.

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 will 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 102: Area Types: Edenfield North: AT/EN 01 Density:** *“Lower density than Edenfield Core to reflect position at northern fringe of Edenfield.”*

This statement continues to be **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 Masterplans and Design Code documents 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 102: 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 112: 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 and quality of life 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 continued 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 virtually all the comments made by the residents who took the time and trouble to respond to the previous consultations have again been totally 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 have also appeared to treat Rossendale Borough Council in a similar manner ignoring the 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 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’s the residents, RBC or consultants employed by RBC. The Developers just continue to progress the Plan make 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 plans, with respect to subdividing the field between Mushroom House and the Old Vicarage, despite all the adverse comments relating to the loss of key views from Market Street and Edenfield Parish Church and the damage to existing properties due to the excessive housing density and poor design of their proposals.

Additionally, even at this stage, the fourth Revision of Masterplan and Design Code there are statements highlighting that key issues have not been fully resolved. The developers cover these with comments similar to **‘to be refined through subsequent individual planning applications’**, i.e just kicking the can down the road in the hope that residents will lose the will to continue to complain. **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, children’s education and full traffic assessment problems.

We recognise that some comments in this representation relate more to the Planning Applications; however, this has been necessary as the two submissions are very closely aligned.

We can only live in hope that Rossendale Borough Council will act on behalf of its Edenfield Residents and reject the revised MDC until such time as the Developers comply with the following:

- 1) The NPPF & PPG.
- 2) All RBC’s Policies including the Site Specific ones.
- 3) Amend the Plan to take into account the issues 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 in addition to their well-being and quality of life.

## Conclusion

**As the developer of the central part of H66 is making no serious effort to address the fundamental issues, we submit the time has come to reject this 4th Revision of the Masterplan and Design Code.**

Alan G. Ashworth and Carol Ashworth

07.06.24

To whom it may concern



I write to object to the latest Edenfield masterplan/design code (ref version 4 or v4) as proposed by the developers. This latest proposal offers no great change to their last offering and still does not address many points raised by local residents, Lancashire highways and yourselves Rossendale BC.

It is beginning to feel that Taylor Wimpey can steamroll this proposal through the sheer weight of big brother verses the rest, a bit like the post office scandal, to the detriment of the local community with no consideration at all to those who live and work in and around Edenfield.

I support the points raised in objection by the Edenfield Community Neighbourhood Forum all of which have been raised before but totally ignored by big brother Taylor Wimpey.

John Q Crossley. 

Forward Planning  
Rossendale Borough Council  
Room 120  
The Business Centre  
Futures Park  
Bacup

  
  
www.sktransport.co.uk

7 June 2024

Dear Sir, Madam,

**RE: EDENFIELD MASTERPLAN VERSION 4**

We are writing to you again on behalf of the Edenfield Community Neighbourhood Forum (ECNF), following our review of the latest Masterplan and Design Code document, produced by Randall Thorp in April 2024, which on page 116 imports the contents of the highways note submitted in June 2023 as part of the Taylor Wimpey planning application 2022/0451.

Whilst this letter is in response to the latest Masterplan for the whole of site H66 it is necessary to refer quite extensively to the planning application of one of the landowners because that is where a key document is located. This in itself is far from ideal as normally a Masterplan would be a standalone document.

You will recall we last wrote to you in the summer of 2023 with our technical review of traffic and transport matters. The majority of our technical points related to 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 ECNF that the Draft Local Plan, which has now been adopted, had been assembled in a robust and accurate way. As you and colleagues are aware the group's position remains unaltered now that the masterplan, planning application and supporting information has been submitted.

Even with the submission of additional technical information, which is being presented to the Council in an ad-hoc manner there remains 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.

We are also disappointed that despite being assured at the Local Plan Examination by Lancashire County Council (LCC) Highways representatives that a comprehensive corridor-based access strategy would be developed, we still wait for LCC Officers and the site promoters to confirm a further meeting with us and RBC Officers for a round table discussion.

This lack of engagement does very little to inspire confidence with the ECNF group that they are being listened to, or that the proposals are being reviewed appropriately. Their lack of willingness to engage is amplified by the positive engagement the group maintains with you and your colleagues, which we continue to be grateful for.

Returning to technical matters, we reiterate that through the Local Plan allocation it was made clear that 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 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 responses 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. We have previously highlighted that we believe 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. The group has noted that LCC’s review of the development proposals, in traffic, transport and sustainable access terms is still being led by Mr Stevens. This makes the lack of engagement from the Highway Authority, and willingness to meet with RBC and ECNF in person even more frustrating for the group.

As we have previously set out, 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

The frustration continues to be 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 submission of the April 2024 Randall Thorp Masterplan and Design Code, which shows changes to the development access strategy and Market Street corridor proposals it is noted that the June 2023 “Highways Consideration of Masterplan” note has not been updated, meaning:

- there are still technical queries and information gaps that have to be addressed to meet both RBC and LCC’s requirements
- the updated information shown in the April 2024 Randall Thorp document has not been updated by the applicant’s transport consultants in their reporting
- all the points raised by the ECNF in their August 2023 submission have not been considered or responded to

This latest 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 and August 2023 submissions 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 an updated Masterplan, prepared by Randall Thorpe in April 2024. Whilst this additional level of information is welcomed, the detail contained within it continues to raise a number of questions, including:

- the detail of the main site access onto Market Street
- the inclusion of a new pedestrian, cycle and vehicular access to Alderwood
- the delivery of the emergency access from the Taylor Wimpey to the Methodist Church 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 updated Masterplan 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 in line with the phasing and implementation strategy set out in Section 3.”*

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 as part of the Masterplan. As acknowledged in the April 2024 Randall Thorp document 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 previously raised in January 2023 that should have been incorporated into the scheme.

It is important to reiterate that at the EiP it was confirmed by both the site promoters and LCC that a design compliant site access strategy would be delivered, and quite reasonably this access strategy and sustainable access enhancement should be the subject of a Road Safety Audit. To date this information has not been provided.

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 shown on the Masterplan.

As previously stated 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. It should be remembered that this eastern footway is the pedestrian route that links the centre of the village with the primary school to the north, and as such is a key route that children and adults will already use to access the school. It remains the ECNF

group's position that widening this footway is a pre-requisite to a sustainable access strategy for the Market Street corridor.

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."*

As presented in this response the eastern footway should be widened to 2m. 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. To date we have not seen any evidence that this technical point has been checked and ratified.

### **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 in the June 2023 highways technical note submitted by the applicant there is still a requirement that the proposed 2.4m x 43m visibility splays are appropriate in this location, and are validated 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.

### **Lost/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.

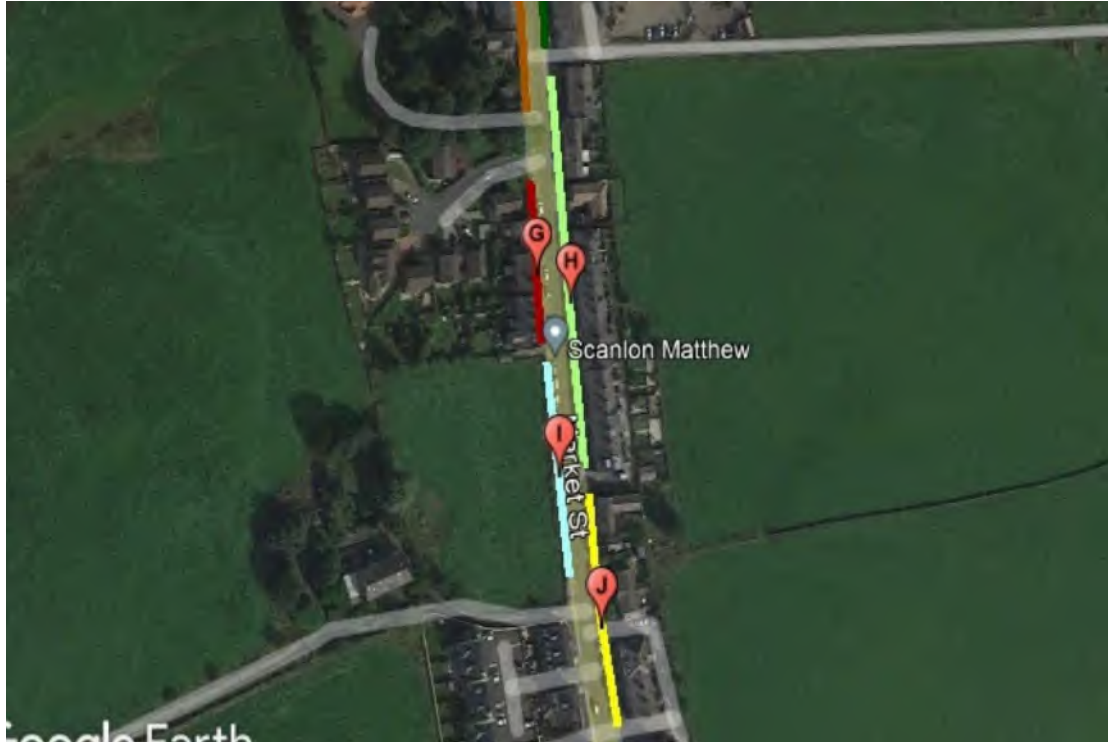
At the time members of ECNF who live locally in the village confirmed that the occupiers of the terraced properties parked on Market Street outside where they live, and as required would also park on the western side of the carriageway, on the opposite side of the road.

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 still proposing a 13-space car park which would be available for Market Street residents to use, we understand that this parking would not be dedicated to them. 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 lost and 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, and LCC Officers who deal with the delivery of new TROs provide their comments on the required on-street parking proposals, the waiting restrictions and the need for Exchange Street to become a one-way street. Only LCC, as Highway Authority can carry out the statutory consultation on the TRO.

The required TRO, 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 in previous responses there is a lack of clarity as to what elements of the corridor strategy will be delivered by each development parcel/phase, and how the works will be delivered across the various development phases. 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
- e) The latest proposals now show the northbound bus stop retained, immediately to the south of an uncontrolled pedestrian crossing on Market Street, and within the main development access visibility splay

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 the Masterplan is agreed. 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.*

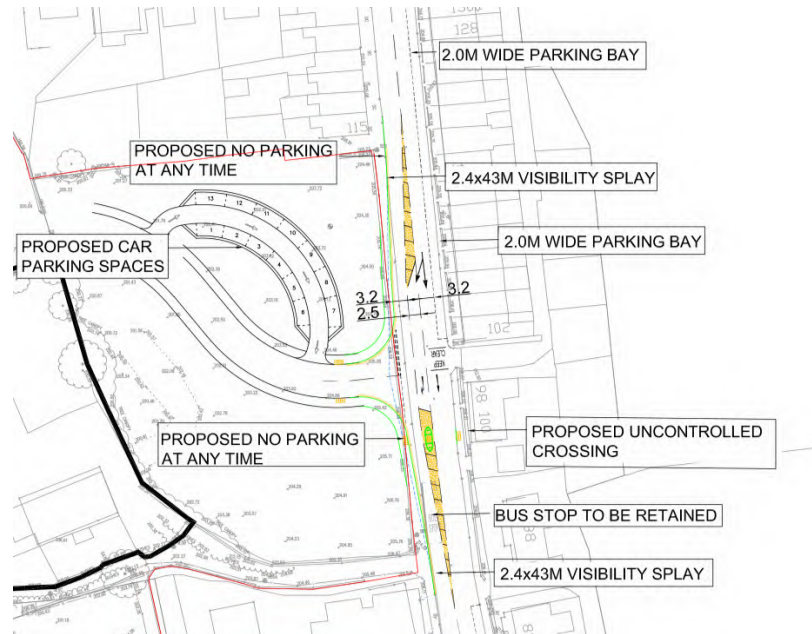
Paragraph 6.10.2 - *Where it is not feasible to provide the widths of the right turning lanes fully in accordance with 1), the widths should be as close to 1) as practicable, but no less than 2) or 3) depending on whether the junction is new or existing.*

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 2.5m wide right turn pocket does not meet the requirements of CD123 for a new junction. It is 0.5m 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 (April 2024 Randall Thorp Report)

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 to all parties whether a CD123 compliant access scheme can be delivered on Market Street.

Our position remains the same that the Masterplan should not be approved whilst the access strategy is still shown not to comply with industry-standard design guidance.

### 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, we reiterate it is appropriate that as part of the technical information submitted with the planning application and Masterplan 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, and the eastern footway width on this corridor not following LCC's own policy and design guidance set out in their Creating Civilised Streets document, 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 lost 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 in previous submissions, the expectation was that any submitted planning application would include a full and comprehensive assessment of all access arrangements to the site. The April 2024 Randall Thorp document does show some additional technical information on the corridor proposals, albeit 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 Methodist Church land, which then will connect with Exchange Street.

The Randall Thorp report also highlights that an additional access onto Market Street is also now proposed. We are not aware that this has been considered or assessed in any technical detail to date, although we are aware of LCC's formal objection to proposals to serve nine residential properties, served from an existing vehicular access from Market Street. The LCC letter, dated 15<sup>th</sup> August 2023 states:

*"The Highway Authority would raise an objection to the proposed development based upon the proposed access arrangements.*

*The spacing between junctions should be based upon the sight stopping distance of the 85%ile speed of the major road speed. The speed limit is set at 30mph on Market Street however we do not hold any speed data on Market Street to ascertain the 85%ile speed in the vicinity of the site access (our emphasis).*

*Assuming speed compliance is in accordance with the speed limit, which often is not the case (our emphasis), the junction spacing should be 43m when applying Lancashire County Council's policy 'Creating civilised streets' which is a policy written to respond to the national document Manual for Streets. Recorded speed data is likely to demonstrate a higher 85%ile speed (our emphasis) which would require a greater separation distance. For example an 85%ile speed of 34mph would require a separation distance of 51m."*

LCC's formal objection on the use of this vehicular access to serve part of the Masterplan is relevant as:

- it confirms that LCC do not hold, and are not aware of the existing 85<sup>th</sup> percentile speeds on Market Street
- they have highlighted that '*recorded speed data is likely to demonstrate a higher 85<sup>th</sup> percentile speed*'
- LCC has referenced their policy document 'Creating Civilised Streets', which they confirm is a '*policy written to respond to the national document Manual for Streets*'

These are three critical points that also relate to the design and assessment of the proposed ghosted right turn junction access to the development. If LCC do not hold any speed survey data then Officers cannot have checked that the proposed 2.4m x 43m visibility splays at the main site access are appropriate for the 85<sup>th</sup> percentile vehicle speeds on Market Street.

In addition, if LCC are referencing the need for compliance with their policy document 'Creating Civilised Streets' for this access to serve nine residential properties, compliance with this policy document for all other access arrangements should be applied and adhered to. This includes the footway width on the eastern side of Market Street.

From our review of the additional submission material presented by the applicant to date there are no detailed 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.

We have previously highlighted that the submitted TA is 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. Now that the Randall Thorp document has been updated and includes some information on the proposed development phasing the technical traffic/transport planning documentation should also be updated and submitted to RBC to reflect this.

We believe that a clear development phasing schedule, with the proposed mitigation works linked to each of the planned works should be prepared for the Masterplan.

As in ECNF's previous submissions it is also requested that a clear and concise Construction Management Plan (CMP) is prepared and submitted to RBC and LCC for consideration alongside the Masterplan. 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. This footway 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 continuing to promote an access strategy which requires the eastern section of Exchange Street to become a one-way street. This 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 and the masterplan 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 Masterplan and planning application. Only LCC, as Highway Authority can carry out the statutory consultation on the TRO.



We also note that the proposed mitigation works for the additional traffic using Exchange Street and Highfield Road are speed cushions (physical and painted) on the Highfield Road corridor. These measures may well control vehicle speeds on this corridor, but the mitigation strategy remains silent on the concerns regarding the increase in traffic movements on these heavily parked and narrow residential streets. This illustrates the need for a comprehensive transport assessment for the whole of the village.

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. We note from the latest Randall Thorp report that only an emergency vehicular access is proposed between the Taylor Wimpey and Methodist Church land, so all traffic from the southern land parcel would route to/from the development via Exchange Street.

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 continue to 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 and August 2023 submissions alongside the lack of clarity on the proposed access strategy for the residential allocation via Exchange Street for the Methodist Church 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 remained 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 lost or 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. On the latest off-site highway improvement drawings submitted in the April 2024 Randall Thorp document the development access is shown on plan, but there is a limited amount of detail relating to visibility splays and removal of existing on-street parking.

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.

Presumably the proposals to provide a new off-street parking facility on the northern edge of the village, at Northstone, are a mitigation solution to the removal of on-street parking in this location. Confirmation of the access strategy and deliverable visibility splays in this location should also be provided, along with including this in the RSA study area.

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, we reiterate that 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 submissions 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 again in this submission, 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 sections of Bury Road are subject to significant levels of on-street residential parking, which often reduces the carriageway down to a single lane width.

This technical matter was highlighted in previous ENCF submissions and to date no additional parking data has been provided for this link, which we still consider to be an omission in the technical submission. This illustrates the need for a comprehensive transport assessment for the whole of the village.





**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.

This is an important point, as at the time of preparing this latest submission another 12 months have passed since COVID and people's travel patterns are now returning to pre-pandemic levels.

This is borne out by in the DfT's own road traffic count statistics for the A56 corridor. Their online data shows as an organisation they are estimating a year on year daily traffic flow increases that are returning to near pre-pandemic flows (circa 8,500 vehicles per day).

Further delays by the applicant run the risk of needing to undertake further assessment work, to validate their base traffic flow data that underpins their assessment.

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 lost or displaced parking), capacity assessments and the required corridor-based mitigation strategy for Market Street it is not possible for either RBC or LCC to accurately and 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 masterplan and 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. Progress has been made through the April 2024 Randall Thorp masterplan report, but disappointingly the applicant has not updated their supporting traffic, transport and sustainable access reports since June 2023, ten months previous to the Randall Thorp information being presented.

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 continues to be an “unknown” as to what level traffic flows on the highway network will eventually return to, albeit the DfT are estimating flows are returning to pre-pandemic levels, based on their online road traffic datasets. In the light of this 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 the proposed new car park. We note that the latest masterplan confirms that the Taylor Wimpey and Methodist Church land will only have an emergency access linking them, placing significant pressure on the need for the TRO on Exchange Street to be successful.

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 continues to confirm 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 the longer these technical matters remain unresolved the likelihood that base traffic flows will increase back to pre-pandemic levels.

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 lost or 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 previous technical responses we look forward to LCC and RBC's response on these technical matters. We remain grateful to you for your time continuing to engage with the group on progress, and hope that you may still be able to encourage LCC Officers to meet with you and the group to discuss these technical matters.

In the meantime if you require any further information ECNF will be pleased to assist you on any technical matter.

Yours sincerely,



MICHAEL KITCHING

Director



The Coal  
Authority



W: [www.gov.uk/coalauthority](http://www.gov.uk/coalauthority)

**For the attention of: The Forward Planning Team**

Rossendale Borough Council

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

7<sup>th</sup> June 2024

Dear Forward Planning Team

**RE: Edenfield (H66) Masterplan & Design Code**

Thank you for your notification of the 8th May 2024 seeking the further views of the Coal Authority on the above.

We have previously commented on this document in responses to the LPA, the last of which was dated 1<sup>st</sup> November 2023. Since this time our records have been updated and they now show coal outcrops running through parts of the site. These features may have been subject to workings at shallow depth and may pose a potential risk to surface stability and public safety.

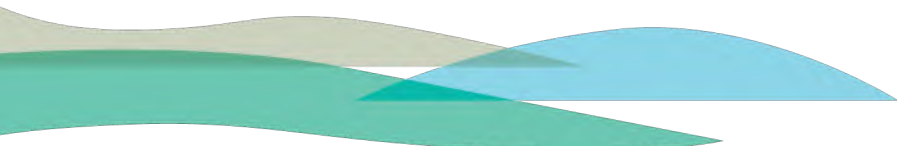
Where built development is proposed in areas where past coal mining activity has taken place we would expect consideration to be given to the risks posed and for any formal application to be supported by a Coal Mining Risk Assessment.

Please let me know if you wish to discuss this further.

Yours faithfully

*Melanie Lindsley*

**Melanie Lindsley** BA (Hons), DipEH, DipURP, MA, PGCertUD, PGCertSP, MRTPI  
**Principal Planning & Development Manager**





## **OBJECTIONS TO EDENFIELD MASTERPLAN/DESIGN CODE V4 SITE H66**

Still no “Masterplan”! The latest submission is incomplete because it does not provide full details of the proposals for Phases three and four of H66. Phasing and implementation is also equally vague – apart from the threat to execute Phases one and two simultaneously, turning the village into a building site. The nomenclature “Masterplan” is therefore incorrect, the submitted documentation cannot be considered to be supportive of a valid planning application and must not be treated as such. The document also claims to be in accord with an agreed design code. There is no indication with whom, or by whom, it has been agreed – other than referencing a national document, one of many listed but with no actual linked connection and in some cases rather dated {page 20}.

Meanwhile the suggested need for additional local housing has become an urban myth. Whether or not there is a requirement for extra housing in Rossendale, there is a complete lack of evidence to indicate the need for an additional 400 houses in Edenfield. Indeed, to the contrary, a small recent development of nine dwellings at the southern end of the village (off Rochdale Road), which took several years to build, still has properties unsold. In the context of national policy targets for more housing having been rescinded, many councils (including adjacent ones) have sensibly stopped or curtailed their house building programmes.

### **Executive summary**

This lists seventeen points, thirteen of which are deferred to be resolved at some future, undetermined, point and include issues which are highly contentious and/or critical to the development ever proceeding, e.g. traffic flow/vehicle access, and make sweeping general statements about what the document addresses/describes with little or no evidence, e.g. land stability /ecological impact.

### **Local planning**

The “Masterplan” is dismissive and scornful of the ENP and Design Code report prepared by AECOM last year, alleging that it does not take account of the H66 and the Local Plan, rather focusing on the existing reality. The developers then describe this (with no justification) as a “conflict with the Local Plan, the early stage of (their) document and the fact that it postdates the submission of this Masterplan and Design Code” going on to say it therefore cannot be “afforded weight at this stage”.

Rather patronisingly they then acknowledge the local community input and the insights it affords in contributing to the preparation of their Masterplan and Design Code. They cannot have it both ways – either it postdates their document (it does not) and cannot contribute, or it is relevant and informative (and has been used by the document). The Neighbourhood Community Forum of course starts from the existing reality and looks at how potential developments should proceed, to future proof that reality and any proposed housing, adding value to both. It does not start with some fantasy estate whose descriptions bear little or no resemblance to the finished product, making continual reference to complementing the existing environment when self-evidently it is completely alien. For instance, selecting minor layout features to justify imposing a standard, one-size-fits-all, layout produced for urban settings into a dispersed rural environment (e.g. citing the prevalence of cul-de-sac development when the main feature of the village is ribbon development).

There are also ludicrous attempts to claim benefits and improvements that will arise from this totally inappropriate imposition and a hallmark of the document is its GENEROUS offers to return to the

village fragments of the space, walks, views and leisure facilities that are currently enjoyed but which will be destroyed by the development that they propose. Moreover, their remarks about consultation are misleading as northern parts of the village were not included in leaflet drops and other communication media, despite being depicted in their submission (page 29). Though less directly impacted, we would suffer equally from the huge loss of environment, chaos of site development, traffic gridlock and infrastructure overload that would ensue should this proposal proceed as planned.

**LEAP** – uses only land not required for building and is tokenistic at best. The juxtaposition on page 80 (showing the tiny proposed LEAP area in part of the development) with the illustration of spacious play areas on page 81, suggesting parity of provision, is cynical in the extreme!

Dubious ‘benefits’ are not confined to structure. It may be of passing interest to note that one new cycle/pedestrian path (page 39) appears to lead straight onto the A56 bypass, while valuable new pedestrian links either already exist (page 42) or are intended to facilitate access for the new development (hardly beneficial for existing residents).

In other flights of fancy **Street Hierarchy** (page 32) indicates continuous local facilities from halfway up Bolton Road to the traffic lights on Market Street (almost a mile). There is one shop on Bolton Road, one pub and half a dozen shops at the mini roundabout nearly half mile further on and then (apart from a café) no other facilities until the north end of the village a further half a mile away.

School Expansion is portrayed as altruistic donation of resources – **it is in the green belt** and already owned by Peel Holdings. Additionally there is no mention of contribution to the main capital (and revenue) expenditure entailed in such extension. The situation regarding other infrastructure pressures, e.g. NHS services, is dealt with – by a deafening silence!

### **Traffic survey**

The situation regarding increased traffic flow – both within the developments and through the village remains deeply concerning and is totally unaddressed in this document. Reliance on the deeply flawed traffic survey by Taylor Wimpey submitted in the first proposal (subsequently partially updated but with little more accuracy) and Northstone’s contribution (including the proposed Green Belt community car park) take no cognisance of the lived reality – particularly at school drop-off and pick-up. **Any** interruptions to normal traffic volume, e.g. road works, bypass obstruction, construction work (housing on Rochdale Road!) bad weather, vehicle breakdown or large vehicles can and does cause traffic paralysis as witnessed by residents on a regular basis (with photographic evidence).

The Market Street access/junctions and consequent traffic flows on, both north and south, have not been accurately assessed – let alone mitigated by these proposals and their own survey showed that capacity at the mini-roundabout junction would be exceeded. (Meanwhile their survey at the northern traffic lights junction referred to Guide Court at the A6! The cut and paste methodology of the document becomes explicit!) Appendix C, cited as supporting their claims has five paragraphs basically saying it will all be fine and that their assessments confirm this. It concludes:

ADDITIONAL INFORMATION IS CONTAINED WITHIN A SEPARATE, DETAILED HIGHWAYS NOTE. It would useful to have this **note** available to stakeholders.

## Summary

It is worth noting that a (presumably) unintended consequence of the document is how implicitly it confirms all the main points that objectors have been making since Taylor Wimpey first went public. All the evidence demonstrates conclusively the overwhelmingly rural and open nature of all aspects of existing village facilities as shown in the accompanying photographs (e.g. pages 27, 33, 35, 69, 70 and 73). Whereas the visual information relating to the proposed developments (limited though it is) is precisely the opposite showing their oppressive, cramped, constrained nature (pages 10, 23) – even in the diagrams describing the traffic (e.g. pages 48, 49). Most telling, perhaps, is the acknowledgement of what lies in store for Edenfield and implications of the village becoming a building site for a minimum of seven years as demonstrated by the photos on pages 56 and 57.

The urban ‘pick-and-mix’ from major house-builders’ repertoire, masquerading as bespoke design and attempting to ‘greenwash’ the resultant mediocrity, does not disguise the cut-and-paste imposition of a tired, sterile and totally unimaginative development which it is insulting to call a

“vibrant residential area which architecturally reflects and compliments the positive characteristics of Edenfield”.(page 10)

Dr Ann-Marie Coyne.

Michael J Coyne.



The Occupants of

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

Friday, 07 June 2024

Rossendale Borough Council

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

**Edenfield Masterplan/Design Code V4**

Dear Sirs,

As we write yet another letter to you to object to the proposals laid out in the Edenfield Masterplan we find ourselves exasperated that yet again the proposals still don't meet the requirements of the Local Plan.

We can only conclude that Rossendale Borough Council by keep consulting on the plan for site H66 are willing to ignore the content and recommendations of the Local Plan and hope that the residents of Edenfield will become tired of making the same objections. We will not.

So yet again, we raise our objections as follows:

The vehicular access to our property is via a cul-de-sac off Highfield Road. The parking proposals that have been submitted to support this version of the plan do not consider the existing Edenfield residents nor does it take into account the already serious traffic and parking problems that exist in our village. Introducing parking restrictions on Market Street, Exchange Street or Highfield Road will have a serious impact on those residents and those of the surrounding areas, like ourselves. Not all houses have the luxury of a drive to park their vehicles, this then forces them to park on the road. 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 our 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.

Any plans to make Exchange Street a one-way system is 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. We are 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 safety of the residents of Edenfield Village, 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. In addition to this we note there are still no plans regarding the infrastructure of the village – there are still no plans for schools or healthcare provisions.

We are yet to see the traffic assessment for the whole site – again as noted in the Local Plan. Why has this not been carried out?

We repeat our earlier comments, we believe that this is a seriously ill-thought-out Masterplan, still lacking in any detail. This is not a Masterplan for existing Edenfield residents this is a plan with the only benefit we can see is 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. That is until you allow over 450 new houses to be built, declassification of greenbelt land to accommodate it and potentially 7 years of ongoing construction. This alone would shut our village down and devalue our properties.

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  
William Finney  
Kieron Finney  
Kristofer Finney

I wish to register my strong objections to The Edenfield Masterplan V4. I set out below my reasons why the Plan must be rejected

1 Traffic

As I understand it, a proper traffic assessment of the whole site, and a full road safety audit, have not yet been undertaken.

It seems more than reasonable to expect that these must be carried out before the Plan, which will transform the village, is approved and any stringent traffic restrictions imposed on current residents to their detriment.

I am a resident of Exchange Street and I am particularly concerned about the effect the implementation of the plan will have on the large increase in the traffic flow through the village, and especially down Exchange Street and Highfield Road.

Exchange Street is very narrow, and not suitable to be an access road to the new houses. Parking restrictions in the street will disadvantage not only the residents, but also the businesses on Market Street whose customers often park their cars in the street, dog walkers, who drive to Exchange Street to use the recreation field to walk their dogs, and parents who drive to the street to bring their young children to use the swing park and the pump track.

2 Infrastructure

The local area cannot support the increase in population and cannot currently provide the necessary school places, public transport, and access to GPs and other healthcare, which will be needed. Plans for how these services will be fully provided must be clear before the approval of the Plan can be contemplated.

3 Greenbelt

The proposed further release of green belt land is not aligned to the RBC Local Plan and will have an adverse effect on the environment, the local ecology, and water drainage.

The commitment of all developers to provide compensatory green belt measures must be in place before the Masterplan is approved.

4 Flood Risk

The increased risk of flood is not properly considered in the Plan and must be addressed before Plan approval.

5 Phasing of Building Work

The simultaneous development of the two main sites by Taylor Wimpey and Peel, will lead to upheaval in the village with traffic congestion, noise and safety concerns.

6 The Equality Impact of the Development

Current residents of Edenfield will be subjected to major change and life will not be the same following the proposed development of the village.

The development of the H66 site must not be done to the detriment and discrimination of existing residents. The provisions of The Equality Act 2010 must be observed to ensure that discrimination is eliminated.

Lesly Spurrell

[REDACTED]  
[REDACTED]

Dear Sirs,

I would like to raise my objection to the Masterplan for Edenfield.

The current infrastructure we have absolutely would not support any further traffic running through Market Street not only that we already have issues with parking to the point where one neighbour frequently gets into screaming matches with people if they park outside his outside. I can only see parking and traffic becoming absolute horrific unless other plans are put in place to divert traffic off Market Street.

Laura Brooks

[REDACTED]

Sent from my iPhone

Please accept this email as my letter of objection against the Edenfield Masterplan V4 and ensure that it is registered.

The Occupant of



Friday, 07 June 2024

Rossendale Borough Council

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

**Edenfield Masterplan/Design Code V4**

Dear Sirs,

As we write yet another letter to you to object to the proposals laid out in the Edenfield Masterplan we find ourselves exasperated that yet again the proposals still don't meet the requirements of the Local Plan.

We can only conclude that Rossendale Borough Council by keep consulting on the plan for site H66 are willing to ignore the content and recommendations of the Local Plan and hope that the residents of Edenfield will become tired of making the same objections. We will not.

So yet again, we raise our objections as follows:

The parking proposals that have been submitted to support this version of the plan do not consider the existing Edenfield residents nor does it take into account the already serious traffic and parking problems that exist in our village. Introducing parking restrictions on Market Street, Exchange Street or Highfield Road will have a serious impact on those residents and those of the surrounding areas, like ourselves. Not all houses have the luxury of a drive to park their vehicles, this then forces them to park on the



road. 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 on the footpaths. 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 our 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.

Any plans to make Exchange Street a one-way system is 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. If this goes ahead will you then put double yellow lines on Highfield Road and Eden Avenue to facilitate the new houses? Is there any thought or consideration in this plan for the people who already live in Edenfield and on these roads where you plan to ban parking? We are 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 safety of the residents of Edenfield Village, 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. In addition to this we note there are still no plans regarding the infrastructure of the village – there are still no plans for schools or healthcare provisions.

We are yet to see the traffic assessment for the whole site – again as noted in the Local Plan. Why has this not been carried out?

We repeat our earlier comments, we believe that this is a seriously ill-thought-out Masterplan, still lacking in any detail. This is not a Masterplan for existing Edenfield residents this is a plan with the only benefit we can see is 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. That is until you allow over 450 new houses to be built, declassification of greenbelt land to accommodate it and potentially 7 years of ongoing construction. This alone would shut our village down and devalue our properties.

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,

Deborah Kenyon

Sent from my iPhone

To whom it may concern

We object to this latest version of this planning application.

There are still no acceptable solutions to the increase in traffic that this small (at the moment) village will have to endure.

The safety of all residents will be at risk.

No acceptable parking provisions have been made for all those residents of Market Street - who have always parked outside their properties - what about the disabled and frail who live there?

There seems to be a very small number of spaces provided in the plan - no where near enough for these residents and certainly not adjacent to their homes.

Given we are all being 'encouraged' to have electric vehicles - where are these people supposed to charge them?

The increased traffic will be a danger to pedestrians - especially those children walking to Edenfield primary school.

There are two 'pinch points' - one at each end of the village which at busy times are already difficult to negotiate - this will be nigh on impossible.

Turning right out of Gincroft Lane into Market street is already a risky manoeuvre due to the volume of traffic - again this will be nigh on impossible.

Who is going to implement the parking restrictions because no one does now.

People park on the double yellow lines and in the zigzags at the zebra crossing now and no one (LCC or the police) do anything about it so how is it going to be different once we have all this extra traffic?

This application is badly thought out and too big for our village.

We object in the strongest terms

Carolyne and Paul Williams

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██████████

Sent from my iPad

I wholly endorse and support each and every objection set out by the Edenfield Community Neighbourhood Forum (ECNF).

It beggars belief that the Rossendale council would sanction such a massive development, completely inappropriate to the available amenities within Edenfield now or within the future. A development which the village community will be unable to cope with without a serious diminution to their way of life and the introduction of a major danger to the environment and indeed the life's of all residents.

The developers fourth attempt to appease the council is driven by the quest for profit, without attending to the needs and protection of the community, now or in the future.

As fairly new arrivals to Edenfield, we as a family experienced great difficulty accessing local services including primary school places, GP and dental registration. The proposed expansion of the village will only make these issues worse, as there are no plans for expansion of the necessary infrastructure. Our personal worry is that our children may end up at different schools in the wider area, rather than the local village school, leading to a disconnection to the community.

Road safety is also of major concern to our family which includes young children and elderly infirm. The through traffic already present in Market Street is at such a level that it poses a danger to all local road users and pedestrians, increasing it is unthinkable. There has been no proposal to address this issue, for example direct access to the M66.

The flood risk and land stability issues, which have been left unresolved are quite alarming. We all know we are facing a climate crisis with more wet and extreme weather and the possibility that we are degrading our defences is a terrifying thought.

Regards,  
Geraldine Sweet

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Regards,  
J B Gray

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

Sent from my iPhone

Please see my Objections to revised Edenfield Masterplan/Design code (ref version 4 or V4) for site H66

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Regards,

Alastair sweet

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Regards,  
Mary Gray

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Sent from my iPhone

Dear Sir/Madam

I am writing to object to the above updated Taylor Wimpey (TW) planning application for the following reasons, my previous objections still standing:

The UK is one of the nature depleted countries in the world (<https://naturaleland.blog.gov.uk/2023/09/29/state-of-nature/>). Rossendale council need to support biodiversity and finally take a stance by not granting this planning application on these green sites and ensure that best use is made of identified brownfield sites.

The plan still does not include input from all developers so cannot be considered a 'masterplan'. It is evident that the developers are blatantly ignoring this prerequisite and are demonstrating that they are clearly unable to work together in partnership. I simply cannot comprehend why these individual planning applications, causing residents stress to continually have to use their valuable time addressing them, are allowed to continue? What was the point of having this pre-requisite??

There is still no traffic assessment for the whole site. I do not believe that the council or developers fully appreciate the impact and chaos that building works will have on the village. I have to drive frequently through the village daily and chaos always ensues at the bottle neck points at either end of the village; on Exchange Street; and the roads around the mini roundabout on Market Street. The recent development on Rochdale road and the roadwork on Gincroft Lane is evidence of the absolute havoc that residents will have to endure from the heavy machinery and lorries that will be required for this development, plus the increased traffic through the village from the additional homes. There is a strong potential for safety issues for non road users of the highway not to mention damage to parked cars (of which I have had personal experience). I envisage the centre of Edenfield coming to a standstill with patience wearing thin and tempers rising. It is obvious that developers do not care but is this really what the council wants for its residents?

Sickeningly, there continues to be direct and indirect discrimination towards current residents because of parking restrictions on Market Street where residents, many of whom are frail and disabled, will be prevented from parking outside their homes. There has been no equality impact assessment to eliminate this discrimination or consideration to protected characteristics under the Equality Act 2010. The unfairness of expecting those affected to have to walk from designated alternative parking on site to their homes possibly with children and shopping in tow is clear to anyone with any intelligence or common sense. That is assuming that there will even be the space for them there! Unless it is monitored it is likely that residents of the proposed site and visitors to the village will take advantage of the parking. Will the proposed alternative parking take into consideration parking for visitors to the affected residents? Most people like to be able to park close to or near to their homes as I am sure you would agree. Parking restrictions may also have a negative effect on local businesses leading to their potential closure and consequently affecting the local economy.

Development remains cramped with limited green and landscaped spaces within the site and so continues to ignore recommendations in the Places Matter Design Review report.

Flood risk and land stability issues have not been resolved with the SUDS drainage pond close to the A56 continue to pose serious road safety concerns highlighted by National Highways.

Proposed further release of greenbelt for the school, play area and car park north of the village is not aligned to the local plan and will have further adverse effect on ecosystems, biodiversity, water drainage and safety issues.



This masterplan and design code is not in keeping with the National Planning Policy Framework outlined in the Design Code document and it is both sad and very disappointing that TW have paid little consideration the Design Code put forward by ECNF and ultimately the community voice.

Rosendale Council, please do not allow the concreting over of any more beautiful green sites across the borough be your legacy.

Janet Smith

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██████████

As a resident of Edenfield living on Market Street for the last 30 years I am writing to express my objections to the proposed development to the site 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 this proposal development is unbelievable. 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 in total on what is or was GREEN BELT LAND. Who are the elected official who voted this scheme through the Council meetings. None of Council member who actual lives in the village of Edenfield will have voted for this development that's for sure. The implementation of this development proposal will ruin the lives of all the people who currently live in this village for ever more. Councillors are elected to safeguard the quality of life of the people who live in the Borough of Rossendale. The current elected Councillors have voted to blight the lives of all the residents of Edenfield. This is unacceptable.

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.
- There has been **NO TRAFFIC ASSESSMENT FOR THE WHOLE SITE.**
- Double yellow lines proposed on Market Street and Exchange Street and restricted parking from 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
- 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
- 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.
- 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.
- Pavements not wide enough – to ensure safety of pedestrians should be 2m wide

Peter Haworth

[REDACTED]  
[REDACTED]

Sent from [Mail](#) for Windows

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Valerie Haworth

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Sent from [Mail](#) for Windows

Good Afternoon,

I would like to submit objections relating to v4 of the Edenfield Masterplan (H66 Masterplan & Design Code) on behalf of myself and Nadia Krasij (cc'd in this email). I noticed the objections we sent in November were not included in the published responses document later the same month, nor that we have received recently either an email or letter to our address [REDACTED] [REDACTED] telling us about the publication of the latest masterplan, so would be grateful if you would confirm both receipt of this email and its objections, and also that they will be published and taken into account. To aid this I have tried to include the most pertinent objections in the body of this email.

### *This is Still Not a Masterplan*

We note again that the masterplan is largely a Taylor Wimpey-based proposal. It makes assumptions on behalf of the other developers, and so we assume they have not been consulted nor agree to be represented by this document. For example the proposed design constraints in the 'area types' specification appendix for Peel / Northstone in 'Edenfield North' may not reflect Peel / Northstone's current thinking based on their standalone planning application for the area and the resulting feedback, and on the phasing of building works. There is barely mention of Richard Nuttal's intentions. The Masterplan has also not taken into account any responses from the independent application made by Peel / Northstone in 2023 which could have informed the new version.

The Masterplan also assumes the council would approve the release of further greenbelt land for a car park to be built by Peel / Northstone, but then assumes the car park is available for the community generally whereas Peel / Northstone's application assumed primary use of this car park for school-related traffic at school drop-off and collection times. These assumptions are conflicting; it may well be the case that the car park is consistently full of displaced cars belonging to residents of Market Street whose on-street parking provision has been removed as part of the traffic proposals, and so the car park might not be available to parents and teachers anyway. And, rather surprisingly, it appears the Masterplan also considers the proposed car park to be a 'local area for play' (in a diagram in the latter part of the plan document). I don't believe we would like for car parks to be considered as playgrounds as a general rule.

### *Considerable loss of Green Belt land; change to Government policy*

We would like to highlight again the change in Government policy regarding mandatory building targets, acknowledging the upcoming general election and resulting Government may again review policy. 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. This becomes even more pertinent when further green belt land is proposed to be reallocated, against current council approval, to support a car park and possible school extension. H66 should be withdrawn in its entirety for the council to reconsider its appropriateness as a whole because the proposed greenbelt land designation differs from that originally approved.

Community / Car Park ("Edenfield North")

There is no justification for removing land from the greenbelt to provide a car park in support of this application. We strongly disagree this meets the requirements set out by Planning to support further loss of green belt. 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, and then base building phasing and occupancy schedule proposals and dependencies on its completion.

National planning policy allows for the removal of land from the greenbelt 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 can be used for such an amenity rather than requesting additional land.

We also note that V4 of the Masterplan seems to indicate a financial contribution may be required to secure the land for the car park (unlike (potentially) that which 'might' be released at nil charge for any primary school expansion):

"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.**

It also 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 (at nil charge to the Local Education Authority) will be subject to evidence of need and through developer/land owner contributions in a proportionate basis based upon the size of their development to ensure the developer/land owner hosting the school expansion is not disadvantaged"

Clearly any public monies going as 'compensation' to landowners / developers to 'pay' for land to be lost from the greenbelt (if the council approves such a request) and become a car park as part of this development is unjustifiable. All costs, including any relating to 'loss of land' or perceived 'compensation due', should be borne by the landowners and/or developers in full.

Specific concern relating to SUS / Drainage for the proposed Car Park field

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, and Rossendale Planning department, can no longer say they are unaware, following the publication of letters from appropriate authorities on the same as part of the recent Peel / Northstone application and the photographs and films I have sent in in previous objections, 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 previous 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 mention of this issue whatsoever in the new masterplan submission and therefore no provision or consideration (nor Peel / Northstone's own application) regarding new drainage works to remediate this. Indeed the planning comments, and feedback from the relevant authorities relating to existing culverts and SUS-related works, note that culverts should not be lost in this manner. Therefore it seems highly improbable the car park could be built on this field without losing the culvert and therefore breaching this condition. I restate this will considerably increase the risk of flooding existing homes; consideration of this is not mentioned in the Masterplan, nor explicitly mentioned in conditions set out by Planning to force developers to address this issue.

We also note the responses and conditions, and want to restate our own concerns, generally regarding SUS and any works in proximity to the A56.

### Traffic Assessment

The Traffic assessment was done in April 2023 and contains flawed assumptions which leads to flawed conclusions, nor does it consider the impact of the proposed "Edenfield North" car park on traffic flow. In particular the traffic assessment document states "It should be noted that the route planning software indicates that, for the TW and Northstone sites, development traffic travelling to/from destinations to the north via the A56 would access the A56 by travelling north along the B6527 to the A56/A680 junction rather than via the Edenfield roundabout.". The 'route planning software' is incorrect; manual observations will confirm the opposite is the case and that residents travel south through the village before joining the A56 at the junction beyond the Red Hall.

Additional delays caused by the introduction of this car park (assuming it is primarily intended for use by school 'traffic' at school peak times), 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 in the current Masterplan. 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. And of course an expanded Edenfield Primary school would increase car volumes by up to the same amount as new child places and additional teaching and support staff. It would also discourage parents and guardians from looking for alternative, greener, modes of transporting their children to school.

### Infrastructure

#### **Education**

Whilst the application does now make mention of the scale of the development and expected population increase on local infrastructure, we note the response from the education authority with their concerns around costs relating to Edenfield CoE Primary school expansion, and the lack of any consideration or provision to contribute to the necessary expansion of secondary education.

#### **Healthcare**

With the exception of the chemist, there are no medical facilities in Edenfield. The Masterplan continues to fail to 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. We note Planning conditions do not appear to consider this and would ask that general utility service provision also be examined by Planning.

Thank you for reading our objections to V4 of the Edenfield Masterplan and we look forward to confirmation you have received them.

Yours sincerely,  
Karen Farquhar and Nadia Krasij.

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

**Dear Sir**

Whilst the current version of a Masterplan/Design Code, provides further information than previously, it is still far from acceptable as to “support development within allocation H66 of the Rossendale Local Plan” nor does it “fully address criteria 1 and 2 of site specific Policy H66” as quoted on Page 6 of the document. There are still issues that have not been addressed and contradictory information is still included. Therefore our previous comments are still valid.

The comments below are the reasons why it is suggested that RBC should not accept the current version of the Masterplan/Design Code.

**Masterplan/Design Code**

The whole document still seems to be Taylor Wimpey led. There are no statements from the other 4 developers to say what, if any, involvement they have had.

**Vision**

**Page 10 to 12**, it is difficult to relate any of the hyperbole in the statements on this page or to the photographs included. None of these relate to any area in Edenfield.

**Context**

**Page 14**, Sub heading NPPF, The bullet points made do not seem to have been taken literally and have been adapted throughout the document to suit the needs of the developers without recognising the existing village context. Paragraph 1.34 states that “*development that is not well designed should be refused*”. It is imperative that RBC should heed this statement and refuse the Masterplan.

Sub heading PPG, The bullet points here are also contradicted throughout the document and have been interpreted by the developers to suit their needs.

**Local Planning Policy**

**Page 16**, sub heading Policy H66

Paragraph 3. “*A Transport Assessment is provided demonstrating that the site can be suitably accessed by all users, including disabled people prior to development taking place on site.*” There has been no confirmation from LCC that the site access points can be suitably accessed. LCC have already determined that this is not the case in the Alderwood application, that this site can only be accessed via the central parcel of land and not via Market St. Therefore this statement is invalid.

3ii Reference is still being made to the “Rawstron Arms” Presumably this should be the “Rostron Arms”

All the other numbered paragraphs are still unresolved and further information is required.

**Page 18**, Edenfield Neighbourhood Plan, This does relate to the amendments made to the plan, which now incorporates future developments in the area. However it would seem prudent for developers to acknowledge, in their design code, that retaining the open and rural character of the area is essential and that the construction of approximately 400 houses does not mean that 400 houses have to be built, in the smallest area as possible.

**National Model Design Code**

The information contained in this heading says that the NMDC refers to Urban Design. This is another contradiction, as in other parts of the Masterplan Edenfield is described as an area of “*rural characteristics*” Does the NMDC still apply? This seems to be the developers choice of suiting their needs, to confirm their piecemeal approach to the design of their houses from a bog standard catalogue even though RBC have requested a more rural approach, which is more in keeping with the existing dwellings.

**Wider Best Practice in Urban Design**

**Page 20**, The previous paragraph refers referring to the concept of Urban dwellings. The accompanying photographs do not bear any relevance to what is being proposed in site H66.

**Stakeholder Engagement**

Yet again this section presents a glowing description of Taylor Wimpey engagement with local residents. Previous comments have been made by numerous residents that this is whimsical, to say the least.

**Westward views from B6527**

**Page 26**, The first paragraph, the first line *“The B6527 is generally developed on both sides with terraced buildings which limits most outward views”* is disputed. Living on the west side of Market St the current views of Peel Tower continuing to The Tor are visible at all times (other than foggy or extremely heavy rain). The photographs accompanying this page relate to the views referred to.

### **Non Vehicular Movement and open space**

**Page 34**, paragraph 3, The pump track at the proposed entrance to the Chatterton Hey site has still not been included as a recreation site. Nor is there photographic evidence produced.

### **Masterplan – 02**

#### **Green and Blue Infrastructure**

**Page 43**. The second paragraph states that the existing vegetation along the A56 boundary will remain and be enhanced to create a defined Green Belt boundary, to prevent encroachment of development into the lower slopes. Really? The lower slopes are the embankment to and including the A56 bypass.

Page 43, The map shows, at the southern end, where the proposed SUDS pond will be located. However it does not show the pump track or how close the SUDS pond will be to a children’s play area.

#### **Vehicular movement**

It is stated that land at Alderwood can be accessed via Market St or via the central parcel land. This is incorrect, as stated above, access via Market St is not possible and has been determined by LCC.

There is no information to show how an emergency access point into the Chatterton Hey site can be controlled.

#### **Off site highway improvements**

The introduction to this proposed improvement scheme only states the off-street parking provision for the Taylor Wimpey site. The provision of circa 8 spaces is whimsical. It is proposed to provide 13 spaces of which only 5 are deemed to be necessary for displaced residents. This does not account for vehicles that park kerbside in front of numbers 88 & 98/100 Market St. On the west side of Market St, it is proposed for yellow lines in front of the existing dry stone wall and the proposed pedestrian crossing will remove parking from the east side of the road referred to above. There will be 16 legal parking spaces lost in this area. To use “displaced parking” is a nonsense, as numbers vary day to day, especially at weekends, when all these spaces are used by visitors to residents and the Coach, when they host parties (Birthday, Anniversary etc). Therefore it would seem appropriate that the number of spaces lost should determine how many spaces are needed.

There is no information regarding off-street parking to be provided by other developers. The statement that this information is to be confirmed through subsequent planning applications, confirms that this is a Taylor Wimpey produced Masterplan and does not constitute a Masterplan for the whole of site H66.

There is still too much information needed and *“details to be agreed”* is not acceptable as a comprehensive Masterplan.

**Page 47**, How are the proposed painted speed cushions along Highfield Road justified? The residents of Chatterton Hey could turn right from Highfield Road onto Eden Ave to avoid them. Like wise residents travelling North would have to turn left onto The Drive to access Bury Road, Market St.

**Page 48**, It is noted that the proposed car park on Burnley Road is no longer laid out into spaces. Nor is it stated how many spaces are to be provided. As this land is still Green Belt, there is no information as to how the land can be removed from the Green Belt. The assumption is that RBC will allow the land to be built on as there is no alternative plan to accommodate the loss of 58 parking spaces. Again this would suit the developer as the necessary land would not be taken from their development, so reducing the number of properties to be built. Can the removal of further Green Belt land be justified?

**Page 49**, The proposed car parking spaces of 13 are not sufficient, as stated above, as 16 parking spaces are to be lost on Market Street, along where the existing dry stone wall, on the west side of the street and 5 on the east side of the street, in front of dwellings numbered 88 & 98/100 Market Street. As the spaces are to accommodate displaced residents of and visitors to Market St and service 238 dwellings on the new development, although the Local Plan stipulated that parking for displaced Market Street residents should be safe and secure,

it is obvious that there are insufficient spaces. The design of this car park is unacceptable, parallel parking in a horseshoe is ludicrous. On a dark, frosty winters night with only low level lighting is a disaster waiting to happen. Not all vehicles have park assist. There are no details as to size of the spaces. Do they meet the necessary length and

width required? There are no spaces for disabled drivers, who require extra length and width of a parking space in order to load and unload a wheelchair. The use of low level lighting will result in dark areas surrounding the parking spaces will make it unsafe for vulnerable, partially sighted and elderly users.

The 3 properties proposed on field are no longer shown. Are they no longer going to be built?

It is noticed that Pilgrim Gardens and the 4 properties facing Market St are still not annotated on the map.

On the west side of Market St the H road markings are still shown at number 47 Market Street, Dean Close and number 21 Market Street. Should these areas also have yellow lines (if approved) in order to afford the residents thereof the protection of the traffic laws.

Exchange Street, as it is proposed to make this street one way, is it necessary to put yellow lines in front of properties number 8 and half way in front of property no 10. The opening adjacent to number 8 is only an entry/exit to the community centre and rarely used. Traffic exiting will only need to look left. The proposed yellow lines in front of number 15 and half of number 13, the opening adjacent to number 15 is only used to access a garage.

The proposed car park on the Chatterton Hey site is to provide 10 -12 spaces. This does not cater for all the lost spaces currently available on Market Street and Exchange Street. There are 17 spaces on Market Street which will be lost (where parking is to be restricted until 6pm. Add to this 4 spaces on Exchange Street (Yellow lines in front of number 8-10 and 13-15, plus the loss of 4 spaces, where yellow lines are proposed from Highfield Road to the entrance of Chatterton Hey. This is a total loss of 24 spaces currently available.

The yellow lines proposed on the west side of Market Street are concerning, as the footway is narrow, it will mean pedestrians will no longer have the buffer of parked themselves between themselves and the flow of traffic. It is a well known fact that exhaust fumes have a detrimental affect on young children, particularly in pushchairs, who are lower to the ground and more in line with vehicle exhausts. Exhaust fumes are the main cause of Asthma In children.

### Landscape-Led Masterplan

**Page 54.** Paragraph 4 quotes *“The Masterplan will deliver approximately 400 new homes for Edenfield, set within a strong landscape structure and characterful village setting.”* Under the heading “National Model Design Code” reference is made to the Urban concept of design, which does not relate to a village setting. Yet another contradiction.

### Phasing – 03

It is still unclear as to how several developers within the site propose to construct with minimum impact on the existing residents and causing further disruption on the existing infrastructure. It appears that more than one developer could be constructing simultaneously.

**Page 63.** Tear 25/26 *“...removal of on-street parking on Exchange Street”* Does this mean all parking on Exchange Street will be removed, prior to construction commencing? If so where is the plan to accommodate the vehicles of existing residents.

The overall build programme estimates 50 dwellings in years 26/27 and 33/34 and 60 in the intervening years. There is no information to determine how this will be achieved or which individual developers will deliver houses in which year. Their terminology of the statement would suggest there will be more builds than “estimated”.

The maps on pages 64 – 68 are not very helpful.

### Site Wide Codes

**Page 82.** The promotion of travel by public transport, walking and cycling is incomprehensible.

GP surgeries and Hospitals are mostly not accessible on a direct bus route. For unwell patients, walking and cycling is unthinkable.

As it is not proposed to expand local schools, travelling to schools 2 miles away is not ideal walking or cycling with 4/5 year old children and direct bus routes are not available to the recommended schools. The existing bus network is intermittent and makes it difficult for users to plan journeys.

**Page 90.** General built form, suggests the principles of urban design. How is this acceptable in a rural setting? It seems that Taylor Wimpey can't decide whether Edenfield is an urban or rural concept. They plan to build houses based on an urban design, with density, massing, height materials etc, but promote the development as being in a rural setting.

### Page 91. Homes and Buildings.

Paragraphs 1,2 and 3 are contradictory, as the proposed development is not well designed, nor are the house types a high quality design or innovative. *“There should be a range in the design of dwellings across the development and it*

*should not just feature standardised house types which could be found in any location*” seems to have been missed by the designers in their planning application.

**Area Types -05**

**Page 96.** The table on this page is interesting, does the *“Reasoning and influences”* relate to the current residents of Market Street or the new residents of the development, specifically referring to the *“glimpsed views”* and *“distant views”* to distant hills. This is a nonsense. The only views Market Street residents will have will be of bedroom windows and roof tops.

**Page 98.** We are now proposing *“Village Streets”* residential areas not *“Urban Streets”*. Very confusing. Is Edenfield a village area or an urban area?

**Page 101.** Is the photograph of *“Potential contemporary buildings”* really appropriate to the area surrounding Chatterton Hey?

**Appendix B – Design Quality Checklist**

In our opinion, none of these questions in the checklist have been answered.

Whilst we appreciate the need of more housing, the proposal to build 400+ dwellings on the land designated site H66, would result in a suburban housing estate, rather than enhancing the concept of a rural village. In light of the above comments, we respectfully request that the Masterplan referred to be rejected.

Margaret Filkins and Gordon Worth



Hi,

I would like to propose my objection to the development in Edenfield, which I now believe it on iteration four (V4)

The nub of this is that the addition of half a thousand houses is not met with very broadly speaking an infrastructure plan that matches in any clear way.

Both during and post the development the traffic which is already bad, will get significantly worse which is bad currently anyway.

There will be significantly increased pressure on a healthcare infrastructure, which already isn't sufficient in Edenfield.

A small school would seemingly need to near accommodate for a doubling in size?

None of the publicly available information including the design code appears to acknowledge the concerns of existing residents, nor actively address their concerns as such.

Yours sincerely

Christopher & Lois Turner,

██████████  
██████████

Dear Sirs .

I am writing to express our concerns over the proposal to build over 400 new homes in the area west of Edenfield your site H66 .Whilst we appreciate the need for more housing we however feel that the proposal for so many houses will be detrimental to the residents of Edenfield and to the village .We do not see how the road layout can accommodate say just one car per household without bringing the village to a vehicular standstill .The houses in the village were not built with garage space so residents are forced to park on the street . When the bypass is closed which happens on a fairly regular basis due to accidents Edenfield acts as the relief road for the bypass and consequently the village becomes a no go area . The residents from the new development would find it impossible to get their vehicles off the proposed site normally never mind if the bypass is closed .

The number of contractors vehicles accessing the site during the seven year building programme will also cause major problems for residents ,for the existing bus services and to the traffic using Market Street to access the route to Rossendale and Burnley . We also notice that it is a possibility that two different building projects by Wimpey and Peel will be carried out at the same time as John McEnroe said "YOU CANT BE SERIOUS " It will mean that the existing residents will need to find alternative areas in which to park their vehicles .Surely this cant be right and many of the residents like myself are not in the first flush of youth with many residents having poor health and mobility problems . I am also sure that there are local By laws and Acts of Parliament covering residents and owners' rights that don't seem to have been considered with this proposal .

Edenfield school which has always provided a good education will not be able to accommodate the substantial increase in numbers that will result from over 400 new homes . The school will need extending which will result in further loss of the green belt . Have you tried to get through the village during school time when the area outside the school entrance again become not only completely blocked but the risk of vehicular accidents and personal accidents is greatly increased The greenbelt has been one of the jewels in the crown of Rossendale and it will be like selling of Rossendale's family silver once its gone its gone for good .Surely there are other brown sites available within the borough to help meet the demand and reduce the number of homes proposed for Edenfield .

With regards to health matters we lost our surgery in the village some years ago and the ability to now gain an appointment to see the doctor is almost an impossibility and we are proposing with this development to add say around another 1000 potential patients . I have not been able to obtain a face to face meeting with my doctors practice for over two years and instead I have to accept a phone call appointment .How are we in all of Rossendale going to cope with an ageing population and a corresponding call for more medical services and this proposal just adds to the demand . I am sure that other concerned residents have raised many more points of concern that we have not discussed here but we earnestly ask you to consider the points raised and we thank you for taking the trouble to read our concerns as we only have the wider interests of Edenfield and Rossendale at heart

Yours faithfully .

Arnold Wilcox-Wood ,Gareth Wilcox-Wood and Ian Fairbrother all of [REDACTED]

Mr and Mrs RJ Barlow

Dear Sir,

**RE: Amended Masterplan and design code in association Housing Allocation H66 ref :V4**

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 8/5/2024 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 failings 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.**

Major concerns have not been addressed and the developers have not provided a traffic assessment for the whole site. The have commented the issues will be addressed by individual planning applications, however it is a requirement of Local Plan state a whole site approach must be used.

- **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. 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( page 65,67 of Master plan submission) 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.

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

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The requirements around the issues of schools and medical GP provision have not been fully addressed.

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This issue has not been fully addressed in the revised version of the masterplan. The details on the SUDS drainage pond located next to the A56 are a cause for concern by residents. National Highways Authority have also raised concerns relating to the issue of road safety in relation to the A56.

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

Your sincerely

GP Hoyle

Mr CJ Hoyle & Mrs GP Hoyle

Yet again I am writing to voice my objections and concerns with regard to the proposed housing development in Edenfield. Another Master plan has been published but very little has changed in that plan. Scant regard has so far been paid to the objections raised by ECNF ,EDCA or anyone else. A major concern is the inevitable huge increase in traffic through the village both during and after the building work has taken place. Two uncontrolled crossing points along Market St will hardly compensate for the increase in traffic.

Another concern is still the proposed parking restrictions on Market St and Exchange St. No consideration is being given to those residents who have no alternative but to park on the road. Providing some parking spaces at a distance from where these residents live in not a satisfactory solution to the problem. It will mean that these residents will have to carry shopping, possibly small children and all their paraphernalia some distance to their home in all kinds of weather, as well as having to cross a busy road!

The H66 Central site entrance itself, both during and after completion of the development, will pose a significant danger to pedestrians, particularly children on their way to and from school. The idea of up to 200 vehicles a day exiting and entering the development is really not acceptable. Market St is a busy road and when there is an incident/ accident on the M66/ bypass the whole stretch grinds to a halt.

The proposed double yellow lines in the centre of the village will inevitably take custom away from local businesses, seriously affecting their future viability.

Making Exchange St one way East to West with added parking restrictions will adversely affect the safety of children trying to access the playpark, the recreation ground and the pump park. Highfield Rd and Eden Avenue will experience a considerable increase in the volume of traffic. These roads are too narrow and unsuitable for such an increase.

With regard to the houses themselves,at least as far as Taylor Wimpey's part of the development is concerned, no consideration is being given to existing residents. The Local Plan,Strategic Policy Env1 High Quality Development in the Borough states among other things: "the scheme will not have an unacceptable impact on neighbouring development by virtue of it being overbearing or resulting in an unacceptable loss of light". However,the houses which Taylor Wimpey intend to build along the eastern edge of their development will not only be directly behind existing properties ( notably 5-8 in Alderwood Grove) but in some cases will actually be higher than them!. Hence these properties will be adversely affected by loss of light, especially as their main living areas face West.

Taylor Wimpey's nod to retaining the character of the village does not ring true,as they are proposing to build a terrace of houses along the eastern edge below Market St. ,which will simply restrict any view across to Holcombe Moor.

Gillian Hulme, [REDACTED]

[Sent from Yahoo Mail on Android](#)



Objection to the Masterplan/Design Code (ref Version 4 or V4) for site H66

The proposed development still raises several concerns regarding its environmental impact, infrastructure, and alignment with local needs and plans

- Increased flood risk and inadequate drainage solutions.
- Potential impact on local water resources due to higher water usage not sufficiently addressed.
- Excessive housing density for the available land, potentially leading to overcrowding.
- Housing design inconsistent with the existing architectural style of the village.
- Insufficient detail on mitigating the impact on local flora, fauna, and biodiversity during construction and beyond.
- Inadequate consideration of the preservation of local heritage sites, particularly views to and from the church.
- Potential loss of existing footpaths and bridleways.
- Lack of clarity on increased traffic congestion and its management.
- Insufficient information on proposed pedestrian and cycle routes, with some contradictory details.
- Need for further clarification on the environmental impact of the construction phase, including waste management.
- Unclear compensatory measures for Greenbelt release, requiring full commitment from all developers.
- Release of additional Greenbelt land for a play area and car park near the school not aligned with the Rossendale Borough Council Local Plan.
- Last but not least a complete lack of detailed consultation with local residents regarding their needs and concerns throughout the process especially on the issues of healthcare and school places.

**Richard Hillel and Gill Hillel**

We are writing to express our objection for the proposed revised Edenfield Masterplan/Design Code for site H66. We feel that many of the previous concerns that we raised in previous objections to proposals have still not been addressed and the plan is a major detriment to the village and its residents.

Having reviewed the masterplan please see the following concerns:

We have serious concerns regarding the traffic, cycle and pedestrian safety particularly in respect of the Market Street mitigation measures, and at the locations of new proposed junctions in the North, Central and South of Edenfield. There is still no traffic assessment for the whole site and no reassurance that the site can be safely and suitably accessed by all users, including disabled people, it being stated this will be dealt with by individual planning applications despite the requirements of the Local Plan for a whole site approach.

The phasing of building works continues to suggest simultaneous development of the two main sites Taylor Wimpey and Peel this highly likely to lead to chaos, exceptional road congestion and safety concerns for the 7 years of construction. The roads can be chaotic and dangerous currently with the number of lorries passing through for the quarries without the addition of further construction traffic. There is not only the issue of danger from vehicles but also the amount of air pollution caused by them. It is highlighted that people, especially children, who live near main flows of heavy traffic are increasingly at risk of lung diseases and related medical conditions. Is this what is wanted for our children?

We feel that the infrastructure required for such a development is still being ignored, particularly issues of schools and healthcare. We have limited resources to gain GP and dentist access as it is without the addition of a further 400 households.

We feel that the Places Matter Design Review report continues to be given very limited consideration, ignoring the community voice and their concerns. This appears to be a development design for the property developer and not the existing residents. Furthermore, the development remains cramped with restricted green/landscaped spaces within the site blatantly ignoring the recommendations in the Places Matter Design Review report.

Flood risk and land stability are a huge issue in the design, we live in a high area of rainfall with a lot of runoffs from the surrounding hillsides, the issues have not been resolved with the SUDS drainage pond located close to the A56 continuing to pose serious road safety concerns as raised by National Highways.

Proposed parking restrictions particularly on Market Street and Exchange Street are ludicrous and would be to the detriment of existing residents. Why are the existing residents being bulldozed out of the way for the new households. The compensatory car parking is unclear as it is marked down as community/visitor parking. Does this mean the existing property dwellers lose all ability to park in their village? This needs clarification as does why there is a need for parking restrictions at all.

As we have noted in our previous objections, we have serious concerns over the equality impact of the development. All measures, in particular the proposal that

current residents are displaced from parking outside their homes, continue to be geared towards the development of the H66 site to the detriment of existing residents some of whom are known to be frail and disabled resulting in direct and indirect discrimination. There is a duty under the Equality Act 2010 to eliminate discrimination yet there is no equality impact assessment or consideration given to protected characteristics.

Negative effect on local businesses and consequently the local economy from proposed parking restrictions, which may result in decreased footfall and subsequently the potential closure of businesses.

We note that the proposed further release of Greenbelt for the school, play area and car park at the North end of the village is not aligned to the Local Plan and will have an adverse impact on the environment/ecology/water drainage and continues to raise safety issues at the already busy junction close to the school.

Given these points, we strongly urge the Planning Department to reject this application and address these substantial concerns before proceeding with any development in the Edenfield area.

Yours Sincerely

Helen and Daniel Quinton (

RBC

I have again look at the next plan for the housing in Edenfield, and I still cant believe you are allowing the building of so man houses in such a small space and so close to a major highway.

These houses are going to be nearly sitting on the Edenfield bypass the major link between Rossendale and greater Manchester. The bypass its self is now to small to handle the traffic from when it was built in the late 70s early80s.

I live at the bottom of exchange street, and I can hear the bypass all the time, I must be 500 yards away. So to live in half that distance wont be good for peoples wellbeing. Fumes as well as noise.

Also I cant understand how you think access to these houses is going to be easy. Market street has been overloaded for years, people want to park outside there own house and this on its own creates a narrow road. They will also in years to come want to charge there electrical vehicles outside the houses on the main road, and by building these houses you will make this even more of a bottle neck. Plus Exchange street, this is a side street and parking is always overloaded, I hear you are talking about putting yellow lines outside peoples houses. This surly is not fair pushing away the ability for people to park outside their own houses, the house that they bought knowing they could park outside. Maybe that's just a rumor. I am not sure.

I can understand to some degree building more houses. But so many No.

This is a lovely country village but you are going to destroy it. I have just this morning walked down Rochdale road, in Edenfield, past a new development The Hawthorns, 9 Houses on a space that used to be 1 house. The 9 houses are nearly touching each other. You as a planning department are responsible for the look of areas and houses and surroundings. Obviously the developer wants to make as much as possible, they dont live in the area, so they do not care. They ask to build 9 crammed in houses and you okay it. The development looks a mess. But who cares.

This is exactly what you are going to do with H66 if you are not careful.

Remember this was a green belt area, somehow its been changed, this in its self is wrong and you should be helping us fright this. Be proud of what you plan. Look back in years to come and be proud of how you help an area look. Dont destroy it.

Matt mead

Morning,

We would like to object to the Edenfield Masterplan (June 2024 version), on the following grounds.

1. There are serious concerns with traffic, cycle and pedestrian safety regarding the Market Street mitigation measures and the proposed new junctions across North, South and Central Edenfield. No traffic assessment has been completed covering the whole site and no road safety audit which is to be dealt with by individual planning applications despite this being a requirement of the local plan and previous recommendations.
2. The phasing of building works suggests the simultaneous development of the Taylor Wimpey and Peel sites which could lead to road congestion, safety concerns and general chaos for the next seven years.
3. There is a proposed release of more greenbelt for the school, play area and car park at the north side of the village which is not aligned with RBC Local Plan. This will cause safety issues at a very busy junction. It will also have a negative impact on the environment, ecology and drainage.
4. There is a flood risk with the SUDS located close to the A56 and this continues to pose a serious road safety concern as detailed in the National Highways objection.
5. The proposed parking restrictions in particular on Market Street and Exchange Street are to the detriment of the existing residents and the compensatory car parking is unclear as referred to as community/visitor parking, this requires clarification as does why there is a need for parking restrictions.
6. There are concerns over the equality impact of the development as all measures are geared towards the development of the H66 site to the detriment of existing residents. It is proposed that residents are to be displaced from parking outside their properties, how will they access their properties with shopping, babies, children and those who are disabled. There is a public duty to to eliminate discrimination under the Equality Act 2010 but there is no equality impact assessment to ensure that consideration is given to peoples protected characteristics.
7. The infrastructure required for this development, schools and healthcare are being ignored.
8. The parking restrictions will have a negative impact on local businesses with a decrease in footfall.
9. The design codes as detailed in the Neighbourhood Plan are not being considered, which is supported by the Places Matter Design Review report. The development has limited green/landscaped spaces which ignores the recommendations in Places Matter Design Review report.
10. The compensatory green belt measures remain unclear and the full commitment to these by all the developers need to be agreed before any Masterplan is approved.

Chris, Adele and Charlotte Hanson



Amy Preston  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

8<sup>th</sup> June 2024

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

Dear Forward Planning

**Ref: Edenfield Masterplan/Land West of Market St/ Design Code (V4) for site H66**

I am writing this letter to express my strong objection to the above proposed development. As a concerned resident of Edenfield, I continue to believe that this development plan poses serious safety concerns and fails to adequately address the well being and needs of existing residents. 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. Serious traffic, cycle and pedestrian safety concerns particularly in respect to Market St. Us, like many local families, walk our young child to Edenfield Primary School and back each day and regularly to the local park. There is no traffic assessment for the whole site and therefore no reassurance that the site can be safely and suitably accessed by all users including people with disabilities.
2. The proposed parking restrictions, particularly on Market Street, would be to the detriment of existing residents including ourselves. We, like many families in Edenfield, own 2 cars in order to commute to work; and rely on street parking for ourselves and our visitors. The proposed compensatory parking arrangements are unclear and do not satisfy the concerns of Market St residents. I have serious concerns over the equality impact of the development as there is a duty under the Equality Act 2010 to eliminate discrimination yet there is no equality impact assessment or consideration given to protected characteristics. Why is there a need for parking restrictions at all? How will these restrictions negatively impact the local businesses in Edenfield?
3. The flood risk and land stability issues have not been resolved either the drainage pond located close to the A56 continuing to pose serious road safety concerns as raised by National Highways.
4. The infrastructure required for such a development is still being ignored, particularly in relation to schools and access to primary healthcare.

I kindly request your acknowledgement of this objection.

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

Amy Preston, [REDACTED]

Good afternoon

Please accept the email as our formal objection to the proposed housing development in Edenfield Village.

The plans for a 8 year long build that would be on both side of our home is very alarming.

The traffic that is currently running through Market St is already a problem for us and we have been personally affected by this ready with several collisions outside of our home and also with damage to our vehicle that we park outside of our home.

We have a teenage son who is Autistic and struggles with Road safety and any further increase to the current flow of traffic is a huge concern in relation to his ongoing safety.

Additionally the proposed yellow lines along market st would remove our parking outside of our property which due to long term chronic spinal problems would create huge difficulties in accessing my property timely and safely. It would also create difficulties in onward sale of our home which we would be forced to consider if development is approved.

The green spaces is one of the reasons we moved to this small village and this proposed development will completely destroy the area we have come to love so much.

I truly hope that Rossendale council supports the views of the village and ensures that these views are being shared with the relevant authorities to prevent this development being approved.

Kind regards

Hayley Fox - [REDACTED]  
Gary Fox- [REDACTED]  
Codaen Fox- [REDACTED]

[REDACTED]

Kind Regards  
Sent from my iPhone

Hi

I would like to support the ECNF objection to the above.

I don't object to some houses being built but the quantity proposed.

When the bypass is closed Edenfield comes to a standstill.

I struggle to park now when shopping in the village, how will I manage when all these houses are built

There are not enough facilities in the village now e.g doctors, shools etc.

The access to the proposed houses are not sufficient.

Regards

Heather Hayden

[REDACTED]



To whom it may

I wish to put in a objection about the planned development in our village edenfield .It's absolutely disgusting you are thinking putting more houses on our green land .The village can't cope with the traffic we have now and the roads are prove thar they are a total disgrace pot holes every where our cars getting damaged .The traffic coming off the roundabout at edenfield think it's brandhatch Accidents waiting to happen especially as they now have a dance school on water lane the traffic is terrible . Please please don't go ahead with this for the sake of our village  
Gail Temple

[Yahoo Mail: Search, organise, conquer](#)

Dear Sir or Madam,

My wife (Janet Irene Desprez) and myself (Jean-Pierre Louis Desprez) long time residents at 9 Moorcroft in the beautiful village of Edenfield wish to register our *continual* and *vociferous* objections to the proposed 'development' of the Edenfield Green Belt building project. Given that none of the important issues have received any proper environmental consideration, we feel that we must again voice our concern on a mere fraction of the prevalent issues:

- the highjacking without consultation of Green Belt area 'taken as read' without local approval
- the impact of greatly increased motoring traffic on an already oversubscribed network. To the point, the permanent congestion of vehicles along market Street (both stationary and circulating) throughout the day. Any thoughts about the 'gridlocking' effect of the slightest congestion on the nearby by-pass' ? Any **achievable** solutions offered ???
- parking facilities in accordance with regulations (e.g. property - already crammed - spaces according to size of buildings)? Any *sensible* overflow spaces planned?
- provision of necessary facilities within walking distance - school(s), dispensary, surgery, creche, care home for the elderly, retail businesses within reasonable access from the new properties etc...???
- further release of Green Belt apparently not subject to tax paying residents approval - not surprising really as the overwhelming answer is painfully obvious.... any comments???
- road safety concerns with increased traffic probably leading to further so-called 'road rage incidents' which implies that children, OAPs and 'ordinary' citizens are not an immediate worthwhile consideration?
- absolute and spiteful ignorance of current residents' wishes and deeply felt concerns.....

The above comments are little more than the tip of the proverbial iceberg. Profit, overbearing intrusion of big powerful money making businesses - property developers in this case - remain in place to the detriment of honest hard-pressed tax-paying Edenfield dwellers. Rest assured that we do not rest our case as futile our objections might seem to the steamroller powers that be. Please feel free to divulge and spread this particular set of thoughts, ideas and objections on any platform which you may find appropriate.

Respectfully yours,

Jean-Pierre & Janet Desprez

**RE: land west of market St, Edenfield (Site H66) - further revised Masterplan and design code Version 4 (V4) (Jun24 )**

**Dear Sirs,**

Whilst we appreciate that the revised Masterplan has included more information and pretty pictures, we still do not think it is sufficiently addressing many of the major issues and concerns of residents that would arise if the council were to give the go ahead to this excessive amount of building of houses within our village.

As I have said before in my letters of objections a document with lots of pictures showing how lovely our village is already, does not mitigate the total chaos that this development would make for **us the existing residents**, for a long period of time. I see little in the plan that would detail how all this building/construction would take place or over what period of time. The design code detailed in The Neighbourhood Plan has been given very little input and mainly ignores the overwhelming Community feelings.

It certainly will not enhance our quality of life which most definitely should be taken into consideration by the RBC and planning officials. Of course they don't live here so it's no skin off their noses if they blight our lives.!!

If the smaller sites of Nuttall, Peel L&P, and Warren (and even the Methodist land although to lose a beautiful meadow in this day and age of conservation is criminal) were the only ones being considered I'm sure objections, (of which there would be some), **would be considerably less**, as those pockets of building would have **far less effect on the village as a whole**, but the large scale central plot being overbuilt will wreck this rural location and put a total strain on amenities schools throughout Rossendale and *already overstretched health services* .

We have read the new Masterplan and do not think that many of the major points we raised in initial objections and later ( full on 3/8/23 and subsequent email of Nov 23 and to Northstone plans Dec 23) have been sufficiently addressed, **nor those of the ECNF who we wholeheartedly support** .

We have noted the responses from several authorities.

In particular I further note:

### **Flood risk management –**

There is no change to Surface Water Management...SO Important in these days of changing climate! There are no details included for foul drainage. Indeed Experts say your document is incorrect as per LCC Flood Risk Management team !.

A SUDS pond so close to the A56 highway is a major cause for concern and what happens when they need to widen the A56... no proper plans.?

**Schools:** there are not enough places at Edenfield and Ramsbottom at Primary level and later at Secondary stage. There is mention of land behind/adjoining Edenfield Primary being transferred **at no cost** to the LEA to extend the school. However, this has no details except to say 'subject to requirements' The LEA want the Masterplan to say what are the specific criteria in respect of both land provision and Building costs... who will pay!!

Plus any extension/enlargement of the school will need more land from green belt, and cause further safety issues at that junction and have an impact on water drainage/environment

No real usable plans for secondary provision I can see.

Then we come to the **major issues of**

### **TRAFFIC/Entry points to site - STILL TOTALLY UNACCEPTABLE on**

**1.Market St. 2.Exchange St, and Highfield Rd.**

**PARKING throughout** the village. Abysmal plans. I see no further regard to the parking problems that already exist **and will be made far worse.**

Who has looked at the **Equality impact** that this highway/roads/parking scheme will have on existing residents?.

Current residents being displaced from outside their own homes, nowhere to park for visitors or health workers visiting patients. Nowhere to park for people to visit the local businesses thereby causing their demise... so we will have nothing left. This is disgraceful.

I will leave my objections regarding the main road through the village and the totally inappropriate and dangerous entry/exit, to others to complain about as I live on Highfield Rd.

Exchange St/ Highfield Rd cannot take extra traffic flow. These 2 Roads are not suitable as an access point. Certainly not for the kind of traffic required for building.

The Masterplan shows one way down Exchange St, which may be feasible but **NOT WITH DOUBLE YELLOW LINES**. This is discrimination.. where can **residents** park? Where can people park to visit the playground/the recreation field?

Plan now shows **traffic calming bumps** down Highfield Rd – Is that because they accept that our narrow quiet Road will become a rat run from your new estate! Not acceptable.

Emergency link from Methodist land into the TW development. No details of how this would work. On the plan it clearly shows a road. How long before that would become a through way.?

Public rights of ways/footpaths/cycleways although marked on plans shows no definite provision or quickest way to get into village or to bus stops mentioned. Is this a full cycle/pedestrian route off the main roads?

In terms of the actual planning 'vision' there are far too many houses crammed onto the areas with limited open/green/landscaped areas/wider roads in, parking areas, tiny gardens etc. If there is going to be some houses make sure they are houses befitting a rural area with space/parking/land.

These are just a few of the many concerns, and we wish to place our objection.

Yours faithfully

Alison Bentley

Keith Openshaw

Hi

I would like to support the ECNF objection to the above.

I don't object to some houses being built but the quantity proposed.

When the bypass is closed Edenfield comes to a standstill. There can be one to two mile queues. In the past it has taken me 45 minutes to enter the village.

I struggle to park now when shopping in the village, how will I manage when all these houses are built? The shops will close down because people will not be able to park.

There are not enough facilities in the village now e.g doctors, schools etc.

The access to the proposed houses are not sufficient. How are forty ton articulated trucks delivering building materials to the sites? Are some buildings going to be demolished? Will the roads take the weights?

People are trying to get plans passed but they don't live here and understand how difficult it is now to get in and out of our village using transport.

Regards

Carl Hayden

[Redacted signature]



Virus-free. [www.avg.com](http://www.avg.com)

Dear sir/Madam

I am writing to oppose the Masterplan put forward by Taylor Wimpey H66 for Edenfield. The objections I want to raise are as follows

1. Traffic. The village at the moment gets gridlocked so often. As we have approx 800 homes in the village at the moment adding a potential extra 400 homes is adding 50% more traffic on to the roads which just cannot cope. The solution to put double yellow lines on Market Street and Exchange St is just so unfair. Where are all the residents going to park? Many of whom are elderly and can't walk very far. It seems so sad that the village has to be totally disrupted for the sake of Taylor Wimpey making a fast buck. Taylor Wimpey have already made it clear they are not bothered by the impact this will cause. I believe they said it was the highways dept problem

Also making Exchange St one way will filter all the traffic through the housing estate of Highfield Road and Eden Ave. children play in these areas and it is going to become so unsafe if the volume of traffic increases so significantly.

Also putting double yellow lines on Market Street will impact massively on the local businesses. If parking is taken away people will not use the butchers, Bakers and fish and chip shop which will ultimately result in the closure of these business if they can't make a living.

2. Drainage. All the extra building will obviously have an impact on drainage. We already have a problem with flooding in Stubbins and Irwell Vale due to water run off from Edenfield. Building work is going to have a severe effect as land that till now soaks up the water, is taken away and concreted. The water run off will significantly increase. Plus any housing built will likely suffer flooding as well. The new development in Ramsbottom off Bury New Road suffers badly from flooding in gardens. Residents are having to spend thousands to try and sort the problem out. I can see the same thing happening in Edenfield .

3. Infrastructure. There is no provision for all the extra population that will occur. The local school cannot cope with the numbers at the moment plus there is no healthcare in the area.

4. Cramped Development. The number of houses proposed is quite frankly ludicrous for the space. The idea that you can increase the village size by 50% in 3 fields seems absurd.

5. Phasing of building works. The plans suggest that building work will take approx 8 years. ☹️ 8 years of dust dirt and filth, Traffic Chaos and noise. This village is too small to cope.

I might sound like a nimby and in truth that isn't the case. I recognise the fact that we need building and if what was proposed was reasonable I wouldn't be objecting. Like I have already stated to increase a village the size of Edenfield by 50% with no thought to the residents is just totally totally unfair

Les and Jan Adams

██████████  
██████████

Sent from my iPhone

## **Masterplan / Design Code for Site H66 Land West of Market Street, Edenfield. Version 4 June 2024**

This latest version is fundamentally the same as previous versions and outstanding issues and concerns are not satisfactorily addressed. Please refer to our previous comments to the last Masterplan, which remain relevant.

Proposals are not evolving, but belligerently pursue the individual developers' own aims. What is needed is a drastic re-think instead of trying to make things fit, regardless of the damaging, unworkable consequences for this rural village. The proposals continue to demonstrate just how unsuitable this site is for such development.

It lacks a coherent holistic approach that best serves the village community in this unique rural landscape with its limited road systems. What we have are proposals for extremely damaging, disjointed mass development that does not relate to the existing village character, does nothing to enhance it, does not function well and does not meet needs.

Essentially this is creating a new town which requires more than this continued haphazard, piecemeal approach.

**There continue to be considerable issues about the Masterplan and Design Code. In summary the proposals are unacceptable.**

**1 ) The proposed Masterplan and Site Codes are inadequate and not fit for purpose :-**

- They do not demonstrate “**a comprehensive development of the entire site**” as required by the Local Plan H66, Criterion 1.
- Information is vague, lacking and misleading making it unworkable and unacceptable
- There is no declaration of ownership or demonstration of commitment by all landowners to engage with the plan, which undermines its authority
- It disregards and dismisses local input which demonstrates a contempt for the local community. Specifically it dismisses ECNF and its emerging plan
- It is not evolving in response to further information or challenges and comments 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.



- **Key areas are not satisfactorily addressed -**
  - 1) **Transport and parking**
  - 2) **Schools**
  - 3) **Green Belt Compensation**
  - 4) **Landscaping within the site**
  - 5) **Drainage for the whole site including existing arrangements with neighbours (eg Alderwood Grove)**
  - 6) **Implementation and Phasing**
  - 7) **Construction - topography and ground levels and engineering solutions**
  - 8) **Mitigation of noise, nuisance, damage and disturbance during construction**

**2) Proposals do not meet a number of National and Local Planning Policies particularly around -**

- **Achieving well designed and beautiful places (NPPF paragraphs 131 - 141)**
- **Effective Community Engagement (NPPF)**
- **Sustainable Developments (NPPF paragraph 8)**
- **Local Plan Policies - ENV1,2 and 3**
- **The 11 main criteria of the Site Specific Policy H66**

**3) Poor Layout, Design and Materials lack adequate consideration for the special character of the village, damage amenity, adversely impact the landscape and community and do not provide for successful integration.**

**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**
- **materials and features do not reflect the local context and are incongruous - red brick housing, large SUDS, high acoustic fencing/bund all along the A56 border, creating a compound, internal brick walls and high fencing, retaining walls, creation of a large junction in the middle of Market Street**
- **the location and nature of the village means it is not a sustainable site for development on this scale and is at odds with any Council aspirations to create sustainable communities**

- does not meet the needs of the ageing population of the area
- focuses on urban principles in a rural village landscape. Area codes refer to 'maximising densities', clearly at odds with this rural village setting
- does not minimise adverse impact with its high build, cramped densities, incongruous building materials and poor layout
- does not preserve the openness, significant views and historic context 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 little green landscaping and open space within the built area of the site
- disjointed layout. The individual sites do not link ; - roads, footpaths and cycle ways do not link with each other across the whole site. It does not integrate well with the existing village
- the site accesses and highways mitigation measures, including the loss of further green belt, are unworkable, damaging and unacceptable
- 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, agricultural land and wild life habitats
- loss of a high quality open space.

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

\*\*\*\*\*

## In Depth -

### 1) The documents are inadequate and not fit for purpose :-

**“a comprehensive development of the entire site is demonstrated through a masterplan....” Site Specific Policy H66 1**

- Lack of clear information renders it unusable. It is too vague and open to interpretation. It has flaws, is misleading and makes claims that are unsubstantiated, which devalues the basis on which they are made.
- 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.
- There is too much reference to ‘potential’ which is neither helpful nor useful. Often these are just ideas and are unrealistic. Examples include -

The ‘potential’ pedestrian and cycle access route connecting Taylor Wimpey site in the north west corner to Church Lane has no basis as the land is not owned by Taylor Wimpey nor any of the developers.

The ‘potential’ vehicle connection at Alderwood ( alternative access from Market Street ) ignores the views of the Highway Authority which did not support the planning application for access for 9 properties at Alderwood.

- 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.
- The Masterplan specifically disregards the ECNF, its emerging plan and the work of its agents AECOM. *“This has only been given limited weight” page 21.*

- 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 134. - Not demonstrated**
- It is not evolving in response to further information or challenges and comments. Significantly the reduction in developable land (Taylor Wimpey site) has led to an increase in density rather than a proportionately reduced number of dwellings.

## **1) Key areas are not satisfactorily addressed -**

### **1.1) Transport and parking**

**The proposals for traffic management and parking are unacceptable and unworkable.**

#### **Roads and Access proposals.**

- New access roads. The high number of new access points in close proximity on a short stretch of the main road through the village, will lead to chaos and increased risk of accidents. The 4 new access points (TW site, Alderwood, Peel, Mr Nuttall) are within a short distance of each other all on the west side and some are near a signalised junction. In addition the proposed car park near the school will just add another access point and add to the chaos, particularly at school times. Also the access point for land east of Market Street, H65 must be considered.
- The Highways Authority has already indicated that the access to land at Alderwood cannot be supported because of its proximity to the existing junction at Alderwood Grove.
- It is already difficult to turn out of Alderwood Grove so with increased volume of traffic it will be a nightmare. A lot of people currently use

Alderwood Grove for parking and for turning round so this affects a not insignificant number of road users.

- **Access using existing roads** The attempt to justify access to the Methodist Church site using unsuitable existing side roads, through a housing estate is dangerous and adds to the dysfunction, with its one way traffic on Exchange Street and speed bumps, well known for their ability to increase pollution as cars accelerate away.
- **Traffic Flow** through the village is a significant problem particularly at peak times which will be exacerbated with the increased traffic generated by such a huge development. As well as the pinch points at either end of Market Street there is a significant restriction of traffic flow down Bury Road from its junction with Bolton Road North which will grind to a standstill with the additional volumes of traffic. This route is used for traffic to and from the M66. There is only direct access to the motorway network in Edenfield for traffic heading north on the A56.
- It seems inevitable that many of the proposed properties will be occupied by commuters and leisure users to Greater Manchester who will access the motorway system via the M66 by travelling south to Junction 1 (Ramsbottom). The impact of the proposals has not been fully assessed including at Junction 1.
- **Proposals to cope with additional traffic from the site rely on a range of unsuitable measures including extensive prohibition of parking, diversions, new road layouts and junctions, all with significant adverse impact on the existing village and its residents.**

### **Parking**

- The reduction of on street parking in order to 'improve' traffic management will seriously impact residents and businesses in a way that is grossly unfair and inconsiderate.
- The proposed 'community parking areas' are located away from the residents displaced and are not viable alternative options. It is unreasonable to expect residents to stop parking outside their own homes and to have to park some distance down the road, especially if there is no guarantee of a space. It appears that they will be available generally and subject to a free-for-all. There is also no information about who is responsible for maintaining them.
- Businesses will face a loss in passing trade due to the parking restrictions, which is unacceptable.

- 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 is a lack of clarity about the junction on Market Street with Exchange Street and whether there will be access to Exchange Street only from the south. This would result in dangerous U turns around the mini-roundabout.
- The further loss of green belt to develop a car park in the north area is unacceptable and there are no 'Special circumstances' to justify its approval.
- Development of a car parking feature in the core section of Market Street takes up valuable green field and is incongruous with the character here.
- Gateway Features and coloured chipping aggregate are unnecessary window dressing and are more consistent with defining a housing estate rather than an established functioning village road. The gimmicky Gateway features do not relate to village boundaries and are pointless.
- The creation of a significant junction in the middle of Market Street involves developing a new road line which will curve into the bellmouth of the entrance. This will create a dominant feature, with a focus on the entrance to TW site undermining the important historic linear village characteristic layout and effectively cutting Market Street into two.
- The proposed narrow roads on site do not meet adoptable requirements. Parking allocation for houses is woefully inadequate and will lead to parking on the (narrow) streets and in the community car park areas, blocking use for residents displaced by parking restrictions.

**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.**

## **1.2) Schools**

Proposals are vague and identify land at the rear of Edenfield School for expansion which would lead to further loss of Green Belt and is unacceptable.

In order to meet increased demand Lancashire Education Authority has indicated that schools outside the area would be used, which would involve additional car journeys adding to the traffic chaos, particularly at school times.

### **1.3) Green Belt compensation**

This section just refers to measures that 'could' be funded and lists examples from the Council's 'Compensation Measures for Green Belt Release' document (January 2023).

There are errors and inconsistencies on this list which include areas not in green belt and not eligible. Some suggestions will be affected by other proposals such as the community car park in the north and any expansion of the school.

It gives the impression that this is what will be provided but it is all qualified by "where feasible".

There is no mention where gardens 'with focus on food production and edible plants' are to be located in adjacent green belt.

Compensation measures should be meaningful and useful with significant community benefit. Certainly provision of a few signs is not enough.

The Masterplan should undertake a commitment to identified projects instead of just referring to a vague list.

### **1.4) Landscaping within the site**

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 green corridors 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.

Additional green open spaces within the built area of the site are kept to a minimum with attempts to provide additional small circular areas as shown on the green blue infrastructure on page 43 and nothing in the Peel /Nuttall north sites.

Much more green landscaping is needed to soften the impact within the site and also at the boundaries with existing properties, to preserve openness and visual amenity.

**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; - not demonstrated**

**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; - not demonstrated**

### **1.5) Drainage**

Drainage is not fully covered for the whole of site H66. SUDS are indicated on the Methodist Church and Taylor Wimpey 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. There is also no information about drainage for Peel and Nuttall sites.

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 (as detailed on the TW planing application ) 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 nor does it provide an explanation as to how water will travel uphill from the furthest points north of the SUDS, where land slopes away.

Surface water drainage from properties at 1 - 9 Alderwood Grove onto Taylor Wimpey site is subject to a lease and should be taken into consideration on any plans.

Foul water will discharge to the existing sewage drains along Market Street and Blackburn Road using gravity or pumping stations. Given that large areas of the main site will be lower than Market Street, there will be a significant reliance on pumping stations and these should be indicated.

**ENV1l) 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; - not demonstrated**



## 1.6) Implementation and Phasing

**Phasing and programme of implementation is inadequate.** It is too disruptive and damaging to have 3 of the 5 sites (page 62) under construction at the same time, particularly as two sites are the main areas of H66, Taylor Wimpey and Peel.

It will impact on safety at school pick up and drop off times and it would be impossible to enforce any sort of construction management plan, as suggested.

The phasing does not consider the disruption to residents. It is clear that the developers want to build whenever they wish irrespective of the significant disruption. This is demonstrated by the qualification that all phases can be delivered independently and/or simultaneously with Phases 1 and 2, which makes it meaningless.

## 1.7) Construction - topography, ground levels and engineering solutions

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 this is only briefly mentioned in the Masterplan even though it is a significant unacceptable adverse feature.

## 1.8 ) Mitigation of construction

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.

\*\*\*\*\*

## 2 ) Proposals do not meet a number of National and Local Planning Policies.

**NPPF** 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 134 - Disregards local input - discussed above in 1)**

### **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 unnecessarily 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 Masterplan. There is no provision for a Travel Plan. It is unclear whether bus stops will need to be re-located, as previously suggested.
- 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, 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 and beautiful places paragraphs 131-141**

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 139**

The proposals should be refused on the basis that they are 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 provisions relating to landscape considerations. It is unsympathetic to the historic environment including the surrounding built environment and landscape setting.**

**NPPF paragraph 180**

**“planning policies and decisions should contribute to and enhance the natural and local environment by:**

**a) protecting and enhancing valued landscapes...”**

**Not demonstrated**

**NPPF 180 (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. - not demonstrated**

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 briefly mentioned in the Masterplan. 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).

## **Historic Context**

### **NPPF paragraph 196**

**“Plans should set out a positive strategy for the conservation and enjoyment of the historic environment....”**

**Not demonstrated**

#### **ENV1b) Safeguarding and enhancing the built and historic environment;**

- The layout undermines the historic linear village core by infilling with mass housing and creating a junction feature in Market Street
- it does not protect the setting of the listed and non listed heritage assets at Mushroom House and Chatterton Hey and the Church.

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 Holcombe Moor 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.

The Masterplan should require the layout of housing parcels to be designed so as to allow views to the Church to continue. Site Specific Policy Criterion 5 ii.

**Local Plan Policies. 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**

**Other Local Plan Policies -HS5 suitable housing for the demographic of the area.** In line with HS5 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.

Given the ageing population in Edenfield and Rossendale as a whole, more housing suited to the needs of the elderly and disabled should be provided rather than relying solely on housing that is easily adaptable. Single- storey housing, properties to allow downsizing, supported housing schemes will enable people to continue to live in their village in their old age.

**3) Layout, Design and Materials lack adequate consideration for the special character of the village, do not protect the amenity of existing community and do not integrate well with the village. The proposals**

**focus on urban principles as demonstrated through poor and unimaginative Layout, Design and Materials and incongruous features:-**

- **Focus is on Urban Principles.** There is too much focus on urban principles with little attention given to design influences that account for the significant rural aspects and village characteristics:- the local landscape, openness, moorland, fields, significant views, and context in the valley and village character.
- In reference to the ECNF and its emerging plan and design code the proposals state that *“It is pertinent that the plan and Design Code does not fully account for 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”*. Local Planning Policy page 18 of Masterplan
- This confusion demonstrates a lack of understanding and misrepresentation. ‘Elevated’ is fictional and ‘urban status’ is misused in an attempt to promote the developers’ urban aims. It is simply a categorisation used to identify Edenfield’s status based in selected facilities offered at the time of the Local Plan and 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 location of the village in the south of Rossendale is disconnected from the main Haslingden /Bacup corridor and it is obviously defined by surrounding open rural landscape.
- It is disturbing that being *‘focused on the vernacular and characteristics of the village’* is criticised when clearly this is exactly where Policy requires the focus to lie. The Masterplan states that it *‘has been prepared in the context of current best practice in relation to urban design’* Context page 20, reinforcing their urban approach.
- Various Local Plan policies emphasise the need for a well designed scheme that responds to the site’s context, which is clearly not urban.
- The need for a focus on low level, low density development, softened with landscaping within the site, and incorporating local materials, is ignored.

**Heights and densities** are too high, damaging openness, blocking significant views and will be overwhelming and dominant. They do not integrate well with existing housing and landscape.

**“Landscaping of an appropriate density and height is implemented throughout the site to soften the overall impact of the development.....”  
site Specific Policy H66 5v - not demonstrated**

**"New development in the Borough will be expected to take account of the character and appearance of the local area, ...." -ENV1 -not demonstrated**

**ENV1 c) “Being sympathetic to surrounding land uses and occupiers, and avoiding demonstrable harm to the amenities of the local area;” not demonstrated**

**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;...”  
- not demonstrated**

**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**

- There is no justification for excessively high densities proposed, up to 45dph in some cases and above the 29dph mentioned in the Local Plan. Dense housing on this scale will be catastrophic for the village character, blocking and oppressive and does not promote integration.
- For some reason, densities are provided in ranges for each area, which means densities could be the maximum.
- Densities on this sort of scale do not relate to densities in the village. Significantly at the boundaries densities are at odds with the existing neighbouring densities such as at Alderwood Grove where densities ( including a terraced row ) is 25dph (page 30). The plans to build ‘Village Streets’ directly adjacent here with densities of 35- 40dph is oppressive and damaging.
- The reasons for proposed high 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 the explanation as to why densities are higher in ‘Village Streets’ to “reflect proximity to services and public transport” is ridiculous and illogical.
- In fact the focus seems to be to maximise density-  
*“Terraced units used to maximise density” Chatterton South Area type description page 100.*  
*“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.” Village Streets Area Type description page 98.*
- 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 be reduced proportionately . It does not mean that more dwellings have to be crammed into a smaller space.
- All houses are 2 storey high minimum ( except 1 one-storey for Edenfield North site). The large percentage of 2.5 storey is totally unacceptable being too blocking, dominant and incongruous. For variation, the heights should go lower than 2 storeys to maintain the openness and views. Rather than rely on height, the style of housing would allow for variation instead of the monotonous square boxes as shown on the photographs in the Masterplan
- 2.5 storey houses proposed vary with each area :-10 % Village Streets and Edenfield North, 20% for Chatterton South and Edenfield Core. The reasoning is illogical:-
- Edenfield Core -*“Development seeks to retain distant views to wider hill tops. 2.5 storey development which does not obstruct key views can add interest to the street scene.”* 2.5 Storey will definitely obstruct more of the views.
- Village Streets *“Housing will be situated on land at a lower level than Market Street”*. This applies to Edenfield Core.

This town house style approach is inappropriate to this location and will be blocking and oppressive.

- High roof lines will block the significant views and in some cases affect the skyline such as views towards the west over Holcombe Moor. Similarly the distinctive views over the valley from the west will be disrupted with a damaging sprawl of build, illuminated at night and



unrecognisable as a village. The distinct historic linear outline in the central core as seen from the By pass will be severely disrupted with building adding to the degeneration of village character.

- “*key (glimpsed) views are to be maintained*” and views of “*distant hilltops*” (Area types page 96) are not the same as open views and are meaningless. Realistically key views of Holcombe Moor will be blocked and lost. This applies to views from footpaths as well as from Market Street, with Alderwood Grove particularly badly affected.
- The amenity of existing dwellings is not protected with adjacent dominant high-density buildings e.g., at Market Street, Mushroom House, Chatterton Hey. At Alderwood Grove damage is particularly significant with unacceptable loss of light, privacy as well as blocked key views.
- **Materials and features** will be incongruous and dominant with the use of red brick for buildings and walls, lacking in connection to existing village stone constructions.

**“Materials and boundary treatments should reflect the local context.”  
Site-Specific policy H66 5vi**

- Justification for choice of materials seems to rely on identifying the different styles existing in the village and copying them, 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, As well as stone buildings, stone features can be used 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 stone 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. This would make for variation rather than rely on unacceptable building height. 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 recognised and protected in the Masterplan. This should include the wall at Alderwood Grove boundary.

**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.**

- Reconstituted stone blocks for walls and brick walls are not acceptable.
- Features such as a huge SUDS area, high acoustic fencing and bunds, retaining structures, traffic mitigation measures including reconfiguration around the entrance on Market Street, car parking in greenfield areas and unnecessary Gateway features and coloured road chippings will be disruptive and damaging to the village landscape character .
- **Layout** maximises overbearing densities of mass build with narrow roads (too narrow to be adopted) and through a lack of green landscaped spaces within the site, damaging to the openness and views, significant characteristics of the village.
- Layout based on housing types is illogical and undesirable. It is effectively segregation and has unwanted social implications associated with areas of cheaper houses and poorer materials lumped together. The only rationale seems to be to cut costs and put the most visually attractive houses in the most visible areas..
- 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.

- The plans do not consider health and well-being of inhabitants by locating houses in close proximity to the by pass and do not take into account that Highways England have indicated plans to widen the By Pass by 2030.
- Shared cycle ways and footpaths and in some cases also shared with roads, raises issues about safety
- Cycleways/footpaths and play areas are poorly located in terms of accessibility and function including well-being and enjoyment.
- Layout is disjointed and insensitive at the boundaries with existing development and does not successfully integrate. it is oppressive and damaging to the historic linear character and also to specific buildings of historic significance, Mushroom House and Chatterton Hey.
- The development of the whole site is not considered adequately and is lacking in cohesion and flow particularly in relation to roads and cycle ways/footpaths which do not connect across the whole site. This is a good example which demonstrates the developers' single-minded approach in their own self-interested goals.
- The road access points are disruptive and dysfunctional and do not work well with the existing road infrastructure. See comments about the roads and traffic.

## **Conclusions**

There is so much that is wrong with the proposed Masterplan that it requires some radical re-thinking particularly around the roads and traffic mitigation and the design and layout. It is clear that the proposals disregard the conservation and enhancement of the existing village character landscape and will create a mass damaging block of housing which does not function well.

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

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

Karen and Richard Lester

Good Morning Mike

As discussed, I am emailing to send an update regarding the Edenfield Masterplan. I have reviewed the amended documents and supporting information and require further amendments to be made before the LHA can fully support the allocation.

The amendments the LHA require include:

- A solution being proposed which shows that a safe and suitable access can be provided for the Northstone site. The LHA are concerned with the existing northbound bus stop being located directly opposite the proposed junction. This could potentially create a conflict point, should a stationary bus be at the stop and vehicles heading towards the signalised junction overtake the bus, as a vehicle is exiting left from the Northstone site.
- Updated junction capacity assessments being submitted and assessed to the future year 2034, when the allocation is expected to be fully occupied by, as stated within the amended Masterplan and Design code document provided by Randall Thorpe. Currently, the assessments are only growthed to 2030. Therefore, for completeness and to ensure that there is adequate practical spare capacity on the local highway network when the allocation is complete, amended junction capacity assessments are required.

Kind regards

Ryan Derbyshire BSc (Hons) MSc MCIHT  
Assistant Engineer  
Highway Development Control  
Highways and Transport  
Lancashire County Council

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I write to object to the Edenfield Masterplan / Design Code (rec Version 4 or V4) for site H66, based on the following points:

- serious traffic and road safety concerns have not been addressed and a traffic assessment for the whole site has not been completed.
- as per my previous objections, I have seen very dangerous driving in the village when there is any increase in volume of traffic, not just on Market Street but also on Bury Road, where again the traffic can be single file.
- the nearby road infrastructure in Rawtenstall and Ramsbottom (where everyone would need to travel to for local shops and amenities) are already not adequate to cope with the volumes of traffic. I have children and have experienced instances where other Mums have said they weren't going to take their children to Marl Pits to do some exercise because they won't drive round Rawtenstall at a certain times of the day. This isn't acceptable as it is.
- the plan doesn't allow for any additional healthcare or school facilities, which are surely needed given the scale of the suggested plans.
- considering the proposed site is on previous greenbelt, the amount of green space is far too limited and not in keeping with the surrounding areas.
- it is very disappointing to see more greenbelt offered by developers for conversion to a car park and for anyone to think that is a suitable plan.
- for many years, the recreational facilities for children in the village had been limited, lacking in investment compared to nearby areas (e.g. in Ramsbottom, Burnley). This is the case again in these plans.
- the size of the development is completely at odds with the current size of the village.
- there is already visible flooding in local fields (including the plot where a suggested car park is proposed); often flood water running down into the village from the hills onto the local roads, particularly on Burnley Rd; and historically surface water issues on the A56. The level of development will only make this worse and concerns raised haven't been resolved.
- it doesn't seem feasible to just take parking away from current residents and businesses with double yellow lines. If that is acceptable for current residents maybe the new houses should be on a similar no car scheme to help solve the traffic problem.
- there is a disregard for the environment, the current residents and the people who visit the area to enjoy the natural beauty. The phasing of the development also doesn't take into account the impact on people's quality of life and well being in the local area.

I find it very confusing that one of the developers is already advertising houses with move in dates in 2026 when nothing is yet approved. Either this is a corrupt one sided process or the house builder is showing a similar disregard to the planning process itself.

Regards  
Sarah Cottam



To whom it may concern

I am sending this email to voice my objections to the proposed master plan for housing development in Edenfield.

As a resident of Edenfield I find the whole plan preposterous! It will completely destroy the village! The proposals would lead to doubling, if not trebling, the village population, which would make the village unrecognisable!

The council needs to represent the current villagers and defend their way of life, not unscrupulous planners.

This isn't about providing affordable housing either. It's about making a profit!

The effect on the local schools, the roads and parking, the congestion is unacceptable. There isn't enough local GPs.

The effect on this beautiful place is unthinkable and should most definitely not be allowed!

I can only hope that this dreadful masterplan will not be allowed to end Edenfield.

Regards

Katherine and James Gabriel

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

>

> I write to object to the Edenfield Masterplan / Design Code (rec Version 4 or V4) for site H66, based on the following points:

>

> - serious traffic and road safety concerns have not been addressed and a traffic assessment for the whole site has not been completed.

> - as per my previous objections, I have seen very dangerous driving in the village when there is any increase in volume of traffic, not just on Market Street but also on Bury Road, where again the traffic can be single file.

> - the nearby road infrastructure in Rawtenstall and Ramsbottom (where everyone would need to travel to for local shops and amenities) are already not adequate to cope with the volumes of traffic. I have children and have experienced instances where other parent have said they weren't going to take their children to Marl Pits to do some exercise because they won't drive round Rawtenstall at a certain times of the day. This isn't acceptable as it is.

> - the plan doesn't allow for any additional healthcare or school facilities, which are surely needed given the scale of the suggested plans.

> - considering the proposed site is on previous greenbelt, the amount of green space is far too limited and not in keeping with the surrounding areas.

> - it is very disappointing to see more greenbelt offered by developers for conversion to a car park and for anyone to think that is a suitable plan.

> - for many years, the recreational facilities for children in the village had been limited, lacking in investment compared to nearby areas (e.g. in Ramsbottom, Burnley). This is the case again in these plans.

> - the size of the development is completely at odds with the current size of the village.

> - there is already visible flooding in local fields (including the plot where a suggested car park is proposed); often flood water running down into the village from the hills onto the local roads, particularly on Burnley Rd; and historically surface water issues on the A56. The level of development will only make this worse and concerns raised haven't been resolved.

> - it doesn't seem feasible to just take parking away from current residents and businesses with double yellow lines. If that is acceptable for current residents maybe the new houses should be on a similar no car scheme to help solve the traffic problem.

> - there is a disregard for the environment, the current residents and the people who visit the area to enjoy the natural beauty. The phasing of the development also doesn't take into account the impact on people's quality of life and well being in the local area.

>

> I find it very confusing that one of the developers is already advertising houses with move in dates in 2026 when nothing is yet approved. Either this is a corrupt one sided process or the house builder is showing a similar disregard to the planning process itself.

>

> Regards

> Ben Cottam

> 

Tim Preston

9th June 2024

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

Dear Forward Planning

**Ref: Edenfield Masterplan/Land West of Market St/ Design Code (V4) for site H66**

I am writing this letter to express my strong objection to the above proposed development. As a concerned resident of Edenfield, I continue to believe that this development plan poses serious safety concerns and fails to adequately address the well being and needs of existing residents. 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. Serious traffic, cycle and pedestrian safety concerns particularly in respect to Market Street. We like many local families, walk our young child to Edenfield Primary School and back each day and regularly to the local park. There is no traffic assessment for the whole site and therefore no reassurance that the site can be safely and suitably accessed by all users including people with disabilities.
2. The proposed parking restrictions, particularly on Market Street, would be to the detriment of existing residents including ourselves. We, like many families in Edenfield, own 2 cars in order to commute to work; and rely on street parking for ourselves and our visitors. The proposed compensatory parking arrangements are unclear and do not satisfy the concerns of Market St residents. I have serious concerns over the equality impact of the development as there is a duty under the Equality Act 2010 to eliminate discrimination yet there is no equality impact assessment or consideration given to protected characteristics. Why is there a need for parking restrictions at all? How will these restrictions negatively impact the local businesses in Edenfield?
3. The flood risk and land stability issues have not been resolved either the drainage pond located close to the A56 continuing to pose serious road safety concerns as raised by National Highways.
4. The infrastructure required for such a development is still being ignored, particularly in relation to schools and access to primary healthcare.

I kindly request your acknowledgement of this objection.

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, [REDACTED]



## **Objection by Ian and Barbara Lord to the Masterplan & Design Code for Edenfield allocation H66 (Version 4 dated April 2024)**

The following comments are in addition to those we submitted on 5<sup>th</sup> November 2023, 11<sup>th</sup> August 2023 and 17<sup>th</sup> January 2023 on previous versions of the Masterplan and Design Code (MDC) and on the Table of Responses to Council Comments (TRCC) which was published in September 2023. We have also previously commented separately in January 2023 and August 2023 on planning application 2022/0451 including the Highways Consideration of Masterplan (HCM) and the Market Street Corridor Improvement Plan (MSCP).

### **Overview**

It is very annoying that again this latest version of the MDC does not list or highlight changes from the previous version of the MDC (version 3). It makes it much more difficult to assess whether concerns expressed on version 3 have been addressed. No doubt this is a deliberate ploy by the developers to deter further objections.

Yet again the extent of changes is woefully inadequate considering the large number of responses to the consultations on previous versions.

Our comments below primarily address how this latest MDC addresses the issues raised in our previous objections.

### **Stakeholder engagement**

The section on stakeholder engagement (page 21) yet again does not mention the consultations on the previous three versions of the MDC (dated November 2022, June 2023 and September 2023) which resulted in a large number of comments from stakeholders. It merely harks back to a woefully inadequate “consultation” in July 2022 on what was a very brief masterplan. Surely the vast number of comments made during these three subsequent consultations are worthy of mention – unless of course they have been largely ignored.

### **Phasing**

At first glance it was heartening to see that the section of the MDC on phasing was increased from four pages to fourteen pages. At last it appeared that this important issue was being dealt with. However the opening three paragraphs under Development Phasing show that there is still no substance to the proposals. These paragraphs, the first two of which are unchanged from version 3 of the masterplan, read:

*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.*

*The phasing and implementation of the supporting highways improvements is addressed in the following pages, along with the management of construction traffic and an indicative timetable for the allocation coming forward.*

It throws considerable doubt on the credibility of all that follows when words like “*development phases may be varied or delivered simultaneously*” and “*indicative timetable*” are used.

The credibility is further undermined with the final sentence under the Indicative Programme of Implementation (page 62) which reads: “*all timings and dates are indicative and subject to change*”. It renders the whole programme meaningless.

What comfort can residents have that there will be a detailed fixed phasing plan for H66 in place if the MDC is approved? If this MDC is approved it appears that developers would be in control and be able to change much of the plans as they see fit.

There is at last acknowledgment of the timing of the work that needs to be done on the highway improvements by stating that which should be done before the start of construction and that which should be done prior to occupation. However the vast majority of this work **must** be done before construction due to the impact of the traffic generated by the construction.

There are contradictions in the chart on page 61 and the indicative programme on page 62. For example for phase 1A the chart shows “access bellmouth off Market Street” as prior to construction whereas the second bullet point on page 62 states “the associated site accesses ..... to complete prior to occupation”.

This gives further concern that developers will have opportunities to do what they want to do when they want to do it rather than comply with a plan that minimises the impact on residents and those who visit or pass through the village.

The lack of consideration of the impact of construction of phase 3 (Methodist Church) on the proposed Exchange Street access and the other roads affected (Highfield Road/ The Drive/Eden Avenue) is staggering. The unsuitability of these roads for the traffic generated by the additional houses is bad enough (see under Transport Assessment below) but the impact of heavy construction traffic is frightening.

It is good to see the annual housing completions quantified. However considering the multiplicity of developers (who can effectively follow their own timescales) and the comments above relating to “indicative” and “subject to change” mean that these are meaningless.

### **Transport Assessment**

The off-site highway improvements on pages 46-49 do show some relatively minor changes but for Appendix C Transport Assessment Summary not to be changed in the light of all the representations made in the consultation on version 3 of MDC is very concerning.

As the Transport Assessment is unchanged the comments in our objection to version 3 (dated 5<sup>th</sup> November 2023) are still valid. We attach again Appendix 1 to our objection to version 3 with further comments below related to the off-site highway improvements on pages 46-49 of version 4.

Speed cushions have now been proposed along the length of Highfield Road which should theoretically improve road safety. However, our previous comment (see Appendix 1) that this road and The Drive and Eden Avenue were never designed for the volume of traffic that would use them post development still applies. Additionally and, as mentioned under phasing above, the impact of construction traffic prior to occupation of the development is frightening.

Surprisingly there has been no change to the proposals for Exchange Street. Maybe that is because nothing further can be done to solve the issue of the development access, pump track, recreation ground, playground and existing housing combining in a small area. Considering this and the comments above relating to Highfield Road/The Drive/ Eden Avenue how bad does it have to be before the development itself is reconsidered?

Our previous comments (see Appendix 1) on the fundamental problems relating to Edenfield South, Market Street and Edenfield North caused by the increase in traffic resulting from the H66 developments are still very real. As with the Exchange Street problems mentioned above, is it the case that no significant changes have been proposed because there is nothing more that can be done? If so, the extent of the H66 development needs to be reconsidered.

### **Geotechnical investigations**

There has been no change to criterion 8 in the Executive Summary so our comments on version 3 of the MDC are still relevant.

**Ian and Barbara Lord**

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

**9<sup>th</sup> June 2024**

### **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 throughway 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.

# Edenfield Community Neighbourhood Forum

H66 - Land West of Market Street, Edenfield

Masterplan / Design Code (Version V23 - Randall Thorp - April 2024) (V4 - RBC)

## Representations

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# Appendices

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2. Examples of references in the MDC to Edenfield as a village
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4. Letter dated 25 August 2023 from LCC
5. Note by SK of transport issues for RBC/ECNF/SK meeting on 28 September 2023
6. Email dated 30 August 2023 from SK to LCC
7. Strategic Policy ENV1: High Quality Development in the Borough

**NOTE:** The following documents are submitted concurrently with, and should be considered as part of, these representations:

1. Letter dated 7 June 2024 from SK, and
2. AECOM Design Code, which is to be the subject of 'Regulation 16' consultation by RBC.

# Section 1

## **Section 1 Interpretation, Summary Reasons for Rejection and Background**

### **1.1 Interpretation, abbreviations and definitions**

in these representations, extracts of national planning policy or the Local Plan are coloured blue, and expressions and abbreviations have the following meanings, unless otherwise apparent from context -

Section or paragraph number followed by 'above' or 'below' - a Section or paragraph of these representations

APM - access protection marking

CE PS - Church of England Primary School

DAS - Design and Access Statement submitted with the TW application

dph - dwellings per hectare

ECNF - Edenfield Community Neighbourhood Forum

Executive Summary - Executive Summary in the MDC (pages 08 and 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 for Play

LEAP - Locally Equipped Area for 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 April 2024 (Version V23) and presented by Randall Thorp that is the subject of consultation and these representations

Northstone - Northstone Development Limited, an associated company of Peel

NPPF - National Planning Policy Framework (most recently updated on 20 December 2023)

page, with a number - unless otherwise stated, a page of the MDC



Peel - Peel L&P Limited or an associated company

Peel application - planning application reference 2023/0396 submitted to RBC by Northstone for the construction of 50 dwellings in the northern portion of H66

Planning Statement - Planning Statement (Including Heads of Terms, Waste Management Strategy and Affordable Housing & Parking Provision Statements) submitted in 2022 with the TW application

Policies Map - map published by RBC and titled 'Adopted Policies Map - Rossendale Local Plan 2019 to 2036'

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 TW application

SHLAA - Strategic Housing Land Availability Assessment

SK - SK Transport Planning Limited

SPD - Supplementary Planning Document

SSP - 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

TW 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

## **1.2 Summary Reasons to Reject the MDC**

Table 1 below summarises deficiencies in the MDC which require its rejection.

Row	Section or Paragraph of Representations	Contrary to National Policy; or to Local Plan Strategic Policy (SP), Policy (P), SSP or paragraph; OR Fault in MDC	MDC page, and/or reason to reject MDC
1	1.3.1	MDC misrepresentation	Page 21 - false statement of community consultation
2	1.3.7, 2.1, 2.2, 2.8 and 3.1.1	SSP	MDC driven by planning applications, does not demonstrate comprehensive development
3	1.3.9, 3.1.2 to 3.1.6, 3.3.2 and 10.9.4	SSP	MDC does not apply to whole of H66. Doubtful whether all owners were involved, because MDC does not state on whose behalf it was prepared or which owners support it
4	2.8	MDC omission	No planned road network for the whole site
5	do.	MDC omission	No overall provision for landscaping and open space
6	do.	MDC omission	No assessment of developer contributions
7	2.8, 3.2.1 to 3.2.6.4, 3.2.7.1 to 3.2.8.11 and 3.3.2	SSP	Pages 08 and 58 to 68 - no programme of implementation and phasing; infrastructure delivery schedule addresses only highways and does that inadequately
8	3.2.6.5	Paragraph 41, explaining (SP) SS Spatial Strategy	Development not required to grow incrementally north
9	3.2.8.2.1	MDC omission	Pages 47 to 49 and 64 to 68 - insufficient information about TROs
10	3.2.8.2.1 to 3.2.8.2.3 and 11.2.1	MDC unclear	Page 46 - no explanation how lost street parking spaces are calculated
11	3.2.8.2.4, 10.1, 10.9.1, 10.9.7, 10.10	NPPF, paragraphs 152, 153 and 155	Page 61 - no certainty of planning permission for car park/LAP east of Burnley Road
12	3.2.8.3	MDC fails to identify suitable routes	Page 61 - routing of construction traffic along unsuitable residential roads
13	3.2.8.4	MDC omission	Page 60 - no construction works management strategy
14	3.2.8.5.1	MDC omission	Pages 49, 60, 65, 67 and 68 - effect of one-way Exchange Street on traffic on Highfield Road has not been thought through
15	3.2.8.5.2	MDC unclear	Pages 49 and 67 - plans unclear about right turn from Market Street into Exchange Street
16	3.2.8.6	MDC misleads	Page 60 - unrealistic and/or unenforceable promise to repair highway damage
17	3.2.8.7 to 3.2.8.9	MDC misleads	Table on page 61 completely unfit for purpose

Row	Section or Paragraph of Representations	Contrary to National Policy; or to Local Plan Strategic Policy (SP), Policy (P), SSP or paragraph; OR Fault in MDC	MDC page, and/or reason to reject MDC
18	2.6, 3.2.6.2 3.2.9 and 3.2.10	SSP	Denying the need for site-wide MDC or an implementation and phasing programme is attempted subversion of the Local Plan
19	3.2.11 and Section 11	MDC omission	Pages 46 - 49 and 64 - 68, Developers' transport assessment and Highways Consideration of Masterplan Note are inadequate
20	3.2.12	MDC omission	Pages 58 and 59 ignore LCC demand for financial support for X41 bus service
21	3.2.13 and 8.4.1 to 8.4.4	MDC poor draft	Pages 07, 39, 45, 55, 58 and 59 conflict about emergency access between TW and Methodist Church land. Full, accurate information needed
22	3.3.1 to 3.3.3, 6.4 and Sections 13 to 15	NPPF, paragraph 134 Local Plan, paragraph 12 and SSP (SP) SS: Spatial Strategy (SP) ENV1 High Quality Development in the Borough, paragraph 234	Design Code inadequate and riddled with errors and does not reflect local aspirations
23	Section 4 and paragraph 6.4	NPPF, paragraph 134	Page 21 - inadequate community engagement
24	Section 5 and 6.4	MDC error	Pages 18 and 21 - insufficient weight given to Design Code forming part of emerging Neighbourhood Plan, which should be applied in MDC
25	5.3, 5.4.4, 5.5.1 to 5.5.3	MDC misrepresentation	Page 18 - MDC chooses to misinterpret 'Urban Local Service Centre'
26	2.1 to 2.3, 5.5.1 and 5.5.2	SSP including paragraphs 120 and 125; (SP) SS Spatial Strategy including paragraphs 30 and 38; (SP) SD2 Urban Boundary and Green Belt including paragraphs 50 and 51; (SP) ENV1 High Quality Development in the Borough; and (P) ENV3 Landscape character and Quality	Page 18 - MDC denies the need for development to limit impact on openness
27	5.8	MDC misrepresentation	Pages 18 and 21 - inaccuracies in MDC must be struck out
28	Section 6	NPPF paragraphs 131, 134, 135, 139 and 159 and PPG	Pages 14 and 15 - MDC not in accordance with national planning policy or PPG
29	6.1, 6.2 and 6.5	MDC error	Pages 14 and 15 cite obsolete versions of NPPF and PPG
30	6.7 and 6.8	(SP) ENV1 High Quality Development in the Borough	MDC pays no regard to Strategic Policy ENV1
31	7.1	MDC misrepresentation	Page 42 - nonsense claim that MDC can create Green Belt boundary
32	7.1 and 7.2	MDC misrepresentation	Pages 42 and 74 - not acknowledging existing defined and defensible Green Belt boundary

Row	Section or Paragraph of Representations	Contrary to National Policy; or to Local Plan Strategic Policy (SP), Policy (P), SSP or paragraph; OR Fault in MDC	MDC page, and/or reason to reject MDC
33	7.1 and 13.2.2 to 13.2.6	MDC error	Pages 42 and 74 are inconsistent. Confusion <i>re</i> boundary treatment at Green Belt interface
34	7.2	MDC error	Page 43 Incorrect label on map
35	7.3.1, 14.8.1 and 14.8.2	MDC poor draft	Approach of pages 10 and 36 to appreciation of heritage assets is simplistic
36	7.3.1	MDC misleads	Vision (page 10) wrongly suggests valued buildings are located <b>throughout</b> H66
37	7.3.2	MDC poor draft	Vision (page 10) - <i>and in the local context</i> is verbiage
38	7.4.1	MDC misrepresentation	Visual Context (page 26) Impact on view from east wrongly denied
39	7.4.2 and 7.4.4	MDC misleads	Visual Context (page 26) MDC downplays view from Market Street and selects photographs that do not do justice to the views
40	7.4.3	MDC omission	Visual Context (page 26) Design Influences should refer to more viewpoints and be carried into Design Code
41	7.5 and 9.2.2	Local Plan paragraphs 30, 38, 50, 51, 120 and 125; (SP) SS Spatial Strategy; (SP) SD2 U.B. & G.B; (SP) ENV1 High Quality Development in the Borough; and (P) ENV3 Landscape character and Quality	Failure to require removal of large mound of spoil would have adverse impact on openness
42	7.6	SSP (criterion 6)	Page 09 - lack of site-wide ecological assessment
43	7.7	MDC poor draft	Page 54 and 106 - minor changes required to Code MP 01
44	7.8.1	(P) HS16 Self Build and Custom Built Houses MDC omission	Pages 72 and 106 - in Code US 01 add reference to Policy HS16
45	7.8.1	(P) HS16 Self Build and Custom Built Houses MDC omission and error	Page 72 - lacks information about location and phasing of self-build / custom-built dwellings Page 91 - MDC mis-states Policy HS16
46	7.9, 14.2.9 and 14.14.2	Local Plan paragraphs 30, 38, 50, 51, 120 and 125; (SP) SS Spatial Strategy; (SP) SD2 U.B. & G.B; (SP) ENV1 High Quality Development in the Borough; and (P) ENV3 Landscape character and Quality	Page 90 - delete support for high ridge and steep roof pitch, which are not typical of the locality and which would have adverse impact on openness. Prioritise policy imperatives of maintaining openness and having regard to local context.
47	7.10	MDC poor draft	Pages 42 and 72 must clarify <i>baseline analysis</i>

Row	Section or Paragraph of Representations	Contrary to National Policy; or to Local Plan Strategic Policy (SP), Policy (P), SSP or paragraph; OR Fault in MDC	MDC page, and/or reason to reject MDC
48	7.10	MDC poor draft	Page 42 must clarify <i>strategic design principles</i>
49	7.11.1 and 7.11.2	MDC omission	Pages 91 and 108 - Code HB 02 (internal daylight and privacy distances) fails to specify the relevant Local Plan policies
50	7.11.3 and 7.11.4	(SP) ENV1 High Quality Development in the Borough and (P) HS8 Private Outdoor amenity space	Pages 91 and 108 - Homes and Buildings Codes need to embed and elaborate on Policies
51	8.1	MDC misleads	Plan on page 32 exaggerates extent of shops, school and community facilities
52	8.2	MDC unclear	Pages 84 and 108 - Code MO 04 must clarify reference to <i>A secondary street</i>
53	8.3	MDC error	Page 83 proposes estate roads of less than adoption standard
54	8.5 and 8.6	MDC error	Page 38 calls a bridge for vehicles a <i>footbridge</i>
55	8.5 to 8.8 and 12.1	MDC misleads	Pages 38 and 58 do not identify clearly and distinguish public and private rights of way
56	8.5 to 8.10	MDC error	Pages 07 and 55, and LCC, propose interference with private rights of way
57	8.8 and 9.1.1	MDC error	Page 42 and the plan on pages 07 and 55 misname Chatterton Hey
58	8.8, 12.1 and 12.2	MDC misrepresentation	Pages 07, 55 and 82 - basic misunderstanding of availability of FP126 and FP127 for cycling
59	8.11.1 to 8.11.5	MDC misrepresentation	Plans on pages 07, 45, 55 and 58 propose vehicle access to development at Alderwood by the existing driveway, which LCC has declared unsuitable
60	9.1.1 to 9.1.3	MDC omission	Pages 42 and 72 - Area Type Codes omit guidance about dry stone walls but should provide for their protection in a Code
61	9.2	(P) ENV5: Green Infrastructure networks	Page 42 needs to commit to ensuring Policy compliance, to be included in a Nature Code
62	9.3.1 and 9.3.2	SSP	Page 09 fails to specify landscaping throughout H66, including interface with existing dwellings
63	9.3.2	MDC misrepresentation	Claim (page 09) - existing <i>landscape features are retained throughout</i> is contradicted by proposal (plan on page 43) to fell trees near Church Lane
64	9.4	MDC omission	Page 42 must provide for protection of land drainage rights, to be included in a Code
65	9.5	MDC omission	Page 42 lacks detail of blue infrastructure and requirements for their treatment

Row	Section or Paragraph of Representations	Contrary to National Policy; or to Local Plan Strategic Policy (SP), Policy (P), SSP or paragraph; OR Fault in MDC	MDC page, and/or reason to reject MDC
66	9.6	MDC omission	Plan on page 43 fails to show all watercourses within H66 or the green infrastructure marked on the Policies Map
67	9.7	MDC omission	Plan on pages 07 and 55 fails to show the green infrastructure in H66 marked on Policies Map
68	9.8	MDC misrepresentation	Page 43 (plan) - inappropriate off-site references
69	9.9	MDC unclear	Page 42 - <i>biodiversity net area</i> is unclear
70	Section 10	NPPF, paragraphs 152, 153 and 155 (P) TR4 Parking	Car park/LAP east of Burnley Road is contrary to national and local policy and must be deleted
71	10.0 to 10.2, 10.6, 10.7.1 to 10.7.4, 10.9.2, 10.9.3	MDC misrepresentation	Car park/LAP east of Burnley Road - need for parking/set down/pick-up facility exaggerated, not demonstrated evidentially and not justified
72	10.0, 10.6, 10.8	MDC omission	Car park/LAP east of Burnley Road involves further unquantified loss of street parking
73	do.	MDC unclear	Car park/LAP east of Burnley Road - insufficient information about dimensions, layout, surfacing, drainage, lighting, maintenance and continued availability
74	10.1	MDC error	Car park/LAP east of Burnley Road is beyond purview of MDC
75	10.3		Car park/LAP east of Burnley Road involves encroachment into Green Belt, which should have been raised during Local Plan process
76	10.4		Car park/LAP east of Burnley Road - local transport infrastructure to be properly planned, not provided <i>ad hoc</i>
77	10.6, 10.8	MDC misrepresentation	Car park/LAP east of Burnley Road endangers traffic and pedestrians
78	10.7.5	MDC misleads	Purported justification in Peel application for Car park/LAP east of Burnley Road includes a new footpath, seen by school as a security risk
79	10.8	MDC misrepresentation	Car park/LAP east of Burnley Road - developer benefits and community pays as landowner would set cost off against s 106 contributions
80	10.9.1 and 10.9.7	NPPF, paragraphs 152, 153 and 155 (P) TR4 Parking	Car park/LAP east of Burnley Road - no certainty that it would receive planning permission. MDC must not pre-empt that decision
81	10.9.6	MDC error	Car park/LAP east of Burnley Road is inimical to promotion of active travel to and from school
82	10.10	MDC misrepresentation	Car park/LAP east of Burnley Road - misrepresented as <i>in accordance with Local Plan</i>

Row	Section or Paragraph of Representations	Contrary to National Policy; or to Local Plan Strategic Policy (SP), Policy (P), SSP or paragraph; OR Fault in MDC	MDC page, and/or reason to reject MDC
83	10.10 and 10.11	MDC error	Pages 22, 72 and 106 - Code US 03 incorrect
84	10.13	MDC misrepresentation	Location of LAP east of Burnley Road does not meet accepted LAP criteria - see page 80
85	10.14 and 10.15	(P) TR4 Parking	Car park/LAP east of Burnley Road contravenes all seven criteria in Policy TR4
86	11.1	MDC errors	Transport issues - refer to SK submissions
87	11.2	MDC error	Page 46 - proposed car park areas off Burnley Road, Market Street and Exchange Street wrongly described as <i>highway improvements</i>
88	11.2.1	MDC error	Page 46 - car parks off Market Street and Exchange Street wrongly described as <i>off site</i>
89	11.2.2	MDC unclear	Pages 42 and 43 - ambiguity whether car park on Market Street will be provided.
90	11.3	MDC omission	Pages 48, 64 and 66 - maps fail to take account of H65 access
91	11.3	MDC error	Pages 49, 65 and 67 - out-of-date maps fail to show Pilgrim Gardens junction and houses
92	11.4	MDC unclear	Maps at pages 47 to 49 and 64 to 68 lack key to colours and symbols and fail to show existing and proposed TROs clearly. 'No parking' in labels is not a TRO expression
93	11.5		Pages 46 to 49, 66 and 67 - coloured chippings seem pointless
94	11.6		Pages 46 to 49, 66 and 67 - 'Gateway' features unnecessary, dangerous, not at village entrances
95	11.7.1		Pages 46 to 49, 66 and 67 - Loss of street parking would inconvenience residents
96	do.		Pages 46 to 49, 66 and 67 - Loss of street parking would be detrimental to businesses
97	11.7.2		Pages 49, 65 and 67 - Exchange Street build-out and bollard would block deliveries to butcher
98	11.7.3.1 and 11.7.3.2	MDC omission	Pages 48, 49, 66 and 67 - Nonsense not to extend proposed prohibitions of waiting to replace adjoining APMs
99	11.8		Pages 46 to 49, 66 and 67 - disabled residents harshly affected by loss of street parking
100	11.9.1, 11.9.2 and 11.10	S 17, Crime and Disorder Act 1998 NPPF, paragraph 135 f); PPG; (SP) ENV1: High Quality Development in the Borough; and (P) TR4: Parking	Pages 46, 49 and 67 - concealing car park on TW land with a mound and providing only low-level lighting would facilitate crime.

Row	Section or Paragraph of Representations	Contrary to National Policy; or to Local Plan Strategic Policy (SP), Policy (P), SSP or paragraph; OR Fault in MDC	MDC page, and/or reason to reject MDC
101	11.11	(P) TR4: Parking	Pages 46, 49 and 67 - car park on TW land not policy-compliant in other respects
102	11.14 to 11.16	MDC evidence base is unsound	Various errors in Eddisons' Highways Note
103	12.3.1 to 12.3.4	MDC errors	Unacceptable discrepancies between page 43 plan, page 50 plan and plan on pages 07 and 55
104	12.3.5	MDC unclear	Page 50 lacks clarity about new north-south pedestrian/cycle route
105	12.4	MDC omission	Page 82 cites LTN 1/20 wrongly and fails to translate principles into Site-Wide Code
106	Section 13	SSP, criterion 8	Safe accommodation of SUDS not demonstrated - NH, LLFA and UU approval required
107	13.1	MDC poor draft	Page 74 forbids essential and/or desirable removal of vegetation
108	13.3.2	MDC error	Nature Code NA 05 (pages 76 and 107) prescribes separate outfalls for adjacent parcels
109	13.3.3	MDC omission	Foul drainage requirements (page 76) need to be carried into a Site Wide Code
110	2.8 and 13.3.4	MDC omission	Flood risk and drainage issues not addressed
111	13.4.1 to 13.4.3	SSP, criterion 8 MDC misleads	Page 09 wrongly claims ground conditions and land stability are accounted for
112	13.5	MDC omission	Effect of widening A56 on SUDS not considered
113	13.6	NPPF, paragraph 180 e)	MDC needs to show how stability of new build will be assured
114	13.7.1		Pages 77 and 107 - BNG should be assessed by requirements at time of planning approval
115	13.7.2	MDC error	Page 77 cites statute incorrectly
116	13.8	MDC poor draft	Pages 38 and 42 and the plan on page 39 mistake watercourse for a spring
117	13.9	MDC error	Page 39 - map omits shading
118	13.10	MDC omission	Pages 75 and 107 should forbid planting of non-native species
119	14.1 to 14.2.3, 14.3.1 to 14.4, 14.12 and 14.13	(SP) ENV1 High Quality Development in the Borough explained in paragraph 233	Pages 96, 98 and 102 - Area Types propose inappropriate building materials
120	14.2.2 and 14.2.3	MDC misrepresentation	Page 98 - Village Streets Area Type description is inaccurate
121	14.2.4 and 14.2.5	MDC misrepresentation	Page 98 - Reasoning and influences for Massing in Village Streets Area Type are ill-founded



Row	Section or Paragraph of Representations	Contrary to National Policy; or to Local Plan Strategic Policy (SP), Policy (P), SSP or paragraph; OR Fault in MDC	MDC page, and/or reason to reject MDC
122	14.2.6 to 14.2.8	SSP including paragraphs 120 and 125; (SP) SS Spatial Strategy including paragraphs 30 and 38; (SP) SD2 Urban Boundary and Green Belt including paragraphs 50 and 51; (SP) ENV1 High Quality Development in the Borough; and (P) ENV3 Landscape character and Quality	Page 98 - High density of Built form of Village Streets Area Type does not respond to context and does not maintain openness
123	7.11.4, 14.2.9 and 14.14.2	SSP including paragraphs 120 and 125; (SP) SS Spatial Strategy including paragraphs 30 and 38; (SP) SD2 Urban Boundary and Green Belt including paragraphs 50 and 51; (SP) ENV1 High Quality Development in the Borough; and (P) ENV3 Landscape character and Quality	Page 98 - buildings of more than two storeys in Village Streets would not maintain openness; reasoning ignores impact on Alderwood Grove
124	14.2.10	SSP including paragraphs 120 and 125; (SP) SS Spatial Strategy including paragraphs 30 and 38; (SP) SD2 Urban Boundary and Green Belt including paragraphs 50 and 51; (SP) ENV1 High Quality Development in the Borough; and (P) ENV3 Landscape character and Quality	Page 98 - Village Streets Area Type is poorly conceived, unjustifiable, illogical, unresponsive to context, detrimental to residential amenity and contrary to policy
125	14.4, 14.8.3 and 14.15	MDC omission	Pages 36, 38, 96, 98, 100 and 102 - Area Types must protect all, not just 'glimpsed', key views
126	14.5 to 14.6.4, 14.8.1, 14.8.2, 14.9 and 14.10	SSP (criteria 4 and 5 ii)	Pages 08, 36, 38, 96, 98 and 102 - Area Types fail to protect heritage assets and safeguard setting
127	14.5 to 14.6.4, 14.10	SSP (criterion 5 ii)	Pages 08, 96, 98 and 102 - Area Types fail to protect views to and from Parish Church
128	14.4 and 14.6.1 to 14.6.5	MDC omission	Pages 42, 43, 45, 96, 98 and 102 - Views to west not protected, hills wrongly called <i>distant</i>
129	14.7	MDC misleads	Page 99 - misleading image of Village Streets
130	14.11	Local Plan paragraph 125 MDC error	Page 100 - MDC wrong to suggest Chatterton South need not be high quality throughout
131	14.14.1 and 14.14.2	MDC omission	Pages 96, 98, 100 and 102 - Area Types too lax about houses of more than two storeys
132	14.16	MDC unclear	Pages 96 and 98 - unacceptable lack of detail about front boundary railings
133	14.17	MDC omission	MDC fails to acknowledge/promote local tradition of development in small batches

Row	Section or Paragraph of Representations	Contrary to National Policy; or to Local Plan Strategic Policy (SP), Policy (P), SSP or paragraph; OR Fault in MDC	MDC page, and/or reason to reject MDC
134	Section 15	(P) HS2 Housing Site Allocations	Housing too dense. Pages 44, 96, 98, 100 and 102 - all Area Types propose a density greater than in Local Plan
135	15.2.1	MDC error	Page 44 confuses developable and gross areas.
136	15.8.2	MDC omission	Map on page 30 omits Pilgrim Gardens houses
137	15.10	MDC error	Page 102 confuses relative densities of Edenfield Core and Edenfield North
138	15.11	MDC misleads	Page 44 misleads about overall density
139	Section 16	MDC omission	Equality Impact Assessment required
140	Section 17	MDC misrepresentation	Pages 09 and 44 falsely claim MDC commits to making school extension land available
141	Section 18	NPPF, paragraph 147 (P) SD4 G B Compensatory Measures SSP (Criterion 7)	Pages 09 and 51 - Green Belt compensatory improvements misunderstood, not addressed adequately
142	19.1	MDC unclear	Page 19 - codes 'wheel' partly illegible
143	19.2	MDC error	Plans on pages 07, 39 and 55 mis-name Chatterton Hey
144	19.3	MDC misleads	Plan (pages 07 and 55) omits LEAP and LAPs
145	19.4	SSP, explained at paragraph 127	No strategy for promoting public transport; failure to require travel plan/s
146	19.5	MDC omission	Impact of construction on flora and fauna not mitigated
147	19.6	MDC omission	No detailed risk assessment for potential environmental hazards
148	19.7	MDC omission	Contaminated land - no remediation strategy
149	19.8 and 19.9	MDC misleads	Page 106 - Codes MP 01, PH 01 and PH 02 wrongly said to be site wide Codes referred to within the Design Code
150	20.1	MDC omission	MDC fails to address impact of construction on residents and provide for redress
151	Section 21		Conclusion: MDC lacks holistic approach; not policy-compliant. Reject

Table 1: Summary of reasons to reject the MDC

### 1.3 Background

**1.3.1** A local consultation of sorts was conducted on behalf of TW in June/July 2022. This is misrepresented in the MDC (page 21, second paragraph) as being '*related to the whole H66 allocation*', when in reality it was only for the land of TW and the Methodist Church. ECNF pointed this out in January 2023, August 2023 and November 2023 in response to the consultations on previous versions (V7/V8, V13 and V17) of the

MDC, and it is deeply and increasingly regrettable that the MDC perpetuates the error (please refer to Section 4 below).

**1.3.2** TW, apparently with the support of Anwyl who were instructed by the Methodist Church, submitted to RBC in Autumn 2022 Version V7 of the MDC 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. The Methodist Church, no longer represented by Anwyl, own 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.

**1.3.3** TW's portion of H66 is the subject of the TW application. The documents supporting the TW 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 TW application.

**1.3.4** 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.

**1.3.5** 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 TW 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.*

**1.3.6** 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.*

**1.3.7** 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 TW 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 considered. 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 are familiar with the intricacies of planning law and procedure.

**1.3.8** Version V17 of the MDC was received by RBC in September 2023 and was the subject of consultation. It did not state on whose behalf it was prepared or which owners supported it.

**1.3.9** Version V23 of the MDC was received by RBC in April 2024 and is the subject of these representations. It does not state on whose behalf it was prepared or which owners support it.

**1.4** The following representations demonstrate how the MDC is contrary to planning policy in many respects and deficient in many others and must therefore be rejected.

# Section 2

## 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: Urban Boundary and Green Belt, 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. Even then it was open to the landowners to challenge the Plan in court, if they believed the requirement for a site-wide masterplan rendered the Local Plan unsound. The developers must not be allowed to subvert the Local Plan by defying its requirements.

**2.7** Any disinclination of the landowners 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 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 six undesirable consequences:

1. No planned highway network for the whole site. Piecemeal development risks creating ransom strips that could impede development on the rest of H66.
2. No clear overall surface water drainage system for the whole allocation.
3. No clarity about foul drainage arrangements.
4. No overall landscaping plan including open space provision.
5. No indication as to how the necessary developer contributions might be determined, apportioned and agreed.
6. No programme of phasing and implementation.

# Section 3

## Section 3 MDC fails to meet the requirements of a Masterplan and Design Code 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 (paragraph 2.2 above).

**3.1.2** It might reasonably be expected that any proposed MDC would not be submitted until all site owners 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 allowed the use of another owner's logo without permission on a previous iteration of the MDC (paragraphs 1.3.4 and 1.3.5 above). However, the MDC contains no such statement. Indeed, the MDC does not specify on exactly whose behalf it is put forward.

**3.1.4** It appears that the former Vicarage and land occupied therewith have not been considered in the process. Now that the Local Plan has allocated that land for housing as part of H66, the MDC needs to allow for the possibility of its development, including access and the number of dwellings that might be accommodated with or without demolition of the existing building.

**3.1.5** That is demonstrated by the purported list (page 22) of *Current ownership and control for the 'developable' areas of the H66 allocation* where there is no reference to the land at the former Vicarage.

**3.1.6** It is obvious that, if the MDC is confined to the land whose promoters are currently active in pursuing planning permission, it 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 58 to 68 consider phasing. Pages 58 and 59 purport to identify five phases of housebuilding, but in truth they simply identify five ownerships with so-called Key Deliverables and an indication of how long each phase might take. They do not address the stages in which the development might be implemented. Indeed, Page 58 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** 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. It flagrantly disregards the SSP provisions and the reasons for them, as set out at paragraphs 2.2 and 2.3 above.

**3.2.4** The Executive Summary claims (page 08) to address fully criteria 1 and 2 of the SSP. Page 06 claims that the MDC

*[presents] a phasing and implementation strategy.*

Unless a free-for-all counts as a strategy, those claims are false.

**3.2.5** Phasing Code PH 01 (pages 58 and 106) does not deal at all with phasing as such - it is confined to requiring delivery of so-called *Key Deliverables* associated with each phase. 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 (which was put to consultation at the same time as Version V17 of the MDC) - was 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. They did not do so and must now abide by the policies of the Local Plan.

**3.2.6.3** That 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 allocation 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.

**3.2.7.1** Page 58 goes on to state:

*The phasing and implementation of the supporting highways improvements is addressed in the following pages, along with the management of construction traffic and an indicative timetable for the allocation coming forward.*

The highways improvements are part of infrastructure delivery, and it causes confusion to apply the expression 'phasing and implementation' to them when that expression is used in the Local Plan to apply to the actual housebuilding.

**3.2.7.2** Infrastructure may be taken as including (but not limited to) new and improved roads, water supply, wastewater collection, electric power supply, gas supply, education facilities and health facilities. Of these, only highway matters are considered, and inadequately at that, by the MDC.

**3.2.8.1** 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 3.2.7.2 above and which would be linked to the programme of phasing and implementation.

**3.2.8.2.1** As regards TROs, in view of the lack of clarity of the maps at pages 47 to 49 and 64 to 68, the MDC needs to include or be accompanied by a summary schedule of (a) current TROs applicable to Exchange Street, Gincroft Lane, Alderwood Grove, East Street, Church Lane, Guide Court, the B6527 between Market Place and the A56 bridge and to Burnley Road from the junction with B6527 to 21/23 Burnley Road, and (b) all the additional TROs that development of H66 and the land east of Burnley Road would require. These details, of current and projected TROs, would include speed limits, one-way traffic and measurements of lengths of sides of roads on which waiting is or would be prohibited or restricted and hours of operation. The schedule should then go on to show the calculation of how many on-street parking places would be lost with each proposed prohibition and restriction.

**3.2.8.2.2** Page 46 asserts:

*Whilst proposed parking restrictions will be introduced at several locations along Market Street, the three proposed off-street parking areas will result in an increase in overall parking provision in the area of circa 8 spaces. These replacement parking spaces will be provided when the main access into Phase 1A is constructed and therefore within the initial phases of development and prior to the occupation of the new homes.*

**3.2.8.2.3** The MDC or an accompanying document needs to demonstrate how that surplus of *circa* eight parking spaces is calculated.

**3.2.8.2.4** It cannot be assumed that the proposed off-street parking area east of Burnley Road in Green Belt would receive planning permission (see Section 10 below). That immediately casts doubt on whether it can be provided when the H66 access from Market Street is constructed or at all. The MDC is based on the unwarranted assumption that sites within H66 might be developed concurrently.

**3.2.8.3** The question of construction traffic access to the Methodist Church land requires further consideration. Page 61 says its route will be "*South*". That is vague but suggests a route along one or more of Exchange Street, Highfield Road, The Drive and Eden Avenue. None of those residential roads is suitable for construction traffic. This needs to be revisited, and a solution found to avoid detrimental impacts on the community.



**3.2.8.4** Page 60 provides:

*Further detail of how construction works will be coordinated (sic) and managed, including ensuring that construction traffic and deliveries avoid peaks of intense usage in the village (such as school drop off / pick up), can be agreed through Construction Management Plans for each phase of the Masterplan.*

The MDC needs to provide clarity on this issue and not to defer consideration. 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.

**3.2.8.5.1** Page 60 promises that the

*one-way system on Exchange Street [will] be delivered prior to construction [on the Methodist Church land] along with the associated access junction.*

One issue ignored by the MDC is that, if Exchange Street is one-way from Market Street up to its junction with Highfield Road, as the plans on pages 47, 49, 65 and 67 show, northbound traffic on Highfield Road will come to an effective cul-de-sac with no room to turn, as a right turn into Exchange Street will be prohibited and a left turn will lead to an immediate dead end beyond which there is no public vehicular right of way. If the one-way section were between Market Street and The Bowling Green only, that residential *cul-de-sac* would become a turning area and/or vehicles would use the unadopted way serving 21 - 29 Exchange Street and beside the LEAP to return to Highfield Road.

**3.2.8.5.2** The unexplained colouring of the central hatching on Market Street near the Exchange Street junction in the plans on pages 49 and 67 begs the questions whether this represents some physical barrier to turning right into Exchange Street and, if so, what alternative route is contemplated.

**3.2.8.6** Page 60 provides also:

*Any damage that is incurred to the highway network within Edenfield during the construction of H66 will be repaired at the cost of the developer group (with the condition of the existing network to be surveyed at the outset so this can be accurately monitored).*

This sounds just too good to be true, and probably is. How is Edenfield defined? **Any damage?** Must the damage be attributable to the development of H66? If so, must it be attributable to a particular site within H66, or will the 'developer group' take collective responsibility? Who exactly are the 'developer group'? Does 'highway network' include street furniture? How and against whom can this promise be enforced?

**3.2.8.7** Phasing Code PH 02 (pages 60 and 106) provides:

*All construction traffic and off-site highways improvements will be delivered in line with the construction and infrastructure phasing table, unless otherwise justified and agreed with the Local Highway Authority.*

**3.2.8.8** In that Code 'accordance' might be a more suitable word than 'line', but it is questionable any way what is meant by 'construction and infrastructure phasing table'. The MDC includes:

- a Phasing and associated key deliverables table at pages 58 and 59
- a different table, also captioned 'Phasing and associated key deliverables' at page 61, which is very limited, and
- an Indicative programme of implementation at page 63, which, being indicative only, is not of value

none of which is clearly a 'construction and infrastructure phasing table'.

**3.2.8.9** The Table on page 61 seems to be an attempt at a highways improvements schedule, although it is captioned '*Phasing and associated key deliverables*'. It is completely unfit for purpose. For example,

- The column headings are unintelligible.
- Peel is unlikely to permit Mr Nuttall to use its bellmouth: the Peel application rules out access from its land to his.
- Mr Nuttall's pending planning application could be granted as soon as he completes a satisfactory planning obligation, and he would not be obliged to wait for the Peel L&P car park.
- Access *via* the drive to Alderwood is totally unsuitable for construction traffic - see paragraph 8.11 below.

**3.2.8.10** Pages 62 and 63

*[give] an indicative timeline for the implementation of the allocation in terms of housing delivery and the associated infrastructure works. This recognises that all phases can be delivered independently and/ or simultaneously, subject to the infrastructure phasing provisions set out.*

No reliance can be placed upon the timeline, being merely indicative. Furthermore, it defies the fundamental SSP requirement for a Masterplan with an agreed programme of implementation and phasing, as noted at paragraphs 3.2.1 to 3.2.7.2 above. Page 63 purports to estimate annual housing completions, but without a programme of implementation and phasing that is no more than guesswork.

**3.2.8.11** What does emerge from pages 62 and 63 is that the MDC envisages simultaneous development of more than one owner's land and that the new car parks will not be ready until development of the respective sites with which they are associated is well under way, thus doing nothing to relieve the pressures of an untold number of construction workers' parked vehicles.

**3.2.9** Without a strong framework of a programme of implementation and phasing and a comprehensive 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 or challenged the Local Plan in the High Court, 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 denial of the requirements for an implementation programme and infrastructure delivery schedule are 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 across the country that developers, particularly TW, fail to deliver on 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** The so-called '*Key deliverables*' on pages 58 and 59 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.

**3.2.13** An error on page 58 is to be noted. It states that there will be emergency access to Phase 1A via FP126, but the plans on pages 07 and 55 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 (Spatial Portrait, 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 owners of land within H66 have been involved in its preparation. See paragraphs 3.1.2 to 3.1.5 above. 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, given all the affected landowners the opportunity to participate, even if not all agree.

**3.3.3** The Executive Summary (page 08) 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 adequate programme of phasing and implementation and an infrastructure delivery schedule. A masterplan and a programme of implementation and phasing are specific policy requirements, as is a 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

## Section 4 Lack of 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 TW application was submitted. ECNF drew attention to this in their response to RBC's consultations on Versions V8, V13 and V17 of the MDC, as well as in their observations about the SCI as part of their representations about the TW 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 of the MDC was developed in consultation with ECNF, which, as a local 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.

**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

## **Section 5 No reason to limit weight given to the Design Code in the emerging Neighbourhood Plan**

### **5.1** The MDC refers at page 18 to

*the initial informal Regulation 14 consultation on a draft [Neighbourhood] Plan (and Design Code Report prepared by AECOM) undertaken in March and April 2023.*

**5.2** In fact there was nothing informal about that consultation, which was carried out by ECNF in strict accordance with the Neighbourhood Planning (General) Regulations 2012, as amended, and with the benefit of advice from RBC. ECNF condemns the misrepresentation and in its response to Versions V13 and V17 requested deletion of the word “*informal*”. It is appalling that the misrepresentation persists in the current Version V23.

### **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 (sic) ‘Urban Local Service Centre’ in the adopted Local Plan, and focuses on the existing vernacular and characteristics of the village.*

**5.4.1** The Neighbourhood Plan and Design Code were initially prepared in the knowledge that the (then emerging) Local Plan allocated H66 for housing. After the Local Plan was adopted and prior to the Regulation 14 consultation, it was amended after discussion with RBC. In the light of responses to the Regulation 14 consultation and having further regard to the adoption of the Local Plan, the Neighbourhood Plan was again amended, and at ECNF’s request AECOM reviewed and updated the Design Code.

**5.4.2** The outcome is an up-to-date document, taking full account of relevant national and local policy, including a Design Code compiled by expert consultants of international repute, who are free of any vested interest and whose brief was not influenced by the need to produce a document that suited the client’s preferred development. Developers may quibble about how much weight should be attached at this stage of the Neighbourhood Plan process, but the fact is that the emerging Plan and Design Code provide an authoritative benchmark against which the MDC may be assessed. The latest version of the emerging Neighbourhood Plan and its Design Code is submitted alongside these representations. Regulation 16 consultation is expected to commence in June 2024.

**5.4.3** It is therefore simply wrong to say that the current draft *Neighbourhood Plan and Design Code largely ignore the allocation of H66.*

**5.4.4** 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 25 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. Edenfield is identified as an Urban Local Service Centre by Strategic Policy SS: Spatial Strategy, but that is on the strength of the services and facilities it offered in 2021 rather than its character. The following provisions in the Local Plan are to be noted.

- The development in Edenfield creates the opportunity to masterplan a substantial new addition to the **village** (ECNF emphasis) that would have a limited impact on the openness of the Green Belt - Spatial Portrait, paragraph 30
- [H66] will require a well-designed scheme that responds to the site's context - paragraph 120
- 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
- Paragraphs 50 and 51 (noted at paragraph 2.1 above)
- The Council will require that the design of [greenfield] development relates well in design and layout to existing buildings, green infrastructure and services - Strategic Policy SS: Spatial Strategy
- [Housing] development needs to take place . . . whilst retaining and strengthening Rossendale's special character and enhancing its valuable natural habitat - Explanation of Strategic Policy SS: Spatial Strategy, paragraph 38
- The Council will expect that the design of development on [H66] minimises the impact on the character of the area and addresses relevant criteria in policy ENV3 - Strategic Policy SD2: Urban Boundary and Green Belt
- Paragraph 120 (of the Explanation of the SSP) reproduced at paragraph 2.3 above
- Any proposed development must make a positive contribution to the local environment and consider the site's form and character . . . Development must be of a high quality design . . - paragraph 125 of the Explanation of the SSP
- All proposals for new development in the Borough will be expected to take account of the character and appearance of the local area . . . A . . . Design Code . . . should set out . . . the appropriateness of the development in the context of the area . . . - Strategic Policy ENV1: High Quality Development in the Borough
- 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 - Policy ENV3: Landscape Character and Quality

**5.5.2** Thus, there are repeated references to the openness of the area, and the Local Plan demands that development of H66 responds to the site's context. Contrary to the MDC's assertion quoted at paragraph 5.3 above, it is therefore entirely appropriate for the emerging Neighbourhood Plan and accompanying Design Code to have regard to *the 'existing vernacular and characteristics of the village'*. Not to do so would simply not be in conformity with the Local Plan.

**5.5.3** The suggestion that *Edenfield's elevated status as a 'Urban Local Service Centre'* outweighs its village character is contradicted by more than forty acknowledgments elsewhere in the MDC that Edenfield is a village - see Appendix 2 hereto.

**5.6** The MDC declares at 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 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 25 April 2024 (see its second page), 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 of the MDC. The reasons in the MDC for giving limited weight to the emerging Neighbourhood Plan and Design Code are therefore completely spurious. The extracts quoted at paragraphs 5.1, 5.3, 5.6 and 5.7 above must be struck out from the MDC.

**5.9** Furthermore 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** Accordingly, ECNF refers as part of this consultation response to the AECOM Design Code as an exemplar which the MDC should emulate. ECNF submits that the MDC needs to be amended accordingly. ECNF therefore respectfully requests RBC to treat as part of this response the latest version of the Design Code, which is already in RBC's possession and which is to be part of the imminent Regulation 16 consultation.



# Section 6

## Section 6 MDC is contrary to National Planning Policy, to Planning Practice Guidance and to local policy

6.1 Page 14 of the MDC refers to NPPF, but to a version that was superseded on 20th December 2023. Differences in the current text are shown below in red.

*NPPF was updated in September 2023. NPPF promotes a presumption in favour of sustainable development for both plan making and decision-taking (Paragraph 11).*

*Section 12 of NPPF, "achieving well- designed and beautiful places", states (paragraph ~~126~~ 131) that 'good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities'*

*Paragraph ~~130~~ 135 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' . . . [two further paragraphs]*

*Paragraph ~~131~~ 136 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 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'.*

*Paragraph ~~134~~ 139 emphasises that 'development that is not well designed should be refused'.*

*Section 14 of NPPF, Meeting the Challenge of Climate Change, Flooding and Coastal Change (paragraph ~~154~~ 159), 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 NPPF, *Conserving and Enhancing the Natural Environment*, (paragraph **174 180**) 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'. [Four more paragraphs, not quoted.]*

The Masterplan proposals presented within this document consistently follow the principles set out in NPPF.

**6.2** Given that the MDC is said to have been checked on 25 April 2024 (second page of MDC), it is regrettable that it does not refer to the NPPF update of 20 December 2023.

**6.3** The emboldened extracts in paragraphs 6.1 above and 6.4 below indicate areas in which the MDC fails to follow NPPF principles.

**6.4** It is significant that the MDC does not quote paragraph 134 of 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 emerging Neighbourhood Plan, which fully reflects local aspirations, clearly demonstrate that the MDC does not conform with national planning policy.

**6.5** Pages 14 and 15 purport to consider PPG, although they seem to be based on the Guidance for Design as published on 6 March 2014 rather than the current version updated on 1 October 2019. Emboldened in the extract below are the areas where the MDC does not measure up to the quotations from PPG:

*The design section of PPG 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.*

*In relation to trees it is recognised that the interaction of trees and tree roots with built infrastructure, transport networks, buildings and utility services is complex and requires detailed interdisciplinary co-operation, with expert arboricultural or forestry advice. When considering street trees it is important to consider which species will best suit the highway environment in the long term, including associated infrastructure and utilities.*

*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 PPG.*

Crammed layout, disregard of landscape and local context, and lack of architectural and design quality actually make the MDC contrary to PPG.

**6.6** At pages 16 to 18 the MDC considers Local Planning Policy. It says that SPDs from RBC that '*should be considered as part of the development of 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. It acknowledges that

*Other relevant guidance includes Compensation measures for Green Belt release.*

**6.7** Pages 16 to 18 confine reference to the Local Plan to Policy HS2 and the site-specific policy for H66. Nowhere in the MDC is Strategic Policy ENV1: High Quality Development in the Borough mentioned, although as the term 'Strategic' and the title suggest, it is crucial to the appraisal of any development proposal. This symbolises the priority which the MDC seems to give to high quality development responsive to context. The importance of compliance with ENV1 must be embedded in the MDC as a whole and in the Design Code in particular.

**6.8** Strategic Policy ENV1 is set out *in extenso* at Appendix 7 hereto.

# Section 7

## Section 7 Content of MDC

### 7.1 Green Belt boundary It is nonsensical to claim (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.*

That paragraph must not remain in the MDC. The Green Belt boundary has been defined by the Local Plan. 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 or defence. 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 two bullets on page 74 (see paragraphs 13.2.2 and 13.2.6 below).

**7.2** The map on page 43 is unclear but seems incorrectly to include the words ‘and play area’ in the caption to the green patch between the south east boundary of TW’s land and Exchange Street.

### 7.3 Vision

#### 7.3.1 The Vision on 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, both non-designated) located in H66, whilst one Grade II\*-listed building (Parish Church) and two non-designated heritage buildings (Mushroom House and Chatterton Hey) are adjacent. As stated at paragraph 14.8.2 below, it is not necessary to enhance the footpath network to ‘enable the appreciation’ of the Church or desirable to do so in the case of private property.

**7.3.2** In that bullet *and in the local context* adds nothing and is mere verbiage.

### 7.4 Visual Context

#### 7.4.1 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, 143 and 147 and Restricted Byway 277, all shown on the map at Appendix 1 hereto.

#### 7.4.2 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 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 page 26 "View across northern parcel from Blackburn Road" is wrong. Blackburn Road is seen in the middle distance. The camera position 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. It is unlikely to provide a firm foundation for housebuilding, and restoration of the natural contours is necessary to mitigate the loss of views resulting from the development, reduce the dominance of the new housing and mitigate loss of openness - see paragraphs 5.5.1 and 5.5.2 above.

**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 (page 09) 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** Code MP 01 on pages 54 and 106 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**

**7.8.1** On pages 72 and 106, in Code US 01, "Policy HS3", dealing with Affordable Housing, should be changed to "Policies HS3 and HS16". According to Local Plan Policy HS16: Self Build and Custom Built Houses, 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. Otherwise, the MDC will not comply with policy.

**7.8.2** Page 91 of the MDC misinterprets Local Plan Policy HS16 and is, in any case, inconsistent with Use Code US 01. It states:

*Development proposals of over 50 dwellings should, where possible, make at least 10% of plots available for self-build in line with Policy HS16 in the Local Plan, subject to evidence of local demand within the Council's self-build register and site viability.*

What Policy HS16 says is:

Developers of schemes comprising of 50 dwellings or over will be encouraged, where possible, to make at least 10% of plots available for sale to small builders or individuals or groups who wish to custom build their own homes. This will be subject to the Council's self-build register and site viability.

Page 91 thus wrongly excludes schemes comprising 50 dwellings and for no good reason introduces a gloss on Policy HS16 by adding the words '*evidence of local demand within*'.

**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 now imposed on H66 by the current Local Plan, steeply pitched roofs are not typical of Edenfield. They make a building tall and dominant, with the result that it blocks long-distance views and increases the loss of openness, which as far as possible the MDC should aim to protect - see paragraphs 5.5.1 and 5.5.2 above and 7.11.3 below. Protection of views and openness and taking account of local character and appearance, as required by policy, must be prioritised over the dubious concept of an interesting roofscape. It is therefore necessary to delete the following bullet on page 90:

- *Variations in ridge height and roof pitch across the site should be utilised to create an interesting roofscape.*

**7.10 Identity** Page 72 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 document.*

In similar vein Page 42 declares:

*. . . Masterplan is underpinned by a number of critical strategic design principles which have emerged from the baseline analysis process.*

It is not made clear which pages of the MDC present the supposed '*baseline analysis*'. Nor is it clear where the '*strategic design principles*' are to be found or whether they are just the '*Design Principles*' on pages 42 and 43.

**7.11 Internal daylight and Privacy** Code HB 02 (pages 91 and 108) 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. Code HB 02 should specify the policies concerned.

**7.11.2** Only Policy HS8: Private Outdoor amenity space 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, set out in full at Appendix 7 hereto, provides *inter alia*

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 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 TW application fails to mitigate the over-bearing and oppressive impact of the proposal on properties on the western side of Market Street and in Alderwood Grove.

# Section 8

## Section 8 Street Hierarchy, Estate Roads, Emergency Access, Rights of Way and Vehicle Movements

**8.1 Street Hierarchy** The green shading in the plan on 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 either side of 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. The plan must be corrected.

**8.2** On page 84, 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 8.4.1 to 8.4.4 below) were in use, there would still be no link if the emergency precluded use of the normal access.

**8.3 Estate roads** By implication, the headings to the Table on page 83 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.

**8.4.1 Emergency access** Page 45 states:

*A controlled emergency vehicular access point will be provided between the southern and central land parcels, close to Chatterton Hey. Any potential through route here would need to be fully justified within a future planning application.*

The emergency access point is marked on the plan on page 45, as well as the plans on pages 07 and 55, which both use the word 'Proposed'. An 'emergency vehicle connection' in this area is shown on the plan at page 39 but heavily qualified by the word 'Potential'. On page 58 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 on page 59 the Methodist Church (southern) parcel is to have '**permanent** (ECNF emphasis) emergency vehicular access via Phase 1A' (TW's land). Whether the emergency access is proposed or merely potential is not clear. Why the Methodist Church emergency access should be permanent and TW's temporary is not explained. It is not clear what is meant by 'any potential through route' and whether that differs from the emergency route or would be available at all times to all vehicles, but it is of such significance that it should be addressed fully in the MDC rather than being left to a planning application.

**8.4.2** Some assumptions appear to be made here by the MDC as to the order of phasing and implementation (see paragraphs 3.2.1 to 3.2.6.5 above). There is an unacceptable lack of clarity.

**8.4.3** 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 FP127 and the roads within H66?

**8.4.4** Pages 38 and 82 add to the confusion by implying a two-way emergency connection between TW's land and the Methodist Church's:



[Page 38] *An emergency access link across PROW FP127 will ensure that the larger southern part of the allocation site [whatever that is supposed to mean] can be safely accessed from two locations; and*

[Page 82] *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*

**8.5 Rights of Way** 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. Page 38 wrongly refers to *the southerly footbridge*. The bridge in question maintains vehicular access to Alderbottom and Swallows Barn and is protected by signs ‘Weight limit 32 tons Only one vehicle on bridge’.

**8.6** It may be that for practical purposes access to the last two mentioned properties is normally taken via Exchange Street, FP127 past Chatterton Hey and onto the above-mentioned bridge over the A56 and FP126, and indeed the two 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. Underlining that point is the fact that the weight limit sign for traffic approaching the bridge from Market Street is on FP126, not FP127.

**8.7** Page 58 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 07 and 55, which shows orange triangles (proposed pedestrian/cycle access) at the Market Street/FP126 and FP126/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 triangle at the Market Street/FP126 junction needs to be relocated to the point where FP126 crosses the H66 boundary. Thirdly, orange triangles (signifying cycle access) are inappropriate for those locations as FP 126 and FP 127 are footpaths with no public right of way on a cycle. The site promoters would not have any power to dedicate the parts of FP126 outside their ownership for additional uses. In passing, it is noted that the plan misnames Chatterton Hey as *Chatterton Heys*.

**8.9** In representations in January 2023 about the TW application, ECNF 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 in 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**

**8.11.1** 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.*

**8.11.2** Page 58, says of this land:

*Primary vehicular access via Market Street or Phase 1a (no through route except for pedestrians/cycles)*

That is so obscurely worded as to be meaningless.

**8.11.3** A blue arrow on the plan on pages 07 and 55 marks the junction of Market Street and the drive leading to Alderwood as proposed highway access. A miniature blue arrow within H66 pointing to Alderwood is labelled '*Potential vehicle connection (alternative to access from Market Street)*'.

**8.11.4** A blue arrow on the plan on page 45 at the junction of Market Street and the drive leading to Alderwood is labelled '*Access to Alderwood either via Market Street or central land parcel*'. There is also a miniature blue arrow within H66 pointing to Alderwood.

**8.11.5** All of those statements in the Masterplan are disingenuous, as LCC in their response to planning application 2022/0577 made it crystal clear that the existing drive would be totally unsuitable as access to a development of nine more dwellings at Alderwood. The text on pages 45 and 58 should be amended to make clear that the access would be via the field opposite 88-116 Market Street and that the drive to Alderwood would not be used as vehicular access to new housing development, and the plans on pages 07, 45 and 55 should be amended accordingly. Saying that access would be via the central parcel is too vague. The actual access point must be specified.

# Section 9

## Section 9 Blue and green infrastructure

### 9.1.1 Page 42 briefly considers dry stone walls:

*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), dry stone walls located along the PROW routes through the allocation site, and existing watercourses.*

Watercourses are blue infrastructure, not green.

### 9.1.2 Page 72 adds:

*Existing dry stone walls within the allocation will be retained and rebuilt, except where they are required for access (such as the approved access point adjacent to 88-116 Market Street). In these instances the stone will be reused as part of the new access feature where appropriate.*

*Refer to Area Types for detailed guidance.*

There is no guidance about dry stone walls in Section 05 Area Types of the MDC. Their protection needs to be carried forward into a Code.

**9.1.3** The MDC needs also to commit to protecting the dry stone 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** Having regard to the area of green infrastructure within H66, as shown on the Policies Map, the MDC needs to commit to ensuring that all development is in accordance with Policy ENV5: Green Infrastructure networks, which provides:

Development proposals will be expected to support the protection, management, enhancement and connection of the green infrastructure network, as identified on the Policies Map. Proposals which enhance the integrity and connectivity of the green infrastructure network will be supported. Development proposals should seek first to avoid or, if not feasible, mitigate biodiversity impacts on-site. Schemes which would result in a net loss of green infrastructure on-site will only be permitted if:

- The function and connectivity of green infrastructure networks are retained or replaced; or
- The development scheme integrates new or enhanced green infrastructure where appropriate, such as natural greenspace and trees; and in all cases
- The proposal would not have an unacceptable impact on amenity, surface water or nature conservation.

Where practicable and appropriate, new green infrastructure assets incorporated into development proposals should be designed and located to integrate into the existing green Infrastructure network and should maximise the range of green infrastructure functions and benefits achieved.

That commitment needs to be stated on page 42 and carried forward into a Nature Code (pages 74 to 77 and 107).

**9.3.1** The Executive Summary says (page 09) 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. Existing landscape features are retained throughout the allocation and green corridors permeate the larger development parcels*

**9.3.2** There needs to be a commitment to implementing appropriate landscaping throughout H66, over and above the green corridors. 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. It is misleading to say that existing landscape features are retained throughout H66, when, to cite just one example, the clearance of trees adjacent to Church Lane (plan on page 43) is proposed. The one landscape feature that should be removed, the artificial mound (paragraph 7.5 above), is not mentioned. Brief reference to the plan on pages 07 and 55 confirms that it is wild exaggeration to state that the larger parcels are permeated by green corridors.

**9.4** The MDC needs to contain a commitment that during development of H66 there shall be no interference with existing land drainage arrangements that benefit adjoining land and that any damage shall be promptly made good, such commitment to be carried forward to the Site Wide Codes.

**9.5** Under the heading ‘*Green and blue infrastructure*’, page 42 says nothing about existing blue infrastructure, save for a passing reference to a spring (see paragraph 13.8 below) and as mentioned at paragraph 9.1.1 above. It is essential that the MDC should set out requirements for the treatment of all watercourses, including retention and enhancement.

**9.6** The plan on page 43 is incomplete in at least two respects. It fails to mark the Great Hey Clough watercourse within H66 and is thereby incomplete. It does not show the green infrastructure on H66 marked on the Policies Map.

**9.7** Page 74 states:

*The green infrastructure network, as indicated on The Masterplan, will respond to the opportunities and constraints of the site . . .*

In this context ‘The Masterplan’ must mean the plan so captioned on pages 07 and 55, but this does not show the green infrastructure on site marked on the Policies Map, either.

**9.8** It is inappropriate, irrelevant and impudent to include on the plan on page 43 (*Strategic Principles: Green and blue infrastructure*)

- ‘*Mature gardens at Mushroom House*’;
- ‘*Existing recreation ground and play area*’; and
- ‘*Strengthened and retained tree cover on Church Lane*’ in the vicinity of the Parish Church

as these are outside H66 and are not items over the management and retention of which the site promoters have any control.

**9.9** Page 42 states -

*The non-native trees that are removed will be replaced with native species in biodiversity net areas at a replanting ratio of 2:1, therefore providing increased tree coverage in the locality -*

but, whilst ‘biodiversity net gain’ is widely understood, it is not clear what is meant by *biodiversity net area*.

# Section 10

## Section 10 Land east of Burnley Road - proposed car park and public open space

### 10.0 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 (pages 44 and 48) show the area, located east of Burnley Road. The access point is marked on the plan on page 48. There is no information about layout or the dimensions of the bays or how many parking spaces on Burnley Road would be lost in consequence.

**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 separate, unconnected site in the Green Belt. The MDC acknowledges that it contains no justification for the car park -

*justification for this provision to be addressed through subsequent planning applications (page 44, fourth paragraph), and*

*details to be confirmed through subsequent planning applications (page 46, third bullet).*

Having regard to NPPF, paragraphs 152, 153 and 155, it cannot be assumed that planning permission would be granted for the proposed car park. Therefore, unless the car park were granted planning permission, it is wrong for the MDC to proceed on the basis that it is achievable.

**10.2** Whether the location of the 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 Northstone in a pre-application public consultation in 2023. It forms part of the pending Peel application.

**10.3** It is alarming that, to bring forward development of former Green Belt, the site promoters are proposing a car park and public open space in the remaining Green Belt. If the site owners deemed these essential to the development of H66, they should have raised the point during the Local Plan process. If the Inspectors had agreed that their inclusion was 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. Any necessary car parking provision should be confined to H66.

**10.4** Northstone suggested that the car park constitutes local transport infrastructure which could be allowed in the Green Belt (see paragraph 10.9.1 below). The provision of local transport infrastructure is not something to be considered *ad hoc*. It needs proper planning, and the appropriate way 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 10.5 below) but contains no suggestion that a car park outside H66 should be provided.

**10.5** The third proviso to the SSP 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.

**10.6** The MDC does not justify the provision of the proposed car park (see paragraph 10.1 above), and it lacks crucial detail about its design as well as about its 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), and that both these accesses will be close to a school and the signalised junction of these roads with Market Street and Guide Court

**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 its 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 (August 2023) accompanying the Peel application 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 involving 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.

**10.7.5** Paragraph 5.15 of that Planning Statement boasted that a pedestrian pathway would be provided, allowing direct and safe access between School and LAP. There are two major difficulties with that:

- first, Peel did not own all the land which the pathway would traverse, and
- secondly, it is understood that for reasons of safeguarding and security the School opposed the pathway.

**10.8** There is a shortage, if not an absence, of information about the proposed car park 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, it 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 is a boon to be provided at no cost to the community. It appears that in reality RBC as representative of the local community would 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 the appropriate number of parking spaces been calculated?
- The car park 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?
- A new footpath is shown on the plan on page 48 adjacent to Burnley Road, but it is not clear if this is to be adopted as part of the highway, or, alternatively, who would be responsible for its maintenance.

- How, if at all, would sustainable drainage of the proposed car park be achieved? It emerged at the consultation event that Northstone are aware that drainage issues require attention.
- The number of parking spaces on Burnley Road to be lost through a prohibition of waiting near its access. Some yellow lines are drawn on the plan on page 48 on Burnley Road, but they are not explained.

**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 says (paragraph 5.8 of the planning statement accompanying the Peel application) 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) [now 155 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 necessitated by development of H66, 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' personal 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 there is currently a 'lollipop' school crossing patrol and where an uncontrolled crossing is proposed along with a proposed pedestrian phase at the traffic signals (pages 48, 64 and 66).

**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 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.*

That extract is a misrepresentation and must be corrected. 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, and therefore not *in accordance with*, 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 pages 72 and 106 -

*Subject to requirements identified through subsequent planning applications, the delivery of off-site community car parking and/or school expansion should be delivered in the location identified on the Masterplan -*

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’ (page 44) and ‘off-street parking area’ (page 46) and ‘Northstone off-street car park area’ (pages 48 and 66), ‘proposed car park, public open space’ and ‘proposed community parking area’ (both on page 54) and “proposed community car park and public open space” (pages 07 and 55), the MDC changes tack at page 78 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 car park. It must be relocated within H66 (paragraph 10.9.4 above) and the “Green infrastructure and play provision’ plan on page 78 redrawn accordingly, because it fails to meet the parameters set out in the MDC (page 80):

*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

## Section 11 Transport

**11.1** In the last two preceding consultations, about the MDC (V13 and V17), ECNF submitted a document reflecting local concerns about traffic arrangements, reprinted at Appendix 3 hereto. That document is 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 25 August 2023, to which there is a link at Appendix 4 hereto, was considered at a meeting between RBC, ECNF and SK on 28 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. Further submissions from SK on behalf of ECNF are being submitted concurrently with these representations.

**11.2.1** Under the heading *Off site highway improvements* page 46 refers to -

*Provision of off-street parking areas at the western extent of Exchange Street, off Market Street towards the centre of the H66 allocation, and to the east of Burnley Road at the northern extent of the village (details to be confirmed through subsequent planning applications)*

Being *off-street*, these three areas cannot be highway improvements. Furthermore, the proposed areas off Market Street and Exchange Street will be on site, not *off site*. This careless presentation requires correction. The calculation of circa eight additional parking spaces requires to be fully explained - see paragraphs 3.2.8.2.2 and 3.2.8.2.3 above.

**11.2.2** Whether the car park off Market Street will actually be provided is called into question on page 42, pre-penultimate paragraph:

*This area may also include community car parking.*

The car park is not specified in the labels on the plan on page 43. This ambiguity must be resolved.

**11.3** The maps on pages 48, 64 and 66 fail to take account of the potential new or improved access to site H65 (Land east of Market Street). The maps on pages 49, 65 and 67 are out of date: they fail to show the junction of Market Street and Pilgrim Gardens and the new houses in the vicinity.

**11.4** The maps on pages 47 to 49 and 64 to 68 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, and failing to show existing restriction and prohibition of waiting. Use of the expression '*No Parking*' where '*No Waiting*' would be accurate suggests the map labels were not applied by a highways expert.

**11.5** Coloured chippings/aggregate (pages 46 to 49, 66 and 67) seem pointless.

**11.6** It is not clear what purpose 'gateway features' (pages 46 to 49, 66 and 67) would serve or what need they would fulfil or how they might be safely accommodated in a narrow highway near a zebra crossing or at a signalised junction. They would not be at the entrances to the village.

**11.7.1** Pages 46 to 49, 66 and 67: the extensive 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.

**11.7.2** Pages 49, 65 and 67 - the build-out and bollard at the east end of Market Street would block deliveries to M R Cook, Butcher. Instead, a short extension of prohibition of waiting adjacent to his premises would facilitate unloading.

**11.7.3.1** With prohibition of waiting proposed (pages 49 and 67) between the APMs at numbers 21 and 47 Market Street, it is ridiculous to retain those markings and to interrupt the prohibition to retain the APM covering the Dean Close junction and entrance to number 43. If there were a prohibition, unwelcome as it would be, it would be sensible to extend it to replace all three markings. The prohibition would be enforceable, an APM is not.

**11.7.3.2** Similar considerations apply to the proposed prohibition of waiting (pages 48 and 66) on the west side of Market Street between the drive to Alderwood and number 167, which is interrupted by a bus stop with no proposal for protection by a TRO and the entrance to number 153 with an APM.

**11.8** Pages 49, 65 and 67 - the extensive proposed prohibition of and restriction on waiting outside existing houses will bear harshly on disabled occupiers and their carers. Currently, there is no reason not to approve a disabled person's parking space application outside those houses, but, if there were a prohibition of waiting, the outcome of any application would be in doubt. The application might be approved for a space remote from the applicant's home. Where waiting is prohibited, a disabled person's vehicle is unable to wait for more than three hours or to return within one hour.

**11.9.1** One aspect of the on-site parking area intended to replace lost spaces on Market Street causes particular concern (pages 46, 49 and 67). 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'.

**11.9.2** The MDC does not provide details of surfacing, drainage or lighting of the parking area, but it was suggested in the TW application that any lighting would be low-level. That would be likely to result in dark places, with further risk to public safety.

**11.10** The mound is contrary to

- section 17 of the Crime and Disorder Act 1998, as amended - RBC is required to exercise its functions with due regard to their likely effect on crime and disorder, and to the need to do all it reasonably can to prevent crime and disorder.
- NPPF, paragraph 135 f) - [create places that are safe . . . where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience](#) -
- PPG (crime prevention to be considered - paragraph 6.5 above),
- Strategic Policy ENV1: High Quality Development in the Borough - [h\) Minimising opportunity for crime and malicious threats, and maximising natural surveillance and and personal and public safety](#) - and
- the second bullet in Policy TR4: Parking, quoted at paragraph 10.14 above.

**11.11** The proposed parking area does not meet other criteria in Policy TR4, namely, [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 safe, secure and benefit from natural surveillance;](#)
- . . .
- [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 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 [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.

**11.12** It is noted that the MDC makes reference (caption on page 48) to the involvement of LCC Highways in the transport/traffic proposals -

*Off site highway improvements (updated to address LCC Highways comments April 2024 - Rev P)*

As set out in this submission ECNF have considerable concerns in respect of these proposals (paragraph 11.1 above and Appendix 3 to these representations). It is therefore 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. See also concurrent representations by SK on behalf of ECNF.

**11.13** The seventh bullet on page 88 claims 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, there is no guarantee that sufficient parking provision will be provided. The bullet promises kerbside parking, but the emphasis of the plans on pages 47 to 49 and 64 to 68 is on off-street parking in locations of varying unsuitability.

**11.14** Eddisons' Highways Consideration of Masterplan Note (referenced at paragraph 10.7.4 above) speaks at paragraphs 1.41 to 1.43 of the Market Street/Northstone Site Access junction, but the Local Plan is clear that the Northstone site would take access from Blackburn Road.

**11.15** That 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.

**11.16** It is therefore apparent from the Note that the compilers lacked a clear understanding of the subject.

# Section 12

## Section 12 Pedestrian and cycle connectivity

**12.1** The plan on pages 07 and 55 shows “Proposed pedestrian/cycle access” at the junction of FP126 with Market Street and at the junction of FP126/P127 but the plan shows that Footpath 126 at these points and Footpath 127 at its junction with FP126 are outside H66. See paragraph 8.8 above.

**12.2** The statement in the text on page 82 -

*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. Therefore, as the routes within H66 would not be connected to the *local cycling network*, they would not expand the network, informally or otherwise.

**12.3.1** It is wholly unacceptable for the MDC to present plans containing conflicting information, as shown in this and the next three following paragraphs. The MDC is ambiguous, in that there is conflict between the plan *Strategic Principles: Pedestrian and Cycle Connectivity* on page 50 and the plan on pages 07 and 55 in their respective treatment of proposed or potential pedestrian and cycle routes, as shown in Table 2 on the next following page. There are more differences in the plan on page 43, where a route captioned *North-South pedestrian link* goes no further south than FP126.

**12.3.2** The marking of routes within H66 as ‘Potential pedestrian/cycle route’ might indicate that the respective owners of the potential routes are not on board with the MDC.

**12.3.3** The variety of adjectives - proposed, potential, indicative - is confusing.

**12.3.4** The plan on page 50 marks two routes as for pedestrians, but the plan on pages 07 and 55 shows them as pedestrian/cycle. This is despite the fact that the main sub-heading on page 50 is ‘Pedestrian and cycle connectivity’. This confusion alone renders the MDC unfit for purpose.

**12.3.5** Page 50 states,

*The Masterplan includes an additional new north-south pedestrian and cycle route which will improve the overall permeability of the area. Where viable, pedestrian links will be enabled to the northern and southern boundaries of the central land parcel to ensure that connectivity is maximised (within the constraints of land ownership). Individual planning applications associated with the various land ownerships should ensure that this link is provided for within and up to the immediate edge of each application boundary without impediment.*

*A short section of this link located between the Taylor Wimpey site and Church Lane will be delivered by Lancashire County Council on highway-controlled land.*

This north-south route would appear to be the one referenced 2 in Table 2 below. The plans on page 50 and pages 07 and 55 do not show the ‘*highway-controlled land*’, whatever that means. Clarification of that expression and the location of the land and the length of route located therein is necessary.

Reference	Location of route in H66	Caption on plan on page 50	Colouring on plan on pages 07 and 55
2	Near south-east boundary of Methodist Church land to Church Lane (by former Vicarage)	Proposed north-south pedestrian and cycleway connection. The south end is labelled Proposed pedestrian connection. The north end is not labelled	Proposed pedestrian/cycle route (indicative alignment), except at north end, where it is shown as potential pedestrian/cycle route (indicative alignment). South end is combined with Proposed road link (alignment subject to detailed design)
3	South-eastwards to Recreation Ground	Potential pedestrian and cycleway connection from internal road network to land ownership boundary	Potential pedestrian/cycle route (indicative alignment)
4	Market Street to boundary of 4 and 5 Alderwood Grove, then westwards to route reference no 2	Potential pedestrian and cycleway connection	Potential pedestrian/cycle route (indicative alignment). Combined at east end with Proposed highway access and Proposed road link (alignment subject to detailed design)
5	North-west part of TW land to Market Street via the driveway serving Alderwood	Potential pedestrian and cycleway connection	Potential pedestrian/cycle route (indicative alignment). Combined at east end with Proposed highway access
6	Church Lane to Blackburn Road	Proposed pedestrian connection	Proposed pedestrian/cycle route (indicative alignment). Combined at east end with Proposed highway access

Table 2: Comparison of plan on page 50 with plans on pages 07 and 55

#### 12.4 Page 82 states:

*All new cycle routes within the allocation will meet the core design principles of (LTN) 1/20, where feasible.*

A correct citation would be Cycle Infrastructure Design Local Transport Note 1/20 published by the Department of Transport in July 2020. The MDC fails to translate this principle into a Site-Wide Code.

# Section 13

## Section 13 Landscape design principles and SUDS

**13.1** The second bullet on page 74 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 twelfth bullet on page 74 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 penultimate bullet on page 74 is nonsensical as it avoids a crucial point - the Green Belt boundary is now the A56.

*Development proposals that interface with retained Green Belt land will need to justify an appropriate boundary treatment of dry stone walls, fencing, native hedgerows or open boundaries (along with any associated landscape screening) depending on the character of the development and views towards the boundary interface.*

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 is inconsistent with the new woodland structure proposed on unnumbered page 42 (see paragraph 7.1 above).

**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 dated 12th April 2024 to the TW application (repeating comments dated 15 February 2024, 24 November 2023, 22 September 2022 (misprint for 2023), 26 June 2022 (misprint for 2023) and 8 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** Page 74 of the MDC closes with a bullet that was not in previous consultation versions:

*Any acoustic or road safety barrier required along the A56 boundary will need to justify an appropriate treatment of bunding, fencing or dry stone wall (where practicable); along with any associated landscape screening.*

This is irreconcilable with the bullet which is quoted at paragraph 13.2.2 above and which needs to be deleted.

**13.3.1** The text on page 76 and Nature Codes on pages 76 and 107 must be amended to show that any SUDS shall 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 shall be maintained in strict accordance with arrangements which shall have been approved by those bodies prior to the commencement of construction of the SUDS.

**13.3.2** It is not clear why Nature Code NA 05 (pages 76 and 107) prescribes separate outfalls for Phases 1A and 1B.

*Each development parcel (as broken down by phase) will have a separate outfall from their drainage systems, each restricted to associated greenfield runoff rates. Each network will be maintained by an appropriate body (either private management company, water authority or Lead Local Flood Authority) separate from one another, including outfall locations and SuDS features as required.*

There would seem to be environmental advantages in treating them as one development parcel for these purposes. Similar comments apply in the case of Phases 2 and 4. It is questionable whether a private management company would have the resources to fund the maintenance of drainage systems.

**13.3.3** Foul drainage requirements (page 76) need to be carried forward into a Site Wide Code.

**13.3.4** It is noted that in response to consultation about previous iterations of the MDC, United Utilities have raised a number of concerns about flood risk and the drainage arrangements (surface water and foul) for the site, that is, the whole of H66, not just TW's land. The MDC still fails to deal adequately with these, and, as long as that continues, it must be rejected.

**13.4.1** 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 09) 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 ‘*account for ground conditions and land stability*’ or 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.

**13.4.2** 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.

**13.4.3** Likewise, page 42 stating -

*Additional space is allowed along the south western edge of the site. This represents the most appropriate and logical area for providing SUDs as it includes the lowest lying parts of the site. Potential locations for surface water storage are illustrated indicatively on the masterplan on page 55. The delivery of SUDs in these locations is the developer’s preference but they will be subject to detailed design considerations associated with part 8 of Policy H66, which requires detailed geotechnical investigations to take place to confirm such blue infrastructure would suitably protect the A56. At this stage, however, it is anticipated that the SUDs locations indicatively shown on the masterplan can be delivered and designed appropriately to avoid any impact on the A56.*

*Detailed geotechnical information for each phase/parcel of land must be provided at the planning application stage -*

needs to be qualified by noting that it has yet to be demonstrated that H66 can safely accommodate SUDs and that any water attenuation area will need the approval of the LLFA.

**13.5** In identifying a preferred location for the SUDs, the MDC makes no allowance for how this might be affected by the projected widening of the A56.

**13.6** Maintaining the integrity of the A56 is of the utmost importance, and so too is the stability of any new build on H66. Having regard to what is already known about the site geology, the MDC needs to specify how these objectives will be maintained, including but not limited to the geotechnical investigations that will be required throughout H66 and the nature of the works that are likely to be required in a worst-case scenario. NPPF, paragraph 180 e) requires:

[Planning policies and decisions should contribute to and enhance the natural and local environment by:](#)

[. . . 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 . . .](#)

**13.7.1** On page 77 in the third paragraph and on pages 77 and 107 in the first paragraph of Nature Code NA 06 -

*Biodiversity Net Gain (BNG) should be achieved throughout the development in line with current National and Local Authority requirements at the time of submission of subsequent planning applications -*

'submission' should be changed to 'approval'. 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, or of the lapse of time between submission and approval.

**13.7.2** The second paragraph of Nature Code NA 06 -

*The 2021 Environment Act requires a 10% net gain from submissions from 12th February 2024 (or 2nd April 2024 for small sites), to be met through on- site habitat enhancement; the allocation of registered off-site biodiversity gain; and the purchase of biodiversity credits -*

should cite the statute as the Environment Act 2021, not the 2021 Environment Act.

**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 page 38 that

*A small spring passes through the southern part of the allocation site, located to the rear of Eden Avenue and Oaklands Road.*

Page 42 and the plan on page 39 seem to make the same mistake:

*. . . an existing small spring prevents development from backing onto existing housing.*

**13.9** The map on page 39 omits yellow shading (*Housing backing on to site*) at Mushroom House and 51 - 59 Blackburn Road.

**13.10** It is essential that the Species Palette on page 75 should expressly forbid the planting of non-native species and should require the selection of species appropriate to the ground conditions. Any species that do not meet those criteria should be deleted from the palette. After the word '*should*' in Nature Code NA 02 on pages 75 and 107 -

*Species selection and distribution should be reasoned and justified through a Landscape Strategy Plan as part of any future planning application relating to the H66 allocation -*

add 'accord with the Species Palette in the Masterplan and'.

# Section 14

## Section 14 Area Types

**14.1** The proposed use of reconstituted stone (or fake stone, as the Places Matter assessment called it) and red brick as building material in Edenfield Core (page 96) 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 blurred image (of FP126 bounded on one side by a dry stone wall and on the other by a wall of reconstituted stone) at the top of page 97 shows. Red brick is even less acceptable - see paragraphs 14.3.1 and 14.3.2 below. The MDC fails to take account of paragraph 233 of the Explanation of Strategic Policy ENV1: High Quality Development in the Borough:

*The use of local materials, particularly stone and slate, is important in reinforcing local distinctiveness.*

**14.2.1** The philosophy behind the Village Streets area type (page 98) 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 churchyard, from Market Street and Alderwood Grove, from Highfield Road, Exchange Street and the Recreation Ground, from FP127 and FP128 and from high ground to the east and west. It would also be seen from the Edenfield Core area.

**14.2.2** The description of Village Streets does not stand scrutiny. Page 98 claims:

*The 'Village Streets' comprises the residential areas located behind the more visually prominent, outward facing housing which falls within the Edenfield Core character area. The Village Streets will draw upon key characteristics of the village but have greater flexibility to vary building materials due to the reduced visual prominence of the area within the wider development. This will add variety to the urban form within the village.*

*The area will broadly extend to cover:*

*Areas located away from PROW routes, existing main roads and which will be visually screened by housing in the Edenfield Core character area.*

**14.2.3** Taking those points in turn and having regard to the plan on pages 52 and 95

- *behind* -
  - viewed from the **north**, Village Streets is not behind any housing at all - it extends to virtually the entire northern edge of TW's developable area and would be visible from the churchyard and Church Lane, from the A56 and from FP128 on the west side of A56;
  - from the **east**, Village Streets is not behind Edenfield Core - it would be visible from Market Street and Alderwood Grove and high ground;
  - from the **south**, Village Streets is not behind any housing at all - it extends to the entire southern boundary of TW's developable area and would be visible from Exchange Street, Highfield Road, FP 127 and the Recreation Ground
  - and from the **west**, visible from high ground
- *reduced visual prominence* - still prominent, as noted

- *add variety* - the variety would not respond to context
- *away from PROW routes* - it adjoins FP127
- *away from existing main roads* - visible from A56 and Market Street
- *screened by housing in the Edenfield Core* - only partially, and assumes views from Edenfield Core are unimportant

**14.2.4** The reasoning and influences for massing are (page 98)

*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.*

**14.2.5** Taking these points one by one

- *sit internally to the central housing parcel* - stilted language is unclear, but central parcel is taken to mean the land subject to the TW application. Village Streets occupies the northern and southern portions of that parcel and extends to its northern and southern limits - see plan on pages 52 and 95.
- *less sensitive locations* - it is crass to compare the sensitivity of different locations. They may be sensitive in different ways. The MDC acknowledges the sensitivity of the the western edge of the development. Paragraph 14.2.3 above considers the other borders: north is particularly sensitive as regards views from the Churchyard, east because of the interface with existing dwellings and south because it would form the backdrop to views across the Recreation Ground.
- *potential to be delivered at higher densities* - use of plural is puzzling. In any case, being feasible does not mean a higher density is desirable (see paragraphs 5.5.1 and 5.5.2 above). On the eastern interface, particular regard must be paid to the sensitivity of existing dwellings. See paragraphs 7.11.4 above and 14.2.9 below.
- *incorporating terraces which are typical of the area* - see paragraph 14.2.8 below.

**14.2.6** A density of 35 - 40 dph is proposed for Village Streets, because (page 98) it

*Reflects proximity to services & public transport network*

This has the appearance of an excuse where the authors could think of nothing better. The reason is wholly inappropriate - see paragraphs 15.3 to 15.8.1 below.

**14.2.7** The reasoning and influences for the built form of Village Streets being *distinctly linear* (page 98) are

*Complements terraced built form found in the centre of Edenfield*

Page 98 promises also

*Strong building line with variation in set back used to vary frontage and side parking arrangements,*

the reasoning and influences being

*A strong block structure will complement the character of nearby Market Street and will enable a variety of parking solutions.*

**14.2.8** The characteristic linearity of Edenfield will not be enhanced by additional terraces to the west of Market Street. *Strong building line* and *strong block structure* are euphemisms for dominant terracing. Furthermore, cramming Village Streets with high-density housing is contrary to the policy requirements to have regard to the openness and context of the site (see paragraphs 5.5.1 and 5.5.2 above)

**14.2.9** The reasoning and influences for height (page 98) are said to be

*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.*

The requirement to maintain openness means that buildings of more than two storeys are unlikely to be appropriate in Village Streets. That reasoning compares the heights of Village Streets with Market Street. It ignores the impact of development on existing dwellings in Alderwood Grove, which falls away from Market Street and where the height difference between numbers 5 to 8 and Village Streets is much less. Nor does the reasoning take into account the extreme proximity of 5 to 8 Alderwood Grove to Village Streets.

**14.2.10** Paragraphs 14.2.2 to 14.2.9 above show that the Village Streets Area Type is poorly conceived, unjustifiable, illogical, unresponsive to context, detrimental to existing residential amenity and contrary to planning policy.

**14.3.1** The use of red brick in Edenfield Core and Village Streets is out of keeping with the built environment. In the area bounded by Exchange Street, FP 127, the A56 and the B6527 there are only fourteen brick buildings: 43 and 45 Market Street, Alderwood, 1 to 9 Alderwood Grove, a detached garage at 2 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 brick development in Edenfield Core and Village Streets, 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.*

**14.3.2** The claimed reasoning and influences for the red brick in Village Streets are (page 98)

*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 much further from the Edenfield Core and Village Streets areas than largely stone-built Market Street, as an inspiration - this just appears to be a poor excuse. Use of red brick would be contrary to policy: criterion 5 vi of the SSP requires materials and boundary treatments to reflect the local context. See also paragraph 5.5.1 above.

**14.4** The “Key (glimpsed) views to be considered” for Village Streets (page 98) include “Quality of views to and from recreation ground”. On Area Type 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 red brick 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 in addition to the views listed.

**14.5** A glaring omission from the Area Type 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.

**14.6.1** In Edenfield Core, Area Type Code AT EC 08 (page 96) needs to restate the views to be maintained as 'Views to hills (including Bull Hill, Musbury Tor and Oswaldtwistle Moor), Peel Monument, Emmanuel Church and Edenfield Parish Church and Churchyard from Market Street, Exchange Street, Edenfield Churchyard and PROW and from within the development. Layout of housing parcels must be designed to allow views of Edenfield Parish Church to continue.'

**14.6.2** In Village Streets, Area Type Code AT/VS 08 (page 98) needs to restate the views to be maintained as 'Views to hills (including Bull Hill, Musbury Tor and Oswaldtwistle Moor), Peel Monument, Emmanuel Church, Edenfield Parish Church and Churchyard and Recreation Ground from Market Street, Exchange Street, Edenfield Churchyard and PROW and from within the development. Layout of housing parcels must be designed to allow views of Edenfield Parish Church to continue.' At the beginning of Reasoning and Influences for this Code should be added: 'These are locally valued and provide sense of place'.

**14.6.3** In Edenfield North, Area Type Code AT/EN 08 (page 102) needs to restate the views to be maintained as 'Views to hills (including Bull Hill, Musbury Tor and Oswaldtwistle Moor), Peel Monument, Emmanuel Church, Edenfield Parish Church and Churchyard from Blackburn Road and Burnley Road and from within the development. Layout of housing parcels must be designed to allow views of Edenfield Parish Church to continue.'

**14.6.4** It is the hills, not just the hilltops (pages 96, 98 and 102), of which views must be maintained. The word '*distant*' is tendentious and not objective and were better avoided. Page 42, with the plan on page 43, falls into the same errors -

*An area of green space is proposed adjacent to Market Street to prevent development from fully obstructing valued long views to the distant hilltops from the centre of the village. This area may also include community car parking. This is an appropriate complementary use as it will not obstruct long views.*

**14.6.5** Similarly on page 45, *distant* and *where feasible* must be deleted from the sentence:

*View corridors along internal streets to distant hills should be retained where feasible.*

**14.7** Notwithstanding the warning on page 94 -

*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 99 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;

**14.8.1** 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.*

**14.8.2** 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.

**14.8.3** It is not accepted that the public views of Mushroom House from FP126 or the views of the former Vicarage from Church Lane are, as stated on page 36, 'glimpsed'. Nor is it only 'glimpsed views to the wider landscape context' that development should seek to retain and frame (page 38).

**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 Type Codes. Page 38 says that

*Development should ensure that the setting of these buildings is conserved, and where possible enhanced,*

but the Codes completely ignore heritage issues. The MDC does 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** 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 (page 08) 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 Type Codes. For all the reasons in this paragraph and paragraphs 14.5, 14.8.1 to 14.8.3 and 14.9 above, the Executive Summary is wrong to claim (page 08):

*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 (page 100) 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 (page 102). Natural stone would be the only acceptable building material at this prominent approach to Edenfield. Even if the proposed brick buildings are out of view from Blackburn Road, they would still be an incongruous sight from the A56, from adjacent PROW and from across the valley.

**14.13** In the light of paragraphs 14.1 to 14.12 above, the suggestion on page 72 -

*Across the allocation building materials will 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 another.

**14.14.1** All the Area Types (Pages 96, 98, 100 and 102) 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 openness and 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.

**14.14.2** Therefore a proviso needs to be added to the applicable Area Type Codes - “provided that no building of more than two 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 (page 98) -

*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. See also paragraph 14.2.9 above

**14.15** In all the Area Types (pages 96, 98, 100 and 102), in the subject “Key (*glimpsed*) views to be maintained”, the word “*glimpsed*” should be deleted, as it is too restrictive.

**14.16** The front boundary treatments (Area Type Codes AT/EC 07 and AT/VS/07) (pages 96 and 98) for Edenfield Core and Village Streets 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.

**14.17** 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

## 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, 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 (43 dph - see paragraph 15.8.1 below) already built at Pilgrim Gardens / Market Street (Horse & Jockey site).

**15.2.1** In stating “a residential net developable area of 13 hectares” for H66, page 44 conflicts with 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). . .*

*Peel are freehold owners of the majority of the northern part of the site (measuring 2.2 hectares). .*

*The Methodist Church control the southern parcel (measuring 4.75 hectares).*

*Richard Nuttall controls the land (measuring 1.85 hectares) to the far north of the allocation . . .*

*David Warren controls land (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. The meaning of ‘largest’ in the context of TW’s ownership is unclear. It must be noted that the central part of H66, includes, as the Policies Map shows, 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 3 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
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 3: 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 (page 84) is extremely concerning, as it is up to 38% more than the density for H66 in the Local Plan. It is excessive compared with densities in the vicinity as shown in Table 4 at paragraph 15.8.1 below. 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 (reproduced at paragraph 2.3 above) 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, and
- 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 . . .

**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 on page 98 (*Reflects proximity to services & public transport*) is irrelevant.

**15.8.1** Table 4 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, page 30
49-77 and 58-82 Market Street	45	MDC, 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 4: Selected comparative densities of development near H66

**15.8.2** A notable omission from the map on page 30 is the Pilgrim Gardens development, even though the page carries a paragraph of text about it and an image in one of the vignettes.

**15.9** The Chatterton South Area Codes (page 100) 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 15.8.1 above apply to Chatterton South as well as to Village Streets.

**15.10** Page 102 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.

**15.11** Table 5 below seeks to analyse the projected density of development at H66 taking the highest figures in the AT/xx/01 Codes on pages 96, 98, 100 and 102. It excludes possible development on land at Alderwood or at the former Vicarage.

	Owner or Site	Developable Area (ha) per SHLAA/ application	Yield (30 dph) per SHLAA	Maximum yield per Area Type Codes	Notes
1	Methodist Church	2.32 / —	70	105 @45 dph	
2	TW	9.12 / 7.1	273	238** (33 dph)	**Number of dwellings applied for
3	Peel + Richd Nuttall	2.09 / —	63	71 @ 34 dph	
4	Horse & Jockey	— / 0.21	10*	10* (43 dph)	*Actual build figure - development complete

*Table 5: Analysis of projected density of development at H66*

The developable Area of H66 per Local Plan Policy HS2, Table 7 is 13.74ha, which equates to the sum of the above SHLAA area figures plus the Horse & Jockey site area. The TW developable area is now known to be only 7.1ha (paragraph 15.1 above), bringing the figure of 13.74 down to 11.72. Table 5 above shows that on the maximum yield proposed for Chatterton South and Edenfield North Area Types plus the number in the TW application (covering Edenfield Core and Village Streets) and the number built on the Horse & Jockey site, the MDC is proposing up to 424 (105 + 71 + 238 + 10) dwellings to be built in H66 on 11.72ha. That is a yield of 35 dph, more than 20 per cent higher than the Local Plan density of 29 dph for H66. Page 44 of the MDC therefore misleads when it says:

*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.*

## Section 16

## **Section 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 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 a primary school 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.

# Section 17

## Section 17 No commitment to make school extension land available

### 17.1 Criterion 9 of the SSP states:

[Development of H66 for approximately 400 houses would be supported provided that] Provision will be required (*sic*) 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 (*sic*). 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 (now 152) of the NPPF.

### 17.2 In respect of criterion 9 the Executive Summary claims at page 09:

*The Masterplan identifies the land to the rear of Edenfield CE Primary School for potential expansion (page 55) and makes a commitment that this land can be made available (at nil charge to the Local Education Authority) should the local education authority identify a need, with detailed arrangements to be agreed through subsequent planning applications.*

**17.3** It may be doubted whether the MDC can direct the use of land outside H66 and whether a masterplan can make any such commitment at all, but, even if it were an appropriate vehicle, the MDC does not actually make a commitment. The MDC marks a plot on the plan on pages 07 and 55 'Potential school expansion land (subject to requirements)', a plot on the plan on page 23 'Peel L&P (land available for potential school expansion)' and a plot on the plan on page 44 'Potential school expansion land'. The MDC says at page 22:

*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". This is yet another example of misrepresentations in the MDC.

### 17.4 The MDC returns to this topic at page 44, falling well short of any actual commitment, saying:

*[The MDC] also 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 (at nil charge to the Local Education Authority) will be subject to evidence of need and through developer/land owner contributions in a proportionate basis based upon the size of their development to ensure the developer/land owner hosting the school expansion is not disadvantaged.*



# Section 18

## Section 18 Compensatory improvements to Green Belt

### 18.1.1 Criterion 7 of the SSP states:

Compensatory improvements must be provided to the Green Belt land in proximity of the site in accordance with Policy SD4

#### Policy SD4: Green Belt Compensatory Measures provides

Where land is to be released for development, compensatory improvements to the environmental quality and accessibility of the remaining Green Belt land will be required.

Types of improvements that would be considered acceptable include the creation or enhancement of green or blue infrastructure; biodiversity gains (additional to those required under Policy ENV1), such as tree planting, habitat connectivity and natural capital; landscape and visual enhancements (beyond those needed to mitigate the immediate impacts of the proposal); new or enhanced walking or cycling routes; as well as improved access to new, enhanced or existing recreational and playing field provision.

This policy applies to developments on land that is located within the Green Belt or on allocated housing and employment sites that were previously in the Green Belt as listed in Policy SD2

The Council has identified a number of projects where Green Belt compensatory measures can be delivered, or proportionate contributions made towards these schemes, listed below. Further details are contained in the Green Belt Compensatory Document or its successor:

- Rossendale Forest
- Rossendale Incredible Edible
- New Hall Hey Gateway
- Edenfield Cricket Club
- Edenfield CE / Stubbins Primary School Extension
- Public Rights of Way / Cycleway Upgrades and
- Improvements to the Network

#### NPPF, paragraph 147, provides:

Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport. They should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.

### 18.1.2 In the Executive Summary (Page 09) it is claimed in respect of criterion 7:

*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 (sic) noted at page 51 and can be secured through S106 contributions from individual applications.*

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.

**18.1.3** Page 51 confirms that the authors do not comprehend that compensatory improvements to the remaining Green Belt must be made in the Green Belt. The map captioned *Indicative Green Belt compensation* is too pixellated for clarity but wrongly proposes the following as a compensatory improvement to the Green Belt:

- Improving FP112 where it runs through housing allocation site H67 Edenwood Mill. H67 lies outside the Green Belt

**18.1.4** Page 51 wrongly lists the following as examples of compensatory improvements to the Green Belt:

- *Enhancements to recreation ground links* The Recreation Ground off Exchange Street is well within the Urban Boundary.
- *Improved signage for PROW* without stipulating that the signage would need to be in the Green Belt
- *Community amenity and play areas which include gardens focused on food production and edible plants promoting the Incredible Edible Rossendale Scheme.* These would count only if, as seems unlikely, they were located in the Green Belt.
- *Facilitation of improved cycle / pedestrian footpaths from Burnley Road to Blackburn Road and on to the rest of the allocation to reduce pressure and potential conflicts on Market Street’.* Leaving aside the tautological *pedestrian footpath* and oxymoronic cycle footpath, any such improved route is unlikely to be in the Green Belt

**18.1.5** RBC’s guidance document ‘*Compensation Measures for Green Belt Release*’ (January 2023) is cited unquestioningly, but it must be noted that of the schemes suggested therein

- *Rossendale Forest* improvements would be eligible only if located within the Green Belt
- *Incredible Edible Rossendale* schemes would be eligible only if located within the Green Belt, which as noted above is unlikely. Indeed, the cited achievements at Haslingden and Rawtenstall are clearly not in the Green Belt
- *Edenfield C.E. / Stubbins Primary School Extension* As section 2 of the guidance document points out, *there are specific measures that will be necessary in order to make developments acceptable, and these will not be considered for Green Belt compensation.* Whilst the guidance document provides -

*The residential allocations in Edenfield, particularly H66 which proposes approximately 400 dwellings, may require additional classroom capacity at one of the two primary schools in the area – Stubbins or Edenfield C.E. Either school extension would require new additional development to be located within the Green Belt and improvements to Green Infrastructure, playing pitches or travel to school routes could be investigated. This would be considered as part of the overall Masterplan for H66 -*

it would seem that such improvements were more appropriately considered in the context of a proposed extension rather than development of H66. It is unrealistic for them to be considered as part of the Masterplan for H66, as they are outside H66 and there is no certainty that any such extension will actually be required.

- *Public Rights of Way / Cycleway Upgrades and Improvements to the Network Specific routes have been identified close to the Green Belt releases in Edenfield. Such routes as have been identified are regrettably not specified, and therefore it cannot be assumed that they are all in the Green Belt.*
- Page 10 of the Guidance Document also considers PROW improvements: *A number of potential PROW improvements have been identified to the east of Edenfield, which are within the Green Belt. These potential improvements include:*

*o Connecting to the Pennine Bridleway – improve Byway 14-3-RB277 (at the end of Gincroft Lane, costing up to £25K) and 14-3-FP147 (Sandbeds Lane).*

*o Improvements to the ford along Byway 14-3-BOAT276 at Dearden Clough (approx. £50K max).*

It must be pointed out that Sandbeds Lane is not in the Green Belt.

# Section 19

## **Section 19 Miscellaneous errors and omissions in MDC**

**19.1** The site-wide design codes grouping 'wheel' from the National Model Design Code is reproduced so poorly on page 19 as to be illegible in places.

**19.2** The plans on pages 07, 39 and 55 mis-name Chatterton Hey.

**19.3** The plan on page 78 marks a proposed LEAP and LAP, but these are not shown on the plans on pages 07 and 55, raising doubt about whether they will be delivered. This ambiguity needs to be resolved.

**19.4** The MDC lacks a clear, detailed and achievable strategy for promoting the use of public transport. It fails to require the production of travel plan/s, contrary to paragraph 127 explaining SSP.

**19.5** The MDC does not explain how the impact of construction on flora and fauna will be assessed and mitigated.

**19.6** The MDC fails to provide for a detailed risk assessment for potential environmental hazards.

**19.7** The central portion of H66 is known to include contaminated land. The MDC needs to set out a clear remediation strategy, identifying the volume of contaminated land.

**19.8** At page 106 begins what is claimed to be *a list of all site wide Codes referred to within the Design Code*. First on the list is Code MP 01. Next are Codes PH 01 and PH 02. This is incorrect. Site Wide Codes, and by implication the Design Code, begin at Section 04 at the last page before page 72. Code MP 01 is on page 54 in Section 02 Masterplan. Codes PH 01 and PH02 are on pages 58 and 60 respectively in Section 03 Phasing. None of these Codes is listed in Section 04 as a Site Wide Code or referred to anywhere within the Design Code.

**19.9** It is obvious that those three Codes are not design-related, but if the authors of the MDC do not accept this, they should be directed to pages 18 and 19 referring to the National Model Design Code, whose 'well-designed place' wheel (page 19) does not mention masterplan or phasing.

# Section 20

## **Section 20 Construction Management**

**20.1** Page 60 refers to Construction Management Plans (see paragraph 3.2.8.4 above). Although such Plans are unlikely to be followed, the MDC needs to address with clarity and specificity issues arising from operations and including but not limited to dust and diminution of air quality and noise and vibration, particularly from pile driving, which is likely to affect existing properties. It is expected that the MDC will require any development proposal to contain provisions enabling persons affected by construction works and deliveries to raise their issues with a responsible person identified by the developer and will require a developer to keep a full record of any such issue, to be made available to the local planning authority on demand.

**h**

# Section 21

## **Section 21 Conclusion**

**21.1** The fundamental problem with the MDC is that it does not begin by assessing H66 as a whole and devising a unified scheme that conforms with planning policy and responds to local built and natural context. Instead it just cobbles together the aspirations of two of the landowners to cram as many dwellings as possible of the cheapest materials onto their own parcels of land at the time of their choice without regard to the implications for the other site owners or the community.

**21.2** Whilst exploiting the allocation of H66, the MDC ignores or defies other provisions in the Local Plan.

**21.3** The MDC should, for all the reasons set out in these representations, be rejected.

Richard W. Lester for self and on behalf of Edenfield Community Neighbourhood Forum



8th June 2024



# Appendix 2

## Examples of references in the MDC to Edenfield as a village

### Paragraph 5.5.3

- *Vision . . . to allow the characterful and varied grain of the village to continue to evolve* - page 10
- *[MDC] . . . ensuring that settlement character can be preserved as the village evolves* - page 18
- Five references in *The Context of H66 within the Settled Valley Landscape* - all on page 24
- *Visual Context* - third paragraph on page 26
- Under *Existing Architectural Character* and under *Design Influences* - both on page 28
- Description of Market Street - page 30
- Caption to image of *loose built grain* - page 31
- Three references under *Street Hierarchy* - all on page 32
- Seven references under *Non Vehicular (sic) Movement and Open Space* and two more under *Design Influences* - all on page 34
- *Green and blue infrastructure - valued long views to the distant hills from the centre of the village* - page 42
- *Off site highway improvements* - two references to *Edenfield Village* and one to *the village* - all on page 46
- *The Masterplan will deliver approximately 400 new homes for Edenfield, set within a strong landscape structure and characterful village setting)* - page 54
- *All construction traffic will . . . avoid the centre of the village where possible . . . ensuring that construction traffic and deliveries avoid peaks of intense usage in the village . . . the growth of the village* - all on page 60
- *Landscaped front gardens and pockets of green space contribute to 'greening' the street scene in parts of the village* - page 74
- *Scale of the H66 allocation site within the village* - page 81
- Area Type designation 'Village Streets' - pages 52, 94, 95, 98 and 99
- *Historic core of the village . . . historic centre of the village* - both on page 96
- *Key characteristics of the village . . . urban form within the village the village . . . central village location* - all on page 96
- *Village core* - page 100
- *Northern part of the village . . . northern fringe of the village . . . traditional building materials of the village (twice)* - all on page 102



# Appendix 3

## ECNF Transport submission in response to 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 *H66 Masterplan (Version V23)*

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 25 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.

# Appendix 6

## Email dated 30 August 2023 from SK to LCC

### Paragraph 11.1

On 30 Aug 2023, at 21:55, Michael Kitching <mk@sktransport.co.uk> 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  
Albion Wharf, 19 Albion Street, Manchester M1 5LN  
0161 234 6509  
07809 876 703  
[sktransport.co.uk](http://sktransport.co.uk)

Registered in England & Wales 06001445

**NOTE:** References in the email to 23rd August 2023 should be to 9th August 2023.

# Appendix 7

## Strategic Policy ENV1: High Quality Development in the Borough

### Paragraph 6.8

#### 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:

- a) Siting, layout, massing, scale, design, materials, lighting, building to plot ratio and landscaping;
- b) Safeguarding and enhancing the built and historic environment;
- c) Being sympathetic to surrounding land uses and occupiers, and avoiding demonstrable harm to the amenities of the local area;
- d) The scheme will not have an unacceptable adverse impact on neighbouring development by virtue of it being over-bearing or oppressive, overlooking, or resulting in an unacceptable loss of light;- nor should it be adversely affected by neighbouring uses and vice versa;
- e) Link in with surrounding movement patterns, encourage permeability and reflect the principles of "Manual for Streets";
- f) Not prejudice the development of neighbouring land, including the creation of landlocked sites;
- g) Demonstration of how the new development will connect to the wider area via public transport, walking and cycling;
- h) Minimising opportunity for crime and malicious threats, and maximising natural surveillance and personal and public safety;
- i) 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;
- j) Including public art in appropriate circumstances;
- k) 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;
- 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;
- n) Where appropriate applications shall be accompanied by an independent Design Stage Review;
- o) Making provision for the needs of special groups in the community such as the elderly and those with disabilities;
- p) Consideration of Health impacts, including through a Health Impact Assessment for major developments, looking particularly at effects on vulnerable groups, and identification of how these may be mitigated;
- q) Designs that will be adaptable to climate change, incorporate energy efficiency principles and adopting principles of sustainable construction including Sustainable Drainage Systems (SuDS); and

r) Ensuring that contaminated land, land stability and other risks associated with coal mining are considered and, where necessary, addressed through appropriate investigation, remediation and mitigation measures.

## Explanation

232 Good design is a key aspect of sustainable development and in making places better for people. This includes consideration of both buildings and open spaces and the relationship between the two; a balance between the need for neighbourliness and the scope for design freedom.

233 Developments need to function well and add to the overall quality of the area. They should optimise the potential of the site to accommodate development and respond to Rossendale's local character, history and topography. In Rossendale the relationship of town and countryside, hill and valley, stone and other materials are particularly important. The topography of the Borough also means that the visual impact of a development can be greater when looked down from higher ground or from the valley below compared to being viewed from its immediate situation. The use of local materials, particularly stone and slate, is important in reinforcing local distinctiveness. "Anywhere" standardised design solutions will be discouraged. At the same time as encouraging local distinctiveness, innovation in design will not be discouraged where this contributes to a high quality development. Good architecture and appropriate landscaping play key roles in ensuring that Rossendale is visually attractive and in creating safe and accessible environments. Developments also need to maximise energy efficiency and be adaptable to climate change. The need to minimise flood risk is a key consideration and design should look at reducing heat loss and heat island effects through use of materials, orientation and landscaping. Higher densities in developments need not lead to sites appearing cramped, and high quality design solutions delivering more houses on urban sites will be encouraged. Equally, the creation of high quality and adaptable internal spaces is as important to users as external appearance. Wherever possible, internal layouts should meet the requirements of all members of the population and be adaptable. The Council welcomes pro-active engagement on all elements of design.

234 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.







## 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, AECOM  Lucy Sykes, 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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*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









## Baseline Review

# 02

---



## 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

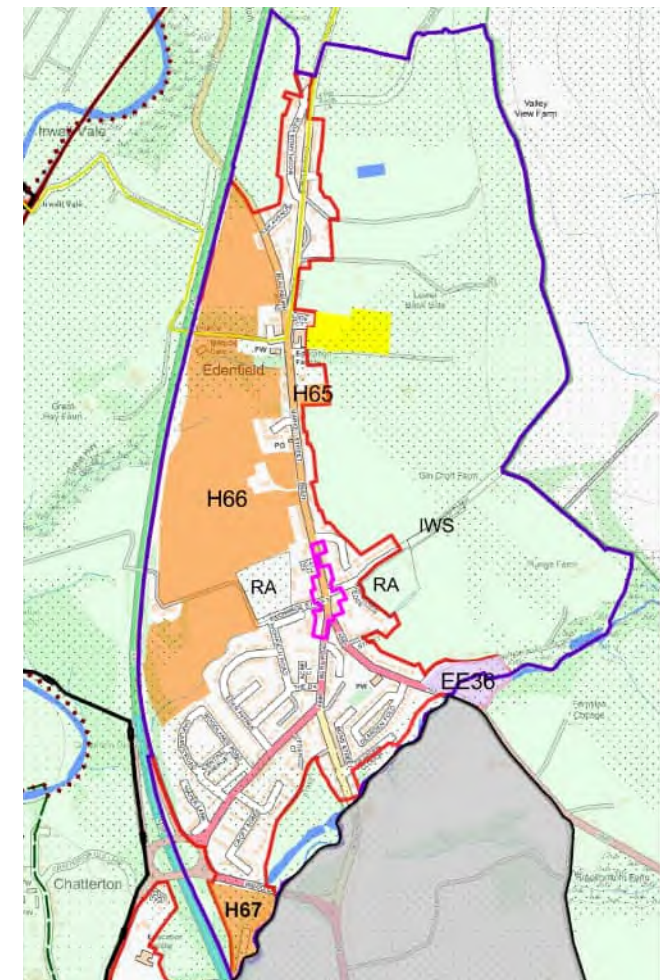
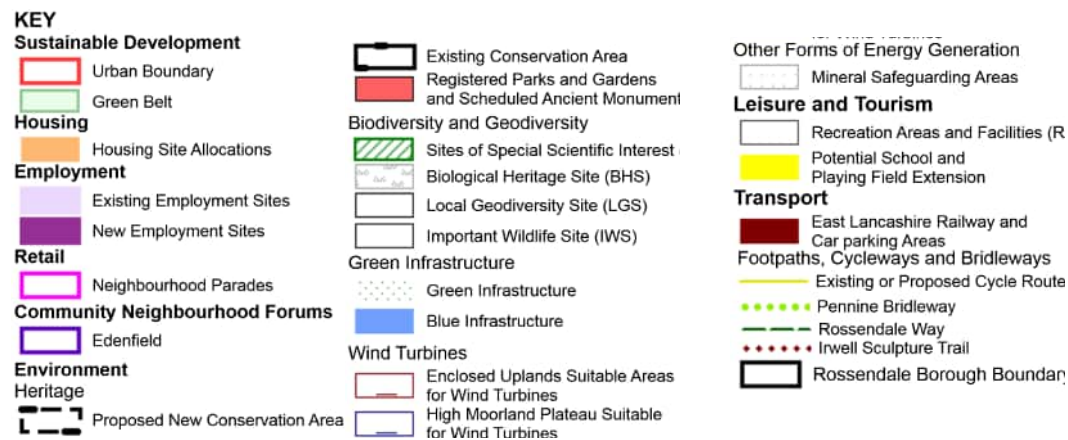


Figure 2.1: Rossendale Policies Map

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## 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.

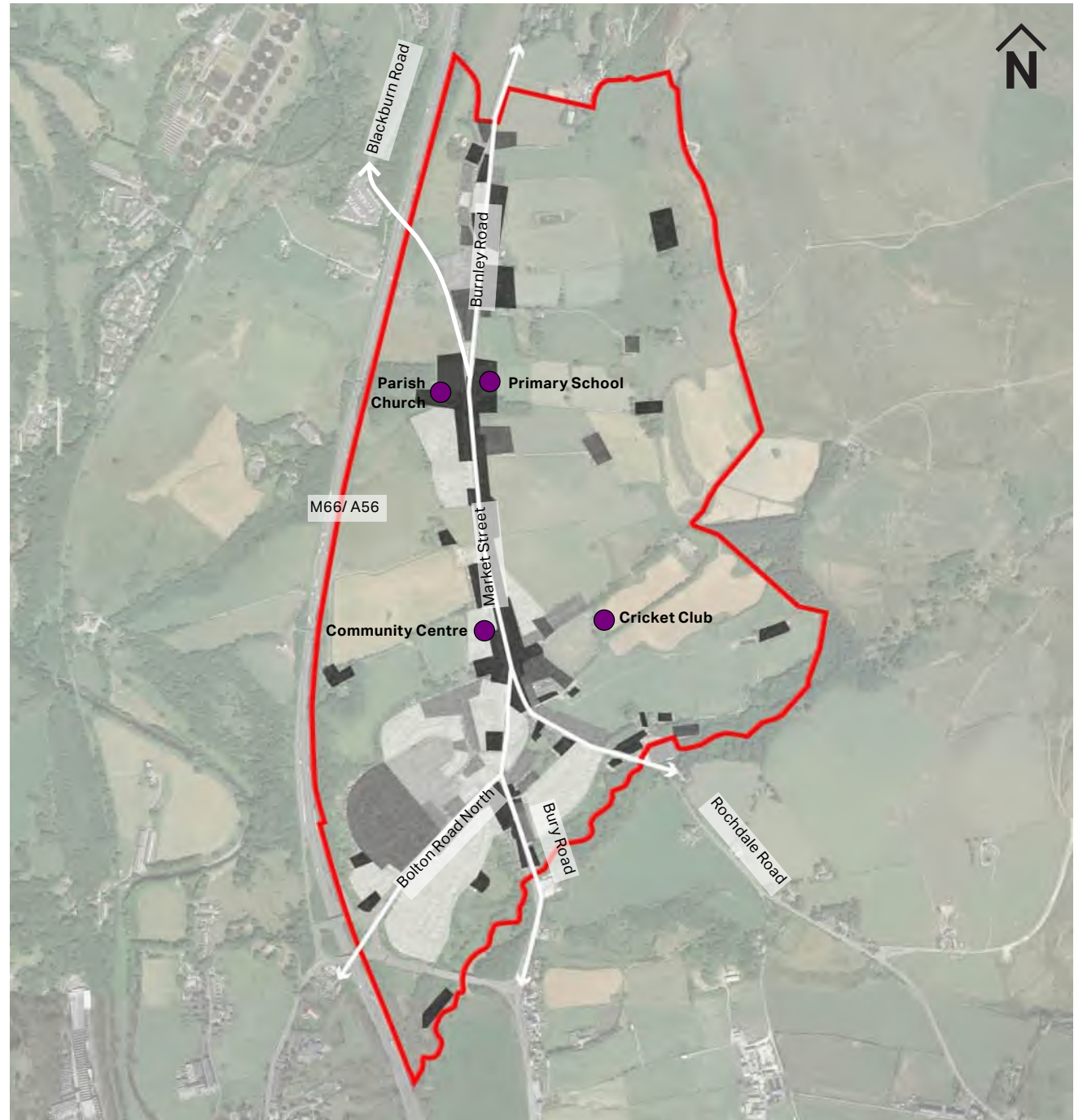


Figure 2.2: Village Structure and Growth



## 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.

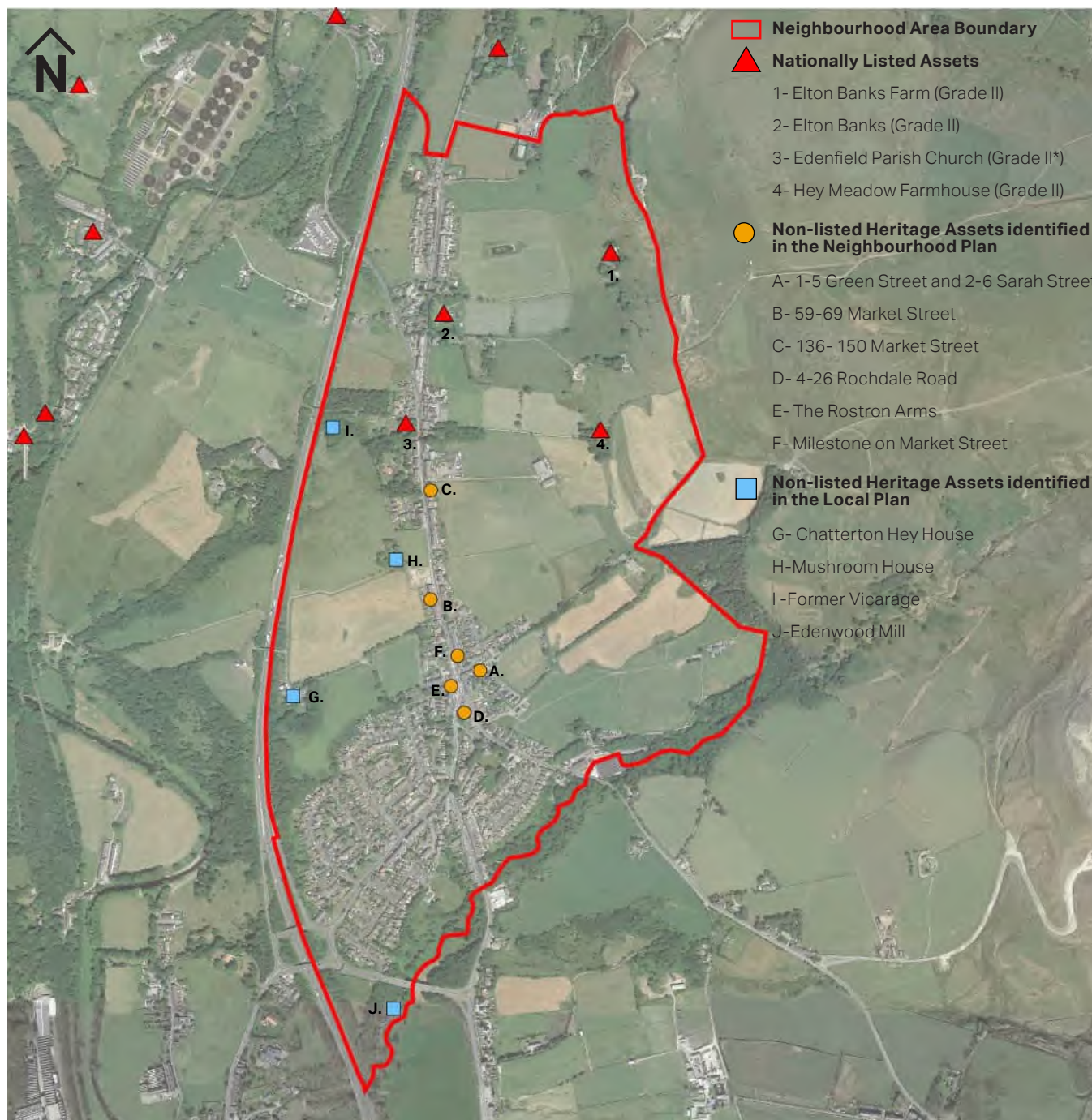


Figure 2.4: Heritage Assets





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.

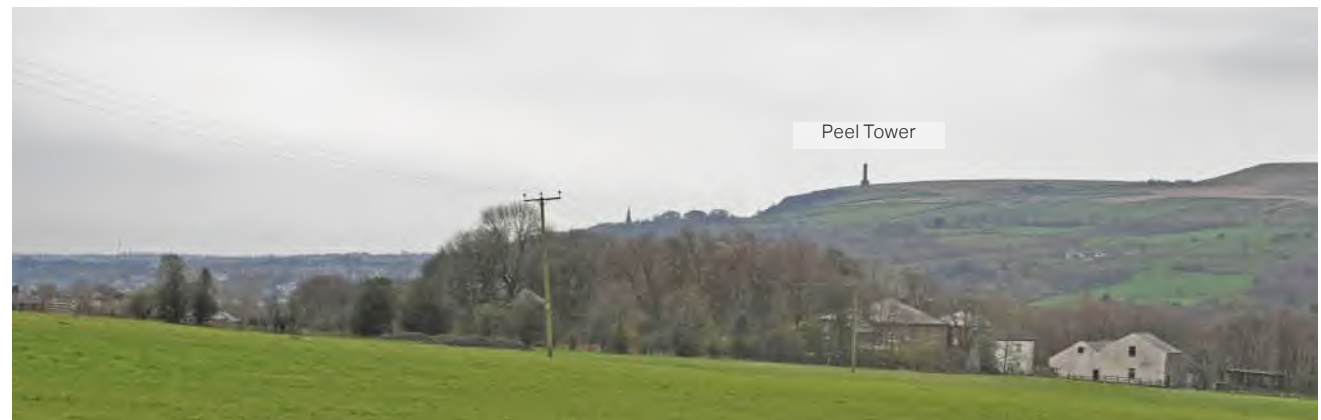
As per the Lives and Landscapes Assessment for Rossendale Borough Council (December 2015), the landscape character type of Rossendale is defined as a series of interlocking valleys, with ribbon development extending along the primary valley between Rawtenstall and Bacup. The southern part of the borough 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)

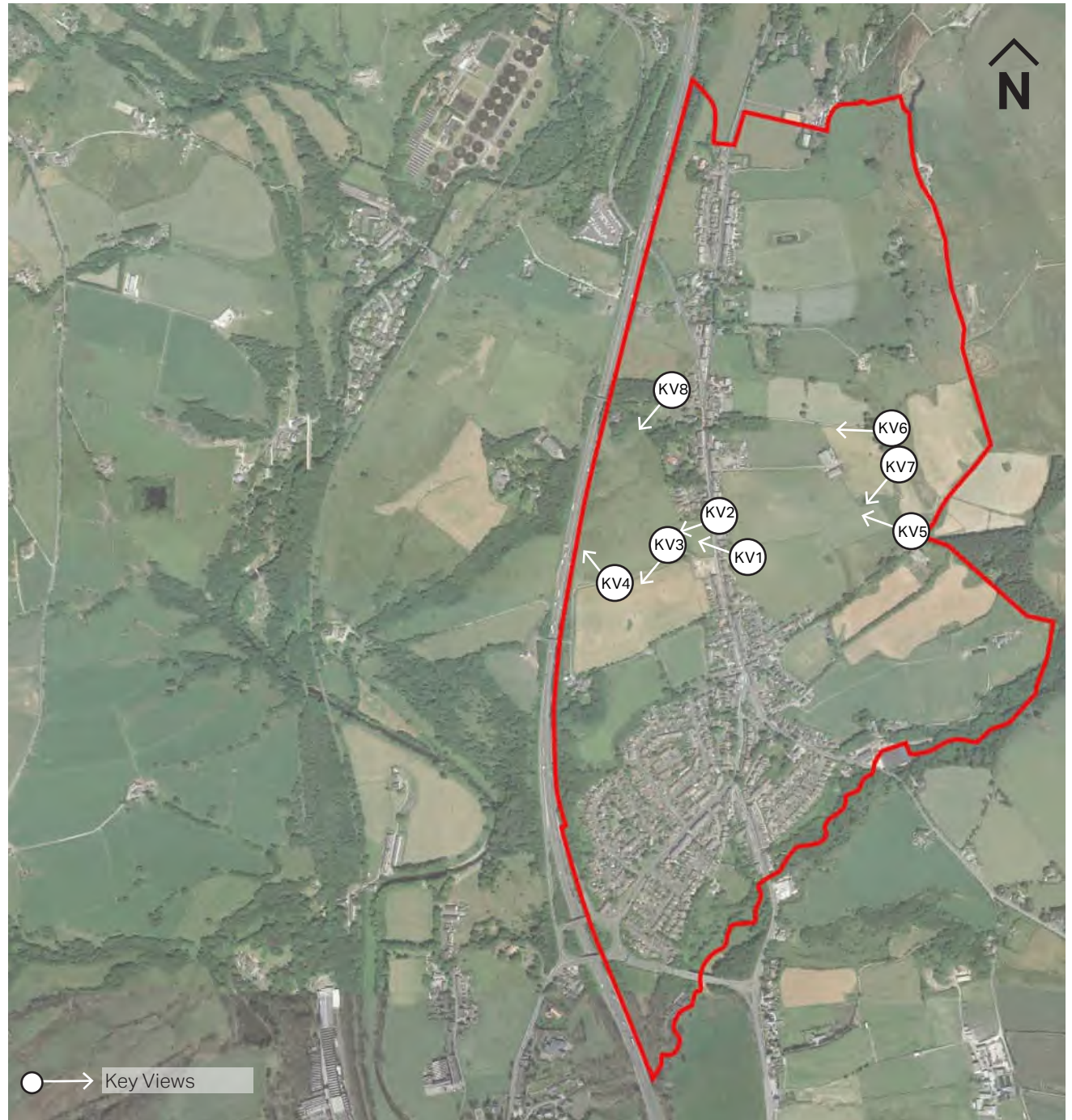
**KV4**-Lane leading west off Market Street by Mushroom House (Footpath 14-3 FP 126)

**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



**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

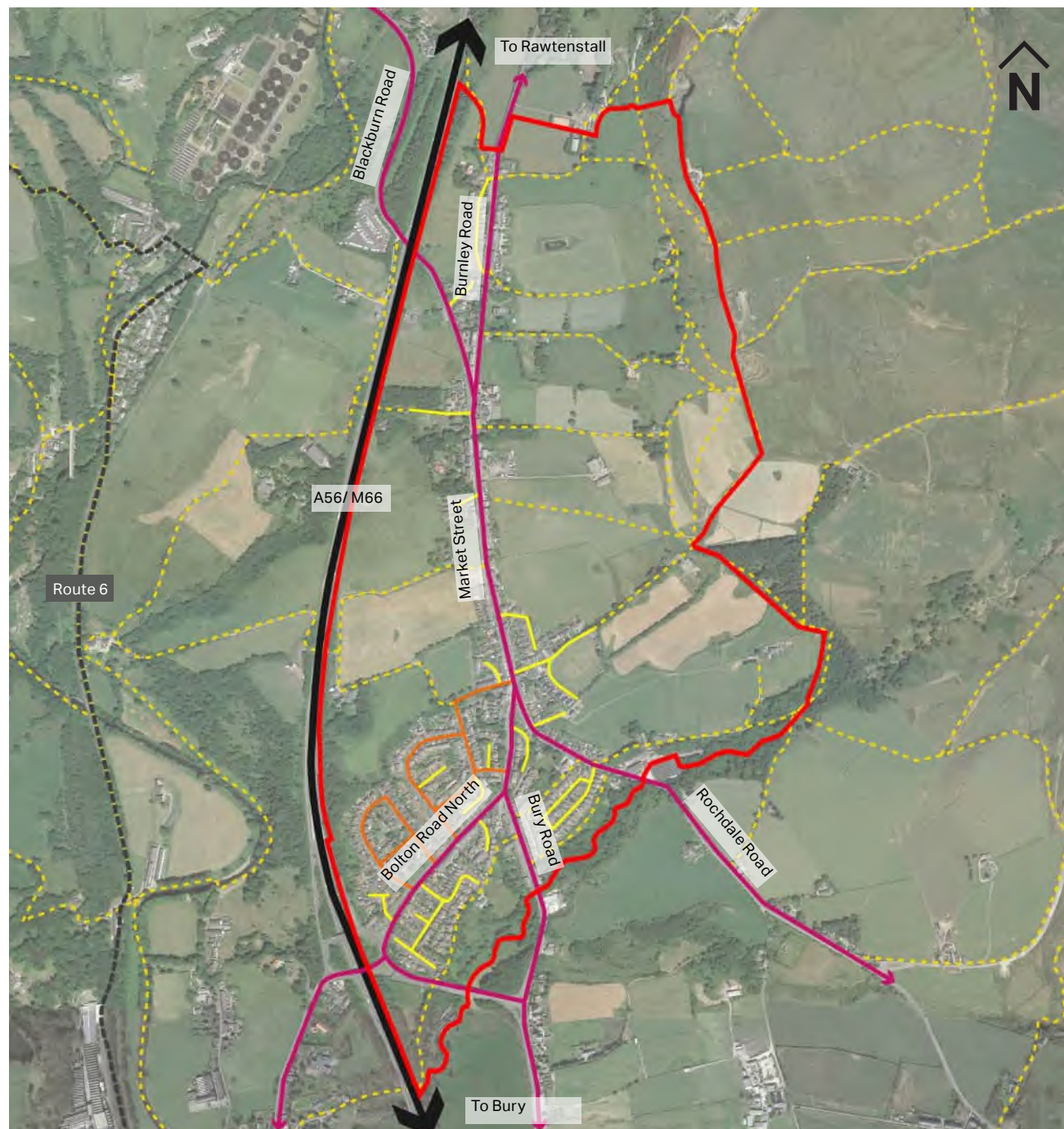


Figure 2.6: Existing Movement Network



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/ M66



Figure 2.7: Congestion and car parking



Pinch point 1: Market Street north



Pinch point 2: Market Street south









# Workshop Engagement 03

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*Views across the local landscape*



## 3.0 Workshop Engagement

### Summary of Session

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.

The following strengths, weaknesses, opportunities and threats were established to be addressed within the design codes:

### Strengths

The following features are considered to be strengths within Edenfield and will be supported within this design code document:

- The physical and visual connections to the countryside are valued, locally distinct, and should be preserved;
- Important community assets include the Parish Church, the Primary School, the Cricket Club and the Recreation Ground. These should be protected from development impacts;
- The two ends of Market Street act as local hubs of activity, and encourage people into the village
- The traditional stone and slate vernacular establish the local village character;
- The rural nature of the settlement and its countryside setting are key to Edenfield's character;
- The piecemeal and organic nature of village growth has created architectural diversity and variety. This organic growth is welcomed and encouraged.

### Weaknesses

The design code report acknowledges the following weaknesses, as identified by the group within the engagement session:

- 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;
- 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;
- Certain developments have had no regard for the impact of building height on views
- 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;
- 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.

## 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





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Character Areas

# 04

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*Traditional terraces of Bury Road*

## 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.



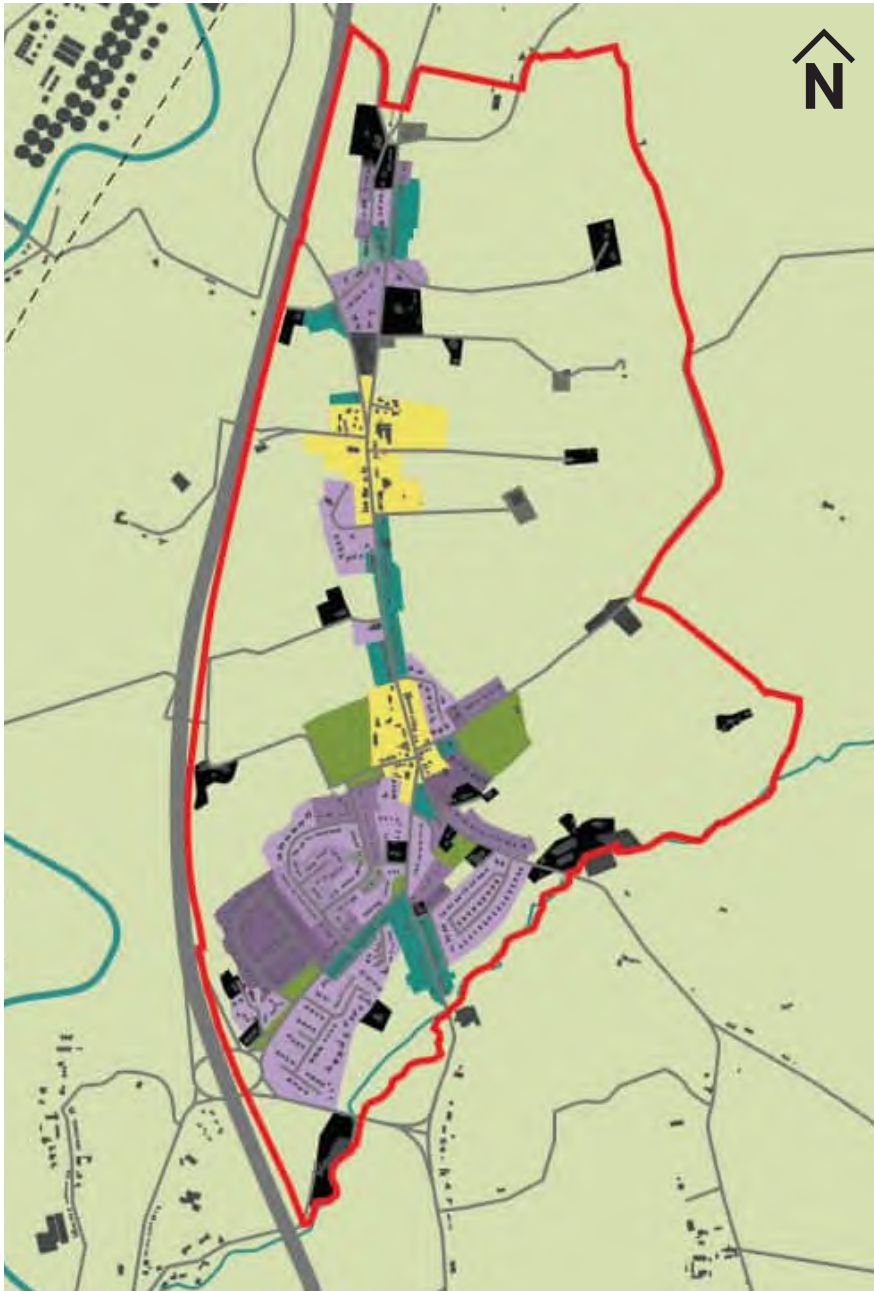


Figure 4.1: Existing mosaic of character area

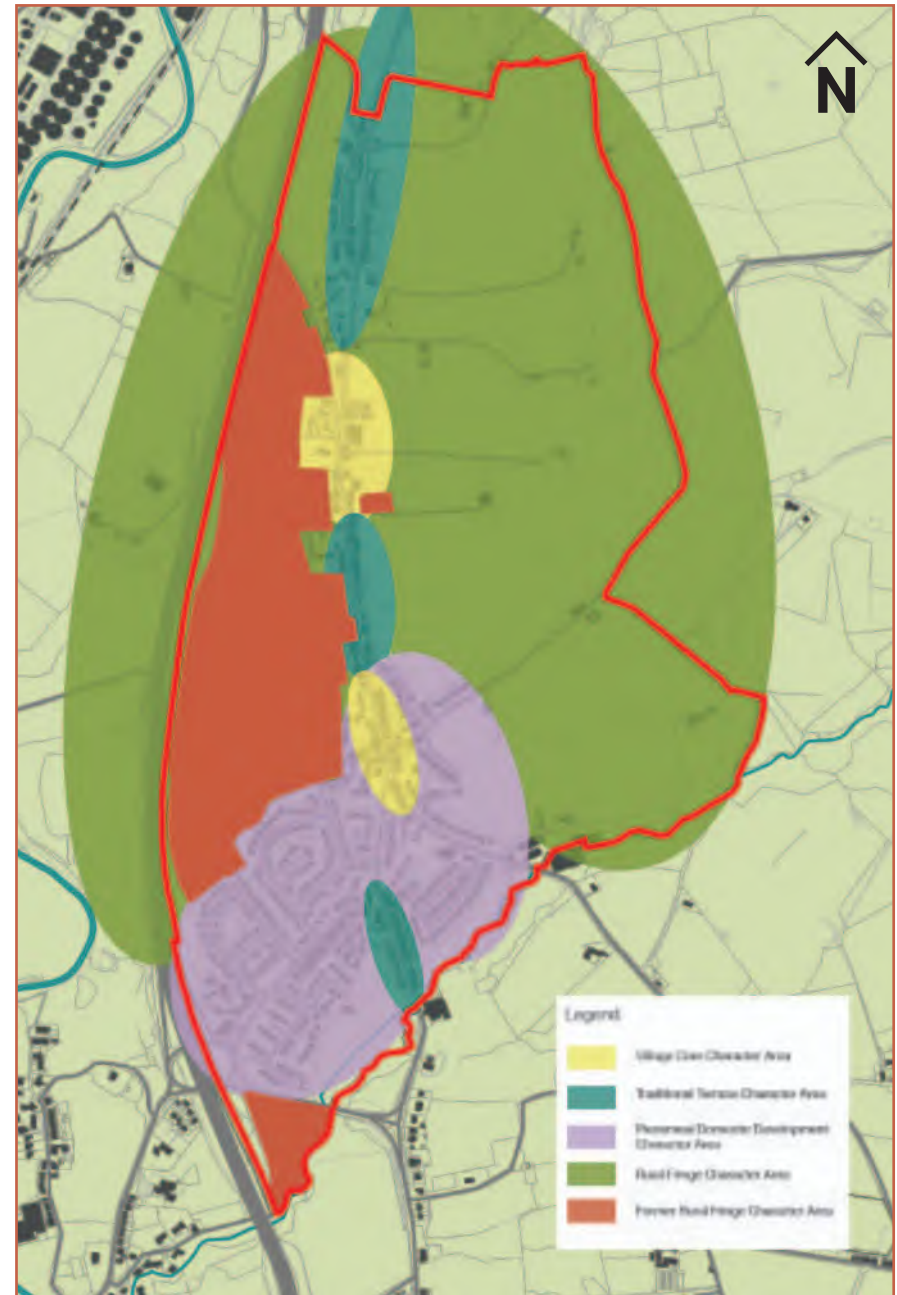


Figure 4.2: Character area for application of design codes

## 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*

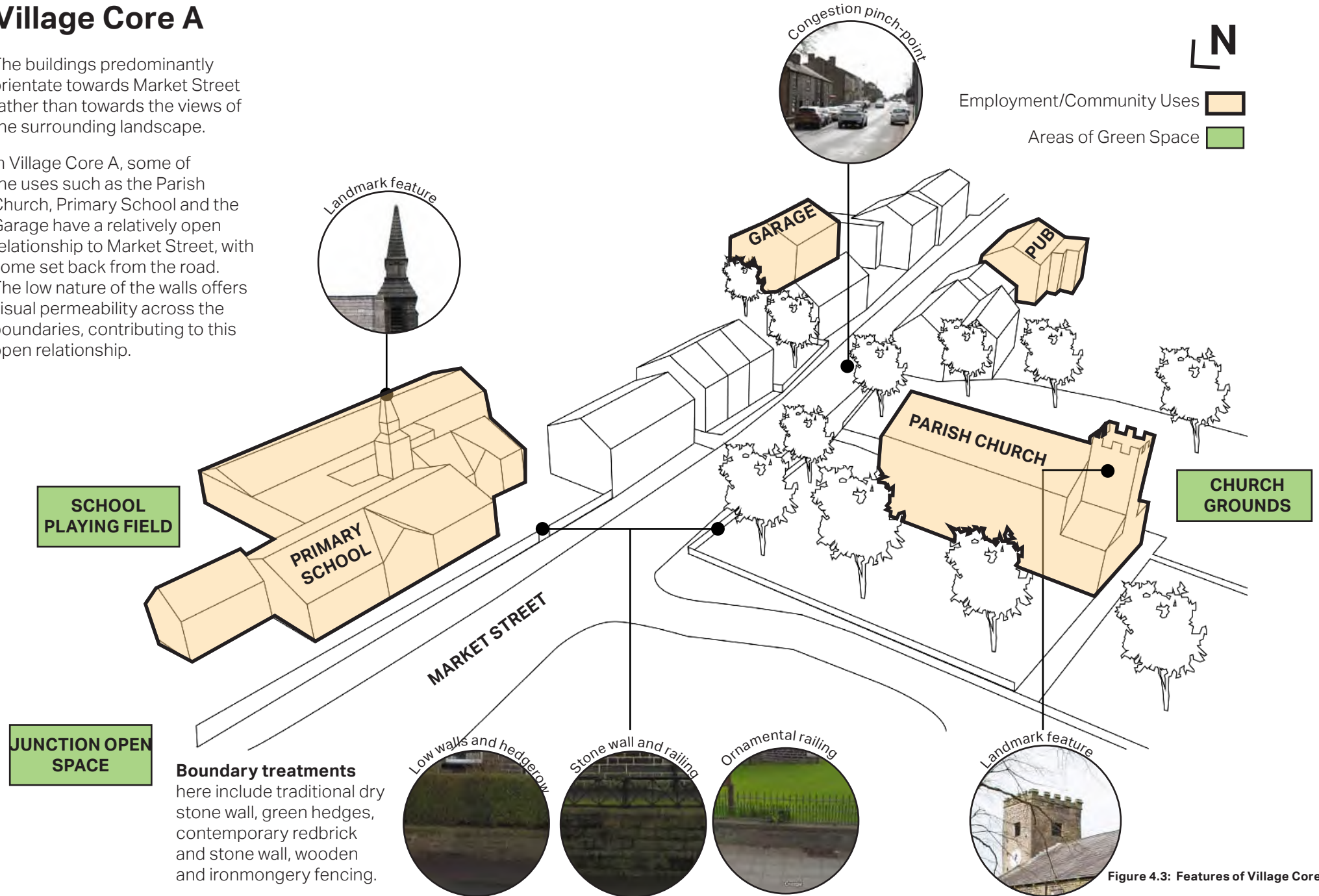


*Rostron Arms, located in Village Core B*

# 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

# 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.

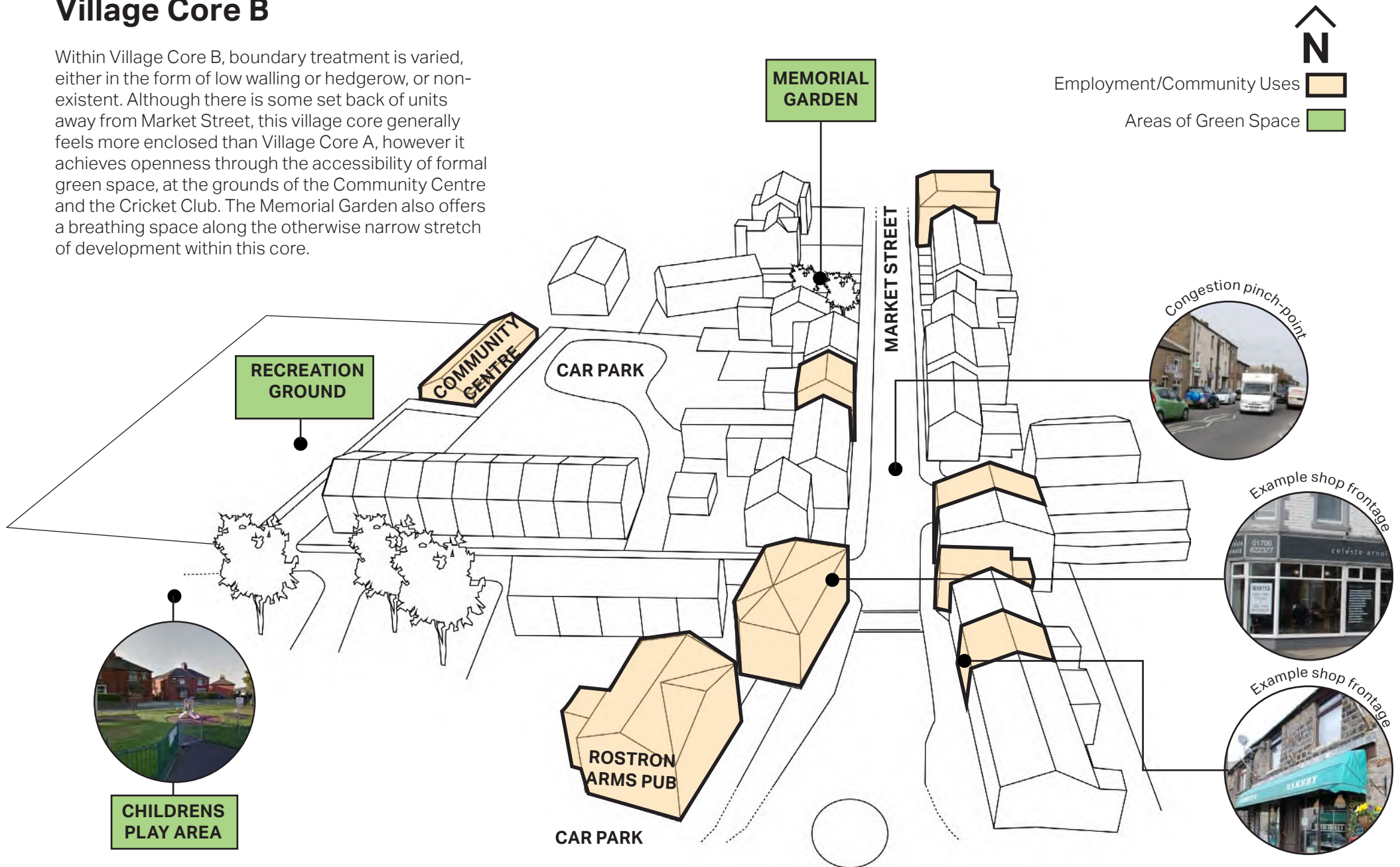


Figure 4.4: Features of Village Core B



## 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*

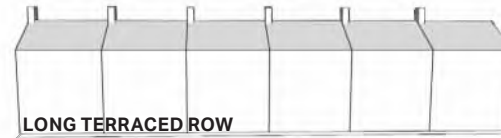
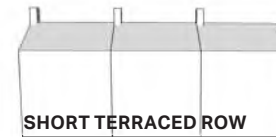
## Block structure, orientation and rhythm

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  
AECOM



### 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.



Figure 4.5: Traditional-Terraces structure and features



## 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.

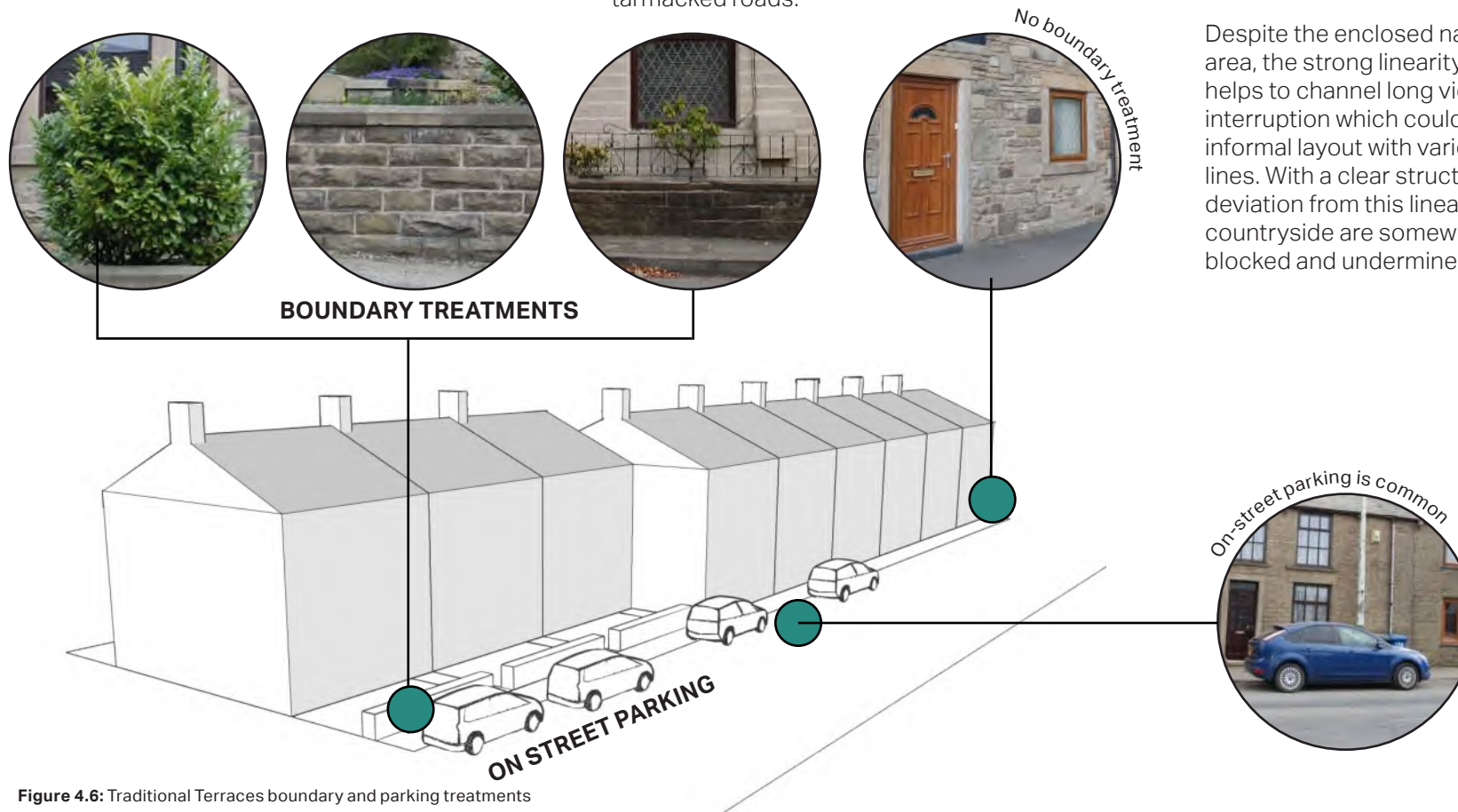
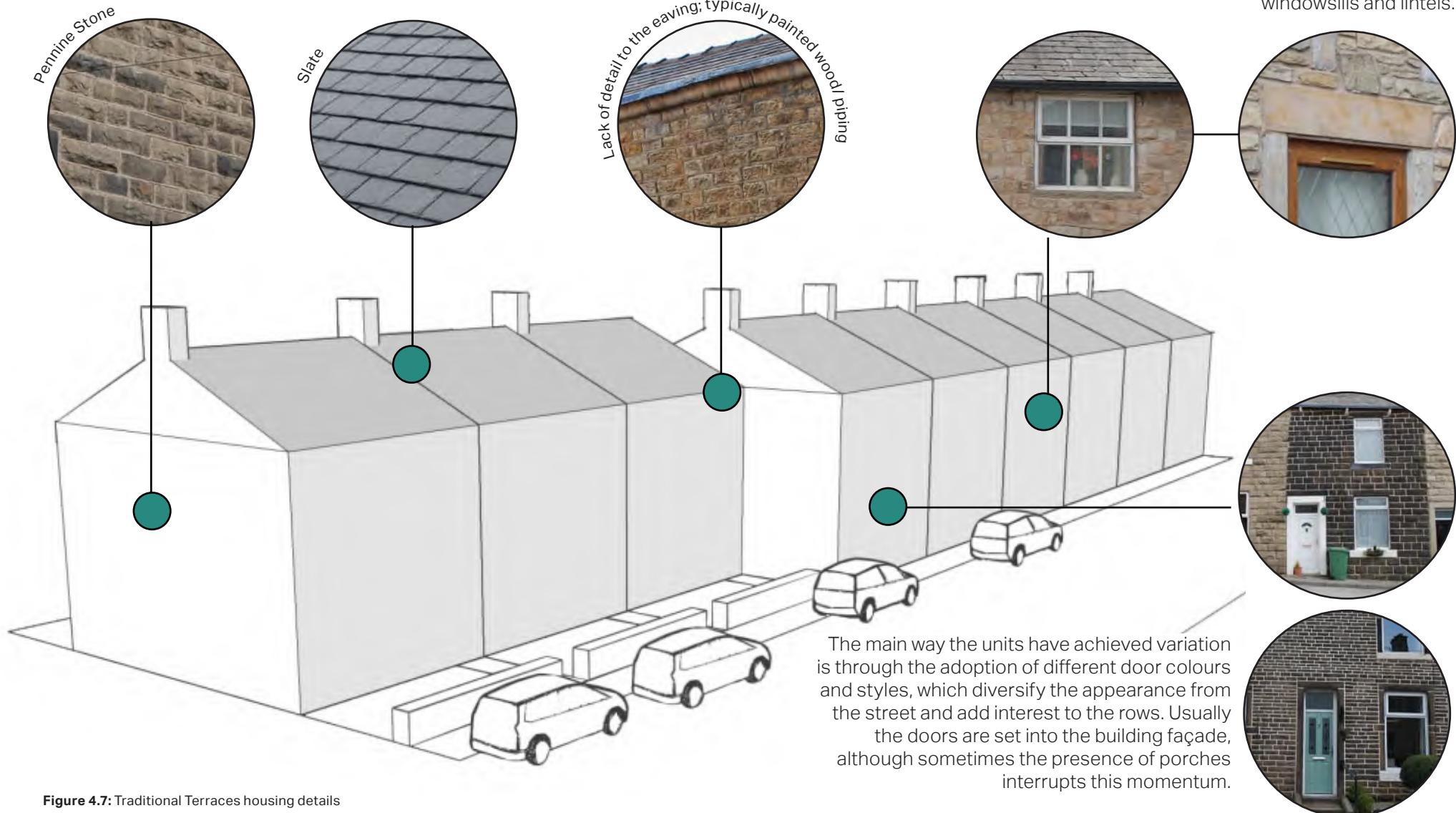


Figure 4.6: Traditional Terraces boundary and parking treatments

# 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.



The main way the units have achieved variation is through the adoption of different door colours and styles, which diversify the appearance from the street and add interest to the rows. Usually the doors are set into the building façade, although sometimes the presence of porches interrupts this momentum.

Figure 4.7: Traditional Terraces housing details



## 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.

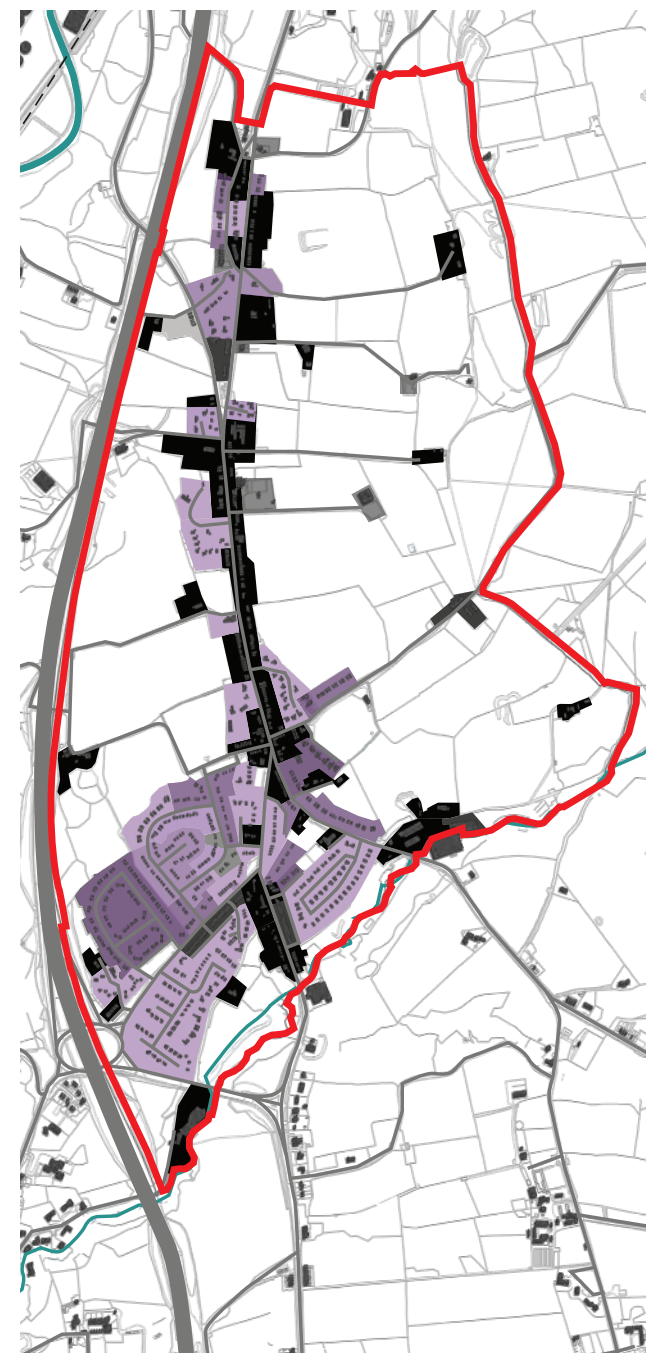
### Block structure, orientation and rhythm

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*



**Figure 4.8:** Map showing incremental parcels of domestic development within Neighbourhood Area based on period of delivery. **326** 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*



*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.

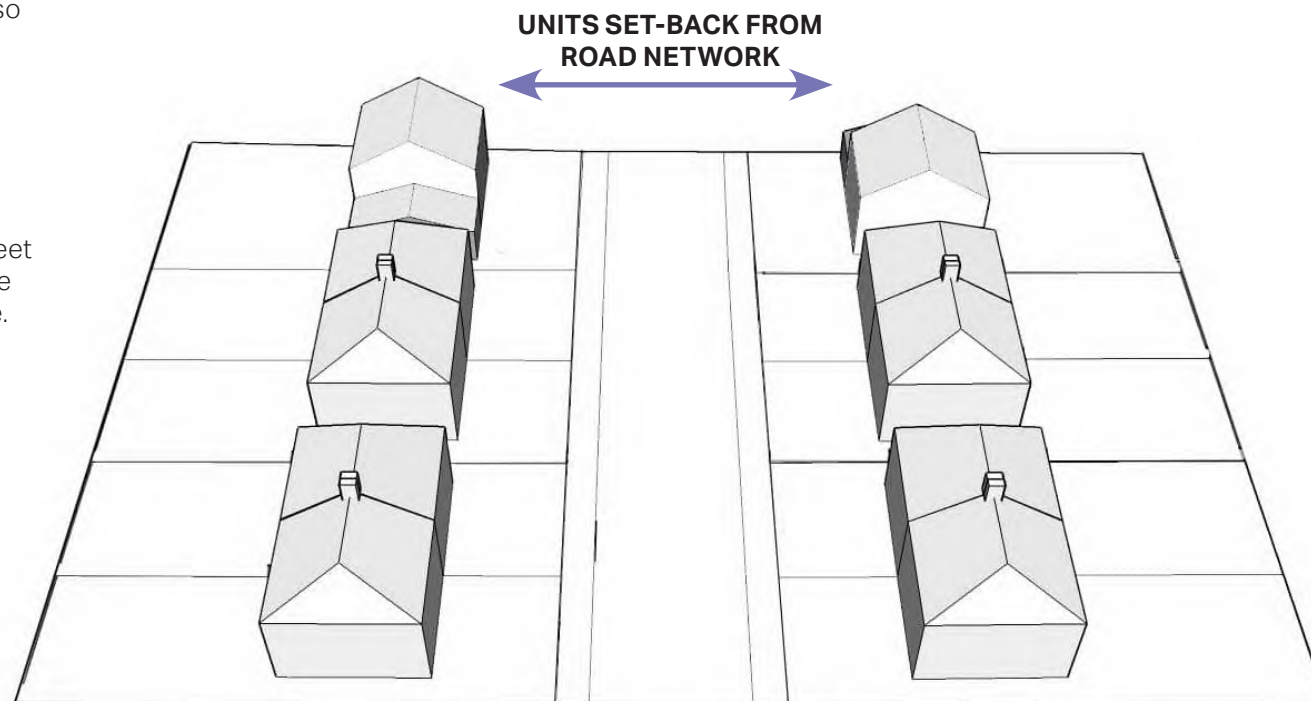


Figure 4.9: Enclosure of piecemeal domestic development character area



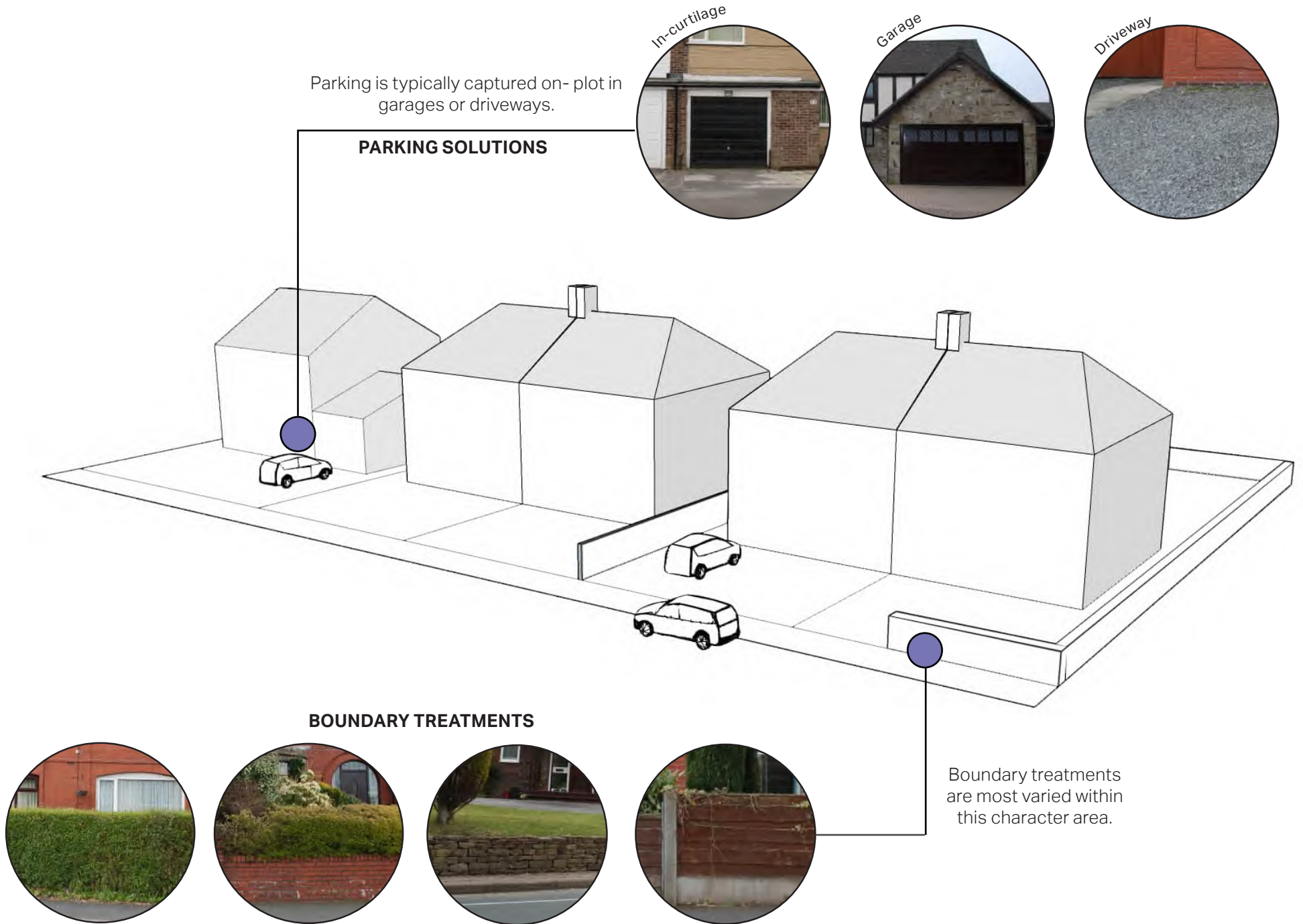


Figure 4.10: Piece meal domestic development boundary and parking treatments

## 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.

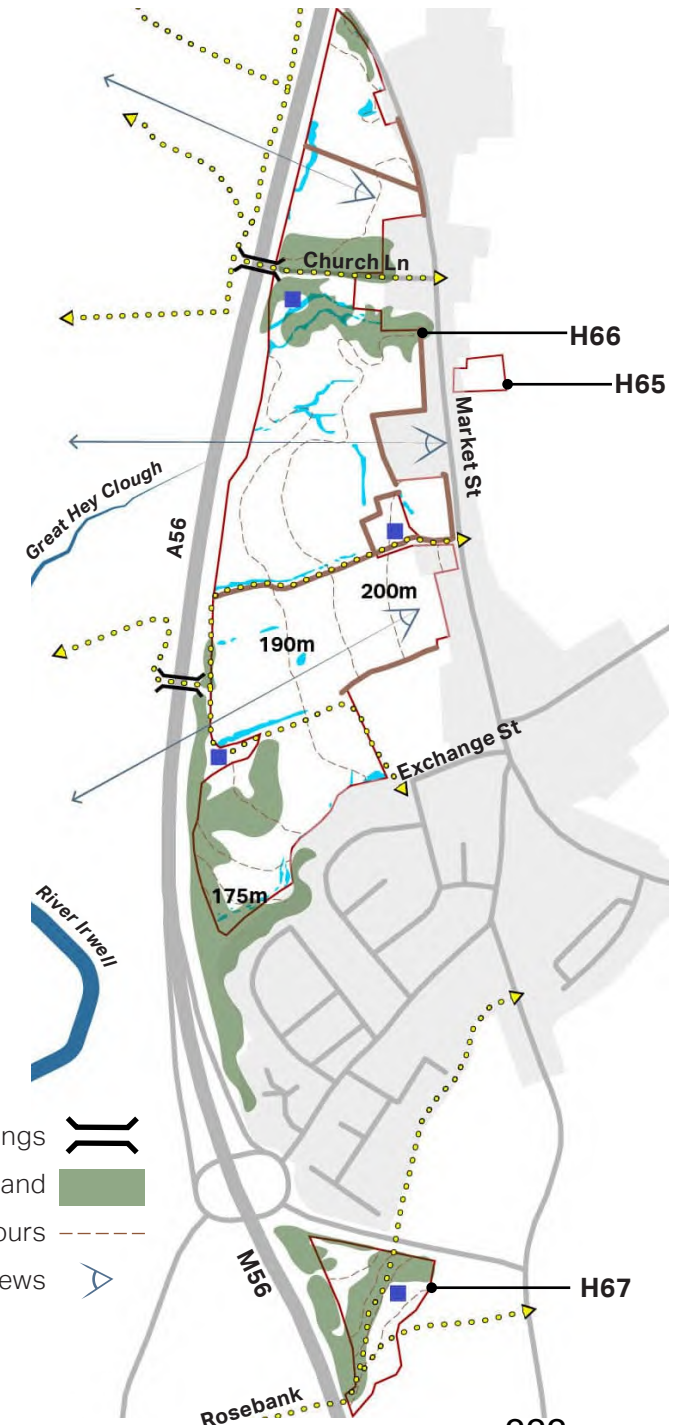
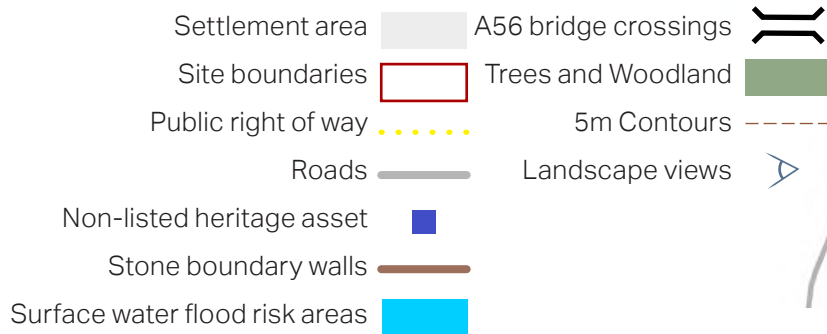
The existing residential development to the south and east of site H66 will require careful consideration. Designs will need to consider privacy and overlooking between existing and proposed development with consideration to the gradient of the site. The use of landscape buffers between existing and 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.









**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.



Slate roofing is a traditional material to the local area



Chimneys help to add rhythm to the streetscape and are a key characteristic of the local area

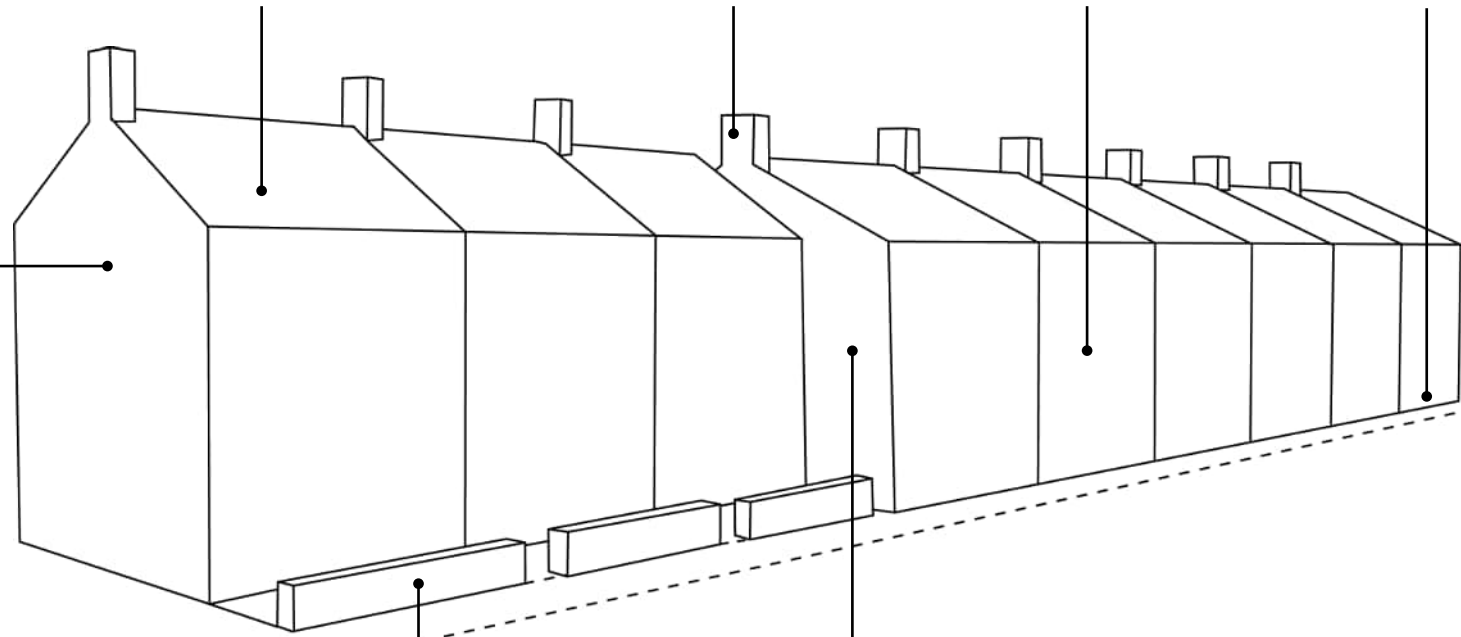


Size, proportion and style to closely mimic existing features



Windows and doors should seek to maintain the rhythm of the street.

Use the traditional material palette or material that complements the buff/beige colour of natural stone



Use appropriate boundary treatment of stone, hedges etc. Use dry stone wall or equivalent. Retain and enhance existing traditional boundary treatment.

Off-setting gable ends can help define the start of a new block of long or short terraces

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.

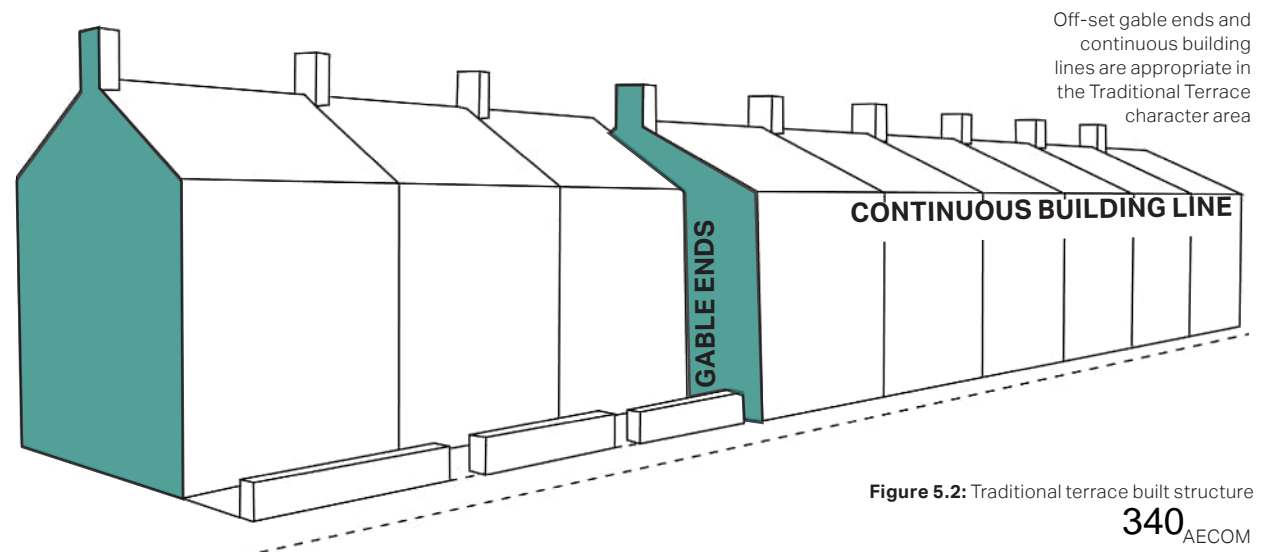


Figure 5.2: Traditional terrace built structure

### Code USB3- Developed Urban Structure

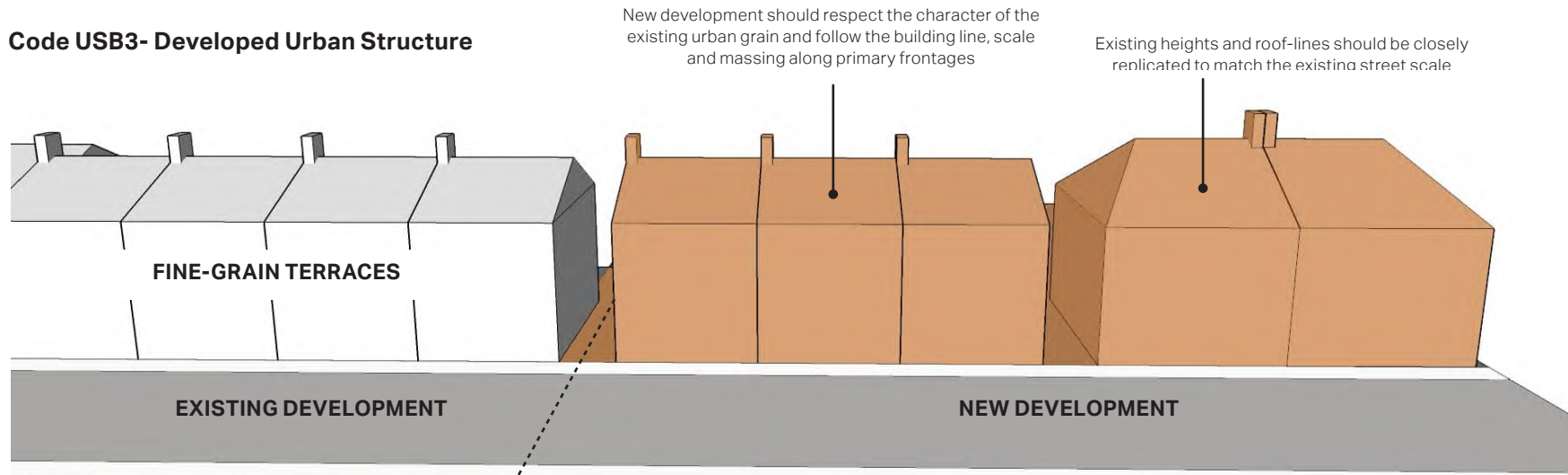


Figure 5.3: Example of development responding to Traditional Terraces structure

### Code USB4- Edge Urban Structure

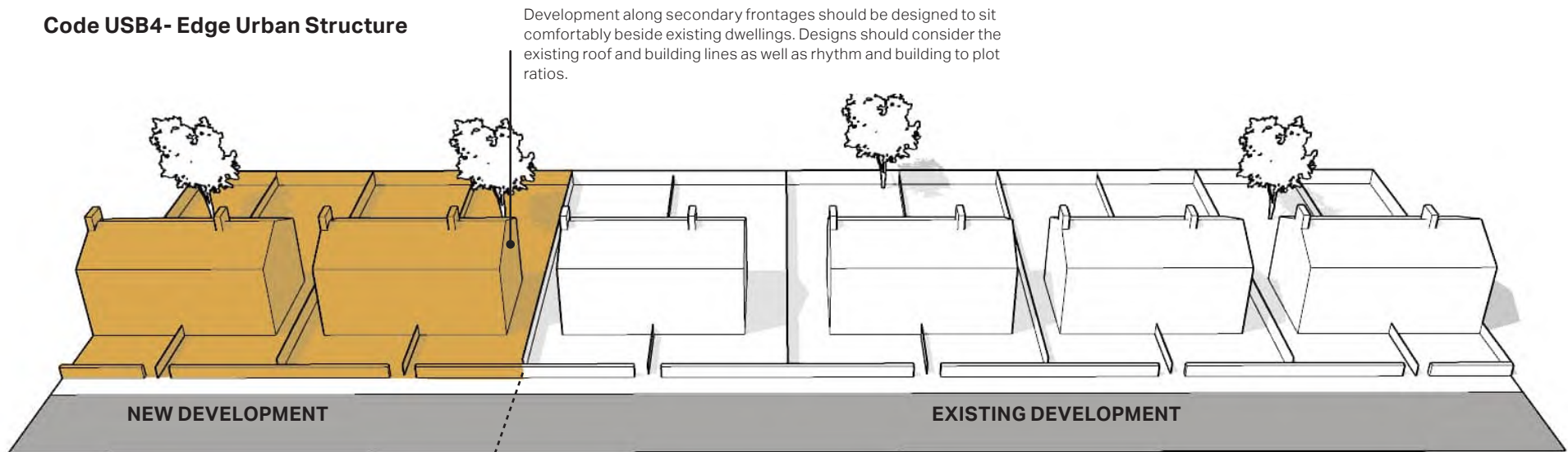


Figure 5.4: Example of development responding to Piecemeal Domestic structure



## 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.

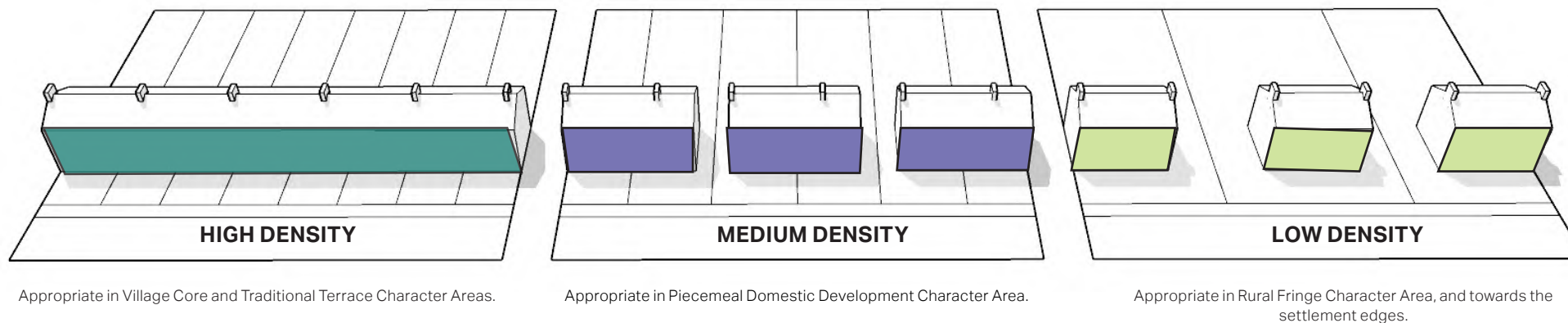


Figure 5.5 Application of density



## 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.

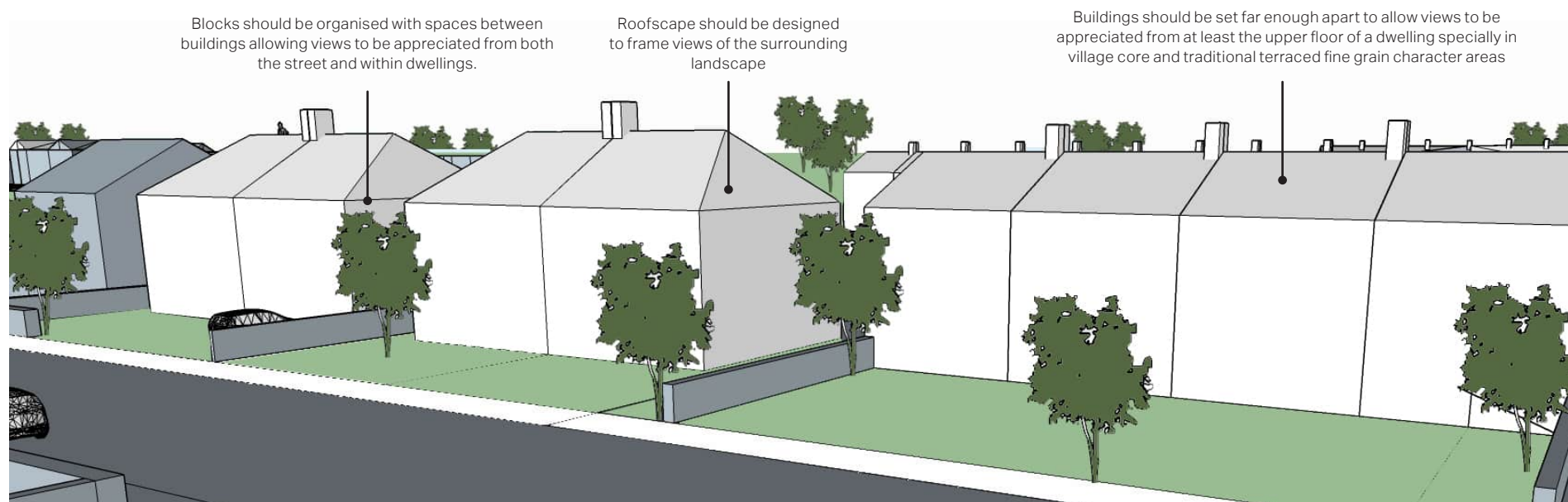


Figure 5.6 Diagram illustrating the enhancement and framing of views to surrounding landscape

### 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.

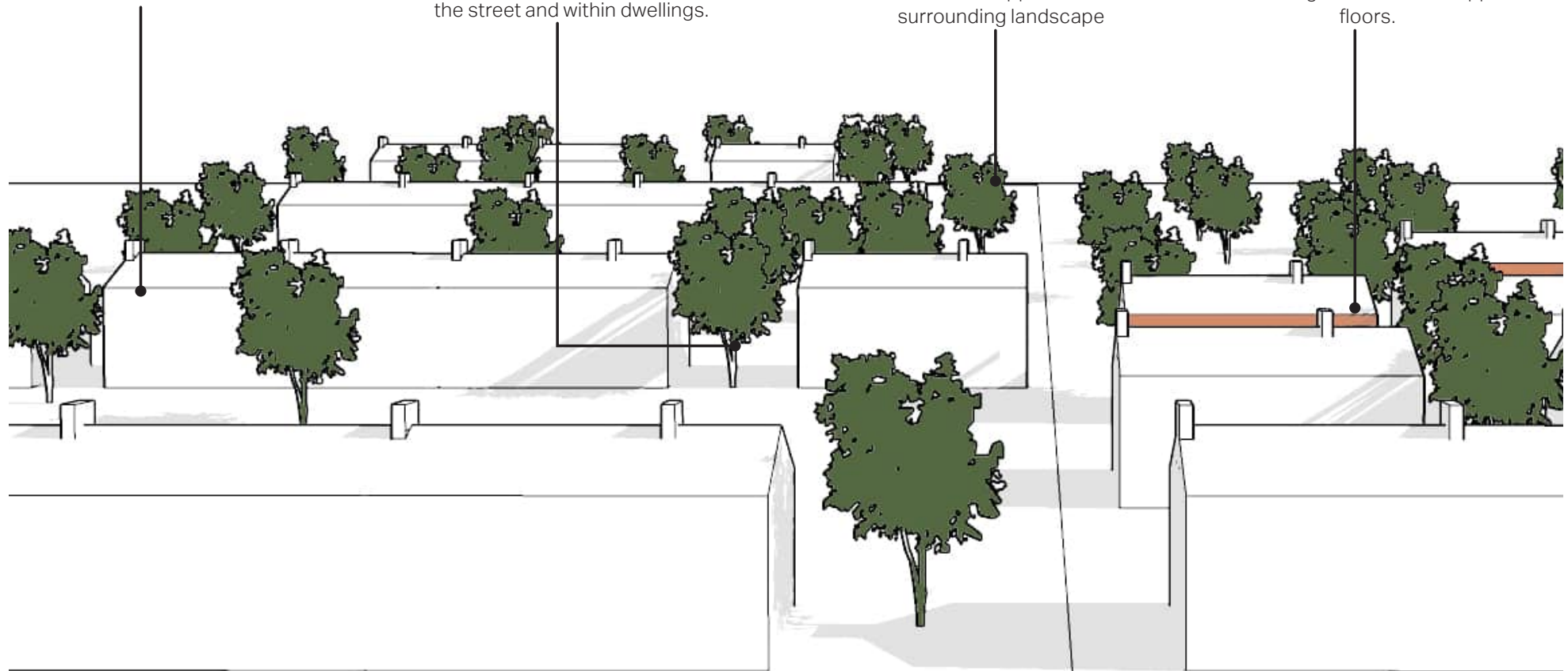


Figure 5.7 Diagram illustrating the protection of views on a sloping site.



## 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

# 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

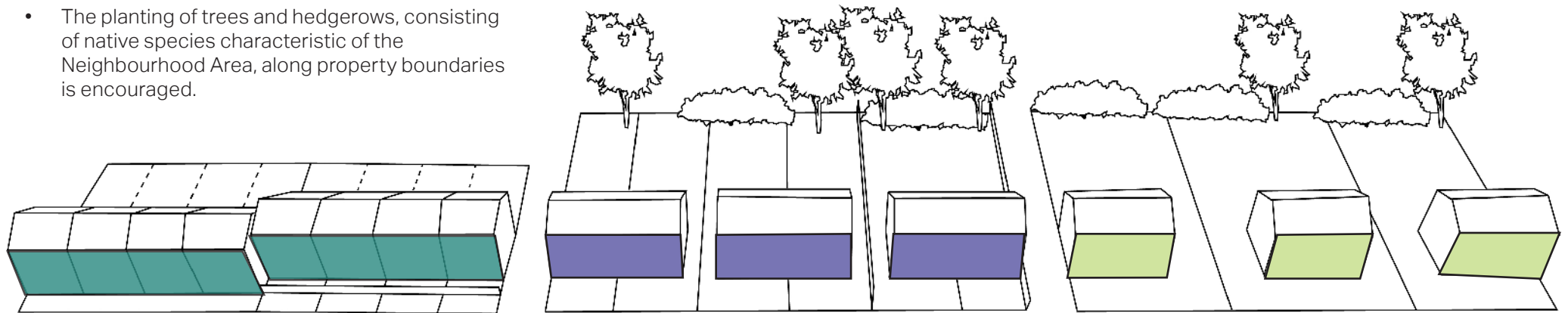
- Ensure the nature of any boundary treatment is appropriate to its character. Closed board fencing should not be used at the landscape edge or onto the public realm. This is appropriate for garden division only
- Retention and planting of locally native trees and hedgerows along property boundaries 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.



**TRADITIONAL TERRACES AND VILLAGE CORE**

**PIECEMEAL DOMESTIC DEVELOPMENT**

**RURAL FRINGE**



**Figure 5.8:** Example boundary treatments

## 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.

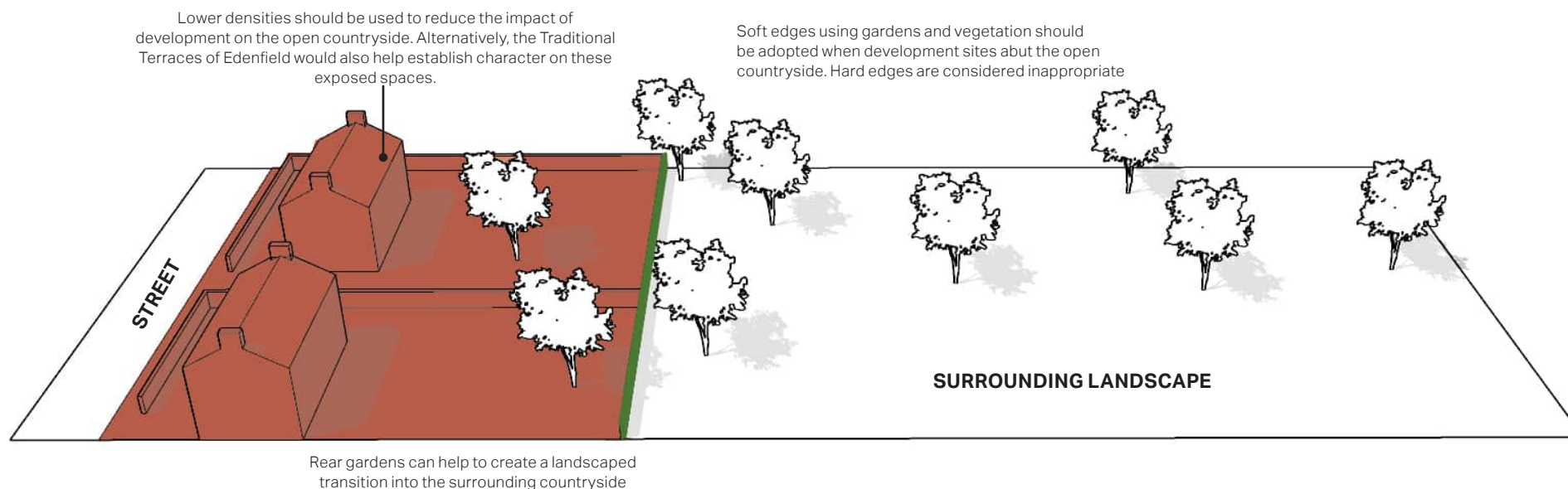


Figure 5.9: Settlement edge treatment

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## 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.

### 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.

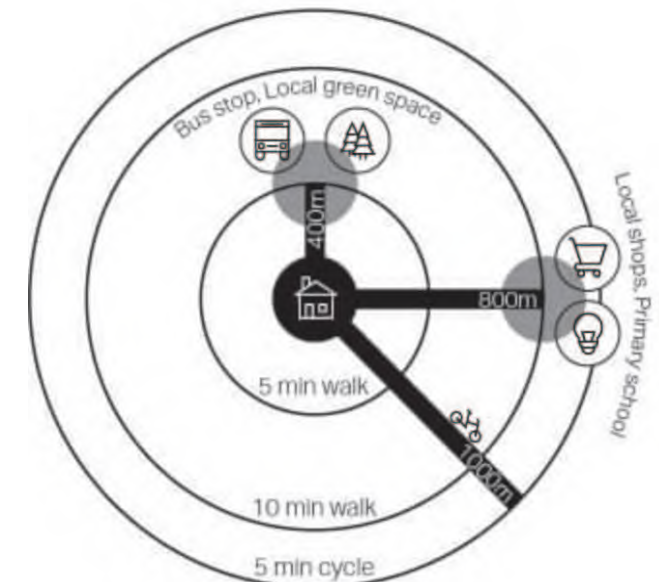


Figure 5.10: 'Walkable neighbourhood' Diagram

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

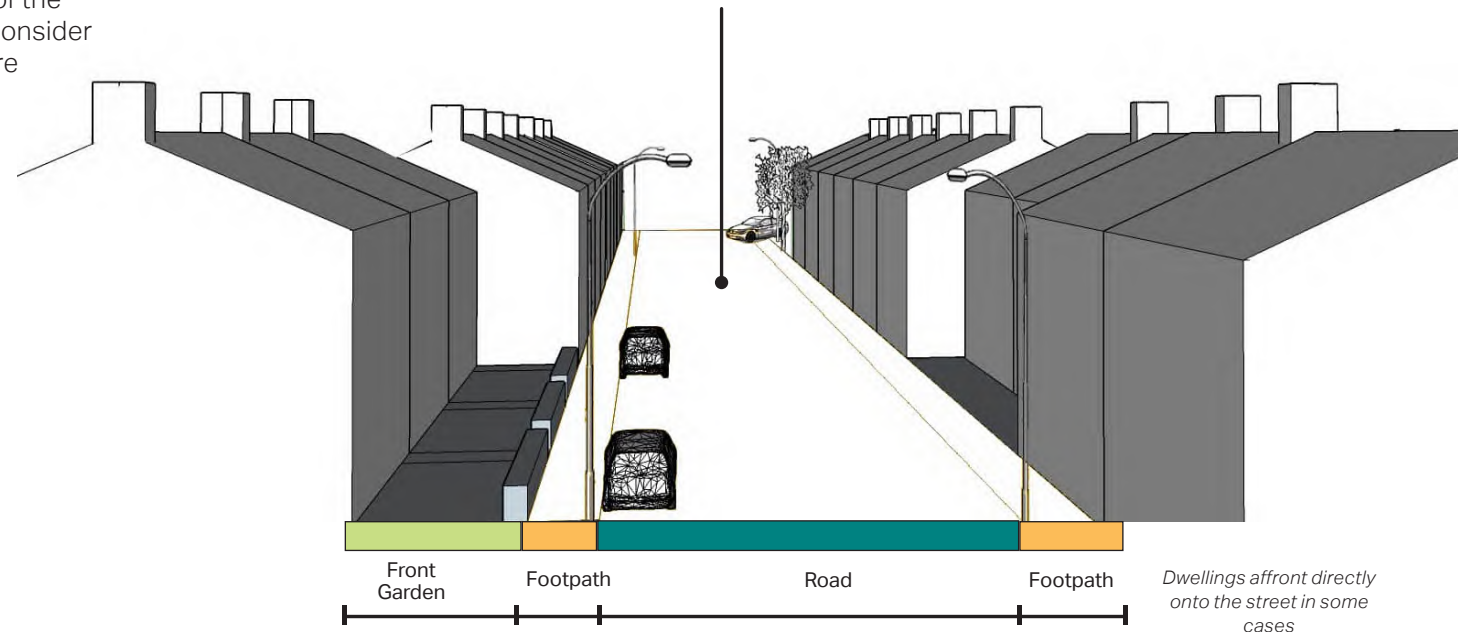


Figure 5.11: Primary street diagram

## 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.

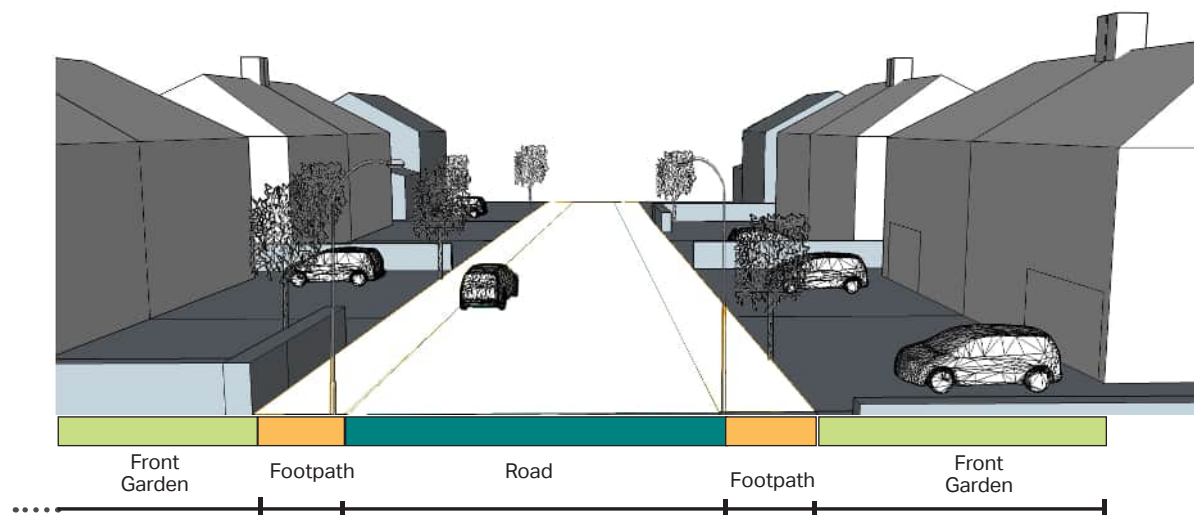


Figure 5.12: Secondary Street Diagram

### 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.

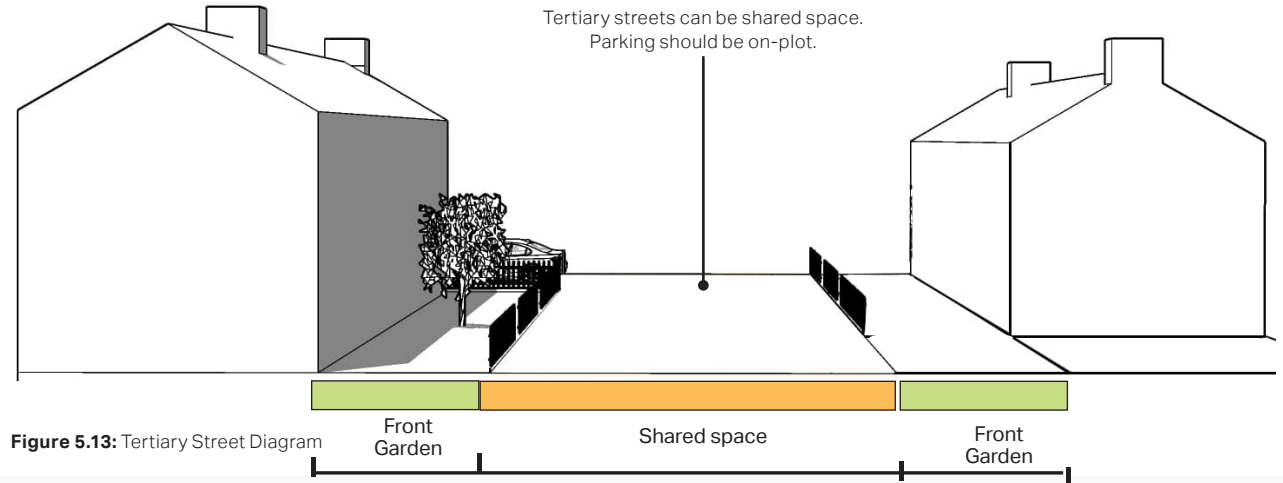


Figure 5.13: Tertiary Street Diagram

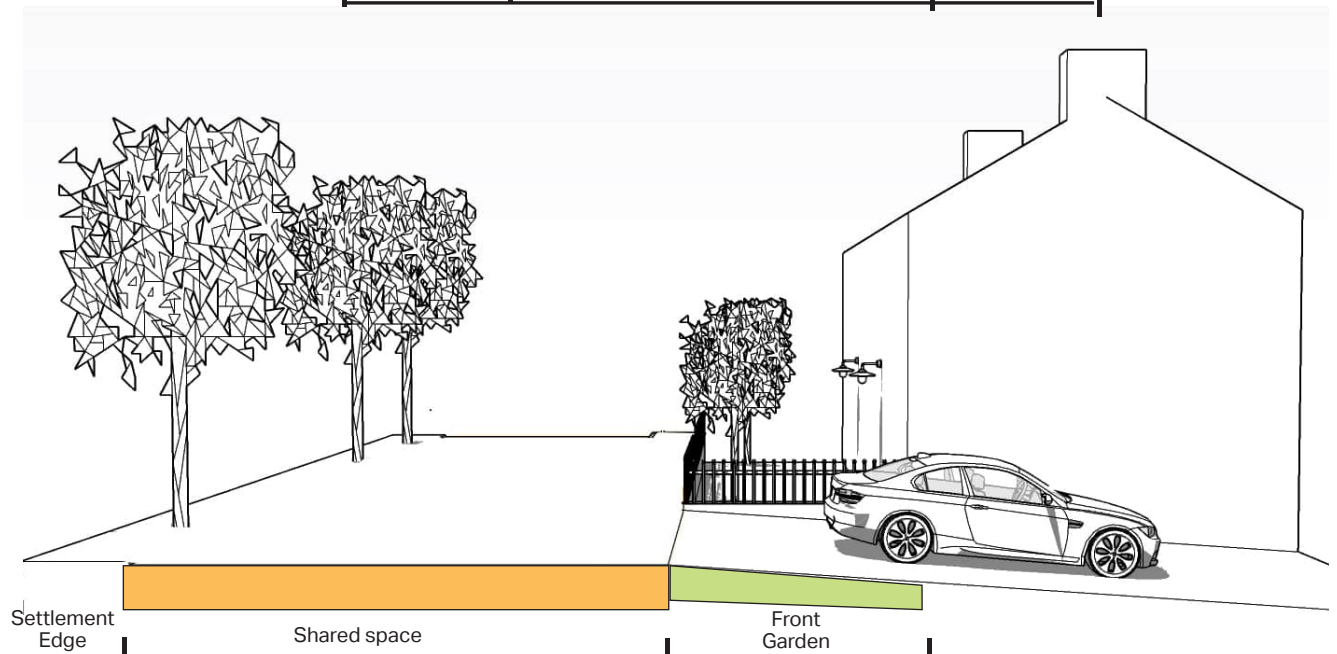


Figure 5.14: Tertiary Street Diagram 02

## 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.

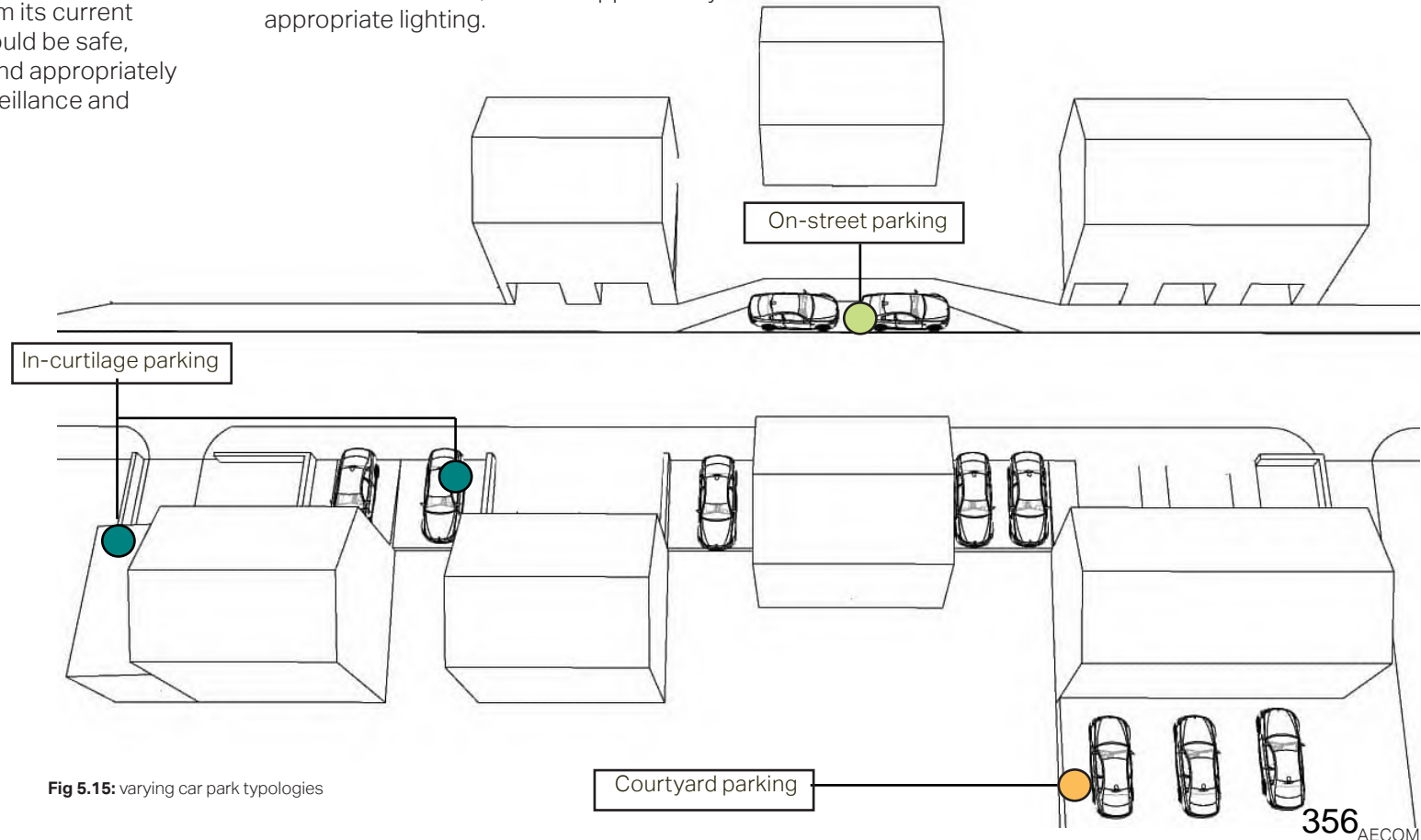


Fig 5.15: varying car park typologies



## 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**

AECOM is built to deliver a better world. We design, build, finance and operate infrastructure assets for governments, businesses and organizations in more than 150 countries. As a fully integrated firm, we connect knowledge and experience across our global network of experts to help clients solve their most complex challenges. From high-performance buildings and infrastructure, to resilient communities and environments, to stable and secure nations, our work is transformative, differentiated and vital. A Fortune 500 firm, AECOM had revenue of approximately \$17.4 billion during fiscal year 2016. See how we deliver what others can only imagine at [aecom.com](http://aecom.com) and [@AECOM](https://twitter.com/AECOM).

## Edenfield Community Neighbourhood Forum

### Land West of Market Street, Edenfield

#### Edenfield Masterplan and Design Code Version 4

Edenfield Community Neighbourhood Forum (ECNF) has submitted representations on version 4 of the Masterplan and Design Code for Land West of Market Street (Allocation H66) which was published for consultation in May 2024

ECNF has received confirmations of support for these representations from 371 individuals who reside in Edenfield and from 15 individuals who reside outside Edenfield. The names and addresses are listed below.

<b>Christian name</b>	<b>Surname</b>	<b>Address - street</b>	<b>Post code</b>	<b>Town</b>
<b>Edenfield residents</b>				
Les	Adams	[REDACTED]	[REDACTED]	[REDACTED]
Jan	Adams	[REDACTED]	[REDACTED]	[REDACTED]
Emma	Ainsworth	[REDACTED]	[REDACTED]	[REDACTED]
Brian	Arpino	[REDACTED]	[REDACTED]	[REDACTED]
Sandra	Arpino	[REDACTED]	[REDACTED]	[REDACTED]
Lee	Ash	[REDACTED]	[REDACTED]	[REDACTED]
Christine	Ash	[REDACTED]	[REDACTED]	[REDACTED]
Peter	Ash	[REDACTED]	[REDACTED]	[REDACTED]
Alan	Ashworth	[REDACTED]	[REDACTED]	[REDACTED]
Carol	Ashworth	[REDACTED]	[REDACTED]	[REDACTED]
Thomas	Axon	[REDACTED]	[REDACTED]	[REDACTED]
Justin	Axon	[REDACTED]	[REDACTED]	[REDACTED]
John	Ayers	[REDACTED]	[REDACTED]	[REDACTED]
Kate	Barlow	[REDACTED]	[REDACTED]	[REDACTED]
Terri	Barnes	[REDACTED]	[REDACTED]	[REDACTED]
Liam	Barnes	[REDACTED]	[REDACTED]	[REDACTED]
Jennifer	Barnfield	[REDACTED]	[REDACTED]	[REDACTED]
Bill	Barnfield	[REDACTED]	[REDACTED]	[REDACTED]
Ingrid	Battersby	[REDACTED]	[REDACTED]	[REDACTED]
Nick	Battersby	[REDACTED]	[REDACTED]	[REDACTED]
Mike	Battersby	[REDACTED]	[REDACTED]	[REDACTED]
Tom	Beaney	[REDACTED]	[REDACTED]	[REDACTED]
Graham	Beaney	[REDACTED]	[REDACTED]	[REDACTED]
Tom	Beaney	[REDACTED]	[REDACTED]	[REDACTED]
Steven	Bennett	[REDACTED]	[REDACTED]	[REDACTED]
matthew	bennett	[REDACTED]	[REDACTED]	[REDACTED]
Pamela	Bennett	[REDACTED]	[REDACTED]	[REDACTED]
Maleah	Bennett	[REDACTED]	[REDACTED]	[REDACTED]
A	Bentley	[REDACTED]	[REDACTED]	[REDACTED]
Jarreth	Bentley	[REDACTED]	[REDACTED]	[REDACTED]
Ben	Bentley	[REDACTED]	[REDACTED]	[REDACTED]

Bradley	Biggs	[REDACTED]	[REDACTED]	[REDACTED]
Neil	Binns	[REDACTED]	[REDACTED]	[REDACTED]
Deborah	Binns	[REDACTED]	[REDACTED]	[REDACTED]
Christine	Bishop	[REDACTED]	[REDACTED]	[REDACTED]
Christopher	Bishop	[REDACTED]	[REDACTED]	[REDACTED]
RICHARD	BISHOP	[REDACTED]	[REDACTED]	[REDACTED]
SARAH	BISHOP	[REDACTED]	[REDACTED]	[REDACTED]
JAMES	BISHOP	[REDACTED]	[REDACTED]	[REDACTED]
KATIE	BISHOP	[REDACTED]	[REDACTED]	[REDACTED]
Margaret	Bispham	[REDACTED]	[REDACTED]	[REDACTED]
Geoff	Blow	[REDACTED]	[REDACTED]	[REDACTED]
Christine	Blow	[REDACTED]	[REDACTED]	[REDACTED]
Trevor	Boothman	[REDACTED]	[REDACTED]	[REDACTED]
Jacqueline	Boothman	[REDACTED]	[REDACTED]	[REDACTED]
P	Borkus	[REDACTED]	[REDACTED]	[REDACTED]
Gerald	Bowden	[REDACTED]	[REDACTED]	[REDACTED]
Hilary	Bowden	[REDACTED]	[REDACTED]	[REDACTED]
Stanley	Brooks	[REDACTED]	[REDACTED]	[REDACTED]
Jean	Brooks	[REDACTED]	[REDACTED]	[REDACTED]
Diane	Brooks	[REDACTED]	[REDACTED]	[REDACTED]
Edna Mary	Brown	[REDACTED]	[REDACTED]	[REDACTED]
Lauren	Brown	[REDACTED]	[REDACTED]	[REDACTED]
David	Bruty	[REDACTED]	[REDACTED]	[REDACTED]
June	Bruty	[REDACTED]	[REDACTED]	[REDACTED]
Katie	Burrows	[REDACTED]	[REDACTED]	[REDACTED]
Nicholas	Bury	[REDACTED]	[REDACTED]	[REDACTED]
Keith	Butterworth	[REDACTED]	[REDACTED]	[REDACTED]
Shirley	Butterworth	[REDACTED]	[REDACTED]	[REDACTED]
Julie	Butterworth	[REDACTED]	[REDACTED]	[REDACTED]
Julian	Butterworth	[REDACTED]	[REDACTED]	[REDACTED]
Daniel	Butterworth	[REDACTED]	[REDACTED]	[REDACTED]
Jack	Butterworth	[REDACTED]	[REDACTED]	[REDACTED]
James	Byron	[REDACTED]	[REDACTED]	[REDACTED]
Catherine	Byron	[REDACTED]	[REDACTED]	[REDACTED]
Alison	Caldwell	[REDACTED]	[REDACTED]	[REDACTED]
Steven	Caldwell	[REDACTED]	[REDACTED]	[REDACTED]
Joseph	Caldwell	[REDACTED]	[REDACTED]	[REDACTED]
Janet	Campbell	[REDACTED]	[REDACTED]	[REDACTED]
Colin	Campbell	[REDACTED]	[REDACTED]	[REDACTED]
Shona	Campbell	[REDACTED]	[REDACTED]	[REDACTED]
Alessio	Cecco	[REDACTED]	[REDACTED]	[REDACTED]
Kevin	Chadwick	[REDACTED]	[REDACTED]	[REDACTED]
Christine	Chadwick	[REDACTED]	[REDACTED]	[REDACTED]
Gill	Chadwick	[REDACTED]	[REDACTED]	[REDACTED]
Alec	Chadwick	[REDACTED]	[REDACTED]	[REDACTED]
Sam	Chadwick	[REDACTED]	[REDACTED]	[REDACTED]
Lucy	Chadwick	[REDACTED]	[REDACTED]	[REDACTED]
Brenda	Chester	[REDACTED]	[REDACTED]	[REDACTED]



Kathryn	Clucas	[REDACTED]	[REDACTED]	[REDACTED]
David	Clucas	[REDACTED]	[REDACTED]	[REDACTED]
Darrell	Cope	[REDACTED]	[REDACTED]	[REDACTED]
Laurie	Costigan-	[REDACTED]	[REDACTED]	[REDACTED]
Ben	bentley	[REDACTED]	[REDACTED]	[REDACTED]
Sarah	Cottam	[REDACTED]	[REDACTED]	[REDACTED]
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Matthew	Cotton	[REDACTED]	[REDACTED]	[REDACTED]
Joshua	Cotton	[REDACTED]	[REDACTED]	[REDACTED]
David	Coulson	[REDACTED]	[REDACTED]	[REDACTED]
Lorraine	Cowan	[REDACTED]	[REDACTED]	[REDACTED]
Joseph	Cowan	[REDACTED]	[REDACTED]	[REDACTED]
Emily	Coyne	[REDACTED]	[REDACTED]	[REDACTED]
Penelope	Coyne	[REDACTED]	[REDACTED]	[REDACTED]
Shirley	Coyne	[REDACTED]	[REDACTED]	[REDACTED]
Ann-Marie	Coyne	[REDACTED]	[REDACTED]	[REDACTED]
Michael	Coyne	[REDACTED]	[REDACTED]	[REDACTED]
Susan	Coyne	[REDACTED]	[REDACTED]	[REDACTED]
JOHN	Crook	[REDACTED]	[REDACTED]	[REDACTED]
Susan	CROSSLEY	[REDACTED]	[REDACTED]	[REDACTED]
Elizabeth	CROSSLEY	[REDACTED]	[REDACTED]	[REDACTED]
Audrey	Dalby	[REDACTED]	[REDACTED]	[REDACTED]
Kenneth	Davis	[REDACTED]	[REDACTED]	[REDACTED]
Kathleen	Davis	[REDACTED]	[REDACTED]	[REDACTED]
Phillip	Davy	[REDACTED]	[REDACTED]	[REDACTED]
Lynda	Dawber	[REDACTED]	[REDACTED]	[REDACTED]
Stuart	Dawber	[REDACTED]	[REDACTED]	[REDACTED]
JPL	Dearden	[REDACTED]	[REDACTED]	[REDACTED]
Janet	Desprez	[REDACTED]	[REDACTED]	[REDACTED]
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Paul	Dodd	[REDACTED]	[REDACTED]	[REDACTED]
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Alexandra	Donkin	[REDACTED]	[REDACTED]	[REDACTED]
Joao	Duarte	[REDACTED]	[REDACTED]	[REDACTED]
Peter	DUARTE	[REDACTED]	[REDACTED]	[REDACTED]
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Beth	Dydyna	[REDACTED]	[REDACTED]	[REDACTED]
Holly	Dyson	[REDACTED]	[REDACTED]	[REDACTED]
Fiona	Eason	[REDACTED]	[REDACTED]	[REDACTED]
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Antony	Edwards	[REDACTED]	[REDACTED]	[REDACTED]
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Paulina	Ellis	[REDACTED]	[REDACTED]	[REDACTED]
Colin	Ellis	[REDACTED]	[REDACTED]	[REDACTED]
Margaret	Entwistle	[REDACTED]	[REDACTED]	[REDACTED]
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John	Entwistle	[REDACTED]	[REDACTED]	[REDACTED]
Anne	Farmer	[REDACTED]	[REDACTED]	[REDACTED]
Craig	Finn	[REDACTED]	[REDACTED]	[REDACTED]
Katie	Finn	[REDACTED]	[REDACTED]	[REDACTED]
Katie	Finn	[REDACTED]	[REDACTED]	[REDACTED]
Craig	Finn	[REDACTED]	[REDACTED]	[REDACTED]
Ryan	Finnerty	[REDACTED]	[REDACTED]	[REDACTED]
Emma	Finnerty	[REDACTED]	[REDACTED]	[REDACTED]
Adele	Finnerty	[REDACTED]	[REDACTED]	[REDACTED]
Tracy	Finney	[REDACTED]	[REDACTED]	[REDACTED]
William	Finney	[REDACTED]	[REDACTED]	[REDACTED]
Kieron	Finney	[REDACTED]	[REDACTED]	[REDACTED]
Kristofer	Finney	[REDACTED]	[REDACTED]	[REDACTED]
David	Fisher	[REDACTED]	[REDACTED]	[REDACTED]
Sandra	Fisher	[REDACTED]	[REDACTED]	[REDACTED]
Stuart	Fisher	[REDACTED]	[REDACTED]	[REDACTED]
Ian	Fletcher	[REDACTED]	[REDACTED]	[REDACTED]
Nicola	Fletcher	[REDACTED]	[REDACTED]	[REDACTED]
Jonathan	Frankish	[REDACTED]	[REDACTED]	[REDACTED]
Sarah	Frankish	[REDACTED]	[REDACTED]	[REDACTED]
Moyra	Franklin	[REDACTED]	[REDACTED]	[REDACTED]
Jason	Gallagher	[REDACTED]	[REDACTED]	[REDACTED]
J	Giles	[REDACTED]	[REDACTED]	[REDACTED]
B R	Giles	[REDACTED]	[REDACTED]	[REDACTED]
Victoria	Giles	[REDACTED]	[REDACTED]	[REDACTED]
Daniel	Giles	[REDACTED]	[REDACTED]	[REDACTED]
Rita	Graham	[REDACTED]	[REDACTED]	[REDACTED]
Barry	Gray	[REDACTED]	[REDACTED]	[REDACTED]
Mary	Gray	[REDACTED]	[REDACTED]	[REDACTED]
Paul	Green	[REDACTED]	[REDACTED]	[REDACTED]
Michelle	Green	[REDACTED]	[REDACTED]	[REDACTED]
Joshua	Green	[REDACTED]	[REDACTED]	[REDACTED]
Linda	Griffin	[REDACTED]	[REDACTED]	[REDACTED]
John	Griffin	[REDACTED]	[REDACTED]	[REDACTED]
Megan	Griffin	[REDACTED]	[REDACTED]	[REDACTED]
Joyce	Griffiths	[REDACTED]	[REDACTED]	[REDACTED]
Lesley	Hallam	[REDACTED]	[REDACTED]	[REDACTED]
James	Halligan	[REDACTED]	[REDACTED]	[REDACTED]
Bev	Hamblett	[REDACTED]	[REDACTED]	[REDACTED]
William	Hamblett	[REDACTED]	[REDACTED]	[REDACTED]
E	Handley	[REDACTED]	[REDACTED]	[REDACTED]
Charlotte	Hanson	[REDACTED]	[REDACTED]	[REDACTED]
Adele	Hanson	[REDACTED]	[REDACTED]	[REDACTED]
Christopher	Hanson	[REDACTED]	[REDACTED]	[REDACTED]

Stephen	Hardman	[REDACTED]	[REDACTED]	[REDACTED]
Stephen	Hardman	[REDACTED]	[REDACTED]	[REDACTED]
Peter	Harrison	[REDACTED]	[REDACTED]	[REDACTED]
Karen	Haworth	[REDACTED]	[REDACTED]	[REDACTED]
Peter	Haworth	[REDACTED]	[REDACTED]	[REDACTED]
Sophie	Haworth	[REDACTED]	[REDACTED]	[REDACTED]
Lucie	Haworth	[REDACTED]	[REDACTED]	[REDACTED]
G C	Hewitt	[REDACTED]	[REDACTED]	[REDACTED]
N J	Hewitt	[REDACTED]	[REDACTED]	[REDACTED]
Simon	Hill	[REDACTED]	[REDACTED]	[REDACTED]
Gill	Hillel	[REDACTED]	[REDACTED]	[REDACTED]
Richard	Hillel	[REDACTED]	[REDACTED]	[REDACTED]
Maureen	Hodgkinson	[REDACTED]	[REDACTED]	[REDACTED]
K	Holden	[REDACTED]	[REDACTED]	[REDACTED]
B	Holden	[REDACTED]	[REDACTED]	[REDACTED]
IAN	holt	[REDACTED]	[REDACTED]	[REDACTED]
Tim	Hope	[REDACTED]	[REDACTED]	[REDACTED]
Ben	Hope	[REDACTED]	[REDACTED]	[REDACTED]
Olivia	Horsfield	[REDACTED]	[REDACTED]	[REDACTED]
Anthony	Hudson	[REDACTED]	[REDACTED]	[REDACTED]
Morven	Hudson	[REDACTED]	[REDACTED]	[REDACTED]
Kathleen	Hutchinson	[REDACTED]	[REDACTED]	[REDACTED]
Jamie	Irwin	[REDACTED]	[REDACTED]	[REDACTED]
Rachel	James	[REDACTED]	[REDACTED]	[REDACTED]
Steven	Jary	[REDACTED]	[REDACTED]	[REDACTED]
Carol	Jary	[REDACTED]	[REDACTED]	[REDACTED]
Rebecca	Jenkins	[REDACTED]	[REDACTED]	[REDACTED]
Daniel	Jenkins	[REDACTED]	[REDACTED]	[REDACTED]
Graham	Jewell	[REDACTED]	[REDACTED]	[REDACTED]
Claire	Jewell	[REDACTED]	[REDACTED]	[REDACTED]
Dorothy	Jones	[REDACTED]	[REDACTED]	[REDACTED]
Donna	Kean	[REDACTED]	[REDACTED]	[REDACTED]
Charlotte	Kennedy	[REDACTED]	[REDACTED]	[REDACTED]
B	Kenyon	[REDACTED]	[REDACTED]	[REDACTED]
K	Kenyon	[REDACTED]	[REDACTED]	[REDACTED]
T	Kitson	[REDACTED]	[REDACTED]	[REDACTED]
HF	Knott	[REDACTED]	[REDACTED]	[REDACTED]
Keith	Kushner	[REDACTED]	[REDACTED]	[REDACTED]
Barbara	Kushner	[REDACTED]	[REDACTED]	[REDACTED]
Barry	Lang	[REDACTED]	[REDACTED]	[REDACTED]
Sandra	Lang	[REDACTED]	[REDACTED]	[REDACTED]
Brian	Langrish	[REDACTED]	[REDACTED]	[REDACTED]
Denise	Langrish	[REDACTED]	[REDACTED]	[REDACTED]
Philip	Leake	[REDACTED]	[REDACTED]	[REDACTED]
Susan	Leake	[REDACTED]	[REDACTED]	[REDACTED]
Graham	Leck	[REDACTED]	[REDACTED]	[REDACTED]
Michelle	Letchford	[REDACTED]	[REDACTED]	[REDACTED]
James	Letchford	[REDACTED]	[REDACTED]	[REDACTED]

Andy	Lill	[REDACTED]	[REDACTED]	[REDACTED]
Eleanor	Lill	[REDACTED]	[REDACTED]	[REDACTED]
Pauline	Littlewood	[REDACTED]	[REDACTED]	[REDACTED]
Joe	Littlewood	[REDACTED]	[REDACTED]	[REDACTED]
Corinne	Littlewood	[REDACTED]	[REDACTED]	[REDACTED]
Anne	Livesey	[REDACTED]	[REDACTED]	[REDACTED]
Brian	Livesey	[REDACTED]	[REDACTED]	[REDACTED]
A	Long	[REDACTED]	[REDACTED]	[REDACTED]
L	Long	[REDACTED]	[REDACTED]	[REDACTED]
Ian	Lord	[REDACTED]	[REDACTED]	[REDACTED]
Barbara	Lord	[REDACTED]	[REDACTED]	[REDACTED]
Annabelle	Lumb	[REDACTED]	[REDACTED]	[REDACTED]
John	Lumb	[REDACTED]	[REDACTED]	[REDACTED]
Adam	Lumb	[REDACTED]	[REDACTED]	[REDACTED]
Alan	Lumsden	[REDACTED]	[REDACTED]	[REDACTED]
Sue	Lumsden	[REDACTED]	[REDACTED]	[REDACTED]
Nina	Malecki	[REDACTED]	[REDACTED]	[REDACTED]
Katy	Mason	[REDACTED]	[REDACTED]	[REDACTED]
Ian	McAllister	[REDACTED]	[REDACTED]	[REDACTED]
Graeme	McDonald	[REDACTED]	[REDACTED]	[REDACTED]
Eileen	McDonald	[REDACTED]	[REDACTED]	[REDACTED]
Finlay	McDonald	[REDACTED]	[REDACTED]	[REDACTED]
Lorna	McGlyn	[REDACTED]	[REDACTED]	[REDACTED]
Helen	McVey	[REDACTED]	[REDACTED]	[REDACTED]
matt	mead	[REDACTED]	[REDACTED]	[REDACTED]
Carol	Mitchell	[REDACTED]	[REDACTED]	[REDACTED]
Katy	Moore	[REDACTED]	[REDACTED]	[REDACTED]
J	Mukuna	[REDACTED]	[REDACTED]	[REDACTED]
Melissa	Mukuna	[REDACTED]	[REDACTED]	[REDACTED]
Melissa	Mukuna	[REDACTED]	[REDACTED]	[REDACTED]
JoÃ«l	Mukuna	[REDACTED]	[REDACTED]	[REDACTED]
Paula	Munro	[REDACTED]	[REDACTED]	[REDACTED]
Lee	Munro	[REDACTED]	[REDACTED]	[REDACTED]
Paula	Munro	[REDACTED]	[REDACTED]	[REDACTED]
Lee	Munro	[REDACTED]	[REDACTED]	[REDACTED]
William	Murray	[REDACTED]	[REDACTED]	[REDACTED]
Joseph	Murray	[REDACTED]	[REDACTED]	[REDACTED]
Christine	Murrell	[REDACTED]	[REDACTED]	[REDACTED]
Michael	Murrell	[REDACTED]	[REDACTED]	[REDACTED]
Rob	Neave	[REDACTED]	[REDACTED]	[REDACTED]
Lara	Neave	[REDACTED]	[REDACTED]	[REDACTED]
dave	oneill	[REDACTED]	[REDACTED]	[REDACTED]
Susan	Openshaw	[REDACTED]	[REDACTED]	[REDACTED]
Jordan	Openshaw	[REDACTED]	[REDACTED]	[REDACTED]
K	Openshaw	[REDACTED]	[REDACTED]	[REDACTED]
Ken	Parkes	[REDACTED]	[REDACTED]	[REDACTED]
Gaynor	Parkes	[REDACTED]	[REDACTED]	[REDACTED]
John	Partington	[REDACTED]	[REDACTED]	[REDACTED]

M	Porter	[REDACTED]	[REDACTED]	[REDACTED]
A	Porter	[REDACTED]	[REDACTED]	[REDACTED]
S	Porter	[REDACTED]	[REDACTED]	[REDACTED]
Joan	Preston	[REDACTED]	[REDACTED]	[REDACTED]
David	Preston	[REDACTED]	[REDACTED]	[REDACTED]
Amy	Preston	[REDACTED]	[REDACTED]	[REDACTED]
Tim	Preston	[REDACTED]	[REDACTED]	[REDACTED]
Mary	Pye	[REDACTED]	[REDACTED]	[REDACTED]
Joanna	Quigley	[REDACTED]	[REDACTED]	[REDACTED]
Ian	Quigley	[REDACTED]	[REDACTED]	[REDACTED]
Lesley	Quigley	[REDACTED]	[REDACTED]	[REDACTED]
Dominic	Rathmill	[REDACTED]	[REDACTED]	[REDACTED]
Kim	Rathmill	[REDACTED]	[REDACTED]	[REDACTED]
Lola	Rathmill	[REDACTED]	[REDACTED]	[REDACTED]
Liam	Rathmill	[REDACTED]	[REDACTED]	[REDACTED]
David	Rawcliffe	[REDACTED]	[REDACTED]	[REDACTED]
Thomas	Reid	[REDACTED]	[REDACTED]	[REDACTED]
Jacqueline	Reid	[REDACTED]	[REDACTED]	[REDACTED]
Anthony	Robertson	[REDACTED]	[REDACTED]	[REDACTED]
Amy	Robinson	[REDACTED]	[REDACTED]	[REDACTED]
Mark	Robinson	[REDACTED]	[REDACTED]	[REDACTED]
Sheila	Rostron	[REDACTED]	[REDACTED]	[REDACTED]
Morgan	Rothwell	[REDACTED]	[REDACTED]	[REDACTED]
Marianne	Rushton	[REDACTED]	[REDACTED]	[REDACTED]
Skye	Scott	[REDACTED]	[REDACTED]	[REDACTED]
Richard	Shaughnessy	[REDACTED]	[REDACTED]	[REDACTED]
Chad	Shaughnessy	[REDACTED]	[REDACTED]	[REDACTED]
Kathleen	Shaughnessy	[REDACTED]	[REDACTED]	[REDACTED]
Katie	Simpson	[REDACTED]	[REDACTED]	[REDACTED]
Michael	Sixsmith	[REDACTED]	[REDACTED]	[REDACTED]
Michaela	Sixsmith	[REDACTED]	[REDACTED]	[REDACTED]
Marilyn	Slavinski	[REDACTED]	[REDACTED]	[REDACTED]
Thomas	Smith	[REDACTED]	[REDACTED]	[REDACTED]
Samuel	Smith	[REDACTED]	[REDACTED]	[REDACTED]
Richard	Smith	[REDACTED]	[REDACTED]	[REDACTED]
Audrey	Smith	[REDACTED]	[REDACTED]	[REDACTED]
Myra	Souter	[REDACTED]	[REDACTED]	[REDACTED]
Brian	Souter	[REDACTED]	[REDACTED]	[REDACTED]
Lesly	Spurrell	[REDACTED]	[REDACTED]	[REDACTED]
paul	stanley	[REDACTED]	[REDACTED]	[REDACTED]
ian	stanley	[REDACTED]	[REDACTED]	[REDACTED]
Jason	Straccia	[REDACTED]	[REDACTED]	[REDACTED]
Clare	Straccia	[REDACTED]	[REDACTED]	[REDACTED]
Lindsay	Stringfellow	[REDACTED]	[REDACTED]	[REDACTED]
Tom	Stroud	[REDACTED]	[REDACTED]	[REDACTED]
ann	subasic	[REDACTED]	[REDACTED]	[REDACTED]
Geraldine	Sweet	[REDACTED]	[REDACTED]	[REDACTED]
Alastair	Sweet	[REDACTED]	[REDACTED]	[REDACTED]

Minnie	Targett	[REDACTED]	[REDACTED]	[REDACTED]
Laura	Tattersall	[REDACTED]	[REDACTED]	[REDACTED]
Gary	Tattersall	[REDACTED]	[REDACTED]	[REDACTED]
Peter	Taylor	[REDACTED]	[REDACTED]	[REDACTED]
Paula	Tehrani	[REDACTED]	[REDACTED]	[REDACTED]
Sara	Tomlinson	[REDACTED]	[REDACTED]	[REDACTED]
Margaret	Trofinesuk	[REDACTED]	[REDACTED]	[REDACTED]
Walter	Turck	[REDACTED]	[REDACTED]	[REDACTED]
Patricia	Turck	[REDACTED]	[REDACTED]	[REDACTED]
Michael	Varlow	[REDACTED]	[REDACTED]	[REDACTED]
Louise	Waller	[REDACTED]	[REDACTED]	[REDACTED]
Joseph	Waller	[REDACTED]	[REDACTED]	[REDACTED]
Joseph	Wallwork	[REDACTED]	[REDACTED]	[REDACTED]
Richard	Wallwork	[REDACTED]	[REDACTED]	[REDACTED]
Eric	Wallwork	[REDACTED]	[REDACTED]	[REDACTED]
Susan	Wallwork	[REDACTED]	[REDACTED]	[REDACTED]
Joe	Walmsley	[REDACTED]	[REDACTED]	[REDACTED]
Steven	Ward	[REDACTED]	[REDACTED]	[REDACTED]
Kathryn	Ward	[REDACTED]	[REDACTED]	[REDACTED]
Joel	Watkinson	[REDACTED]	[REDACTED]	[REDACTED]
Jennifer	Watkinson	[REDACTED]	[REDACTED]	[REDACTED]
Alex	Watson	[REDACTED]	[REDACTED]	[REDACTED]
Bernadette	Watson	[REDACTED]	[REDACTED]	[REDACTED]
David	Watson	[REDACTED]	[REDACTED]	[REDACTED]
Dave	Webb	[REDACTED]	[REDACTED]	[REDACTED]
Stacey	Webb	[REDACTED]	[REDACTED]	[REDACTED]
Nicholas	Wheeler	[REDACTED]	[REDACTED]	[REDACTED]
Matthew	Wheeler	[REDACTED]	[REDACTED]	[REDACTED]
Alexandra	White	[REDACTED]	[REDACTED]	[REDACTED]
Russell	White	[REDACTED]	[REDACTED]	[REDACTED]
Alexandra	White	[REDACTED]	[REDACTED]	[REDACTED]
Mark	Whitehead	[REDACTED]	[REDACTED]	[REDACTED]
Clare	Whitehead	[REDACTED]	[REDACTED]	[REDACTED]
Ethan	Whitehead	[REDACTED]	[REDACTED]	[REDACTED]
Paul	Whitehead	[REDACTED]	[REDACTED]	[REDACTED]
Susan	Whitehead	[REDACTED]	[REDACTED]	[REDACTED]
Ellie	Whitehead	[REDACTED]	[REDACTED]	[REDACTED]
Max	Whitehead	[REDACTED]	[REDACTED]	[REDACTED]
Matt	Whittaker	[REDACTED]	[REDACTED]	[REDACTED]
Carolyne	Williams	[REDACTED]	[REDACTED]	[REDACTED]
Paul	Williams	[REDACTED]	[REDACTED]	[REDACTED]
Linda	Williams	[REDACTED]	[REDACTED]	[REDACTED]
Chris	Williams	[REDACTED]	[REDACTED]	[REDACTED]
Sarah	Williams	[REDACTED]	[REDACTED]	[REDACTED]
Ron	Williams	[REDACTED]	[REDACTED]	[REDACTED]
Renee	Wilson	[REDACTED]	[REDACTED]	[REDACTED]
David	Wilson	[REDACTED]	[REDACTED]	[REDACTED]
Victoria	Wilson	[REDACTED]	[REDACTED]	[REDACTED]

Angela	Wilson	[REDACTED]		[REDACTED]
Stephen	Wilson	[REDACTED]	[REDACTED]	[REDACTED]
Emma	Wolfe	[REDACTED]	[REDACTED]	[REDACTED]
Helen	Woroniuk	[REDACTED]	[REDACTED]	[REDACTED]
Tim	Wright	[REDACTED]	[REDACTED]	[REDACTED]

**Resident outside Edenfield**

Emily	Baines	[REDACTED]	[REDACTED]	[REDACTED]
Dominic	Baines	[REDACTED]	[REDACTED]	[REDACTED]
Lynn	Clegg	[REDACTED]	[REDACTED]	[REDACTED]
Heather	Dodd	[REDACTED]	[REDACTED]	[REDACTED]
Keith	Dodd	[REDACTED]	[REDACTED]	[REDACTED]
Eileen	Hargreaves	[REDACTED]	[REDACTED]	[REDACTED]
Dave	Neave	[REDACTED]	[REDACTED]	[REDACTED]
Louise	Neave	[REDACTED]	[REDACTED]	[REDACTED]
Gillian	Pinner	[REDACTED]	[REDACTED]	[REDACTED]
Jonathan	Pinner	[REDACTED]	[REDACTED]	[REDACTED]
Nancy	Pinner	[REDACTED]	[REDACTED]	[REDACTED]
Andy	Smith	[REDACTED]	[REDACTED]	[REDACTED]
Jayne	Wilkinson-Smith	[REDACTED]	[REDACTED]	[REDACTED]
Janice	Wolfe	[REDACTED]	[REDACTED]	[REDACTED]
Stephen	Wolfe	[REDACTED]	[REDACTED]	[REDACTED]



Peter Cooke



8<sup>th</sup> June 2024

Objection To Version 4 of the Edenfield H66 Masterplan and Design Code

Dear Sirs,

I have very serious concerns about the proposed development, as follows:

No traffic assessment has been submitted and there has been no reassurance regarding the safety of access by all users and it's proposed that this will be subject to individual planning applications, which I view as totally unacceptable and potentially chaotic.

Why has this not been enforced?

The release of further Greenbelt for the school, play area and car parking is in contravention of the Local Plan, the developers should forfeit a considerable area, allocated for housing. It will, without doubt, have potentially severe environmental impact and raises concerns about safety issues at the busy junction near the school.

Why is this being potentially approved?

Without doubt, the proposed parking restriction will have a negative impact on current residents and local businesses, I have spoken to one trader who is resigned to a radical reduction in his trade and is preparing for closure should their welfare and livelihoods be disregarded.

Compensatory car parking has been referred to but is devoid of detail.

Why?

If as proposed, there is allowed simultaneous development of the two main sites of Taylor Wimpey and Peel, this would most certainly create utter pandemonium, drastically increased road congestion and probable safety issues for the entire 7-year period of construction.

Has this been considered, if not why not?

Is it true that the recommendations of the Places Matter Design Review report have been totally disregarded? The development remains cramped with limited green areas.

If this is the case, then the profit of the developers is being placed well in front of quality of life, not only for the existing residents of Edenfield, but also compromises the wellbeing of the incomers. Why has that been ignored?

It appears that the safety issues of National Highways with regard to the flood risk and land stability issues have not been addressed regarding the SUDS drainage pond adjacent to the A56, which continues to have serious road safety issues.

Why has this not been addressed?

It is a matter of considerable concern that there has been a blatant disregard of the requirement for additional infrastructure, in particular the shortage of doctors and school places, which are already overstretched.

I consider this to be an affront to existing and potential incomers.

The community voice with regard to the Design Code detailed in the Neighbourhood Plan for ECNF appears to have been totally ignored.

This is despite being receiving very favourably by the Places Matter Design Review report.

In conclusion, the impact upon current residents appears to have been totally disregarded by this proposed enormous development.

People who have lived in Edenfield for decades will be unable to park outside their own homes, which is an extreme injustice, generated entirely by the thirst for profit of the developers.

This is a massive manifestation of inequality, and our village will be swamped, quite literally, with traffic and incomers who will unwittingly destroy what they seek.

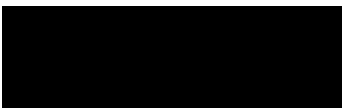
Edenfield will no longer be a village, but a mini, congested metropolis.

All of the above is of very serious personal concern to me, as I moved to Edenfield several years ago and have always enjoyed the peacefulness and the friendliness of the residents, but that will be destroyed if this development is given the unfettered "green light", as no one takes kindly to what actually amounts to an invasion.

My final question:

Will Rossendale Borough Council enforce all of the stipulations placed upon the developers?

Regards,

A solid black rectangular box redacting the signature of Peter Cooke.

Peter Cooke

Dear Sir/Madam,

I am APPALLED that this plan is still being proposed despite the obvious issues and problems that such a plan would entail. I cannot help but feel that the council is in thrall to these greedy developers, who are showing scant regard for the wellbeing of the residents (both existing and future ones) of Edenfield.

Firstly, why does the council plan to build on green field sites in Edenfield, when other brown field sites are available in the Valley?

Furthermore, there are already major issues with the traffic flow in Edenfield without exacerbating the problem. To add more vehicles would not only be irresponsible of the council, but it would be dangerous for motorists, cyclists and pedestrians. Exiting Gincroft Lane and Exchange Street is already extremely hazardous.

Moreover, the infrastructure will not cope with the number of households proposed. Demand for doctors and NHS dentists is already problematic in the borough and there will be an added burden on our village school.

And we already have flooding issues on the A56; building on this site would only increase these.

I trust that you will take these concerns into account and register my objection to this farcical proposal.

Yours faithfully

Mrs Doreen Johnson

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

Sent from my iPhone

Begin forwarded message:

**From:** [REDACTED]  
**Date:** 9 June 2024 at 17:58:11 BST  
**To:** [forewardplanning@rossendalebc.gov.uk](mailto:forewardplanning@rossendalebc.gov.uk)  
**Subject:** Edenfield Masterplan/Design code ( ref Version4 for site H66)

Dear Sirs

I wish to register my objections to the above on the grounds that the proposed development will have a detrimental effect on the village , the existing community and those who visit Edenfield in many other capacities .

My family has been resident in the village for 60 years and many changes have taken place . The greatest being the creation of a by-pass road to alleviate the intolerable congestion at the time. This road is now out dated & as a result of being connected to the wider “fast” road network has way surpassed its design capacities . As a result the roads through the village are currently only just coping with the traffic demand & should there be any interruption to the by-.pass flow the village already becomes gridlocked . This scenario is already becoming more & more frequent without extra large scale housing development. .

To further exacerbate existing residents difficulties there are suggestions of restricting on highway parking . Where does the powers that be expect these vehicles to be kept by residents ? When my husband attended Edenfield School there were 2 classes & the school was purpose built for such . I believe there are now 7 classes. It is massively over subscribed with no room to expand .

Regards

Lindsay Stringfellow

[REDACTED]  
[REDACTED]  
[REDACTED]

Sent from my iPhone

9<sup>th</sup> June 2024

Dear Sir/Madam

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

I am writing in respect of the above planned development and wanted to make you aware of my strong objection to this.

I have a number of concerns regarding the plan:

- There is no traffic assessment for the whole site and no road safety audit. I live on Market Street with my 12 year old daughter and I feel the road is very busy and at times unsafe, I regularly see passing car and buses pull off wing mirrors when driving past because of congestion on the road. Having so many new houses will only make this issue worse and I do fear for resident safety. Simultaneous building from Peel and Taylor Wimpey will also exacerbate this problem.
- Infrastructure for this development is still not being addressed. We have very limited infrastructure in the village, unless there are plans to increase the size of the school, build a doctors surgery etc I cannot imagine how overrun existing service will be.
- The flood risk and land stability issues have not been resolved either the drainage pond located close to the A56 continuing to pose serious road safety concerns as raised by National Highways.
- Parking restrictions on Market Street will severely negatively impact me and my family and friends. I need to be able to park close to my house and am often needing to transfer heavy objects to and from my house, if parking is restricted this will be a huge safety concern for me. I already struggle at times to park outside or near my own property. I also have regular elderly relatives visiting, again I would be very concerned if there were not able to park outside or near to my front door. Under the Equality Act 2010 there is a public duty to elimination discrimination which this plan is in breach of.

To myself, and many other Edenfield residents, this planned development is just another example of the council cashing in on a big development and not properly considering the impact on the local community. The developers too are only concerned about the money involved and residents' concerns are pushed to the bottom of the pile and disregarded. I am asking you, whoever is reading this, if this was your village, on the road where you lived, would you lie back and let this happen? No probably not. So why should we?

I kindly request your acknowledgement of this objection.

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.

Regards

Michelle Smith

Dear Sirs,

Further to my previous objections regarding the plans for the development of the H66 site in Edenfield, I have reviewed the latest version of the Masterplan & note the following:

- The continuing negative impact of the development on the existing green spaces within the village. Far from adding "to the overall quality of the area" & "protecting & enhancing valued landscapes," the development will enclose the area, blocking views from the village of the locality & thus eliminating the openness & space that adds to the appeal of the village. The Visual Context section states that there will be "viewpoints within the development including *glimpses ... where feasible.*" Apart from this being a less than positive proposal, it seems to contradict the comments in the "Vision" section about creating an "attractive public green space." No building on this site can provide the green space that already exists.
- The density of housing has also been a subject of concern. Given all of the housing built recently both in Rossendale & on the boundary of Ramsbottom, is it still necessary to build in such numbers as quoted? There still lacks proposals for single level dwellings for older & less able-bodied residents, instead concentrating on the usual 3 & 4 bedroom dwellings. Young people in Edenfield & Rossendale are still unlikely to be able to afford such homes or else languish in debt, which no doubt has added to the recent cost of living crisis. Additionally, there are still issues relating to the provision of healthcare & education that would be required to support such a development.
- One of the biggest issues relating to traffic & parking is still of serious concern. How would an uncontrolled zebra crossing (as outlined on the latest plans) outside of the school provide a safe passage for children? Proposed parking restrictions outside of the shops would surely mean the closure of those businesses & a loss of facilities for the village. Extra journeys would be required to be made outside of the village for essential services such as those offered by the chemist. A one-way road system in Exchange Street would cause more traffic on Highfield Road & Eden Avenue. And raised humps on Highfield Road would inevitably cause Eden Avenue to become a rat run. It does seem that all proposed changes within the village are for the benefit of the development, & the new residents therein, at the expense & discrimination of the existing residents.
- I would not support any further release of green belt as proposed close to the school.

Regards,

Carol Jary,  
Resident of [REDACTED]

8 June 2024

Dear Sir/Madam

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

We are writing in respect of the above planned development and wanted to make you aware of our strong objection to this.

We have a number of concerns regarding the plan:

- There is no traffic assessment for the whole site and no road safety audit. We live on Market Street with our 2 children age 2 and 4. The road is very busy and at times unsafe, this week a passing car pulled off its wing mirror driving past because of congestion on the road. Having so many new houses will only make this issue worse and we do fear for my family's safety. Simultaneous building from Peel and Taylor Wimpey will also exacerbate this problem.
- Infrastructure for this development is still not being addressed. We have very limited infrastructure in the village, unless there are plans to increase the size of the school, build a doctor's surgery etc, we cannot imagine how overrun existing service will be.
- Parking restrictions on Market Street will severely negatively impact our family. We need to be able to park close to our house and are often needing to carry my children into the house, if parking is restricted this will be a huge safety concern for us. We have two cars so need both sides of the road to park our cars. We also have regular elderly relatives visiting, again we would be very concerned if there were not able to park by our front door. Under the Equality Act 2010 there is a public duty to elimination discrimination which this plan is in breach of.

We do not understand why the green belt land needs to be used. There's plenty of other land available which is not green belt. WE imagine the reason for this is the desirable location which means higher prices which can be charged for housing – this is not a good enough reason.

To us, and many other Edenfield residents, this planned development is just another example of the council cashing in on a big development and not properly considering the impact on the local community. The developers too are only concerned about the money involved and residents' concerns are pushed to the bottom of the pile and disregarded.

We really do hope you listen to our concerns.

Regards

Erena Pillitteri & David Dewhurst



Dear Sir/Madam,

I am writing to formally object to the Masterplan/Design Code (ref Version 4 or V4) for site H66.

My objection to the proposed plan includes a range of points which are covered below:

- The current application does not meet the requirements of the Rossendale Borough Council Local Plan - how can the council agree to this plan when it fails to meet their own requirements? This cannot be right legally, logically or morally. The council is there to serve its local residents and that is clearly not the case here should this plan be approved.
- The traffic through the Edenfield is already a serious concern and there is no adequate plan to address the enormous increase to the volume of traffic that this proposed development would cause. The current analysis which estimates 50% of the homes might use a car at rush hour is seriously flawed, given the severe lack of public transport and access to local amenities (this arbitrary figure of 50% clearly cannot be applied equally to an area which has access to strong rail and public transport infrastructure compared to a village which severely lacks such infrastructure). People struggle to commute to work or access services such as doctors/dentists without using a car given the rural nature of the village – this would only worsen with the proposed plan.
- I have serious concerns that lives will be put at risk given the traffic issues – as buses and lorries struggle to move through the village on a regular basis already, I fear that lives will be put in danger should ambulances or fire engines need to reach people within the village with such a significant change to the number of vehicles in the village.
- The proposed road infrastructure and access routes are inadequate and not properly addressed.
- The application fails to address many environmental concerns including but not exclusive to:
  - How will the development deal with the flooding and drainage concerns – the sites already struggle with volumes of water – concrete and tarmac will not do anything to ease this problem.
  - There is concern about landslide risks down to the bypass.
  - The development is seriously out of keeping with the character of the village – a village it will no longer be and boundaries will be eroded, negating one of the reasons that land is marked a greenbelt in the first place.
- The application fails to address how local infrastructure and services will cope with such a significant increase in houses – how will people be able to access school places, dentists, doctors etc.? This will again lead to increased traffic issues as well as cause stress and anxiety to local residents.
- The threat of this proposal is already causing severe strain to many local residents – the mental health and wellbeing of the residents will be further put at risk with such an enormous development and over such a long period of time; the long term impact of this is highly concerning.

These are just a few of the main points which I wish to raise in my objection.

My 12 year son asked me today: “why are they going to build all those houses on the fields mum when they could knock down all those old buildings in the area that aren’t used and make those into nice homes instead?” - I was unable to give him a good reason.

I would ask you to consider the irreparable damage that this proposal would cause, and the impact it will have on both current local residents and future generations; there are alternative solutions if we are prepared to consider them as responsible and honest adults.

Yours faithfully,

Carolyn Duncan

Hi

I would like to object to the proposal for Edenfield Masterplan/Design Code (ref Version 4 or V4) for site H66. The proposal will destroy Edenfield causing traffic chaos and parking issues for residents, leaving them with no parking. I can not believe that our green belt is going to be taken away for such a bad made plan! The main points brought to my attention are as follows

- Traffic and pedestrian safety concerns.
- Phasing of building works.
- Lack of supporting infrastructure (especially school places and healthcare).
- ECNF design code has not been adequately considered.
- Cramped development with limited green spaces.
- Flood risk and land stability issues.
- Proposed parking restrictions will have an adverse effect on existing residents.
- Negative effect on local business in terms of "footfall".
- Proposed further release of greenbelt for car parking.

Thanks

Michelle and James Letchford

Sent from my phone

## **Feedback on Revised Masterplan and Design Code for Edenfield/Market Street Version 4 May 2024**

9<sup>th</sup> June 2024

**Name:** Helen McVey

**Address:**

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

**Overall, as per my previous objections to the Masterplan I object to version 4 of the revised masterplan and design code, as none of the revisions have allayed my concerns to the previous masterplans consulted upon, only heightened my concerns.**

**The reasons for my concerns and subsequent objections are: -**

- The masterplan still does not meet the requirements of the local plan, particularly in that there is still no comprehensive traffic plan and phasing. It is also unclear as to whether the masterplan represents the voice of all developers so cannot be relied on.
- The consultation process has been flawed all along, but with regards to this consultation the letter notifying of the revised masterplan was only sent to a select number of residents despite all residents being affected by the proposal. The voice of Edenfield Community Neighbourhood Form, and its members has openly been given limited consideration and hence in affect is ignored.

Existing residents of the village do not want parking restrictions and have serious concerns with regards to the effect on them directly which they have expressed on numerous occasions, however the plan ignores this and continue to push ahead, "rough shod" with the proposal despite the number of concerns expressed. Residents would be better reassured if they were able to contribute to the plans, work collaboratively with Lancashire County Council, Rossendale Borough Council and the developers to explore solutions rather than them being imposed on them to their detriment.

- There remains no comprehensive traffic assessment for the whole site demonstrating it can be safely accessed by all users and serious concerns remain about the safety of the proposed road infrastructure. Of particular concern is the junction of Exchange Street and Highfield Road opposite the pump tract, many children, including my grandchildren, play here and it is unsafe to increase the traffic at this junction. The existence of the pump track is still not being recognised in the Masterplan. Also the safety mitigation measures for the Market Street Corridor aren't clear, the revised masterplan increasing the number of junctions and therefore the safety risk to road users. A full comprehensive traffic assessment of the whole H66 site should be completed including a road safety audit, rather than a piecemeal approach by each developer, before the Masterplan and any planning applications are approved.
- As mentioned above there is significant concern for the parking restrictions proposed. No clear rationale is given for the proposed parking restrictions and the negative affect this will have on residents and local businesses/shops/café/pubs. A clear rationale needs to be given and parking restrictions minimised to the least they can be to ensure existing residents' concerns are taken into consideration.
- The compensatory car parking is not compensatory as it is referred to as community parking. People come to the village for many different reasons as well as live here e.g. to shop, visit the

local pubs/café, visit the pump track with their children and walk in the surrounding countryside. Compensatory parking would only be compensatory if it was for resident use only. It also needs to have cycle storage, electric charging points etc. to meet government guidelines.

- Whilst the phasing is explained in more detail simultaneous development is still proposed particularly of the two largest sites Taylor Wimpey and Peel, this would mean that Edenfield would be one big building site for a number of years causing chaos and safety concerns to road users, increased noise and pollution, disruption to public footpaths and green spaces and subsequently a negative effect on existing residents health and wellbeing. There is no overall proposal to put the road and parking infrastructure in place before development, meaning that existing residents could be unduly affected by the measures before the necessary mitigation measures are in place. This is in contravention of the local plan which proposes suitable phasing to mitigate disruption.
- The design code is still not in keeping with the current village, it gives very little consideration of the Neighbourhood Plan and 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 requirement for green spaces.
- Concerns over insufficient amenities to support the development remain particularly GP provision, educational provision and other amenities e.g. shops. Currently new residents to the village are finding it increasingly difficult to get a GP. Amenities being outside the village means that people will have to commute outside the village increasing traffic further within the village.
- Concerns over flooding and land stability remain, particularly with the increased rainfall over the last few years. Over the winter there have been constant flood warning signs on the A56 bypass, this could be further exacerbated by the development leading to a road safety risk.
- 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 Rossendale Borough Council Local Plan (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. If this infrastructure is required it should be within the limitations of the release of greenbelt for the H66 site and not in addition.

A Masterplan cannot be approved, proposing building on greenbelt, if the release of greenbelt has not already been approved within the local plan. Approval should be sought first before the Masterplan approval given further consideration.

**Overall my objections to the Masterplan, as previously stated in my previous objections, is an overarching concern that the Masterplan is inadequate and fails to meet the requirements of RBCLP for a comprehensive traffic assessment and suitable phasing for the whole H66 site.** That due to this there are serious safety concerns for traffic, cycle and pedestrian safety that are not adequately addressed and pose a significant safety 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, a requirement being that measures taken are the least restrictive they can be for existing residents. Until this has been done the Masterplan should not be approved.

Dear Sirs,

I object to this planning application on the follow points:

- Flooding. The area floods approximate every 5 years from Irwell Vale to Ramsbottom. By removing the field, trees and ditches and filling them with concrete and tarmac the run off created during periods of rain will be more than the river/bridges can handle. The flooding will worsen and result in many properties becoming uninhabitable, either permanently or for long periods of time. Thus making the creation of new housing pointless.
- Access. The dual carriageway is frequently blocked during peak hours and any surrounding road closure means all traffic comes through Edenfield. The local network cannot handle the increase in traffic by so many proposed houses.
- Greenbelt. This is all greenbelt land which shouldn't be built on under current planning laws. Brown belt land is available in the area.
- Schools. The schools in the area are all oversubscribed. In the application it states there is room to rebuild Edenfield school. Where is the money coming from to do this? Also it is a practicing Church of England School and so would not be appropriate for many people.

Best Regards

Cathy and Iain Blyfield

Sent from my iPad

Dear Rossendale Planning

We would like to register our objection to the latest planning proposal for Land west of Market St, Edenfield, V4.

This is still no Masterplan of the whole of the proposed building sites in Edenfield, despite this being required in the local plan.

There is no still traffic assessment for the whole site. Traffic access down Exchange St is poor, as is access along Highfield Ave and The Drive/Eden Ave if these are used for access or exit.

Serious traffic concerns along Market St, the roundabout at the Rostrons Pub, where the Councils own traffic studies predict traffic congestion in a few years, and down Bury Rd, and other areas in Edenfield remain unaddressed. This also includes pedestrian, cyclists and disabled access.

There are no plans for moving bus stops which may be in the way of new junctions. Merely they will be “upgraded”, which means nothing.

Phasing of building works by the big two contractors, Taylor Wimpy and Peel, suggests years of simultaneous development, leading to potential chaos and road congestion in Edenfield.

It is important there is infrastructure to support the build. There is little infrastructure in Edenfield, no buses to Rochdale or Bolton, a poor service to Blackburn ,Burnley and Bury. GPs in the wide rarea like elsewhere are struggling to provide a service. The only dentists are private.

The design code given as ECFN, places matter, people matter, has ignored residents voices. Eg yellow lines, parking spaces.

Flood risk and land stability issues have not been resolved, with the Suds drainage pond located next to the A56, despite the concerns over the field raised by National Highways and the need for core samples taken from this field to assess stability in case of landslip onto the A56, which could potentially be catastrophic.

Proposed parking restrictions on Market St and Exchange St are to the detriment of existing Edenfield residents. The need for these restrictions is unclear.

Concerns over the equality impact of the development. Residents displaced from parking outside their homes, in favour of the new developments. Hence at detriment, especially if old, infirm or disabled,

These restrictions may also have a negative effect on local businesses with restricted parking and the local economy.

Proposed further release of greenbelt for the car park and school at the north end of the village is not aligned with the local plan. It will have an adverse effect on the environment, water drainage and ecology and continues to raise safety issues at an already busy junction.

Jane Hartley Jacques

██████████  
██████████

Robert Henderson

██████████  
██████████



This is my response to the Rossendale Borough Council consultation:

The Edenfield Masterplan/Design Code (V4) for site H66

I urge Rossendale Borough Council to reject this version because I believe so many of the previous concerns have not been addressed.

So many aspects contained within the original Masterplan/Design Code were criticised and objected to, so RBC required that in any further application these concerns were to be addressed. That appears not to have happened.

Instead, what has been produced is a glowing appraisal of what they intend to do for us , for our benefit. They describe in glossy, beautifully illustrated ways how this development will look, what it will be like, what the trees will be like, and the views. How mitigation measures will assist flow, how they will employ a "contemporary interpretation of positive existing built form in order to avoid pastiche development "(yes really) They will build, enhance, alter and adjust. Widening pavements here, planting trees there, extending, phasing , balancing, integrating, improving, modernising .....on and on.

. It's almost as though this Masterplan, this version, is being designed on a completely blank canvas. As if we don't exist. There is NO village here right now, No villagers, No Community. Nothing exists here already. In fact, this Masterplan/Design Code is a Plan for The Developers not our Village. It is all geared towards the success of THE DEVELOPMENTS and for the benefit of those who may live there. It has been drawn up ignoring the scale, the look and feel of the existing village or the needs of the people who already live here.

This version was supposed to have addressed ALL previous concerns, especially the major stumbling blocks... such as the huge scale of the combined developments, serious traffic issues, phasing of the building works and the likelihood of simultaneous developments, the limited infrastructure, the massive, cramped site with minimal green spaces, proximity of SUDS pond close to A56, parking restrictions affecting existing residents. The list goes on and on.

But it doesn't. All the above are ignored, dismissed or ...they will be "refined and secured through subsequent individual planning applications." The latter being a favourite and frequent response to any awkward question! In other words, THEY HAVE NO ANSWER TO ANY OF THESE PROBLEMS any of these MAJOR ISSUES!!!!!!! How are they allowed to respond in this way,?

I suspect they believe they don't need to answer .. if they keep swatting away these "hindrances" for long enough and if the Development does go ahead, they will get round it somehow. ,,then they will move on to the next development and leave us to deal with the fall out.

WE will have to deal with the congestion, noise, flood risk, poor air quality, inadequate infrastructure, the ugly and built-up land all around us, the lack of greenery, lack of Greenbelt, of space, of shops, of parking, of village life, of Edenfield!.

You represent us...you must not allow this to happen to us.

I urge Rossendale Borough Council to reject this Revised Masterplan /Design Code (V4) for site H66.

Elizabeth Stooke [REDACTED]

## **OBJECTION**



Complete objection to Edenfield Masterplan (V4) due to the following concerns still not being addressed;

Traffic concerns & safety of pedestrians

Phasing of building works

Required infrastructure & availability of essential amenities

Proposed parking restrictions

Further release of green belt

Regards

Rob Neave

Sent from my iPhone

I write on behalf of Edenfield Village Residents Association to object to this document on a number of grounds as follows.

- 1) Firstly this is not a Masterplan as it does not state on whose behalf it is prepared, whereas the Site Specific Policies (SSP) in the Local Plan require that a Masterplan be prepared by all developers involved in the H66 Allocation.
- 2) There is no serious effort at phasing of the whole development site, the document includes the whole of the Taylor Wimpey site as a single phase which amounts to almost 60% of the whole of H66. Under this scheme all the phases specified could be implemented simultaneously causing huge disruption to the lives of Village Residents and is clearly unacceptable.
- 3) There is no Traffic Assessment for the site as a whole and the proposed parking restrictions proposed for Market Street would cause serious inconvenience to existing residents which is unacceptable. Such compensatory car parking as is included is either completely inadequate such as those near the entrance to the Taylor Wimpey site or too far away as in the site proposed by Peel off Burnley Road. In addition there would be serious negative impacts on the businesses on Market Street if these proposals are implemented.
- 4) The Design Code, produced for Edenfield Community Neighbourhood Forum is given limited consideration which reflects the disdainful comments made about it in the earlier versions of this document, this contrasts sharply with the positive view taken by the Places Matter Design Review prepared on behalf of the Council.
- 5) Flood risk is inadequately addressed as there is serious flood risk posed by the SUDS scheme made in this proposal.

With that we conclude but would just add that it is astonishing that this document has been prepared (we assume) on behalf of major developers and yet fails to address the requirements of the Local Plan, which are clear for all to see. We do hear in the media about Developers frustrations with the planning system and how it causes delays yet here are these firms simply not addressing the issues which are clearly before them and so meaning that the whole process is extremely convoluted

Yours

Paul Bradurn

Chairman, Edenfield Village Residents Association



Hello

I would like to submit my comments on this revised plan. I think that it should be rejected for the following reasons:-

There is no traffic assessment for the whole of the site, and no reassurance that it can be safely used and accessed, particularly for disabled people. Major safety concerns re traffic, cycle and pedestrian safety.

It looks like both the Peel and the Taylor Wimpey sites could be built simultaneously, leading to major disruption, congestion and safety concerns over several years.

No attempt to resolve the issue of infrastructure required, in particular for healthcare and schools, there are already issues for current residents.

The community wishes and requirements as detailed in the design code of the ECNF Neighbourhood plan are not given sufficient consideration.

Despite recommendations in the Places Matter Design Review report, there is still limited green space within the site and the development is very concentrated.

The SUDS drainage pond close to the A56 continues to pose serious safety concerns. Flood and land stability concerns have not been addressed.

Parking restrictions on Market Street represent a big step back for existing residents. The community/visitor parking needs clarification.

The development will have a detrimental impact on existing residents and their rights under the Equality Act 2010 are not being taken into consideration, in particular, displacement of parking from outside homes. There is direct and indirect discrimination. Numerous residents affected are elderly and infirm.

The parking restrictions will have a major effect on the village businesses and are very likely to lead to loss of income and possible cessation of trading.

Yet more Greenbelt is under threat due for the school, play area and car park at the end of the village. This is not in line with the Local Plan, it will adversely impact drainage, environment, ecology, and raises safety issues at what is an already busy junction near to the school.

Please take my objections into account. This development will have a major detrimental impact on our village and our lives.

Regards

Elizabeth Latham

[REDACTED]

[REDACTED]

Hello

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Yet more Greenbelt is under threat due for the school, play area and car park at the end of the village. This is not in line with the Local Plan, it will adversely impact drainage, environment, ecology, and raises safety issues at what is an already busy junction near to the school.

Please take my objections into account. This development will have a major detrimental impact on our village and our lives.

Regards

Trevor Latham

██████████  
██████████

I am writing to register my objections to the latest plan.

It does not address the traffic implications of the plan for the whole Edenfield site.

It does not address the implications for schooling and NHS provision.

The phasing of the overall plan has not been properly addressed. The cumulative effect of unco-ordinated building work by different contractors with its associated traffic is likely to cause mayhem for a long period of time.

Paul Mitchell

[REDACTED]

[REDACTED]

Dear Sir/Madam

I object to the above mentioned proposal to build on greenfield designated land in Edenfield.

Reasons:

1. Undeveloped brownfield sites available in the borough not yet developed.
2. Vastly increase traffic flow through Edenfield and the surrounding areas.  
The existing traffic flow creates hazardous conditions for motorists, cyclists and pedestrians.
3. No provision for access to GP doctors, dentists, or increase in school place availability.
4. Increased danger of flooding in Edenfield and on the A56, when field drains are cut and inadequate.  
alternative provision made.

Yours faithfully

Colin Johnson

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



## Housing Allocation H66 (Edenfield) - Revised Masterplan.

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 Masterplan includes proposals to strengthen and retain the woodland at Church Lane. It is stated that by selectively thinning the non-native and dominant trees within the woodland, the proposals will allow the native trees present in the woodland to flourish which will increase the biodiversity value of the woodland. The non-native trees that are removed will be replaced with native species in biodiversity net areas at a replanting ratio of 2:1. It should be ensured that any woodland that is removed is replaced to maintain the visual buffer between Edenfield Parish Church and the application sites. A proposed uncontrolled crossing will be positioned outside of Edenfield Parish Church, this will have a minor/negligible impact on its setting.

Overall, I feel that the plans will have a limited impact and cause only negligible levels of harm to the settings of the NDHAs and on the Grade II\* listed Church. 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.

**Olivia Birks**

**Heritage and Conservation Advisor**

**Growth Lancashire**

[REDACTED]

[REDACTED]

[REDACTED]

W: [www.growthlancashire.co.uk](http://www.growthlancashire.co.uk)

Growth Lancashire Limited is a Company incorporated under the Companies Acts (reg. no. 05310616). Registered office : Lancashire County Council, County Hall, Fishergate, Preston PR1 8XJ.

Hello, I write to express my objection to the H66 Masterplan & Design Code (V4). All my earlier comments and objections relating to H66 still apply.

The MDC does not cover the whole H66 site.

There is no planned road network for the whole site.

The proposed loss of parking spaces outside existing residents' homes and shops is purely for the benefit of the development and future homeowners, not existing residents – how and why can existing peoples needs not be considered? Surely this contravenes the Equality Act.

There are no phasing proposals that include time scales, without which building could be simultaneous with all the attendant traffic and safety issues this would entail throughout the whole of the Edenfield area. This raises serious concerns over road and pedestrian safety if phasing is ignored and building undertaken simultaneously by multiple developers.

Flood risks overall are a known issue along with the specific concerns from National Highways about the A56. These cannot be ignored but perhaps what is equally significant is that it is also possible that the matters raised by National Highways are not capable of being resolved.

There are geotechnical issues associated with the proposed development being in such close proximity to the A56 boundary that do not appear to be satisfactorily addressed. There are known points of failure along this section of the A56.

The increased light, air and noise pollution from such a large development estate will severely impact the quality of life of those in neighbouring properties.

The infrastructure required for such a major development across the whole of H66 continues to be ignored. Particularly in terms of schools, healthcare, provision for new local business, sports, leisure, community facilities and spaces.

The application does not provide sufficient community space and play areas for children. And we still do not see pedestrian, reduced mobility/disabled, cyclist and equestrian links; north-south linking the whole of the H66 site (surely a must, given Market Street's inevitable substantial increase in traffic), to the rest of the village and the wider community. Where are the links to National Cycle Network Route 6 in Irwell Vale?

The increases in parking restrictions and road layouts will have a negative effect on 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. This is clearly in conflict with economic policy.

The proposed development of the site is for 8 years, 8 YEARS! Can you imagine living with such disruption, noise and pollution for 8 years

In addition to the below, I fully support all views and objections from ECNF.

Thanks

David Rawcliffe  
Associate Director, Building Surveying

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████████████████████9

Dear Sirs

I object that this development should go ahead, in addition to all the reasons mentioned in my neighbour Darren Gary's email, I have already explained previously in my last year's response dated 1 March 2023 (attached below) my concerns why this development should not go ahead.

Highlighted in my previous email below in red are my personal objections regarding this development.

Yours sincerely

Dr Nabil Isaac

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

**From:** Nabil Isaac <[REDACTED]>

**Sent:** Wednesday, March 1, 2023 6:19 AM

**To:** [REDACTED]

**Subject:** Re: Feedback to Northstone regarding the proposed building of a car park on the land owned by Peel L&P off Burnley Road

Thank you Darren for all the relevant points you have raised concerning this proposed development by Northstone.

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.

I agree will all the mentioned points that we're raised by my neighbour Darren Gray 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 attached below.

**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

[REDACTED]  
[REDACTED]

Sent from [Outlook for iOS](#)

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**From:** [REDACTED]  
**Sent:** Monday, June 10, 2024 3:38:09 PM  
**To:** [planning@rossendalebc.gov.uk](mailto:planning@rossendalebc.gov.uk). <[planning@rossendalebc.gov.uk](mailto:planning@rossendalebc.gov.uk)>  
**Cc:** 'Nabil Isaac' <[REDACTED]>  
**Subject:** FW: Objections to Northstone regarding the proposed building of a car park on the land owned by Peel L&P off Burnley Road (application number 2023/0396)

Dear Sirs

I am emailing in connection with the latest version of the Edenfield Masterplan/Design Code (ref Version 4 or V4) for site H66. 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:** [REDACTED]  
**Sent:** Monday, November 6, 2023 3:11 PM

**To:** 'forwardplanning@rossendalebc.gov.uk' <[forwardplanning@rossendalebc.gov.uk](mailto:forwardplanning@rossendalebc.gov.uk)>

**Cc:** 'Nabil Isaac' <[REDACTED]>

**Subject:** Objections to Northstone regarding the proposed building of a car park on the land owned by Peel L&P off Burnley Road (application number 2023/0396)

**Importance:** High

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:** [REDACTED]

**Sent:** Tuesday, February 28, 2023 10:06 PM

**To:** [REDACTED]

**Cc:** 'Nabil Isaac' <[REDACTED]>

**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, BLO 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 [REDACTED] 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 Sirs

Please see an email below that I sent earlier today to just the planning email address as I thought I had been advised previously by a Jacob Landers employed by you to only use this email address, but on re-read I can see that he advised that we need to use both addresses (ie yours and the planning address) and so please accept the below email in relation to the below application number.

Kind regards

Darren Gray

**From:** [REDACTED]  
**Sent:** Monday, June 10, 2024 3:38 PM  
**To:** 'planning@rossendalebc.gov.uk.' <[planning@rossendalebc.gov.uk](mailto:planning@rossendalebc.gov.uk)>  
**Cc:** 'Nabil Isaac' [REDACTED]  
**Subject:** FW: Objections to Northstone regarding the proposed building of a car park on the land owned by Peel L&P off Burnley Road (application number 2023/0396)  
**Importance:** High

Dear Sirs

I am emailing in connection with the latest version of the Edenfield Masterplan/Design Code (ref Version 4 or V4) for site H66. 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:** [REDACTED]  
**Sent:** Monday, November 6, 2023 3:11 PM  
**To:** 'forwardplanning@rossendalebc.gov.uk' <[forwardplanning@rossendalebc.gov.uk](mailto:forwardplanning@rossendalebc.gov.uk)>  
**Cc:** 'Nabil Isaac' [REDACTED]  
**Subject:** Objections to Northstone regarding the proposed building of a car park on the land owned by Peel L&P off Burnley Road (application number 2023/0396)  
**Importance:** High

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:** [REDACTED]  
**Sent:** Tuesday, February 28, 2023 10:06 PM  
**To:** [REDACTED]  
**Cc:** 'Nabil Isaac' <[REDACTED]>  
**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, BLO 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 [REDACTED] 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

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

Forward Planning Team  
Rossendale Borough Council  
Business Centre  
Futures Park  
Bacup  
OL13 OBB

Your ref:  
Our ref:  
Date: 12-JUN-23

Dear Sir / Madam

**ROSSENDALE BOROUGH COUNCIL – LAND WEST OF MARKET ST, EDENFIELD (H66) - MASTERPLAN & DESIGN CODE – APRIL 2024**

Thank you for your consultation seeking the views of United Utilities Water Limited (Uuw) as part of the above Masterplan and Design Code consultation.

In our previous consultation responses (enclosed for ease of reference), we highlighted various matters requiring additional consideration.

Having read the latest version of the Masterplan and Design Code, we retain significant concerns regarding the content of the masterplan. Whilst we welcome some changes to the masterplan, 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 of the Rossendale Local Plan states:

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

The holistic allocation-wide drainage strategy is a key component of the masterplan which should demonstrate how foul and surface water drainage will be sustainably delivered across the allocation.



Having reviewed the latest version of the masterplan, we are particularly concerned that it does not identify the outfall points for the management of surface water for each phase. It is not clear where water (both 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.

Identification of the outfall points is critical to determine the drainage strategy and the location of any SuDS. 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. We specifically wish to note our response dated 9 November 2023 to application reference 2023/0396, which covers a portion of the northern part of the allocation. Our response raised significant concerns about the proposal to discharge surface water to the public combined sewer. We identified a potential watercourse which continues to require further investigation by the applicant. The response also raised concerns regarding the proposed drainage arrangements for the noise attenuation bund, which shows a filter drain connecting to the public sewer network. Our response to the application highlighted that we are under no obligation to accept a land drainage connection to the public sewer, which is an important matter for the applicant to consider as part of the overall surface water drainage strategy for the site.

At the current time, the masterplan proposes a potential location for a SuDS feature, which is immediately adjacent to the A56. This appears to only relate to the southern parcel of the allocation. There is a lack of detail of SuDS for the northern parcels within the masterplan shown on page 55 and therefore the approach to SuDS on the northern parcels requires clarification.

We note criterion 8 of Policy H66 in the adopted local plan, which states:

*'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.'*

In the context of this policy criterion, UUW considers it appropriate that further clarity is provided on whether SuDS can be sited on the boundary of the A56 prior to the masterplan being approved. If geotechnical investigations dictate that the location of the SuDS feature in this location is not acceptable, the masterplan would require revision to confirm the approach to multi-functional SuDS across the allocation.

On a more general point, we believe further clarity is also required to demonstrate how SuDS will be integrated with the wider site design and landscaping. It would appear that the masterplan is proposing an end of pipe solution and it is not clear if the applicant proposes to incorporate a range of SuDS features into the wider landscaping and design of the site. In relation to this, we wish to highlight some of the wording within the drainage section of the masterplan. At the current time the masterplan states:

*'The SuDS system should explore the use of a range of measures such as ponds, swales, permeable paving, rain gardens, water butts, green roofs, or green walls.'*

We are concerned at the reference to '*should explore*'. This should be amended to state '*must incorporate*'. We suggest that other references to '*should*' within the drainage section of the masterplan also require amendment to state '*must*' rather than '*should*'.

We wish to highlight that there is no clear strategy for foul water management within the masterplan. Having regard to the topography of the allocation, a phased delivery of the allocation could

result in a number of foul water pumping stations. Policy ENV9 of the adopted local plan is clear that a proliferation of pumping stations should be avoided. Therefore we request further information on the likely strategy for foul water management across the allocation as part of the preparation of this masterplan.

Having regard to the above points, we request that the design quality checklist on pages 112 and 113 is updated to include the following criteria:

- Is the proposal in accordance with a holistic strategy for foul and surface water drainage; and
- Does the proposal incorporate and make space for a range of multi-functional SuDS which are integrated with the landscaping of the site?

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 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 Leyssens  
Planning, Landscape and Ecology  
United Utilities Water Limited

*Enc. Previous consultation responses dated 17 January 2023 and 7 Nov 2023*

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

Forward Planning Team  
Rossendale Borough Council  
Business Centre  
Futures Park  
Bacup  
OL13 OBB

**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 (U UW) as part of the above Masterplan and Design Code consultation. U 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

[Redacted contact information]

Developer Services – Water

[Redacted contact information]

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 UJW 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

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

Forward Planning Team  
Rossendale Borough Council  
Business Centre  
Futures Park  
Bacup  
OL13 OBB

**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 (Uuw) as part of the above Masterplan and Design Code consultation. Uuw 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

[Redacted contact information]

Developer Services – Water

[Redacted contact information]

## **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*