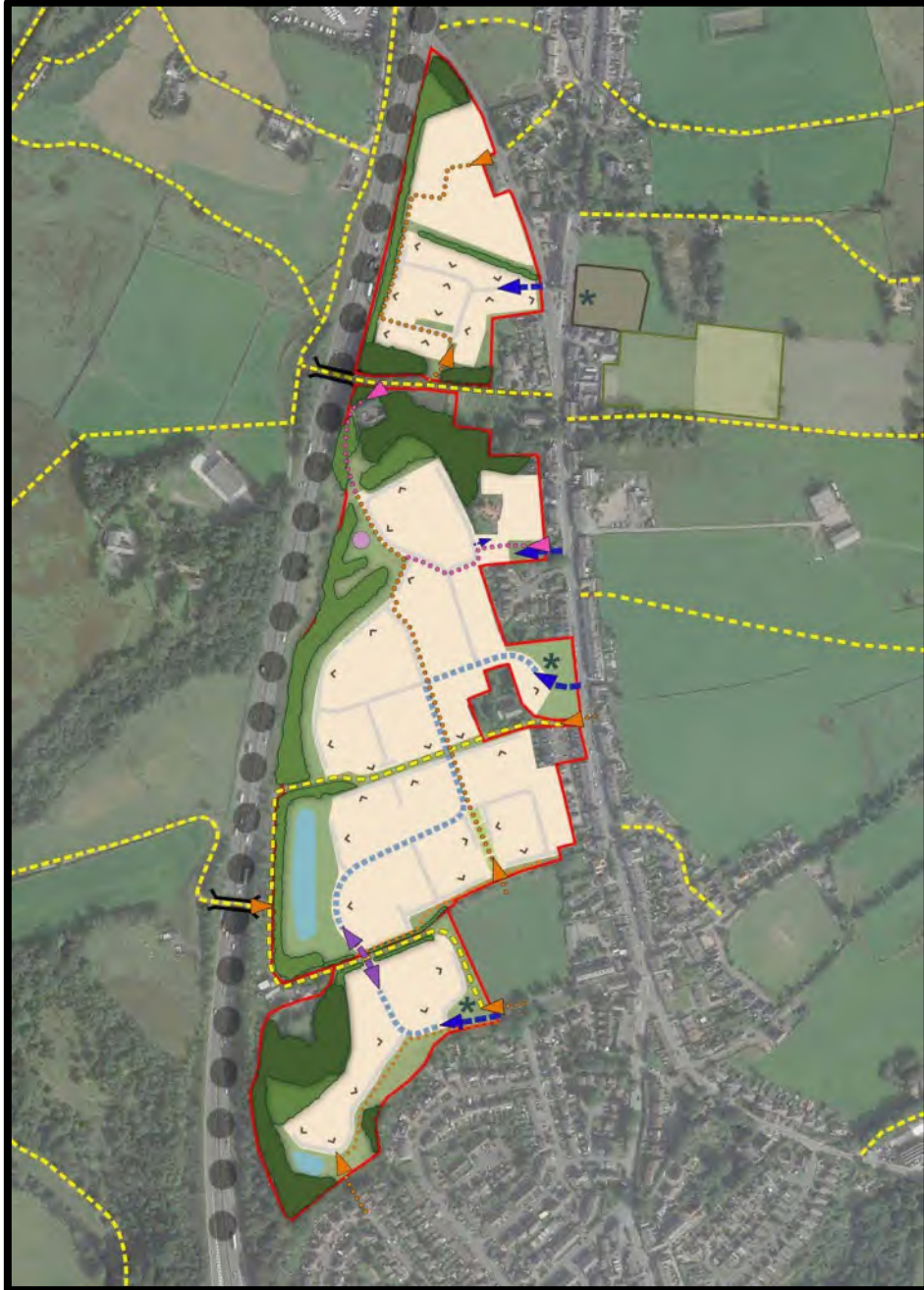


Land West of Market St, Edenfield (H66)
Masterplan & Design Code (Version 5) June 2024
Responses Received



H66 Masterplan (Randall Thorp, 2024)

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Dear Sirs

Thank you for your letter dated 26 June 2024 in connection with the above.

I write in connection to the proposed resiting of the bus stop at the entrance to the Wimpey Taylor Phase 1 Site.

I am the owner and resident of [REDACTED]
[REDACTED]

I object to the bus stop being sited in front of my home for the following reasons....

1. It would invade my privacy from passengers waiting for the bus and from passengers on the bus peering into my home..
2. It would interfere with my views from my front elevation to open countryside...
3. My garden wall would become a seat for passengers waiting for the bus to which I strongly object...
4. The bus shelter would take light from my home.....
5. The bus stopping outside my home would create a site problem for me and residents exiting Pilgrim Gardens in cars etc.

I would also raise my concerns over the traffic calming measures as there does not appear in this Masterplan sufficient traffic calming along Market Street along with safe places for people to cross the road.

Would you please note my concerns and objections accordingly and acknowledge receipt of this email.

Thank you.

Mrs Susan Burgess
[REDACTED]

Dear sir/madam,

I'm writing yet again to register my objection to the plans to build on the land west of market street. My objections have not been addressed and remain the same as every previous objection I've made. Again, I would like to object to the process of having to object on multiple occasions with every revision. This is an underhand tactic that exploits 'objection fatigue'

Sincerely

Henry Botham

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Sent from my iPhone

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

Our ref:NO/2012/104518/OR-04/PO1-L01

Your ref:

Date: 12 July 2024

Dear Sir/Madam

Edenfield Neighbourhood Plan

Thank you for consulting the Environment Agency on the above Neighbourhood Plan.

We are pleased to see that all points raised in our previous response NO/2012/104518/OR-03/IS1-L01 dated 13 April 2023, have been taken into consideration in the updated Edenfield Neighbourhood Plan – submission version (Jan 2024).

Yours faithfully

Mrs Dana Binns
Planning Advisor

E-mail [REDACTED]

Version 5 of the Masterplan & Design Code in association with Housing Allocation H66 of the Adopted Rossendale Local Plan 2019 to 2036.

Thank you for the opportunity to make further comment on Edenfield (H66) Version 5 of the Masterplan and Design Code.

I can confirm that National Highways has no further comments on this revised version other than those previously made.

Please feel free to contact me if you would like to discuss this response.

Kind Regards

Lindsay

**Lindsay Alder, PGCE,
Pronounced: Lind-say Al-der
Pronouns :She/Her/Hers**

Spatial Planner

Network Development & Planning Team

OD EDI Lead

Equality Diversity and Inclusion NW Champion

Please note new email address. Please update your address book to include this; [REDACTED]

National Highways | [REDACTED]
[REDACTED]

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

GTN: [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/>

Dear Sir/Madam

This V5 of the plan does nothing address residents' previously documented concerns regarding this proposed development. In that:

the village doesn't have the infrastructure to support the people who would live in these houses. this is in terms of schools, doctors and dentists.

The traffic is already often gridlocked on market street and this road is often used as a diversion when there is an issue with to M66. Adding hundreds of more cars to a development which borders market street would be a disaster for all concerned.

Whilst i accept new housing is required for the future this location is wholly inappropriate for so many reasons inc ,but not exclusively, those mentioned above.

yours faithfully
James Lythgow

[Redacted signature block]

To whom it may concern,

I am writing to express my objection to the development of the land off Market Street in Edenfield.

As a resident, I know how congested the village can become already and the proposed plans do not address this issue. The proposals in my opinion may sort out the existing issues for the current residents but to then introduce another 400 households (approx 2 cars per households) and around another 800 cars to the area is asking for more trouble and congestion. Once the development is built, this will be impossible to unpick and remedy.

The removal of parking for some residents on Market Street and the suggestion they park on community parking areas is both unfair and unsafe. As a woman, I would not like to have to park my car that far from my house at night, especially when some of the car parking areas are off the main road.

My largest objection is the sheer size of the development and the number of new residents it would bring to the village. We are already in great competition to get places in the nearest schools for our children and the plans v the potential number of new children doesnt resolve this issue. Primary aged children should be able to walk to school but this wont be possible if the local schools become over subscribed and we have to travel by car to schools further out. This also will impact our environment.

Again, in terms of dentist/GPs (for which we already have to go to Ramsbottom or Rawtenstall), the new plan doesn't sufficiently address how this will be remedied. The pressure on already overwhelmed and overstretched services would be too great.

The problem for me is not the development of the land but the sheer size of it. Our village cannot withstand such huge influx of new residents without a massive injection of money and thought put into supporting and expanding the infrastructure as a whole. As it stands, this plan and development will have a detrimental impact on each and every resident and their quality of life.

I hope you are able to take my thoughts into account going further.

Regards,

Kathryn McGowan
Resident of [REDACTED]

To whom it may concern,

This process has become utterly ridiculous.

A new "design" submitted within two weeks of the closing of the previous consultation, and you expect us who could severely affected by the proposals to submit objections within a week.

How is that fair or reasonable?

I know the chances of any reply to this are remote but I'd like an explanation of why this is being done this way? Is it to wear us down so we give up, is that how little you think of us.

Regards

Graeme McDonald



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

██████████
██████████

Sent from my iPad

Sent from my iPhone

Dear Sir/Madam,

I am again writing to object to the plans for development across Edenfield. Please see below;

1) Environmental

The developments will take much of the existing green areas and transform them into houses. There are very few greens areas left and removing these are very detrimental. This will have a massive impact on the wildlife within the area, meaning a loss of habitats and feeding grounds

2) Pollution

Due to the increased number of cars the development will bring to Edenfield, this will inevitably increase the number of cars. Due to a lack of public transport infrastructure in place, residents will have to rely on their cars for commuting. As they will be in a more rural setting, this increases the distance and thus air pollution in order to travel. Until a more robust public transport system is in place, it seems impossible for not just Edenfield but the local communities to accommodate this number of extra residents.

3) Parking

Due to the plans in place to make Edenfield manage with the extra traffic, it appears that local residents will have to rely on car parks. The placement of the car parks is questionable as they appear to be next to the primary school and also the children's playground. It seems very poorly thought through to have car parks placed in such close locations to areas where children will be very high. This is considering the pollution concerns as well as the traffic and risk to life that would be brought about.

4) Traffic flow

Due to the potential increase in cars, there are a number of proposed traffic flow changes. One of these is down Exchange Street. My concerns around this are the fact it will become a rat run, especially heightening concerns that this will be right outside the children's playground and pump track. I would have concerns for child safety due to parking along this road for residents mixed with increased traffic due to the development.

5) Positioning of houses

It appears that houses will be three storey in some places and will overshadow some of the existing properties. This will cause an increase in light pollution and energy costs due to the houses (partially Alderwood Grove), being in the shadow of new properties.

6) General traffic

It seems implausible that Edenfield can manage any further traffic without a much more robust public transport system and road system being put in place. Edenfield struggles to manage with the traffic levels at present. Any increase on the infrastructure will not be sustainable.

7) Public safety

Due to the proposed traffic measures through the village, I suspect that this may increase the flow of traffic through the village where possible, however this is at the detriment to footpaths. Due to Edenfield Primary school having to take on extra pupils, there will be an increase in the number of cars within the village. Due to the footpaths being altered to

accommodate this extra traffic this is of a concern for the safety of pedestrians, especially children

Thank you for your time,

Kind regards

Liz Lawton.

Sent from [Outlook for Android](#)

Dear Sirs

I understand that we are currently in the consultation period for the Version 5 document and revised Transport Assessment. From reading the documents however I cannot recognise anything to address my concerns re V4 as per my comments submitted to you on 3 June 2024 (please see the email below).

Alan Lumsden

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

From: Alan Lumsden [REDACTED]

To: forwardplanning@rossendalebc.gov.uk <forwardplanning@rossendalebc.gov.uk>

Sent: Monday, 3 June 2024 at 20:19:28 BST

Subject: Edenfield Masterplan and Design Code (V4)

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 an 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

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

8th July 2024

Planning@rossendalebc.gov.uk
forwardplanning@rossendalebc.gov.uk

Dear Forward Planning

**Ref: Edenfield Masterplan/Land West of Market St/ Design Code (V5) for site H66.
Re-Consultation in respect of Masterplan & Design Code Version 5**

I am writing this letter to continue 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 needs of existing residents. I have previously written to express my concerns particularly in relation to parking for existing residents of Market St and these continue to not be addressed. I urge you to carefully consider the points outlined below, as they have significant implications for the safety, accessibility and quality of life in our community.

1. 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 remain unclear, there is no reassurance or provision for us to park. It is suggested that following phase 1 compensatory parking will be provided but there is nothing about where we are supposed to park during phase 1. 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?
2. 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.
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]

Dear sir/Madam

Having looked at the latest version of the Masterplan I can see no viable difference to V4 so I want to reiterate my objections .

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. I see that they want to do more traffic studies. This isn't going to make the slightest bit of difference to the large amount of traffic that goes through our village on a daily basis. I do have many videos of the traffic chaos that happens on Market Street if anyone wants to see them.

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 .I would add that climate change is showing that we can expect significantly more rainfall in the future years which makes the problem of drainage all the more important as flooding is a real issue.

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

Good evening.

I've read all the masterplans so far put forward by the proposed developers, and yet again, any semblance of sense has failed to be portrayed.

I live on Market street and whilst it's a busy road, its my home. The proposed installation of the new housing estate (on greenbelt land, which is absurd considering the brown field site less than 0.5 miles away!) only serves to increase traffic through the village. The solution, according to the developer, is to restrict residents parking by making it double yellows and have people walk from one end of the village to the other to utilise the public car park. I ask you, why should I (and others in the area) loose equity on my property value so that "affordable" housing with drives is erected?

With the introduction of double yellows, restrictive parking becomes far worse. Will customers from the drop off Cafe, school of rock and other local businesses be permitted to park and cause yet further issues for residents or, will it become residents only? There hasn't been sufficient thought put into this proposal, clearly. Allegedly, a traffic monitoring process has taken place to show that the current infrastructure can handle an additional 400+ houses. When? During summer holidays when the roads are quiet? When the M66 is closed, the traffic is routed through the village and I can assure you, it cannot support this. I've personally witnessed articulated lorries bumper to bumper attempting to navigate the village.

More consideration needs to be applied to the local community and the only real way to achieve this, would be for a member of the senior planning team to step foot on the ground and look at what's being proposed, not form a PC!

Finally, I'm not against new housing, however, it needs to be completed to suit ALL parties, not just to line the pockets of the developers.

Regards.

Mr R. Fielding.

Dear sir or madam,

I am worried that

- a) the new version comes out so quick from the last one as if there isn't much thought to it and to exhaust the residents
- b) the time to send in feedback is too short to catch local residents out
- c) there is a brief update of the modifications but one has to read 186 and 120 pages to see if/where they are. There should be a better summary of the updates so they can easily be seen. eg. I'm struggling to see the change in the revised drawing of the slightly moved bus stop or the revised text regarding the land next to the primary school.

Due to the nature of how this process is proceeding as if to catch residents out, should this now be referred to the ombudsman/government to ensure a fairer process is followed? I do not think anyone is against any houses being built, just against so many being built in a badly thought out plan with no thought towards the local village amenities and infrastructure.

As far as I can see, there have not been many changes that address the issues..

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. Putting a car park next to the school is a terrible idea. Not only for residents who will have further to their houses but the decreased air quality right next to a primary school doesn't bear thinking about.

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). There should then be no further plans or development until a review of how these 50 have affected the village and surrounding infrastructure.

I sincerely hope that the aim will be to improve the village, not just add homes to make up

numbers and ruin a village.

Yours sincerely,
Steve Woodburn

Tim Preston



9th July 2024

Planning@rossendalebc.gov.uk
forwardplanning@rossendalebc.gov.uk

Dear Forward Planning

**Ref: Edenfield Masterplan/Land West of Market St/ Design Code (V5) for site H66.
Re-Consultation in respect of Masterplan & Design Code Version 5**

I am writing this letter to continue 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 needs of existing residents. I have previously written to express my concerns particularly in relation to parking for existing residents of Market Street and these concerns continue to not be addressed. I urge you to carefully consider the points outlined below, as they have significant implications for the safety, accessibility and quality of life in our community.

1. 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 remain unclear, there is no reassurance or provision for us to park. It is suggested that following phase 1 compensatory parking will be provided but there is nothing about where we are supposed to park during phase 1. 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?
2. 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.
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, 

Hello

I would like to object to this new plan V5. 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. More fitting town housing being more affordable and having a smaller land usage per unit should surely be the main feature of any plan. The current plan just allows the building developer to build yet more over priced housing for an out of town commuter market. I do not believe there has been a focus on affordable and sustainable housing which is perhaps what is justified for the area, although not on such a huge scale.

Please reconsider this disasterous proposal for our community.

Regards

Matthew Whittaker

██████████
██████████
██████████

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. The updated Transport Assessment makes light of the very serious problems residents living on Market St will face with the loss of on street parking and the conclusion of paras 1.22 - 1.27 that there COULD eventually be an overall increase of CIRCA 6 parking spaces (a considerable distance away from the houses) is a flight of fancy.

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 bypass and beyond, to Irwell Vale.

Kathleen Shaughnessy

Richard Shaughnessy

Chad Shaughnessy

██████████

Sent from my iPad



6th July, 2024.

Dear Sir,

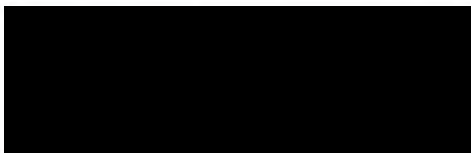
Re: Consultation of Masterplan/Design Code Version 5 – in association with housing allocation H66 of the adopted Rossendale Local Plan.

Will you please take into account my previous objections (letter 3.6.24) as very little has changed from the Version 4 for site H66. The amendments are very minor and do not address ANY of my previous objections.

I think it is particularly unfair to expect residents to constantly have to object to the plans when nothing has changed significantly – maybe you are trying to wear us down with having to keep ahead of these minor changes!!! Or at least the developers are!!!

Get the developers to make some real changes and reduce the numbers of houses we are expected to cope with in this small village.

Yours faithfully,



Jenifer M. Mead (Mrs.)

Dear Sir/ Madam,

I am writing again to strongly object to the revised Edenfield Masterplan V5. - site H66.

My general concerns were voiced in my last lengthy email.

My personal concerns are:-

Drainage

Being in the bottom of the valley we have seen a huge increase in water levels over the last 10/15 years. We are all very well aware of the flooding issues in Irwell Vale. More building will increase the water levels even more. This is a direct threat to residents in Irwell Vale, Alderbottom Farm, Swallows Barn and Strongstry. I have tried to get a response from the Environment Agency - this fell on deaf ears I'm afraid.

If these houses are built it will be too late.. no turning back.. the damage is done!!

This needs addressing NOW

Access

The Masterplan continues to refer to our vehicular access (Alderbottom Farm) as pedestrian. Our private right of way is from Market St passing Mushroom House over the A56 bridge and down to the bottom. The FP 126 runs along this. This is official vehicular access that has been used for hundreds of years. The plan refers to the bridge being a footbridge (southerly footbridge)- this is incorrect. When the A56 was constructed the bridge was put in for our vehicular access and FP126. We have also used the road to Chatterton Hey for access for 60-70 years at least (FP 127 runs along this) Please note there is no public right of way down FP126 with a cycle. The cycle route to Irwell Vale and beyond is down Church Lane. So why are there orange triangles signifying cycle routes on the plan??

Can you please explain why the cattle grids on FP126 are to be removed and vehicles restricted from use?!? Especially the 'vehicle restricted from use' - this is our right of way..... This route is used by cars, post van, bin waggon, emergency vehicles, tractors/trailers, delivery vans to name a few. I don't understand the emergency access points... this needs to be clarified. It seems to suggest controlled or temporary access over FP126 - this needs to be permanent.

I can't stress how ludicrous this whole plan is Angie Pearson [REDACTED]

[REDACTED]
Sent from my iPhone

11th July 2024

Dear sirs

I am again 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

TO:
Economic Development Directorate
The Business Centre,
Futures Park,
Newchurch Road,
Bacup
OL13 0BB
forwardplanning@rossendalebc.gov.uk

Your Reference: Allocation H66 Revised Masterplan & Design Code (June 2024 Version 5)

Location: Land West of Market Street, Edenfield, Lancashire (H66)

Re-Consultation in respect of a Revised Masterplan (5) & Design Code submitted by Taylor Wimpey - A proposed development for the erection of residential dwellings (Use Class C3) and all associated works, including new access, landscaping, and public open space within housing allocation H66 of the Adopted Rossendale Local Plan.

Dear Sir / Madam

I write in connection with the above Revised Masterplan application. I have examined the re-submitted masterplan v 5, and I know the H66 site well as I live in the village. I wish to object strongly to the adoption of this revised masterplan on the following basis:

- The Re-submitted June 2024 V5 masterplan by Randall Thorp on behalf of Taylor Wimpey falls far short of the necessary requirements of the adopted local plan in that **it does not include all developers or comprehensive plans for the entire H66 site, as stipulated clearly in the current Adopted Rossendale Borough Council Local Plan (SEE BELOW).**
- Page 6 of the document has stipulated that the purpose of this revised masterplan 5 is to cover only points 1 and 2 of the Local plan requirements for site H66. **THIS IS NOT A MASTERPLAN** for the village
- Pages 8-9 of the document then goes on to paraphrase the policy requirements of the local plan (in its executive summary), missing out key words and phrases of the policy requirements (fully stipulated below), in an attempt to muddy the waters and gain acceptance by deception. How can it stipulate that it has complied with the adopted local plan policy requirements if it has paraphrased or changed them within its own document??

EXCERPT FROM Appendix_1_Adopted_Local_Plan_Final_10_Dec_2021.pdf
H66 – Land West of Market Street, Edenfield

Development for approximately 400 houses would be supported **provided that:**

1. **The comprehensive development of the entire site** is demonstrated through a **masterplan** with an agreed programme of implementation and phasing.
2. The development is implemented in accordance with an agreed **design code**.
3. A **Transport Assessment** is provided demonstrating that the site can be safely and suitably accessed by all users, including disabled people, prior to development taking place on site. In particular:
 - i. safe vehicular access points to the site are achieved from the field adjacent to no. 5 Blackburn Road and from the field opposite nos. 88 – 116 Market Street. Full details of access, including the number of access points, will be determined through the Transport Assessment work and agreed with the Local Highway Authority;
 - ii. agree suitable mitigation measures in respect of the capacity of Market Street to accommodate additional traffic. Improvements will be needed to the Market Street corridor from Blackburn Road to the mini-roundabout near the Rostron Arms. Measures to assist pedestrian and vulnerable road users will be required;
4. A **Heritage Statement and Impact Assessment is provided**, and suitable mitigation measures are identified and secured to conserve, and where possible, enhance the setting of the Church, the non-designated heritage assets which include Chatterton Hey (Heaton House), Mushroom House, and the former Vicarage, and the other designated and non-designated heritage assets in the area;
5. Specific criteria for the design and layout needs to take account of:
 - i. Retention and strengthening of the woodland enclosures to the north and south of the Church
 - ii. The layout of the housing parcels should be designed to allow views to the Church to continue
 - iii. The relationship of the new dwellings to the Recreation Ground to ensure safe non-vehicular access is provided

- iv. Public open space to be provided along the woodland area south of the brook/Church enclosure
- v. Landscaping of an appropriate density and height is implemented throughout the site to ‘soften’ the overall impact of the development and provide a buffer to the new Green Belt boundary
- vi. Materials and boundary treatments should reflect the local context
- 6. **An Ecological Assessment is undertaken** which identifies suitable mitigation measures for any adverse impacts particularly on the Woodland Network and stepping stone habitat located within the site.
- 7. **Compensatory improvements must be provided to the Green Belt land in proximity of the site in accordance with Policy SD4**
- 8. **Geotechnical investigations will be required to confirm land stability and protection of the A56**, and consideration paid to the **suitability or not of sustainable drainage systems on the boundary adjoining the A56**
- 9. **Provision will be required to expand either Edenfield CE Primary School or Stubbins Primary School** from a 1 form entry to a 1.5 form entry primary school, and for a secondary school contribution subject to the Education Authority. Land to the rear of Edenfield CE Primary School which may be suitable is shown on the Policies Map as ‘Potential School and Playing Field Extension’. Any proposals to extend the schools into the Green Belt would need to be justified under very special circumstances and the provisions of paragraph 144 of the NPPF.
- 10. **Noise and air quality impacts** will need to be investigated and necessary mitigation measures secured.
- 11. Consideration should be given to any **potential future road widening on the amenity of any dwellings facing the A56**.

Explanation

120 Exceptional circumstances have been demonstrated to support the release of this land lying between the A56 and Market Street in Edenfield from the Green Belt. The area is very open in character and allows views of the surrounding hills and moors and will require a well-designed scheme that responds to the site’s context, makes the most of the environmental, heritage and leisure assets, and delivers the necessary sustainability, transport, connectivity, accessibility (including public transport) and infrastructure requirements.

121 **Rossendale Council therefore requires a Masterplan and will work in partnership with key landowners and key stakeholders, including the Edenfield Community Neighbourhood Forum, to ensure a Masterplan is prepared.**

122 Edenfield Parish Church is Grade II* and development would have to consider the effect of the development on the significance of the heritage asset and should safeguard the setting of the designated heritage asset located within close proximity to the site allocation. There are several non-designated heritage assets located within close proximity of the site allocation and other designated and non-designated heritage assets located in the area. Development would have to consider the effect of the development on the significance of these heritage assets and should safeguard the setting of the heritage assets.

123 Sensitive landscaping using native species will be required in order to provide a suitable buffer to the new Green Belt boundary. Any biodiversity improvements should be directed to this landscaped area as well as to the mature woodland, identified as a stepping stone habitat.

124 Due to the removal of the site from Green Belt it is necessary that there are compensatory improvements to the Green Belt within the local area in accordance with SD4 in particular these should relate to proposals identified at Edenfield Cricket Club and Edenfield and Stubbins Schools. Compensatory measures could also be directed towards footpath and cycleway improvements in the vicinity as set out in the Council’s Green Belt Compensation Document.

125 Any proposed development must make a positive contribution to the local environment and consider the site’s form and character, reflecting the setting of features such as the Grade II* Listed Edenfield Parish Church and incorporating appropriate mitigation. **Development must be of a high quality design using construction methods and materials that make a positive contribution to design quality, character and appearance. The development must contribute towards the sustainable use of resources. Implementation of development must be in accordance with an agreed Design Code/Masterplan across the whole development. The layout should be designed to allow glimpsed views towards the Church to continue, for example, by aligning the principle road(s) along a north - south or north east – south west axis, and building heights restricted.**

126 In light of the site’s natural features and relationship to surrounding uses, development is likely to come forward in a number of distinct phases. The infrastructure associated with the overall development and each individual phase will be subject to the production of a phasing and infrastructure delivery schedule to be contained in the Masterplan. Site access will be a key consideration.

127 **Development proposals will be subject to a Scoping Study, a Transport Assessment and Travel Plan. This must be agreed with Lancashire County Council.** Appropriate measures must be put in

place to address any impacts the development may have on the strategic and local road networks. A Travel Plan will seek to ensure that the development promotes the use of public transport, walking and cycling. 128 A **Health Impact Assessment** will be required to maximise the overall benefits of the scheme to intended residents.

129 An **Appropriate Assessment under the Conservation of Species and Habitats** should be undertaken to address any impact on the Breeding Bird Assemblage for the South Pennine Moors.

130 A **geotechnical study will need to confirm that there will be no adverse impacts on the A56. The suitability of providing a Sustainable Drainage System will need to be considered too as National Highways consider that storing water on site may not be advisable. National Highways may wish to widen the A56 and further discussions with National Highways are advised and if this is possible, this should be addressed by a suitable site layout plan to address this.**

131 Edenfield Primary School is operating close to capacity and there is no capacity at Stubbins Primary School. The preferred course of action of the Education Authority would be to expand Edenfield CE Primary School onto adjacent land to the rear, provided that any access issues can be overcome, or at Stubbins Primary School.

In short:

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

ADDITIONAL CONSIDERATIONS

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

MASTERPLAN 5. THERE HAS TO BE A COMPREHENSIVE AND INDEPENDENT ROAD SAFETY AUDIT - FULLY FUNDED AND COSTED BEFORE ANY FORM OF DEVELOPMENT IS APPROVED - EVEN IN PRINCIPLE

Edenfield is a small village settlement on the outskirts of the Rossendale Valley where development proposals should be considered very carefully. The protection of Edenfield's visual, historic, and archaeological qualities needs to be maintained, and the revised National Planning Policy Framework states that permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions.

I would suggest that this revised 'masterplan' in its present form again fails to take the opportunities available for improving the character and quality of Edenfield and the way it functions. As such it should be rejected.

An alternative Masterplan for H66 is being developed in consultation with the community (Edenfield Community Neighbourhood Forum) and until such time as this is finalised AND APPROVED, I believe **any** masterplan application or planning application on H66 should be recommended for refusal.

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

In its current form, this revised masterplan, or any planning application associated with it should not proceed to a planning committee meeting, however if this application is to be decided by councillors in its current form, please take this as notice that I would like to attend and speak at the meeting of the committee at which this application is expected to be decided. Please let me know as soon as possible the date of this meeting.

Yours faithfully

Jason Straccia

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

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

12 July 2024

Dear Sir, Madam,

RE: REVIEW OF HIGHWAYS CONSIDERATION OF MASTERPLAN DOCUMENT

Following on from our letter to you on the 7th June 2024 referring to Version 4 of the Edenfield Masterplan, we are now in receipt of a document prepared by Eddisons titled “Highways Consideration of Masterplan”.

The document is undated, but having reviewed the content it is clear that this document has been prepared on an earlier iteration of the masterplan to that recently submitted to RBC in the Randall Thorp June 2024 Masterplan document. As set out below the disconnect between the various strands of technical information submitted by the applicant makes any meaningful assessment challenging.

Notwithstanding this we have undertaken a review of the latest technical information presented in the Eddison report, noting the points of discrepancy or where further information should be provided.

A headline point is that an improved level of technical information has been prepared by the applicant, including the commissioning of a Stage 1 Road Safety Audit. This audit was undertaken in December 2023, shortly after our meeting with RBC and LCC in November 2023.

Whilst it is positive that following our discussions some progress is being made, it is frustrating that the offer of an “in person” meeting with LCC Highway Officers has still not been progressed, despite there clearly being a dialogue between the Highway Authority and the Applicant’s technical team. We also understand that there has been little contact between LCC and RBC, which we feel is unhelpful in progressing technical matters relating to the planning application.

Whilst we continue to wait for a response on the opportunity for a round table discussion, we have summarised in tabular format the key points we have drawn from the latest Eddison report, which we look forward to discussing with all parties.

Reference	Topic	Technical Point	Action
1	RSA timeline and Assessed Drawing	<p>We note that the RSA was undertaken in December 2023, but this has only now been reported back to RBC in June 2024.</p> <p>Unfortunately this delay by the applicant has meant the RSA is out of date and has been prepared on an earlier version of the masterplan (drawing 3806-FO4 Rev K) than that submitted in the Randall Thorp June 2024 document (drawing 3806-FO4 Rev Q).</p> <p>In short, the RSA is of limited use in the assessment process, as it has been prepared on a superseded layout</p>	<p>LCC/RBC to highlight technical matter to applicant and request that any future RSA is undertaken on the latest scheme drawings prepared and submitted by the applicant.</p> <p>A new RSA should be undertaken on the applicant’s latest scheme drawings.</p>

Reference	Topic	Technical Point	Action
2	Incorrect PIC Dataset Referenced	<p>The applicant has submitted PIC data from the Crashmap website, which only presents data up to the end of 2022.</p> <p>A review of LCC's MARIO database, which shows PIC data up to and including 2024 confirms there has been additional collisions recorded within the study area.</p> <p>The applicant should be presenting and considering the latest, detailed information in their assessment for both LCC and RBC to consider.</p>	LCC/RBC to ask the applicant to present an updated PIC review as part of their submission, using the data that LCC already hold for the study area.
3	Validity of 2023 traffic dataset	<p>The validity of continuing to use the 2023 dataset to base all technical assessment work has previously been highlighted.</p> <p>Noting that the applicant has taken the opportunity to prepare a Stage 1 RSA (albeit on a superseded scheme drawing) it is disappointing that the applicant has not undertaken a seven day ATC on Market Street to validate their 2023 traffic dataset and to also confirm the 85th percentile vehicle speeds to validate their proposed site access visibility splays.</p>	LCC/RBC to request the applicant undertakes a seven-day ATC in a neutral month to validate their 2023 traffic dataset and confirm the proposed access visibility splays are compliant with MfS guidance.
4	Proposed Mitigation Works	<p>Para 1.21 in the Eddison report summarises the proposed mitigation works, but these do not appear to correlate with the latest scheme drawings in the Randall Thorp June 2024 submission.</p> <p>It would be helpful for all parties if the latest scheme drawing (drawing 3806-FO4 Rev Q) could be clearly marked up to show the proposed works</p>	LCC/RBC to request that the latest mitigation works are clearly shown on the latest scheme drawing submitted to RBC.
5	Parking Displacement Summary	<p>The parking displacement summary presented in paragraphs 1.22 to 1.27 does not appear to correlate to the previous parking assessment presented by the applicant in June 2023.</p> <p>It is not clear if the latest parking assessment is based on the latest scheme drawing presented by Randall Thorp in June 2024, or if it is based on drawing 3806-FO4 Rev K.</p> <p>A clear parking plan based on the latest scheme layout (showing the available kerbside space once all mitigation works are implemented) would be helpful to understand the residual parking provision across the study area.</p>	LCC/RBC to request a plan/plans showing all the available parking areas on the latest scheme layout.
6	TRO Requirements	We agree with the applicant that the TRO powers sit with the Highway Authority, but we disagree that the development could proceed	LCC/RBC to confirm that the access strategy is dependent

Reference	Topic	Technical Point	Action
		<p>without the required TROs to deliver the site access on Market Street and the one-way system on Exchange Street (as examples).</p> <p>It is important for the applicant to confirm and acknowledge that their access strategy is wholly dependent on the success of the separate TRO process. This should be confirmed by them in future submissions.</p>	<p>on the delivery of the TROs.</p> <p>The applicant needs to acknowledge in their reporting that their access strategy and scheme is dependent on the success of the TROs.</p>
7	Omission of Stage 1 RSA Response Report	Paragraph 1.30 refers to the December 2023 Stage 1 RSA and a Designers Response. However, no Response Report has been submitted with the Eddison report, contrary to the requirements set out in GG119, and not withstanding reference to this Response Report being in Appendix B of the Eddison report.	LCC/RBC to request a copy of the RSA Response Report from the applicant.
8	RSA – No Formal Audit Brief	The 3 rd paragraph (incorrectly numbered 1 in the RSA) confirms that no formal audit brief was submitted to the RSA team before the audit was undertaken. This should have been provided, to accord with GG119. Its absence reduces the value of the RSA that has been undertaken.	LCC/RBC to request why the applicant did not submit a RSA brief to the RSA team before the work was undertaken.
9	RSA – Timing	<p>The RSA confirms that the whole study area was reviewed on site in less than one hour. Paragraph 2 confirms that the RSA team walked and drove every element of the scheme in 50 minutes.</p> <p>We question whether it is physically possible to walk all routes within the study area (including Market Street, Exchange Street and Highfield Road) and review all the technical elements accurately in a 50 minute period.</p> <p>In view of size and nature of the proposed development, we also question the absence of consideration of the RSA taking place during the network peak periods, the start and end of the local school day and early morning/late evening periods when residential parking on the local highway network would be at its highest.</p>	LCC/RBC to request how the study area was both walked and driven in this confirmed time period and the accuracy of the RSA review.
10	RSA – Incorrect PIC Data Reviewed	As set out in item 2 in this review both the applicant and RSA has reviewed the incorrect PIC dataset. The latest PIC data is provided in LCC's MARIO database, not Crashmap.	LCC/RBC to provide comment on the most appropriate PIC dataset to use for the assessment, noting the most complete dataset is provided in LCC's MARIO database

Reference	Topic	Technical Point	Action
11	RSA - Limited Study Area Assessment	Paragraph 5 Figure 1 in the RSA does not include the full mitigation strategy, suggesting the RSA has not audited the full scheme (which should have been presented in the RSA brief)	LCC/RBC to request confirmation of the study area assessed by the RSA team
12	RSA – Incorrect Scheme Drawing Assessed	<p>The RSA confirms that drawing 3806-FO4 Rev K has been reviewed, whilst the latest scheme drawing submitted by Randall Thorp is drawing 3806-FO4 Rev Q.</p> <p>As an example the RSA does not appear to have included the proposed traffic calming measures on Highfield Road.</p>	LCC/RBC to request the RSA is based on the latest scheme drawing submitted by the applicant
13	RSA – Departures from Standard	<p>Paragraph 9 in the RSA confirms that no departures from standards were presented by the design team within the scheme.</p> <p>This is contrary to the technical points raised with LCC, RBC and the applicant that their proposed access from Market Street does include DMRB departures from standards.</p> <p>It is noted that the extract from the audited scheme drawing provided on page 9 of the RSA does not show any lane widths, including the right turn pocket dimension.</p>	<p>LCC/RBC to ask the applicant why the RSA team was not provided with the Departure from Standard information previously raised with all parties by the ENCF.</p> <p>Why incomplete details were shown on the proposed site access on Market Street (including the lack of carriageway dimensions)</p>
14	RSA Problem 3 – Queuing on Burnley Road	<p>The RSA team noted traffic queuing on the Burnley Road arm of the northern signalised junction to the location of the proposed car park vehicular access. This level of vehicle queuing is not replicated in the LINSIG junction modelling outputs presented in the Eddison report (summary table 4).</p> <p>This anomaly suggests the junction modelling has not been validated against existing queue length surveys.</p>	LCC/RBC to check that all modelling has been validated against existing recorded traffic queue length surveys.
15	RSA Problem 4 – Reference to Pedestrian Phase	<p>The RSA refers to the pedestrian crossing arrangements at the Market Street/Burnley Road signalised junction.</p> <p>The response to this technical point is that the signalised junction will incorporate a new pedestrian phase within the junction, but this does not appear to have been incorporated into the revised LINSIG modelling.</p>	LCC/RBC to request the LINSIG modelling at this junction is reviewed and the junction accurately modelled to reflect the proposed pedestrian crossing facilities and observed traffic queue lengths.
16	RSA – Checks on Pedestrian	The RSA highlights the need for the scheme to ensure that all pedestrian crossing points have	LCC/RBC to request that all pedestrian

Reference	Topic	Technical Point	Action
	Intervisibility Requirements	the appropriate intervisibility between motorists using the corridor and pedestrians crossing at defined crossing points.	intervisibility requirements are shown on the latest scheme drawings to respond to the RSA's requirements that these should be checked.
17	RSA – Pedestrian Links on Exchange Street	<p>The RSA highlights that there is a safety issue for pedestrians on the western section of Exchange Street, at the skate park access point.</p> <p>The Design Team's response is that the lack of pedestrian link in this location is not their issue and the pedestrian link should be provided by the LPA/LHA as part of the skate park consented scheme.</p>	<p>LCC/RBC to comment on the applicant's response to pedestrian safety matter raised on the Exchange Street corridor.</p> <p>A response is also required as to how the development proposals will adequately respond to the safety concerns raised in the RSA.</p>

The above-mentioned review highlights the continual deficiencies and omissions in the technical information supplied to LCC and RBC in support of the planning application. These are in addition to the raft of technical points previously raised with RBC and LCC in our technical submissions, most recently in June 2024, which included (but not limited to):

- the need for a comprehensive masterplan and transport assessment to demonstrate the site can be safely and suitably accessed
- concerns over the detail of the main site access onto Market Street
- the inclusion of the access to Alderwood
- lack of clarity on the Market Street corridor strategy
- a request to validate the main site access visibility splays
- compliance with DMRB standard for the main site access

The quality and accuracy of the information continues to be questioned, with the simplest of requirements, such as reviewing the correct scheme drawings and preparing an RSA brief not being undertaken.

In addition, the lack of an RSA brief being submitted to the RSA team and the lack of a RSA response report makes it challenging for LCC Officers to undertake a meaningful review of the proposals, which remain unclear, and report back to RBC with their technical position.

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

Hi,

I don't know how many times I have to submit my objection but here we go again.

Any new development, anywhere, should enhance what is already there. But TAYlor Wimpey, et al, are basically ruining the lives of everybody who currently lives here. No thought or respect has been given at all. It will ruin people's lives in its current form, and our representatives on the council must see this, if they can't turn I despair.

Double yellow lines on market street not needed. The only reason for increased traffic flow would be because of the 1000 cars that the new development would see. Edenfield has not got the road capacity to add 1000 cars, it's not feasible in the slightest. Why would you do that?

It does make me wonder about how closely anybody has looked at these proposals though. Double yellow lines (ruining people's lives as they can't park outside their own homes) and the traffic calming measure introduced to slow traffic down because the double yellow lines will increase traffic speed. How does that make any sense whatsoever? It's bonkers.

Bury Road, Bolton road north and Rochdale road are beyond capacity all ready, what will another 1000 cars going to do to those roads? (Bury Road seemingly ignored in the documents although I'm happy to be corrected if it is fully analysed and traffic reduction proposed).

You can't pass this plan and then have the houses built, it makes no sense and will do nothing to alleviate Rossendales housing problems. All the buyers will be from out of the area and the housing shortage will continue, and no doubt becomes worse and worse.

I could see a case for building 100 council houses, only filled by people on the list but that not what is proposed and I can't see any justification for this "plan" at all.

Regards

Graeme McDonald

[REDACTED]

John Entwistle

13/07/2024

To Whom It May Concern,

Subject: Edenfield Revised Masterplan / Design Code (v5) 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

RBC

Again I have looked at the new proposal, not long after the last one. How do they submit another proposal so close to the last. I guess its because nothing really has changed. Are they just trying to grind us down, it feels like it.

Could you please post again my last complaint that covers what I think is unjust, Please.

Also ask them to spend a bit more time understanding what the people of Edenfield are looking for.

Matt Mead

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

Representations against the Revised Masterplan & Design Code V5 [MDC] (June 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*.** Numerous safety issues remain 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 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 135 (formerly 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 close to 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 139 (formerly 135): *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 92: Site Wide Codes: Built Form: Column 2: 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 92: 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 92: 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 93: 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 100: 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 100: 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 100: 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 100: 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 100: 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 100: Area Types: Village Streets: AT/VS 08: Key (glimpsed) 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 104: 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 104: 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 114: 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 V5 [MDC] (June 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. "*

Numerous safety issues remain 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 fifth 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. The Developers just continue to succeed in 'kicking the can down the road' by ignoring 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 135 (formerly 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 there are 7 homes proposed behind a detached property 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 terraced rows. 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) the housing density behind my property is 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 density this cannot be acceptable in terms of NPPF's 126, 130 and 134 (former NPPF numbers) and/or the protection of the residential amenity of existing dwellings or 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 have been raised in all our 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 the 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 139 (formerly 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 135 (formerly 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 180- formerly 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 real 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 Criterion 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 land's 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 25th 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 80: 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 92: 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 92: 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 92: 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 93: 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 93: 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 100: 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 100: 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 all 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 100: 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 continued to disregard 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 100: 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 100: Area Types: Village Streets: AT/VS 07: 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 100: 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 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 every occasion the Developers have just continued to disregard them.

The result of the Developer’s refusal to address the issue of the substitution of terraced housing for plots 2 to 5, and 10 to 12 is that not only the residents in the immediate vicinity but all pedestrians / travellers on the main road and footpaths 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 all 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 104: 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 Village Streets 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 114: 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 total 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 fifth 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 any point and certainly at the fifth revision stage.**

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.

Two additional unresolved issues have arisen from our review of the responses received to the fourth revision of the Masterplan. The first is from the Coal Authority who now requires ‘A Coal Mining Risk Assessment’ of the site as they have found that records show ‘coal outcrop’ running through part of the site. (Refer to Response Received page 113 dated 7th June 2024.)

The second unresolved issue relates to the lack of an up to date response from United Utilities with respect to their concerns raised in an incorrectly dated letter 12th June 2023, (presumably should be 2024), referring to the April 2024 MDC. Their concerns highlight the lack of ‘a clear allocation-wide strategy for foul and surface water drainage infrastructure’ and they request that the Masterplan should not be approved until a further revision is received.

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 paragraphs highlighted.
- 2) All RBC's Policies including the Site Specific ones.
- 3) Produce a Coal Mining Risk Assessment as requested by the Coal Authority in their letter to the RBC Forward Planning Team dated the 7th June 2024.
- 4) Provide a clear allocation-wide strategy for foul and surface water drainage infrastructure that gains approval from United Utilities.
- 5) The Plan is amended 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 5th Revision of the Masterplan and Design Code.

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

12.07.24

Dear Sirs,

I write on behalf of **Edenfield Village Residents Association** about the above matters.

We really don't know where to start as this is the fifth version of the so called Masterplan which seems to change little with each iteration.

We could recount many errors and omissions in these two documents but would refer you to the representations sent by Mr Richard Lester of the Edenfield Community Neighbourhood Forum which are a most comprehensive account of the many failings of these proposals and we certainly cannot improve on them so please accept that this Association fully agrees with everything Mr Lester writes.

We would add a few more comments as follows:

1) the question of parking for residents, particularly on Market Street, but also elsewhere, is an issue which exercise many residents because of the loss of parking places near their homes with alternative parking now suggested for 42 vehicles at a site off Burnley Road with a much smaller provision on the Taylor Wimpey plot and also at the bottom of Exchange Street; whilst there may be an arithmetic slight improvement by these measures in the overall parking provision, in practical terms they are just either too small as in the Taylor Wimpey plot or far too far away from those it is intended to benefit in the case of the Burnley Road plot. Imagine if you live in the central part of Market Street and you have done a "big shop" and have to walk 200/250 yards with your goods, it just doesn't work and as such is impractical and we object to it. In addition we have great concerns about the parking restrictions proposed on Market Street outside the shops which have potentially serious, possibly terminal consequences for their businesses.

2) we repeat what we have said in response to previous versions of this so called Masterplan that the two developers so far identified, that is Taylor Wimpey and Northstone, appear very reluctant to work together to produce a coherent Masterplan as is required by the Council's Local Plan, then the Council should threaten to produce its own scheme and carry it out if they do not "get the message"

3) the question of phasing yet again raises its head and what is offered is inadequate.

We close by repeating Mr Lester's conclusion to his representations which we fully endorse which is as follows;

"The fundamental problem with the Masterplan 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 regards to the implications for the other site owners or the community."

With that we conclude by stating that we object to the Masterplan V5 and its associated Transport Plan

Paul Bradburn

Chairman, Edenfield Village Residents Association



To whom it may concern, I wish to object to the newest version of the Edenfield Masterplan on the following grounds:

1. Page 16: There is still no cohesive Masterplan for the four separate proposed developments, and there is still no obvious Design Code.
2. Page 35: the brochure makes liberal use of photos of heritage assets such as the Fingerpost raised beds and Edenfield Recreation area, now wooded, which are supported by Rossendale Borough Council and voluntary groups, but are used here to imply that the proposed development will enhance and/or adopt these.
3. Page 44: this shows, among other things "Proposed School Expansion Area", whilst on Page 51, the same area is suggested as a possible site of "Woodland Planting" as part of the Green Belt Compensation proposals. This is contradictory and possibly disingenuous.
4. Page 49: Traffic Management on Market Street near the shops, and Exchange Street, take no account of the needs of the working and residential population of the village. The proposed No Parking at Any Time markings on Market Street are detrimental to both businesses and residents, and only designed to ease access to the proposed developments. Thanks to the high price of housing, the small houses on Market street are mostly owned by two-car households while having frontages only large enough for 1 car. This has not been taken into consideration. The proposed 1-way on Exchange Street, whilst easing congestion, makes no allowance for current residential or business parking.
5. Page 51: The "dedicated Footpath to Edenfield school" does not specify, or even hint at, how this will compensate for the loss of Green Belt land. Further, "Community amenity and play areas which include gardens focused on food production and edible plants promoting the Incredible Edible Rossendale Scheme" again depends on volunteer support, with no indication of any intent to support the Incredible Edible group. Equally, the "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" seeks mostly to ease traffic on the streets most affected by the extra housing, and offers no obvious enhancement to the natural environment.
6. Pages 58 & 59: in the 5 phases to the proposal only the plots owned by Peel Holdings and The Methodist Church make any mention of Affordable Housing. The largest plot of 238 proposed dwellings contains no "Policy compliant affordable housing at appropriate triggers". This is totally unacceptable, just as is TW's original proposal included only "Up to 30% affordable housing (subject to viability)". Given the current desperate need for affordable and social housing, this largest plot should be **required** to include at least 30% social and affordable housing, which should be the **first tranche** of any construction, not "subject to viability". Furthermore, there should be no possibility for anyone to buy any of these houses on a "Buy-to-Let" basis, as this further restricts the availability of housing to first-time buyers and lower earners.

Yours,
Geoff Blow

To whom it may concern.

We came to live in Edenfield in February 1988. We came because we wanted to be away from the hustle and bustle of town life. Since that time there have been developments going on around in both neighbouring Ramsbottom Helmshore, Haslingden, Rawtenstall and beyond. All of this impacting on the amount of traffic that flows through the "Village" I say village in inverted commas, as developments have already taken place that are taking Edenfield from a small village to a small town.

We are not in an area of outstanding natural beauty and the people who live in and around Edenfield are not in a position to afford to live in those areas, but Edenfield is our area of natural beauty that we have grown to know and love. So many people from the neighbouring areas also come to visit for recreation as they too appreciate the small amount of open spaces, fresh air and some far reaching natural views. Building on those precious open spaces will have an extremely negative impact on people living in and around the area.

In the last years we have had to contend with the Turbines. Not against them per se, but the heavy traffic up and down Market St, probably causing considerable damage to the roads and drains. We have had to contend with the development of Pilgrims Way. Again, not against that development really as it was, surely, going to be better than a rundown derelict pub. I think we were misled with this development. It must have been upscaled so much as the original pictures did not look anything like the site now. It was supposed to be a small development of stone houses fitting in with the surroundings. I don't know if any of you see the finished products of your decisions but this is not the case here. The houses, firstly are far too tall they look ridiculous and overpowering with roof tops that are way too high. They have completely blocked off any natural sunlight to that area of Market Street in the Winter. They have taken away valuable parking space for residents on Market Street as previously they were allowed to park on the pub car park. Secondly, They are not fit for purpose as the living space is far too small. They come with 3 to 4 bedrooms but no space for family to live downstairs. So that site was developed badly. The residents had to contend with years of noise, pollution, dirty roads and paths and an increase in heavy vehicles and machinery. But it's done now and we should learn from that. Quite a few of those houses are now up for resale!!!!!! Building on the land on Market St with no direct access to the Edenfield Bypass is going to be disastrous for the residents. There is already little parking for residents and this is going to be reduced significantly. I can understand the need for development but please have some thought and do it sympathetically.

Why can't the development be beyond Mushroom house towards the bypass and rooftops kept low, surrounded by trees so that natural open space is protected. Have all the site traffic entering and leaving by the bypass, therefore not affecting the immediate residents and flow of traffic through Edenfield whilst the development goes ahead. Let's face it it is bound to happen at some point as ultimately it is to do with money and contracts etc..... I don't think that any of you give much regard to how residents and locals really feel. When we purchased our house we were told that the land in front would never be built on as it was left by the owner with those instructions. So shame on those that have allowed it happen. The previous owner must be turning in her grave!!! So do it with the minimal of disruption. This seems like a common sense approach. The small field in front of Mushroom house that is adjacent to Market Street should be left free. Use it for parking or recreation or make a large roundabout in that area that will allow flow of traffic from the estate and slow the traffic down through Market Street. This would definitely need to happen as the increase in traffic will be immense. Cars already speed in excess 40 mls/hr along the road. Definitely do not use the field for housing as again it will deflect natural sunlight in the autumn/winter months. This will

help to maintain the appearance and feeling of openness and therefore preserving ones mental health.

I have not mentioned all the other problems that will occur like Schooling access to Doctors/ Dentists and other infrastructures that are needed when expanding a community etc.....

I have also not really mentioned the positive aspects of expanding a community either, as I feel and speak for many others, that unless it is done sympathetically with minimal disruption to its natural beauty, then there are no positive benefits.

Please take into account the above as in the North of England our pleasant lands are slowly being eroded.

Thankyou Patricia Turck. [REDACTED] resident.

I am resubmitting the below objections having read the updated V5, which does not address the major issues whatsoever.

Regards,
Geraldine Sweet

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

Begin forwarded message:

From: Geraldine Gray [REDACTED]
Date: 8 June 2024 at 10:37:42 BST
To: forwardplanning@rossendalebc.gov.uk
Subject: **Objections to revised Edenfield Masterplan/Design code (ref version 4 or V4) for site H66**

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

I am resubmitting my objections to the updated V5 masterplan. This version does not address any of the major issues.

Regards,
J B Gray

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

Begin forwarded message:

From: john gray [REDACTED]
Date: June 8, 2024 at 10:39:24 AM GMT+1
To: forwardplanning@rossendalebc.gov.uk
Subject: **Objections to revised Edenfield Masterplan/Design code (ref version 4 or V4) for site H66**

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Regards,
J B Gray

I am resubmitting my objections to the updated V5 masterplan. This version does not address any of the major issues.

Regards,
Mary Gray

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

Begin forwarded message:

From: BARRY GRAY [REDACTED]
Date: June 8, 2024 at 10:40:45 AM GMT+1
To: forwardplanning@rossendalebc.gov.uk
Subject: **Objections to revised Edenfield Masterplan/Design code (ref version 4 or V4) for site H66**

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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.

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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,
Mary Gray

Dear Forward Planning Team,

I'm more than fed up of Taylor Wimpey's attempt to force through this overdevelopment of Edenfield, aided and abetted by a supine council who do not care about the blight that this development will cause on the lives of the people living in Edenfield.

The council's re-categorisation of Edenfield's former green belt land, based on dubious figures which were refuted at the time by ECNF means that some development in Edenfield is inevitable. The new government's objective to build more homes is in line with public opinion, as is the use of previously developed "brown field" or "grey belt" land. Destroying pristine fields, simply because it "is easier" for the council and the developer goes against the wishes of residents and cannot be what the new government had in mind when they took their manifesto to the electorate last week.

The latest Master Plan and Design Code submitted so soon after another (only 7 weeks) seems to be an attempt to prevent further objections and force through the over-development of the village. This fifth version of the Master Plan is simply a minor "tweak" of the previous plan whose consultation ended only one month ago. It is clear that Randall Thorp was working on V5, before seeing fit to read any comments from residents as a result of V4 of their plan.

As per my previous objections, V5 of the Master Plan, in common with those before it, is not comprehensive. It fails to address issues including traffic, healthcare, schooling, and infrastructure concerns.

As per my previous objection, I'd like to make the following points:

- Development should be of a lower density for "strip-villages" like Edenfield which developed organically along a thoroughfare. Local services need to be improved before such large-scale proposals can be approved.
- The submitted Master Plan creates a misleading impression of comprehensive planning but lacks input from all key developers and landowners. The SSP's mandates - including a full biodiversity assessment, landscaping, compensation for greenbelt loss, and transportation plans – have not been met.
- Existing traffic bottlenecks in Edenfield present a significant challenge to residents and commuters. The current Master Plan still doesn't fully encompass all developers, relies on assumptions about building phases and traffic mitigation plans remain ambiguous.
- The plan appears to rely on parking being made available off Burnley Road. This is currently green belt land and has not been released. It is presumptive to assume that planning permission will be granted unless the council has already indicated that this land will be released behind closed doors.
- The Master Plan appears to ignore the traffic impact assessment completed by Edenfield Community Neighbourhood Forum.
- The proposed one-way system for Exchange Street gives no consideration to adjoining roads and junctions. Safety concerns for children accessing play area, "rec" and pump track have not been addressed. No consideration given to ECNF and resident concerns regarding traffic safety and traffic volume despite numerous objections.

- Parking concerns of Edenfield residents have been ignored and proposed compensatory car parking is insufficient because it is open to all, rather than reserved for residents.

In addition to the above points, I'd like to point out that on Page 16 of the Master Plan, the author has highlighted two paragraphs, stating that the council would support development of approximately 400 houses 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;"

It is important to note that the proposed design code produced by ECNF has not been agreed by the developer and an agreed programme of phasing and implementation is not in place. This appears to be yet another attempt by the developers to force through a Master Plan before the design code has been agreed.

The accompanying transport assessment produced by Eddisons contains numerous sections which cause concern. notably:

- **Section 1.25** of the Highways report published by Eddisons suggests that the residents of 43-47 Market Street "would not be disadvantaged" by not being allowed to park outside their homes. This is not the case and as a resident of one of these properties I can say that I have not been consulted. My disabled father visits our house and cannot open his car door if he parks on our very narrow driveway.
- **Section 1.39** of the Highways report reports that data is based on "journey to work" information from the 2011 census. This is clearly out of date and should be revised.
- **Plan 1 Inset 2** of the highways report shows that parking will be prohibited along much of the length of Market Street causing significant problems for mobility impaired residents, their visitors as well as the businesses located near Market Place who will lose passing trade.
- **Page 12 "Review of Accident Statistics"**
The report mentions that "no pedestrian accidents" have occurred on the corridor. I can confirm that this is not the case, I personally witnessed a schoolboy being hit in the head by the mirror of a passing van and knocked to the ground. I know the mother of the victim of this accident and would be pleased to provide additional details if requested.

In line with previous documents produced on behalf of Taylor Wimpey both the plan and the accompanying traffic assessment appear to be littered with errors, omissions and contradictions and the Master Plan should be rejected by the council.

Yours faithfully
Richard Bishop

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 as a whole as envisaged in the Local Plan. Page 6 headed Executive Summary states that in respect of Site Specific Policies numbers 3 - 11 are taken into account but 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 should 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. **N.B. I understand it is now contended that Site Specific Policies 3 to 11 are not to be considered as part of the Masterplan process. This seems contrary to the Local Plan requirements which are for a Transport Assessment, Heritage Statement (singular) etc not Assessments or Statements from individual developers/landowners. Furthermore the Local Plan commits support for “approximately 400 houses” i.e. in respect of all of H66 provided that Site Specific Policies 1 to 11 have been complied with. There is no option to consider individual parts of H66 in isolation or in preference to others. As a result the Masterplan should cover the whole site and deal with all the Site Specific Policies which has not occurred and so the current Masterplan should be rejected.**

2)many of the proposals are vague, incomplete and uncertain. The word indicative is used 37 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. There is no evidence to show that the local road network will be able to cope with such an approach. This is especially important to review in view of the structure of the road network

being that there is only one viable route through the village for local traffic. 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 a Transport Assessment/Highways Consideration of Masterplan document issued alongside the Masterplan as referred to on page 118 of 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. Both of these involve further implications not envisaged in the Local Plan and should therefore be fully examined before being accepted. 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 and be produced on a village wide basis. Furthermore the Traffic analysis has been produced on the basis traffic levels have reduced from pre pandemic levels and that this reduction will continue with no justification that this assumption is correct. It is also envisaged that TRO’s are effectively dispensed with which is not appropriate. As a result 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 land 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) and that the Regulation 16 consultation is currently in progress. 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 58 and 59) 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

Yet again the latest Masterplan seems to be 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]

14 July 2024

Sent from my iPad

The infrastructure in the village cannot possibly support the number of proposed properties be that schools , doctors, dentists, parking , traffic flow or drainage . As a resident of Heycrofts view it is already difficult to exit the close due to traffic flow and this can only get worse with a probable 2 cars per new home . The drains frequently overflow during heavy rain and the proposed building removes natural soak away. The traffic calming proposals are at best ill conceived at worst inept giving little or no consideration to residents of Market Street
Steven Caldwell

Sent from my Galaxy

I am submitting this email to register our objections to Version 4 planning of additional houses being built in Edenfield Village.

The additional houses, and the significant increase in population in the village is not in the public interest. The local community can barely cope now with lack of parking outside our homes, and the dirt on our cars through the constant traffic through the village. It is already difficult enough without putting additional pressure on the families living here now. The additional traffic due to the subsequent significant number of cars which will further affect the air quality and cause additional traffic congestion and decrease the safety of the children and older people in the village due to the high number of traffic and fast cars that already speed through the additional cars will make it even more hazardous.

Plus the additional noise , it is really unfair. The infrastructure currently does not allow for a GP surgery, bank, newspaper shop or post office. The village school does not have the capacity for all the extra children, it will have to change, this will impact on the children in the village, to their detriment. It is one of the high performing primary schools in the area, because of what it stands for, the children are known by their first name, everyone knows everyone.

We are a community and it is going to be ruined by these plans.

Anne Livesey and Brian Livesey.

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Objection to Masterplan: Land West of Market Street, Edenfield (H66) – Further Amended Masterplan and Design Code (June 2024)

Before detailing my objections to this latest version of an attempted Masterplan I have some observations.

1. This 5th attempt is issued within one month of the closing date for objections to the 4th attempt.
2. There are only minor detail changes from Version 4 to Version 5.
3. None of the information contained within Version 5 was unknown at the time of publication of Version 1.
4. The conclusion to be drawn from this is that this is a deliberate tactic adopted by developers to obfuscate the procedure in an attempt to discourage would be objectors.

My objections to this document are as follows:

1. Traffic – the inherently flawed (3 days in April 2023) traffic survey is again quoted in unaltered form. The addition of ‘turning points’ in the previous document are again mentioned. These are meant to indicate traffic usage at the entrance / exit points of the build sites, when completed. The assumption is that each dwelling will use these points only once per day! This is an incredibly low estimation as most dwellings are projected (by parking provision on sites) to have 2 or more vehicles. No evidence is given to further this and therefore no regard to this should be given.

The ‘traffic calming measures’ put forward for Highfield Road are now renamed “speed cushions”. Highfield Road, Exchange Street, The Drive and Eden Avenue, are already designated as 20mph limit streets. These streets are, at the moment, used only to access current dwellings and, at present, virtually no vehicles come anywhere near to exceeding this speed. This begs the question – are developers instigating these measures purely to cope with contractors / construction vehicles accessing the build sites via these roads? Page 62 contains the following statement “the remaining off-site highway works relating to Exchange Street will come forward during this period once Phase 3 progresses UNLESS AN ALTERNATIVE ACCESS STRATEGY IS JUSTIFIED THROUGH SUBSEQUENT APPLICATIONS”.

It would appear that if construction traffic were to be routed to avoid the village centre then only 2 routes are available, these being Blackburn or Burnley Road via Market Street and Bolton Road North / Bury Road / Market Street and Exchange Street. If access to the main site were to be gained via Exchange Street at any point then this brings into play Eden Avenue and Highfield Road.

2. SuDs – the siting of this drainage system for the majority (60%) of the build is sited at the low point adjacent to the A56 Dual-Carriageway. As per Version 4, it appears in diagram form to be 30-50 metres in length. No details of the size of this hazard to traffic (the A56) and life are given and again a vague mention of maintenance (by someone?) is again present.

3. Phasing – the charts appear to give some semblance of order but the accompanying statement “as a result of the ordering of development phasing may be varied or delivered simultaneously” undermines this completely.

A phasing plan containing this rider does not constitute an ordered plan at all. Commercial interest would dictate that as soon as the Masterplan is agreed and planning permissions granted a building ‘free-for-all’ would take place with construction undertaken on each site concurrently. This would lead to massive disruption to the whole of Edenfield for approximately 7 years.

4. Compensatory Car Parking – this is said to involve 3 allocated areas. In the north of the village (subject to further green belt erosion and planning permission) off Burnley Road. In the centre of the village at the Taylor Wimpey site entrance of Market Street, and to the south on the Methodist Church site.

The statement that these, along with parking bays on Market Street, will result in 8 more parking spaces may be correct. The salient point however is the siting and instillation of these parking areas. The proposed north and south sites are approximately 250 metres respectively from the central site access point, and the timing of their construction is unclear due to the planning and building phase doubts.

Approximately 70 vehicles use Market Street for parking and circa 60% of these will be displaced on the instigation of the proposed no parking sections along Market Street. This is prior to any construction of any car park, again penalising existing residents.

Conclusion: for the 5th time in succession these points are raised without any reference to problems with build style / character / build density / increased traffic volume / drainage problems that will undoubtedly be brought about by this flawed and dishonest plan. I therefore contend that this document is wholly incomplete. Therefore it cannot constitute a Masterplan in any form and should be rejected as such outright.

Peter Dawson

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

Masterplan / Design Code for Site H66 Land West of Market Street, Edenfield V 5

We note the additional information to the Masterplan to create Version 5. There is nothing significant which makes this version of the Masterplan any more acceptable than previous versions and major issues are not resolved. It remains totally unsuitable for this village.

The proposals continue in their vagueness, lack of information, baseless claims and belligerent disregard for the rural village identity. This unworkable document promotes a dysfunctional, hugely damaging development. It is simply the wrong plan for Edenfield. It is obviously wrong on so many levels. We are sure everyone involved is aware of just how damaging this will be, including the Council.

Simply basing the proposals on a need to meet Government Housing Targets is not an open charter to build just anything the developers want, irrespective of what is best for the area.

Masterplan does not substantiate claims and is flawed

The Developers are unable and unwilling to provide viable, coherent bases in support of their decisions in many aspects of their proposals. Some of the claims are staggering. Developers instead stick rigidly to the illogical reasons and the flaws in the proposals in an attempt to push this through because it suits their needs.

The claims in the Masterplan's 'Vision' do not bear any relation to the reality of the proposals;-

There is nothing vibrant about mass housing on this sort of scale, density and build height in the core of a small rural village, with its additional disruptive consequences in terms of traffic and parking.

There is no 'sense of journey' through the residential areas because roads, cycle ways and footpaths do not link across the individual sites. The roads are based on a series of cul-de-sacs directing traffic to a number of individual access points on the main arterial road through Edenfield, a road which is difficult because of its narrowness, pinch points and parked cars.

Local people will not be able to conveniently access local facilities because the existing shops will likely decline as a result of parking restrictions damaging passing trade.

There is no local need for this scale of development in this area and needs could easily have been met elsewhere as demonstrated during the Local Plan process. Local people were ignored then and continue to be ignored.

The proposals do not allow for 'attractive green space' within the built area of the site. Landscaping within the site is particularly lacking.

The Council must be able to take responsibility

If the developers are unable to justify their decisions with logical argument, backed by evidence, then the Council, if they are minded to adopt this flawed plan, will be held to account and should fully explain in detail why this plan is suitable for Edenfield.

In particular it should clearly demonstrate how the proposals meet the requirements of a number of National and Local planning policies:-

- **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**

The Significant issues in summary -

1) Design and Layout

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. There is too much focus on Urban principles notwithstanding the rural nature of the area and the elevated position in the valley.

Densities and Heights are too high, materials are bland and incongruous and types of housing unimaginative with rows of brick boxes, all blocking significant views, undermining the current local characteristic and context. It is disturbing that comments made in the Masterplan reject an approach to focus on the vernacular.

Landscaping Lack of landscaping within the site and the road layout all exacerbate the oppressiveness of the dense housing and are not in keeping with the openness of the area.

Road Layout Similarly, the road layout with its narrow roads (unsuitable for adoption by the LA) with cul-de-sac arrangements compounds the incongruous densities.

Access junction layout for TW site 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.

It will also feature a curved car park at this entrance adding to the disfiguration undermining the village character.

The sloping nature of the land is not addressed and is an important aspect in any design. As proposed in the Taylor Wimpey planning application, it will result in a number of high brick retaining walls, a specific design feature that will destroy the village character.

Drainage is similarly overlooked. The recent plans submitted with Version 5 are rudimentary and raise more questions than answers.-

Just how does surface water travel uphill from the lower lying areas to the large Suds? (TW land).

How does the foul water travel from the pumping station near the large Suds (TW land) and some distance up to the main sewer on the higher level at Market Street?

What protection is there for surface water drainage from all the properties at Alderwood Grove, which is subject to Lease ? The proposals show an intention to build over the drains.

What are the arrangements for land at Alderwood, a development previously proposed under a planning application with a stand-alone foul drainage scheme ?

2) Transport and Parking

It is nonsense to suggest that the Masterplan can proceed without the traffic and parking issues being resolved. They are an integral and crucial part of the Masterplan and directly inform the site's suitability.

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.

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.

Access to new development

Access points to the new site rely solely on serving individual sites. This results in too many access points in close proximity to each other feeding into the main arterial road, which is not conducive to good traffic flow, will be dangerous and will lead to chaos. There are four new junction points (TW site, Alderwood, Peel and Mr Nuttall) as well as the access to the proposed car park near the school. A number of these are located in close proximity to the signalised junction, just adding to the disruption and chaos, particularly at school times.

Access proposals for the Methodist Church land development use existing side roads through a housing estate with one way traffic on Exchange Street and speed bumps. These secondary roads are not suitable for such an increase in numbers of vehicles. Speed bumps are known to increase pollution as vehicles accelerate away. It is likely that motorists will use Eden Avenue, another secondary estate road, to avoid the speed bumps on Highfield Road. There seems to be no logic for this proposal.

Eddison's Highways Consideration - True impact

This report uses 2011 census journey to work data for the middle layer super output area and uses North West Preston for trip rates in order to predict likely levels of traffic. We question the relevance of both these sources. Collection of traffic data over only 3 days is not enough to reach any well informed conclusions and use as a base for future predictions.

The report also focuses on traffic flow through the village with data collection at points along the main road corridor. It does not acknowledge the big problem accessing the main road network from existing and new residents' homes. It is already difficult to turn out of Alderwood Grove (especially a right turn) and there is no doubt that increased traffic from the new sites will significantly add to this and increase the risk at junctions.

Destination of journeys

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. Heading south will involve travel along Bury Road which is currently an obstacle course of parked cars, already difficult to negotiate without any additional traffic.

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, inconsiderate and unworkable.

The 'Community' car parks are open to the general public and will result in a free for all. Their location some distance away, together with the increased demand for parking from the new homes, makes it a poor substitute.

Assumptions are made that people will be happy to walk yards away to alternative spaces, crossing roads and negotiating narrow footpaths in some cases.

Businesses will face a loss in passing trade due to the parking restrictions, which is unacceptable.

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. Plans should not rely on this as a solution.

3) Phasing and Programme of Implementation

It is too disruptive and damaging to have three of the five sites 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.

Objections and issues are further discussed below :-

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, crammed 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.

ENV11) 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 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

To whom it may concern,

I am writing further to my previous objections and wish to formally register my objection to version 5 of the Master Plan for the proposed housing development in Edenfield. The fact that this plan was published on 21st June (according to Randall Thorp's timestamp on page 2 of the document) only 1 day after consultation responses were published by the council suggests that the authors have paid little or no attention to the comments made by residents and consultees for Master Plan V4.

As a long-time resident of Market Street, I have significant concerns about the impact this project would have on our community:

1. Traffic and Safety:

- The plan may alleviate congestion in some areas of Rossendale, but risks shifting traffic problems towards Bury.
- Proposed double-yellow lines on Market Street, combined with lack of resident parking, are likely to increase traffic speed and volume, endangering pedestrians, especially schoolchildren.
- The plan lacks an integrated public transport strategy.
- The transport assessment accompanying the plan proposes the restriction of parking along significant parts of Market Street. This will cause significant problems for residents. The assertion in section 1.25 of this report that that residents of 43-47 Market Street will not be disadvantaged is erroneous since the spaces in front of these properties are usually occupied by patrons of the businesses opposite as well as by the cars of residents who live further along Market Street. Imposing this restriction will simply push even more cars into Heycrofts View which is frequently blocked by double-parked cars as well as people parking on pavements and double-yellow lines.

2. Environmental and Infrastructure Concerns:

- The proposed drainage system, relying on a large "SuDS" pond near the A56, may be inadequate given the area's persistent waterlogging issues.
- Current sewage infrastructure is strained; adding more households without a clear strategy for uphill sewage pumping to Market Street is concerning.

3. Utility Challenges:

- Existing issues with water pressure and gas supply may be exacerbated by increased demand from new households.

4. Community Services:

- Local schools and healthcare facilities are already at capacity.
- The plan does not adequately address these pressures, likely leading to increased car dependency for new residents.

5. Scale and Design:

- The proposed 50% increase in Edenfield's size is disproportionate.
- The development's design and materials are inconsistent with our village's character.

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In light of these concerns, I urge the Planning Authority to reconsider this proposal. The potential negative impact on our community and environment is too significant to ignore. We should prioritise alternative solutions that minimise adverse effects on Edenfield.

Yours faithfully
Sarah Bishop

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To Whom it May concern,

We strongly object to the revised Masterplan version 5 as the proposals are completely unworkable!!

Edenfield is a village and the amount of houses proposed would turn a small village into a busy town.

Market Street in particular is already a nightmare and is permanently gridlocked throughout the day.

There are no doctors or dentists in the village and both Edenfield C of E school and Stubbins primary school are oversubscribed!

Noise and traffic pollution would be greatly increased and there are serious issues with land drainage.

We trust trust you will take our objections into consideration when considering this ridiculous proposal!

Yours faithfully,

Stephen and Carole Higginbotham,

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Objection to the Masterplan/Design Code (ref Version 5 or V5) for site H66

We strongly object to the proposed development due to the following significant concerns:

- Traffic and Infrastructure:
 - The masterplan provides insufficient detail on traffic management and congestion mitigation strategies. This is unacceptable given the potential impact on our village.
 - There is a concerning lack of a comprehensive traffic impact assessment for the entire village, which is crucial for understanding the full scope of the development's effects.
 - The cumulative effect of increased housing on local roads has not been adequately considered, potentially leading to severe congestion and safety issues.
 - It is unacceptable to defer detailed traffic proposals to future individual site planning applications, as this approach fails to address the overall impact on the community.
 - The potential loss of existing footpaths and bridleways threatens local accessibility and recreational spaces.
 - Information on proposed pedestrian and cycle routes is insufficient and, in some cases, contradictory, raising concerns about sustainable transportation options.
- Environmental Impact:
 - The development poses an increased flood risk, and the proposed drainage solutions are inadequate to address this critical issue.
 - The potential strain on local water resources due to higher usage has not been sufficiently addressed or mitigated.
 - Detailed plans for mitigating the impact on local flora, fauna, and biodiversity are lacking, both during construction and in the long term.
 - There is insufficient information on the environmental impact during the construction phase, including waste management strategies.
 - Compensatory measures for Greenbelt release are unclear and require full commitment from all developers involved.
- Community and Heritage:
 - The proposed housing density is excessive for the available land, potentially leading to overcrowding and a significant change in the village's character.
 - The housing design is inconsistent with the existing village architectural style, threatening the area's visual cohesion and historical integrity.
 - There is inadequate consideration for preserving local heritage sites, particularly the important views to and from the church.

- The release of additional Greenbelt land for amenities is not aligned with the Rossendale Borough Council Local Plan, raising concerns about adherence to established planning guidelines.
- The potential increase in crime and antisocial behaviour, especially in proposed off-street car parks, has not been adequately addressed or mitigated.
- Process and Consultation:
 - There has been a lack of detailed consultation with local residents throughout the process, undermining community engagement and trust.
 - The proposal shows insufficient consideration of community needs, especially regarding crucial services such as healthcare and school places.
 - There are concerns that planning authorities are attempting to trivialise significant issues by deferring them to future planning stages, which is an unacceptable approach to community development.

We urge the council to reconsider this proposal and address these concerns comprehensively before proceeding. The current approach of deferring critical issues to individual planning applications is unacceptable and fails to account for the cumulative impact on our village. We request a thorough, holistic assessment of the development's effects, particularly regarding traffic and infrastructure, to ensure the preservation of our community's character and quality of life.

Gill Hillel and Richard Hillel

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> I write to object to the Edenfield Masterplan / Design Code (V5) 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

> 

> Sent from my iPhone

MASTERPLAN VERSION 5 CONSULTATION UPDATE

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 & Masterplan Version 5 Consultation Update

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

On Wednesday 5 June 2024 at 14:21:24 BST, Forward Planning
<forwardplanning@rossendalebc.onmicrosoft.com> wrote:

Good afternoon,

Thank you for your email regarding the most recent version of the Masterplan for Housing Allocation H66 – Land West of Market St, Edenfield. Your representation has been recorded & redacted and will be made available for viewing in due course after the consultation has concluded.

Kind regards,

The Forward Planning Team

Rossendale Borough Council | The Business Centre | Futures Park | Bacup | OL13 0BB
E-Mail: forwardplanning@rossendalebc.gov.uk | Tel: 01706 252412 / 252415 / 252418

Website: www.rossendale.gov.uk



Please note, although we may send emails out of office hours, we do not expect a response outside of normal working hours.

From: Jason Horsfall <[REDACTED]>
Sent: 04 June 2024 18:38
To: Forward Planning <forwardplanning@rossendalebc.onmicrosoft.com>
Cc: Ian Lord <[REDACTED]> Paul Bradburn <[REDACTED]>
Subject: Objection to Revised Edenfield Masterplan/Design Code version 4

Dear Forward Planning

We, the residents of 39 Rochdale Road, Edenfield, Ramsbottom BL0 0JT 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

We would like to object to the proposals put forward in the amended H66 Masterplan as outlined above.

Our objections are as follows,

-increased traffic flow, noise, pollution and congestion on Exchange street and Market Street, risk to existing residents.

- the infrastructure of the villiage will not sustain a development of this size, there will be flooding.

- There is no GP, dentist or resource to support new families and the schools cannot accomodate any more pupils.

- No consideration of the impact on existing residents in relation to their health and wellbeing.

- The impact on the fauna and flora will be significant. The field was once green belt.

- The roads in the villiage will not cope with the expected volume of traffic, an additional 800+ cars if each household has 2 cars.

In brief, We do not feel satisfied solutions have been made to the issues of traffic, infrastructure, (electricity, gas & water) increased pollution, risk of flooding or the damage heavy machinery will have on existing homes.

Regards

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Good Evening,

I would like, once again, to submit objections relating to the Edenfield Masterplan - now on version 6 (H66 Masterplan & Design Code) - on behalf of myself and Nadia Krasij (cc'd in this email). It is clear both the Developer submitting this application, and we hope Planning yourselves, are some way off considering this to be a reasonable, well-considered, Masterplan and we encourage you to reject it. Certainly there remain serious flaws in this application and it cannot be said to be at a stage where detailed planning should be commence, especially when the site plans have not fully considered flooding and indeed propose to break Lancashire County Council's Ordinary Watercourse Regulations which have been adopted by Rossendale Planning.

For convenience I have copied our previous objections plus new additions below. Noting the recent change of Government and new guidance on Planning, we are optimistic that you in Planning will take the opportunity to refuse this application, taking the time to give consideration to both the application and indeed the Local Plan overall against the new planning guidance, not least of which is to utilise and prioritise brown and grey belt development over green.

This is Still Not a Masterplan

We note once more 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 car parks to be considered as playgrounds as a general rule.

Considerable loss of Green Belt land; change to Government and Planning Guidance

We would like to highlight the change in Government and Government policy which prioritises the redevelopment of brown and grey belt land over green; which is not represented in this application. The new Government guidance provides the opportunity to review the Local Plan to distribute housebuilding sites in a more sympathetic manner with less greenbelt 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 greenbelt

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. And recent guidance encourages the use of brown and grey field sites rather than green in the first instance. 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 V5 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 SUDS / Drainage for the proposed Car Park field; Contravention of Ordinary Watercourse Regulation

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 (for example it is not shown at all on the illustration on p77) 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 SUDS-related works, note that culverts should not be lost in this manner. Indeed this proposal is in violation of the adopted Ordinary Watercourse Regulation, namely breaching the prevention of "alteration of a culvert in a way that would be likely to affect the flow of an ordinary watercourse".

Therefore it seems highly improbable the car park could be built on this field without losing the culvert and therefore breaching the Regulation. 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. Clearly the car park proposal has to be removed completely from the application, being so contrary to adopted regulation and becoming the cause of flooding to existing homes. Thus removed, Taylor Wimpey will have to redesign their proposed community benefit into land within the planning allocation which has been properly assessed in relation to watercourses.

We also note the responses and conditions, and want to restate our own concerns, generally regarding SUDS 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.

The number of parking spaces lost to development has been overestimated. The assessment states circa fourteen car spaces would be lost due to new parking restrictions on the "East side of Burnley Road", but no one parks there - even at peak times (such as the school pick up and drop off times). Indeed parking is only a brief and temporary issue at school pick up and drop off times; less than twelve cars are parked in the vicinity all day by school staff and these are easily accommodated. Parking is not an issue at any other time near the school.

The use of North West Preston development in estimating traffic growth is inherently flawed and not representative of Edenfield and the proposed development. North West Preston is a large development of 5,300 houses and includes major infrastructure improvements including an East-West Link Road, capacity upgrades to existing roads, and critical congestion relief. I note that although it is expected that northbound traffic joining the A56 would do so via Blackburn Road, no

congestion relief is included for the Bent Gate Roundabout. Furthermore the NW Preston comparison includes plans for nine new bus routes, improvements to railway stations and a new parkway station. No similar improvements are offered for Edenfield.

In addition, the North West Preston masterplan includes the provision of local community centres providing retail, health, and education facilities (of which we speak further below). Few such facilities exist in Edenfield and those that do exist will have parking restrictions placed upon them. Public transport links to these facilities outside the village are limited - there are no direct bus links to the two main East Lancs Hospital sites and one bus per hour to Manchester which does not currently pass any primary healthcare facilities. Taking all this into consideration, the traffic assessment appears to be a significant underestimate (236 and 265 two way trips at peak am and pm during the week) of car journeys in and out of Edenfield. The assessment needs to be redone to represent Edenfield and not NW Preston.

Additional delays caused by the introduction of the 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 masterplan does not make mention nor consideration of this. 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 V5 of the Edenfield Masterplan and we look forward to confirmation you have received them.

Yours sincerely,
Karen Farquhar and Nadia Krasij.

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

On 8 Jun 2024, at 13:14, Karen Farquhar [REDACTED] wrote:

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]) 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.

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

On 7 Nov 2023, at 09:29, Forward Planning <forwardplanning@rossendalebc.gov.uk> wrote:

Good morning,

Thank you for your email regarding the most recent version of the Masterplan for Housing Allocation H66 – Land West of Market St, Edenfield. Your representation has been recorded & redacted and will be made available for viewing in due course after the consultation has concluded.

Kind regards,

The Forward Planning Team

Rossendale Borough Council | The Business Centre | Futures Park | Bacup | OL13 0BB
E-Mail: forwardplanning@rossendalebc.gov.uk | Tel: 01706 252412 / 252415 / 252418

Website: www.rossendale.gov.uk

<image001.png>

Please note, although we may send emails out of office hours, we do not expect a response outside of normal working hours.

From: Karen Farquhar <[REDACTED]>

Sent: 05 November 2023 19:40

To: Forward Planning <forwardplanning@rossendalebc.gov.uk>

Cc: Nadia Krasij <[REDACTED]>

Subject: Re: Objection to Planning Application 2022/0451 - Edenfield Masterplan & Taylor Wimpey Planning Application

Good Evening,

Following the revised submission of the masterplan and design code for H66 we would like to reiterate our objections to the submission. We acknowledge Northstone have submitted an application for the “Edenfield North” area; we’ll send our thoughts in on that application shortly. However - the majority of the points we’ve made previously remain valid and have not been adequately addressed in the revised Masterplan and Design Code submission.

In particular we draw your attention to our objections regarding the proposed new community car parking in the “Edenfield North” area which is an unsuitable release of green belt land and will cause flooding to our home (point four in our email of 9th August 2023 below). The cost of this proposed car park is simply disproportionate to the “benefit” of off-road all-day parking for circa ten teachers and other school staff, and will lead to greater pollution (including reducing our quality of life through poorer air quality), increased traffic volumes, and longer journey times due to additional congestion. Furthermore it does not support national efforts to reduce car journeys and pollution by encouraging children to walk to school.

We also (re)draw your attention to point three in our August email regarding the continued inaccuracy of the traffic management assumptions which are now exacerbated by the proposal to make Exchange Street one way and to introduce “no parking at any time” zones on various streets. A

thorough analysis of the impact of all the proposed traffic alterations has not been undertaken. What's being proposed in terms of road amendment and site access routes and impacts, when considered alongside incorrect assumptions on flow and behaviours, and underestimated additional traffic volumes, needs to be properly assessed as a whole in this initial submission stage of any Master Plan and not kicked into touch to a possible future "detailed design" phase.

Thank you for reading our objection once again and we'd be grateful if you would acknowledge receipt by reply.

Yours sincerely,
Karen Farquhar and Nadia Krasij,

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

On 10 Aug 2023, at 08:36, Forward Planning <forwardplanning@rossendalebc.gov.uk> wrote:

Good morning,

Thank you for taking the time to leave a response on this Masterplan. Your comments have been recorded and redacted and will be made publically available once the consultation has concluded.

Kind regards,

The Forward Planning Team

01706 252412 / 252415 / 252418

www.rossendale.gov.uk

<[image001.jpg](#)><[image002.jpg](#)>

From: Karen Farquhar <[REDACTED]>

Sent: 09 August 2023 21:06

To: Planning <planning@rossendalebc.gov.uk>; Forward Planning <forwardplanning@rossendalebc.gov.uk>

Cc: Nadia Krasij <[REDACTED]>

Subject: Objection to Planning Application 2022/0451 - Edenfield Masterplan & Taylor Wimpey Planning Application

Good Evening,

Ref: 2022/0451. Site H66 Masterplan and Design Codes. In particular H66 Site: North (Junction of Burnley Road / Blackburn Road, Market Street).

We have previously submitted an objection to the Edenfield Master Plan and Taylor Wimpey submission (Ref 2022/0451. Site H66 Masterplan and Design Codes) back in January 2023. We restate our original submission's objections towards the bottom of this email for convenience because we still believe these concerns are valid and have not been addressed satisfactorily in the resubmission, and we want to restate them to ensure they are considered once again.

We would now like to submit additional points of objection following the revised submission by Taylor Wimpey which have provided further areas of concern:

1. No Parking on Market Street

This will reduce footfall to existing businesses on Market Street adversely affecting the few facilities provided in the village. Residents who do currently park their vehicles on the proposed restricted length of the street will not have alternative provision provided by Taylor Wimpey on land proposed to be developed by Taylor Wimpey. The proposal does not take into account residents who may have specific requirements to park close to their homes such as those with limited mobility, nor provide consideration or compensation for those who have invested in and installed electric charging equipment for private vehicles.

2. Traffic Assessment Concern

The revised assessment notes traffic is still below pre-pandemic levels. However there may be several, perhaps temporary, factors causing the low figures observed at the time of survey which are likely to cause the numbers to increase over time. Working from home appears to be on the wane with some companies now asking workers to return to their offices and public transport subsidies, currently capped at £2 rising to £2.50 shortly, are scheduled to end in November 2024. We refer you to consider the census data relating to modes of transport (noted in our previous objection) which remains valid.

3. Traffic Management Assumption is Incorrect

It is incorrect to believe that residents in the north of the village access the A56 at the Bent Gate roundabout whether travelling north or south. It does not represent the reality of the daily traffic flow and should not therefore be used for traffic management planning. Village residents travelling north may well join the bypass at this roundabout but those travelling south will pass through the village to the junction on Walmersley Road. Has a traffic survey been conducted at Bent Gate to ascertain whether or not this junction could cope with the extra traffic? Additional surveys and consultation with the Highways Agency and LCC are necessary to understand the cumulative impact of the additional traffic the developments are expected to generate.

4. Proposed Allocation of Green Belt Land for the provision of a car park opposite 1-5 Spring Bank, Burnley Road / near Edenfield Primary School

There is no justification for removing land from the greenbelt to provide a car park. Furthermore it is not for Taylor Wimpey to incorporate this as a suggestion in the Master Plan on the assumed approval of another landowner / developer, and the assumed approval of the council to re-designate

the land. The caption on the diagram on page 23: “land available for car parking and POS” is both misleading and inaccurate. It does not reflect the current designation of the land. Furthermore the size of the proposed car park in the same diagram is considerably larger than the initial very-early-stages proposal Northstone shared in consultation relating to this area; again this shows a regrettable lack of accuracy in the overall Master Plan resubmission.

National planning policy allows for the removal of land from the green belt when there are ‘exceptional circumstances’ for doing so. A car park is not an exceptional circumstance. Especially when consideration is given to how much green belt land has already been lost to the proposed development area, some of which should be used for such an amenity rather than requesting additional land.

A car park on this particular field will result in the flooding of local homes; particularly the five Spring Bank properties and 34, 36, and 38 Burnley Road. Taylor Wimpey appear unaware, as were Northstone / Peel, that this field contains a culvert which provides vital drainage for run-off from the surrounding hills. During relatively short periods (two or more consecutive days) of medium volumes of rainfall the field is often flooded (see media included in this submission) and any building work/hard standing will adversely affect neighbouring properties with run-off entering those properties rather than naturally draining away. There is no provision in the Master Plan regarding new drainage works to remediate this, nor any provision of compensation for homeowners for actions resulting in making their homes ultimately unsuitable for habitation and/or unsellable. It cannot be an exceptional circumstance to release green belt land to flood existing homes simply to provide a car park.

There is no mention of provision for security arrangements which would be required for a car park to ensure no misuse, loitering, encampments etc. This is not acceptable. More information is needed on this and on proposed opening hours, parking charges, maintenance responsibilities etc. Especially if the proposal intends for a car park to be open all day for those who have been displaced by the proposed no parking on Market Street rather than just during school hours. Note this particular point is valid regardless of where a new car park would be situated within the development.

If this car park is intended for use by those visiting or teaching at the local primary school then a full traffic assessment of the flow and impact needs to be undertaken and submitted. Additional delays, both to users of the car park and to other motorists, and additional pollution and noise from those delays can be expected when vehicles wait to enter and exit the car park, lowering the quality of life and air standards for residents in the area. The Fingerpost junction would need to be redesigned to accommodate the changing patterns of traffic resulting from ingress or egress to the car park; no proposal is made as to how to do this. It should be borne in mind that the current "school run" is a known event and ultimately finite in terms of car numbers, with residents in the local areas very aware of the temporary impact at particular times of day with most if not all cars well away from the area by 5pm. A car park would increase the duration of the school run; this is not an advantage nor benefit to the village or residents. It would also discourage parents and guardians from looking for alternative, greener, modes of transporting their children to school.

Therefore we reiterate our objection to the proposed development. Because we have had difficulties with the online portal, could you kindly acknowledge by reply this submission in full will be included in the objections for this planning application.

Yours sincerely,
Karen Farquhar and Nadia Krasij,



Photo taken 23rd July 2023 showing recent flooding of the field proposed to be taken out of green belt for the provision of a car park (opp. 1-5 Spring Bank, Burnley Road).

<image003.jpg>

Video from February 2020 showing a more prolonged period of rainfall (constant but not heavy for four+ days) and the impact on the Burnley Road houses in particular.

Original Objection submitted via the council's online portal on January 15th 2023 regarding this application, the Master Plan and Design Codes, and which we wish to ensure are considered again as part of your assessment:

- Reasons for comment:
- Affect local ecology
 - Development too high
 - Inadequate access
 - Inadequate public transport provisions
 - Increase danger of flooding
 - Increase in traffic
 - Increase of pollution
 - Information missing from plans
 - Loss of parking
 - More open space needed on development
 - Noise nuisance
 - Out of keeping with character of area
 - Strain on existing community facilities
 - Traffic or Highways

Comments: Dear Sir / Madam,

We write to raise an objection to planning application 2022/0451 - the erection of 238 dwellings in part of allocation H66 in Edenfield. We will also be commenting on further aspects in Taylor Wimpey's commissioned "Masterplan and Design Code" document which cover the remainder / total of the H66 allocation.

Before going into detailed objections we would like to highlight the recent change in Government policy regarding mandatory building targets. The Local Plan notes, and Councillors have been at pains to point out, Government-determined mandatory targets when attempting to justify the re-designation of Green Belt land (which should only be done under "very special circumstances") in Edenfield. Now mandatory targets have been withdrawn, the opportunity should be taken to review the Local Plan to distribute housebuilding sites in a more sympathetic manner with less Green Belt land impacted, and giving due consideration to the equivalent land area in Brownfield sites available throughout Rossendale to support the number of dwellings proposed in 2022/0451, and in H66 / Edenfield overall. Application 2022/0451 should be withdrawn for the developers to consider alternative Brownfield sites in the area which would provide ample opportunities for good quality housing with considerably less

environmental impact.

H66 "Masterplan and Design Code" Document (Ref: "610E Edenfield Mplan Dcode V8")

Taylor Wimpey's H66 Masterplan and Design Code document raises a number of concerns and fails to address the significant risks and impact of the erection of over 400 dwellings within Edenfield. The document does not represent all developers involved in the H66 discussions and may actually misrepresent the land ownership within the so-called "Edenfield North" sub-allocation. Indeed it could be argued that the document (and by extension because this is a core document - application 2022/0451) should be withdrawn from submission on those points alone.

This is the only document relating to H66 which is labelled as a "masterplan". However it is not a Masterplan authored or accepted by the council or community. The lack of RBC-authored Masterplan and integrated planning documents with other local councils, service providers, and government agencies (DoE / DoH / DoT / Highways Agency etc) is a matter of regret because it undermines significantly the case and practical realisation of a development of this scale. Without any integrated masterplan, any medium to large development - certainly one on the scale of 2022/0451 - cannot succeed. The application should be withdrawn or rejected giving the council an opportunity to produce its own masterplan for the H66 site.

2022/0451 Specific Objections

Lack of Infrastructure Provision

Education

The application does not adequately consider the impact of the scale of the development and expected population increase on local infrastructure. Edenfield CoE Primary School and Stubbins Primary school are at or nearing capacity and there are no plans submitted as part of this application (or in the Masterplan and Design Code document) to expand either during the proposed timescale of this development. Squeezing in additional children into either establishment will be to the detriment of all pupils. Further consideration is required and an integrated expansion and growth plan, developed in conjunction with the local education authorities, is needed.

Healthcare

With the exception of the chemist, there are no medical facilities in Edenfield. Neither the Application nor Masterplan and Design Code include any provision for new facilities or expansion of existing facilities in neighbouring towns to accommodate expected growth. The increase in population expected will add a further burden on an over-burdened local healthcare system. Further consideration and discussion with local healthcare providers is needed to develop and submit proposals which will address this problem.

Utilities

The application does not include detailed proposals regarding infrastructure provision and/or capacity increases for water, drains, and gas to the site, nor does it seem to acknowledge or consider the ageing pipelines and give undertakings to upgrade to adequate support the scale of development without impact or reduction in provision to local residents. For awareness there have been at least two major water bursts in Edenfield in the last four months alone. Low gas pressure can regularly be experienced in Edenfield; this will impact existing and proposed developments and will need addressing.

Transportation

The application is optimistic in its projections for additional car journeys and use of public transport. Recent data gathered and submitted in Taylor Wimpey's commissioned traffic

assessment appears to be for one day in June 2022 only, alongside utilisation of data relating to a location near Preston rather than a more comprehensive analysis of the traffic flow through Edenfield itself which could have been taken over a longer timeframe. When submitting an application of this scale, with significant uplift on traffic flows and footfall, a more comprehensive analysis is essential rather than the token gesture submitted herein. The application should revisit the traffic analysis and give the proper time and attention needed to do this properly, and resubmit accordingly. More comprehensive analysis will no doubt encounter the regular snarl-ups and traffic jams which occur in the village, at the roundabout near the Rostron Arms in particular, and give more accurate "queue" times.

Whilst proposals to increase the use of public and other non-car methods of transport are always welcome, the reality shows there is some way to go to change which methods of transport are used by residents of Edenfield. The recent census shows 63.5% of journeys to work are by car (including passengers); only 1.6% by bus, and 3.9% on foot. There is no direct public transport route from Edenfield to Rochdale, and limited capacity on the public transport which does go directly through the village during standard commuting times. Underestimating the likely number of additional car journeys in the application, and insufficient road ingress and egress planning to the site, raises questions regarding whether the environmental impact and the impact on the quality of life and health of Edenfield residents due to the additional pollution and noise introduced by the number of additional car journeys have also been underestimated or inadequately considered.

The application has included data regarding traffic accidents to paint a favourable picture of free-flowing traffic through the village with minimal accidents. However the data being used relies on reports being submitted to these sites; it will not therefore reflect all the near-misses, the clipped wing mirrors, nor the scrapes along the sides of vehicles that we, as residents of Edenfield, see regularly and which are not likely to be submitted to such websites to "track". Living close to the Fingerpost garden we can state there is a near-collision at least once a week due to poor traffic light and road design when drivers are heading North from Market Street onto Blackburn Road where they will see both a traffic light and a Give Way sign; if you don't know this junction you may assume the traffic control is controlling the flow of traffic on your route onto Blackburn Road when it does not. Neither the application nor the Masterplan and Design Code document include adequate detail on proposals to resolve existing road layout concerns, nor have adequately considered traffic management needed for ingress and egress to the site.

Surface Water, Drainage, and Land Slippage Considerations

Building on land close to the proposed site in the past has resulted in land slippage and corrective and mitigating actions being required to steady the land and ensure no slippage onto the A56. This is part of the reason there are no dwellings on this site currently. The Slope Stability Assessment Document notes a number of concerns and has a large number of recommendations in this regard. The application itself does not appear to adequately consider this; plots and therefore dwellings are dangerously close to areas not recommended to be built on without significant remedial action (if built on at all).

Increased heavy bursts of rain have been experienced in recent years and will increase in frequency. The ground on which the application proposes to build holds and drains a lot of surface water. There does not appear to be a detailed risk and impact assessment of surface water and associated flooring as part of the application, either to the proposed development itself or to the wider village and surrounding areas. Building on this land is not desirable; the water will have nowhere to go other than onto the A56 and existing properties. The recent Parsonage Gardens development has seen exactly this with increased surface water now flowing downwards because it cannot drain, with detrimental impact to existing properties. This was not given proper consideration by the developer nor RBC during the Parsonage Gardens application and building processes so lessons must be learned for any further developments to

the West of Market Street.

The 2022/0451 application, whilst including the provision for a couple of "drainage ponds" does not give detailed consideration to the need for proper, sufficient, drainage as recommended by the Slope Stability Assessment and the recent experiences of the Parsonage Garden development. The application should be withdrawn to enable this to be remedied and for all of the recommendations of the Slope Stability Assessment to be considered in detail. No doubt replanning the application to include a sufficient drainage management system will recast the timeline of the development as a whole, notwithstanding the need for greater consultation with local authorities and the Highways Agency regarding any impact to the road infrastructure. However, the risk of not giving proper consideration to the geology, increased rainfall projections and reduction in natural drainage, and proceeding to build dwellings on potentially unsound ground is not worth taking.

Scale and Style of Development

The scale of the development is significant and will fundamentally change the make-up and character of Edenfield. We reiterate the lack of integrated planning with other potential developers for the H66 site as part of this application, the overall lack of an H66 Master Plan developed by RBC, and lack of integrated and considered planning of healthcare, education, and transportation needs. The scale of this development is simply too much, too quickly, and with too few supporting services. Smaller scale development is more in line with what Edenfield can realistically support, and there are local Brownfield sites available in the vicinity.

The designs proposed, including the height of the dwellings themselves and the need to introduce 2.6m and 2.1m structures to serve as acoustic barriers (not a commonly necessary feature of Edenfield housing) do not constitute sensitive urban design and are not in keeping with the rest of the village. The applicant's design proposals have not given adequate consideration to sympathetically "blending in" in an attractive way. The application should reconsider this in line with the ECNF's Design Code.

There are not enough two or three bedroom dwellings in the application which is to the detriment of addressing social housing concerns and the shortage of provision of smaller houses with fewer bedrooms as a whole nationally. The application should reconsider the split of dwellings, increasing the ratio of number of dwellings with two or less bedrooms.

In conclusion, we object to this application and request that it be rejected.

Yours sincerely,

[Redacted signature]

Once again we wish to object to the new version of the plans that in my opinion have been slightly tweaked but in no way come up with an answer that would ever make this plan feasible. You cannot make the traffic situation to away. We have looked at the new plans and apart from some minute changes there is no difference from the other plans TW have submitted.

Elizabeth Brooks

Stephen Brooks



Edenfield Community Neighbourhood Forum

H66 - Land West of Market Street, Edenfield

Masterplan / Design Code (Version V24 - Randall Thorp - June 2024) (V5 - RBC)

Representations

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Appendices

1. Extract of map of Public Rights of Way in Edenfield
2. Examples of references in the MDC to Edenfield as a village
3. Commentary on HCM and the Road Safety Audit appended thereto
4. 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 12 July 2024 from SK, and
2. Neighbourhood Plan and AECOM Design Code, currently the subject of 'Regulation 16' consultation by RBC.

Key Issues

The Masterplan and Design Code are not fit to be approved. The key issues include

- Proposed density of development (over 20% more than Local Plan contemplated) and suggested building materials do not relate well to site H66's surroundings.
- Lack of protection of views to Grade 2*-listed Parish Church and to the countryside.
- Design Code prepared by renowned experts for emerging Neighbourhood Plan has been disregarded.
- No programme of implementation and phasing of development, which Local Plan requires - risk of chaos from multiple developments in a small village at the same time.
- No comprehensive infrastructure delivery schedule, also required by Local Plan.
- Various deficiencies in the Transport Assessment need to be addressed.
- Inadequate provision of replacement parking for lost on-street spaces.
- Masterplan and Transport Assessment are so inter-connected that the latter needs to be agreed before the Masterplan is approved.
- Off-site car park east of Burnley Road and accompanying play area are poorly located and would harm the Green Belt. Their appropriateness should have been considered in the Local Plan process.
- It is not clear that sustainable drainage can be safely accommodated.
- Foul drainage arrangements are unclear.
- Masterplan does not accord with the National Planning Policy Framework or policies in the Local Plan.
- The Masterplan and Design Code are badly presented - numerous errors, misleading statements, misrepresentations and falsehoods urgently require correction.

These matters are considered in detail in the following representations.

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

HCM - Highways Consideration of Masterplan, described at paragraph 1.3.12 below

LAP - Local Area for Play

LEAP - Local Equipped Area for Play

LCC - Lancashire County Council

LLFA - Lead Local Flood Authority

Local Plan - Rossendale Local Plan adopted by RBC on 15 December 2021

MDC - Masterplan and Design Code dated June 2024 (Version V24) 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 (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 and 4.2	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 TW and Peel applications, does not demonstrate comprehensive development
3	1.3.10, 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 are involved, because MDC, having previously misrepresented an owner's involvement, 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	2.8	MDC omission	No overall provision for landscaping and open space
6	2.8	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 must grow incrementally from south
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 3.2.8.2.5, 11.2.1, 11.2.2 and 11.13	Unsound evidence base leads to misrepresentation by the MDC	Pages 42, 43, 46 and 90 - lost street parking spaces are under-stated. Unwarranted assumptions and a false promise underpin parking proposals, which lack clarity
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 in Green Belt
12	3.2.8.3	MDC fails to identify suitable routes	Page 61 - construction traffic routed 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

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
17	3.2.8.7 to 3.2.8.9	MDC misleads	Table on page 61 completely unfit for purpose
18	2.6, 3.2.3, 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	3.2.1.1 and Section 11	MDC omission	Pages 46 - 49 and 64 - 68, Developers' Transport Assessment is 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	4.1 to 4.6 & 6.4	NPPF, paragraph 134	Page 21 - inadequate community engagement
24	4.8.1 to 4.8.4.3 and 6.4	MDC error	Page 21 - insufficient weight given to Design Code forming part of emerging Neighbourhood Plan, which should be applied in MDC
25	4.8.4.1 to 4.8.4.5	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 MDC misrepresentation	Page 21 - MDC chooses to misinterpret 'Urban Local Service Centre'
26	4.8.3.2 and 5.3	MDC poor draft	MDC must conform with AECOM Design Code
27	4.1, 4.2 and 5.2	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 contrary to national planning policy and PPG. Lack of stakeholder engagement vitiates MDC
29	6.1, 6.2 and 6.5	MDC error	Pages 14 and 15 cite obsolete 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

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
32	7.1 and 7.2	MDC misrepresentation	Pages 42 and 74 - not acknowledging existing defined and defensible Green Belt boundary
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 - Map incorrectly locates existing LEAP
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 throughout H66
37	7.4.1	MDC misrepresentation	Visual Context (page 26) Impact on view from east wrongly denied
38	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
39	7.4.3	MDC omission	Visual Context (page 26) Design Influences should refer to more viewpoints and be carried into Design Code
40	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
41	7.6	SSP (criterion 6)	Page 09 - lack of site-wide ecological assessment
42	7.7	MDC poor draft	Page 54 and 108 - minor changes required to Code MP 01
43	7.8.1	(P) HS16 Self Build and Custom Built Houses MDC omission	Pages 72 and 108 - in Code US 01 add reference to Policy HS16
44	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 93 - MDC mis-states Policy HS16
45	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 92 - 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.
46	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
47	7.10	MDC poor draft	Page 42 must clarify <i>strategic design principles</i>
48	7.11.1 and 7.11.2	MDC omission	Pages 93 and 110 - Code HB 02 (internal daylight and privacy distances) fails to specify the relevant Local Plan policies
49	7.11.3 and 7.11.4	(SP) ENV1 High Quality Development in the Borough and (P) HS8 Private Outdoor amenity space	Pages 93 and 110 - Homes and Buildings Codes need to embed and elaborate on Policies
50	8.1	MDC misleads	Plan on page 32 exaggerates extent of shops, school and community facilities
51	8.2	MDC unclear	Pages 86 and 110 - Code MO 04 must clarify reference to <i>A secondary street</i>
52	8.3	MDC error	Page 85 proposes estate roads of less than adoption standard
53	8.5 and 8.6	MDC error	Page 38 calls a bridge for vehicles a <i>footbridge</i>
54	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
55	8.5 to 8.10	MDC error	Pages 07 and 55, and LCC, propose interference with private rights of way
56	8.8 and 9.1.1	MDC error	Page 42 and the plan on pages 07 and 55 misname Chatterton Hey
57	8.8, 12.1 and 12.2	MDC misrepresentation	Pages 07, 55 and 84 - basic misunderstanding of availability of FP126 and FP127 for cycling
58	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
59	9.1.1 to 9.1.3	MDC omission	Pages 42 and 72 - Area Type Codes omit promised guidance about dry stone walls but should provide for their protection in a Code
60	9.2.1 to 9.2.3	(P) ENV5: Green Infrastructure networks	Page 42 needs to commit to ensuring Policy compliance, to be included in a Nature Code. Policy ENV5 should be mentioned at page 16
61	9.3.1 and 9.3.2	SSP	Page 09 fails to specify landscaping throughout H66, including interface with existing dwellings
62	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
63	9.4	MDC omission	Page 42 must provide for protection of land drainage rights, to be included in a Code
64	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
65	9.6	MDC omission	Plan on page 43 fails to show all watercourses within H66 or the green infrastructure marked on the Policies Map
66	9.7	MDC omission	Plan on pages 07 and 55 fails to show the green infrastructure in H66 marked on Policies Map
67	9.8	MDC misrepresentation	Page 43 (plan) - inappropriate off-site references
68	9.9	MDC unclear	Page 42 - <i>biodiversity net area</i> is unclear
69	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
70	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
71	10.0, 10.6, 10.8	MDC omission	Car park/LAP east of Burnley Road involves further loss of street parking
72	10.0, 10.6, 10.8	MDC unclear	Car park/LAP east of Burnley Road - insufficient information about dimensions, layout, surfacing, drainage, lighting, maintenance and continued availability
73	10.1	MDC error	Car park/LAP east of Burnley Road is beyond purview of MDC
74	10.3		Car park/LAP east of Burnley Road involves encroachment into Green Belt, which should have been raised during Local Plan process
75	10.4		Car park/LAP east of Burnley Road - local transport infrastructure to be properly planned, not provided <i>ad hoc</i>
76	10.6, 10.8	MDC misrepresentation	Car park/LAP east of Burnley Road endangers traffic and pedestrians
77	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
78	10.8	MDC misrepresentation	Car park/LAP east of Burnley Road - developer benefits and community pays as landowner would set cost off against s 108 contributions
79	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
80	10.9.6	MDC error	Car park/LAP east of Burnley Road is inimical to promotion of active travel to and from school
81	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
82	10.10 and 10.11	MDC error	Pages 19, 22, 72 and 108 - US Code cannot apply to uses outside allocation. Delete US 03
83	10.13	MDC misrepresentation	Location of LAP east of Burnley Road does not meet accepted LAP criteria - see page 82
84	10.14 and 10.15	(P) TR4 Parking	Car park/LAP east of Burnley Road contravenes all seven criteria in Policy TR4
85	11.1.1 to 11.1.8		HCM is integral to MDC and therefore needs to be approved when MDC is approved
86	11.1.7		There is no limit to content of MDC
87	11.1.8	MDC errors	Transport - see Appendix 3 and SK submissions
88	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>
89	11.2.1	MDC error	Page 46 - car parks off Market Street and Exchange Street wrongly described as <i>off site</i>
90	11.2.2 and 11.13	MDC unclear	Pages 42, 43 and 90 - ambiguity whether car park on Market Street will be provided.
91	11.3	MDC omission	Pages 48 & 64/66 fail to account for H65 access
92	11.3	MDC error	Pages 49, 65 and 67 - maps fail to show Pilgrim Gardens development accurately
93	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
94	11.5		Pages 46 to 49, 66 and 67 - coloured chippings seem pointless
95	11.6		Pages 46 to 49, 66 and 67 - 'Gateway' features unnecessary, dangerous, not at village entrances
96	11.7.1		Pages 46 to 49, 66 and 67 - Loss of street parking would inconvenience residents
97	do.		Pages 46 to 49, 66 and 67 - Loss of street parking would be detrimental to businesses
98	11.7.2		Pages 49, 65 and 67 - Exchange Street build-out and bollard would block deliveries to butcher
99	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
100	11.8		Pages 46 to 49, 66 and 67 - disabled residents harshly affected by loss of street parking

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	11.9.1, 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	Pages 46, 49 and 67 - concealing car park on TW land with a mound and providing only low-level lighting would facilitate crime. It is also contrary to Site Wide Code PS 01 (Pages 83 and 109)
102	11.11	(P) TR4: Parking	Pages 46, 49 and 67 - car park on TW land not policy-compliant in other respects
103	11.1.1.4 and Appendix 3. See also the representations by SK.	MDC evidence base is unsound, with numerous faults in HCM	<ul style="list-style-type: none"> • Errors and unwarranted assumptions in computation of replacement parking provision • Misconception of Anwyl's involvement • Textual errors and incorrect identification of roads • Failure to address hazards at Exchange Street/Highfield Road junction • Vital information omitted • Ill-considered traffic regulation proposals and intention to develop, even if the relevant Orders are not made • Based on out-of-date survey data, underestimate of proposed dwellings and incomplete traffic accident information • TW access would not safely accommodate a standard refuse collection vehicle
104	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
105	12.3.5	MDC unclear	Page 50 lacks clarity about new north-south pedestrian/cycle route
106	12.4	MDC omission	Page 84 cites LTN 1/20 wrongly and fails to translate principles into Site-Wide Code
107	Section 13	SSP, criterion 8	Safe accommodation of SUDS not demonstrated - NH and LLFA approval required
108	13.1	MDC poor draft	Page 74 forbids essential and/or desirable removal of vegetation
109	13.3.2	MDC error	Nature Code NA 05 (pages 76 and 109) prescribes separate outfalls for adjacent parcels
110	13.3.3	MDC omission	Foul drainage requirements (page 76) need to be carried into a Site Wide Code
111	2.8 and 13.3.4	MDC omission	Flood risk and drainage issues not addressed
112	13.3.5 and 13.3.6	MDC error	Page 76 confuses Phase numbers
113	13.3.6	MDC omission	Page 77 plan requires caption and full key
114	13.4.1 to 13.4.3	SSP, criterion 8 MDC misleads	Page 09 wrongly claims ground conditions and land stability are accounted for

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
115	13.5	MDC omission	Effect of widening A56 on SUDS not considered
116	13.6	NPPF, paragraph 180 e)	MDC needs to show how stability of new build will be assured
117	13.7.1		Pages 78 and 109 - BNG should be assessed by requirements at time of planning approval
118	13.7.2	MDC error	Page 78 cites statute incorrectly
119	13.8	MDC poor draft	Pages 38 and 42 and the plan on page 39 mistake watercourse for a spring
120	13.9	MDC error	Page 39 - map omits shading
121	13.10	MDC omission	Pages 75 and 109 should forbid planting of non-native species
122	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 98, 100 and 104 - Area Types propose inappropriate building materials
123	14.2.2 and 14.2.3	MDC misrepresentation	Page 100 - Village Streets Area Type description is inaccurate
124	14.2.4 and 14.2.5	MDC misrepresentation	Page 100 - Reasoning and influences for Massing in Village Streets Area Type are ill-founded
125	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 100 - High density of Built form of Village Streets Area Type does not respond to context and does not maintain openness
126	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 100 - buildings of more than two storeys in Village Streets would not maintain openness; reasoning ignores impact on Alderwood Grove

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
127	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 100 - Village Streets Area Type is poorly conceived, unjustifiable, illogical, unresponsive to context, detrimental to residential amenity and contrary to policy
128	14.4, 14.8.3 and 14.15	MDC omission	Pages 36, 38, 98, 100, 102 and 104 - Area Types must protect all, not just 'glimpsed', key views
129	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, 98 & 100 and 104 - Area Types fail to protect heritage assets and safeguard setting
130	14.5 to 14.6.4, 14.10	SSP (criterion 5 ii)	Pages 08, 98, 100 and 104 - Area Types fail to protect views to and from Parish Church
131	14.4 and 14.6.1 to 14.6.5	MDC omission	Pages 42, 43, 45, 98, 100 and 104 - Views to west not protected, hills wrongly called <i>distant</i>
132	14.7	MDC misleads	Page 101 - misleading image of Village Streets
133	14.11	Local Plan paragraph 125 MDC error	Page 102 - MDC wrong to suggest Chatterton South need not be high quality throughout
134	14.14.1 and 14.14.2	MDC omission	Pages 98, 100, 102 and 104 - Area Types too lax about houses of more than two storeys
135	14.16	MDC unclear	Pages 98 and 100 - unacceptable lack of detail about front boundary railings
136	14.17	MDC omission	MDC fails to acknowledge/promote local tradition of development in small batches
137	Section 15	(P) HS2 Housing Site Allocations	Too dense. Pages 44, 98 & 100/2/4 - all Area Types propose higher density than Local Plan
138	15.2.1	MDC error	Page 44 confuses developable and gross areas.
139	15.8.2	MDC omission	Map on page 30 omits Pilgrim Gardens houses
140	15.10	MDC error	Page 104 confuses relative densities of Edenfield Core and Edenfield North
141	15.11	MDC misleads	Page 44 misleads about overall density
142	Section 16	MDC omission	Equality Impact Assessment required
143	Section 17	MDC misrepresentation	Pages 09 and 44 falsely claim MDC commits to making school extension land available
144	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

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
145	19.1	MDC error	Plans on pages 07, 39, 42 and 55 mis-name Chatterton Hey
146	19.2	MDC misleads	Plan (pages 07 and 55) omits LAPs
147	19.3	SSP, explained at paragraph 127	No strategy for promoting public transport; failure to require travel plan/s
148	19.4	MDC omission	Impact of construction on flora and fauna not mitigated
149	19.5	MDC omission	No detailed risk assessment for potential environmental hazards
150	19.6	MDC omission	Contaminated land - no remediation strategy
151	19.7 and 19.8	MDC misleads	Page 108 - Codes MP 01, PH 01 and PH 02 wrongly said to be site wide Codes referred to within the Design Code
152	19.9	MDC poor draft	Page 89 - spurious apostrophe
153	20.1	MDC omission	MDC fails to address impact of construction on residents and provide for redress
154	21.1 to 21.5		Conclusion: MDC lacks holistic approach; not policy-compliant. Desire for progress does not justify a flawed document. 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, November 2023 and June 2024 in response to the consultations on previous versions (V7/V8, V13, V17 and V23) 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 was the subject of consultation. RBC identified it as Version 4. It did not state on whose behalf it was prepared or which owners supported it.

1.3.10 Version V24 of the MDC was received by RBC in June 2024 and is the subject of these representations. It does not state on whose behalf it was prepared or which owners support it. RBC has identified it as Version 5 and offers the following "brief description of the latest amendments":

- Revised wording on Neighbourhood Plan / Policy Section noting that it has now been issued for consultation (Reg 16 stage)
- Revised highways / access drawings (to deal with slightly relocated bus stop)
- Revised section on SuDS in terms of text and inclusion of indicative drainage strategy showing likely surface water outfall locations, foul drainage connections and locations for above and below ground SuDS solutions & addition of point 6 in the Checklist at Appendix 2
- Slightly amended text in relation to land adjacent to Primary School on Masterplan

1.3.11 More particularly the changes affect the following pages:

front cover - new logo

the next following page - preparation details

05 - section page numbers

07 and 55 - 'educational need' added to school expansion land caption

09, criterion 9 - 'can' changed to 'shall' in Compliance column

72 - Code US 03 re-worded

These changes are meant to convince that the MDC commits to making the land available

18 - column 1 revised to soften the attack on ECNF, but there is no change to column 3 on page 21

19 - the 'wheel' is reproduced more clearly

42 - 'generally' deleted from penultimate paragraph

76 - Centre column: new first and third paragraphs, LLFA deleted from second paragraph

New 77 (new plan) and 79 (photographs), with renumbering of pages formerly 77 to 117

108, formerly 106 - revised Code US 03

114, formerly 112 - new question 6 in checklist

Maps at pages 47 to 49 and 64 to 68 have been re-labelled, although the wording of the labels is the same. Southbound bus stop on Blackburn Road now shown further north

Back cover, now showing Randall Thorp's name, new logo and a strapline, which apparently begins with the noun *Asses*

1.3.12 What RBC describe as "the latest version of the Transport Assessment associated with the [MDC] (V5)" has also been published. Produced by Eddisons and headed 'Highways Consideration of Masterplan', the document is undated. Some content is familiar, and some pages contain material said to have been generated in June 2024.

1.4 The following representations address Version V24/V5 as a whole and the HCM. They 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, which begins by stipulating:

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 108) 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 provision for development to proceed in a specified order with a requirement that, until a specified milestone in each stage has been reached, the next stage 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 on a small village from concurrent developments on a large allocation site.

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. 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, ideally the MDC would include or be accompanied by a summary schedule of 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 Burnley Road (from the junction with B6527 to 21/23 Burnley Road), and 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. A poor person's version of such a schedule is to be found in the HCM - see paragraph 3.2.8.2.3 below.

3.2.8.2.2 Page 46 implausibly asserts (emphases by ECNF):

*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.*

In other words, all three parking areas will be provided when the main access to TW's land is constructed. The indicative programme of implementation (whilst not being the most reliable document) on pages 62 and 63 shoots that possibility down. It shows for 2025/2026:

Completion of site access & S278 works for Phases 1 and 2 (all works in blue, red and green boxes on plans on P.64-67, except for the works to and removal of on-street parking on Exchange Street) with residential construction commencing

It seems unlikely that the highway authority would wish to construct the proposed car park off Burnley Road or the one on TW's land. Indeed, page 63 essays a definition:

A s278 agreement is an agreement with the Local Highway Authority to agree the details of works to be undertaken within the adopted highway.

Those car parks would therefore be outwith the scope of section 278 works and outwith the scope of the words in parentheses. The HCM and MDC thus have no timetable for commencement of construction of those car parks and when they might become available. Nor is there any such timetable in relation to the proposed car park on the Methodist Church land. The indicative programme slates

Completion of Exchange Street Works (remaining works within green box on P.65/67) if required,

for 2027/2028 and 2028/2029, but “Exchange Street Works ‘ does not seem apt to cover on-site works. The indicative programme is silent about the Methodist Church land, except to identify 2028/2029 for first residential occupation. In short, the indicative programme does not indicate how the assertion at page 46 will be delivered - what it does indicate is that there is no prospect of fulfilling the promise.

3.2.8.2.3 How is that surplus of *circa eight spaces* calculated? In the HCM there is a ‘back of an envelope’-type calculation of the loss of street parking availability set against the proposed off-street provision. See Appendix 3 hereto, paragraphs 1 to 8. It

[anticipates] that there will be an increase in provision of circa 6-9 spaces along the corridor.

However, it understates the loss of spaces outside 157 and 159 Market Street by two and overstates the latest capacity of the proposed car park off Burnley Road by two. That reduces the anticipated increase to 2-5. It takes no account of any new prohibition of waiting on Exchange Street. It assumes 10-12 spaces will be available on the Methodist Church land. It also makes the very bold assumption that a new car park will be permitted in the Green Belt (see paragraph 3.2.8.2.4 below), without which the increase of 2-5 would turn into a deficit of 38-41 spaces.

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.

3.2.8.2.5 The MDC claims (page 90) 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),

but it seems improbable that the developers can deliver the supposed new parking in a timely manner, if ever. See also paragraph 11.2.2 below.

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 and HCM is that, if Exchange Street is made one-way from Market Street up to its junction with Highfield Road, as the plans on pages 47, 49, 65 and 67 show, before the Methodist Church site parking area or site road is open for public use, 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. Other issues with this junction are noted at paragraphs 14 to 18 and 39 to 48 of Appendix 3 to these representations.

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 108) 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 at 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.

Little 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, V17 and V23 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.

4.8.1 Page 21 claims

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 (it has not yet been subject to formal regulation 16 consultation) and the fact that it primarily focuses on the existing vernacular and characteristics of the village, rather than allocation H66 and Edenfield's elevation to 'Urban Local Service Centre' within the settlement (sic) hierarchy of the adopted Local Plan.

4.8.2 The statement that the emerging Neighbourhood Plan has not been subject to Regulation 16 consultation was and is incorrect. That consultation began early in the week commencing 17th June 2024, a fact that the MDC, having allegedly been checked on 21st June 2024 according to its second page, should have acknowledged. Indeed, page 21 contradicts page 18, which clearly states,

The Regulation 16 version of the Neighbourhood Plan was published for consultation on 18th June 2024 until 30th July 2024.

4.8.3.1 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.

4.8.3.2 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 versions of the emerging Neighbourhood Plan and its Design Code, which are currently the subject of the Regulation 16 consultation, are submitted alongside these representations.

4.8.3.3 It is therefore simply wrong to imply that the current draft Neighbourhood Plan and Design Code are not primarily focused on the allocation of H66.

4.8.4.1 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.

4.8.4.2 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

4.8.4.3 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 4.8.1 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.

4.8.4.4 The suggestion that *Edenfield's elevation to 'Urban Local Service Centre' within the settlement (sic) hierarchy of the adopted Local Plan* outweighs its village character is contradicted by more than forty acknowledgments elsewhere in the MDC that Edenfield is a village - see Appendix 2 hereto.

4.8.4.5 For the above reasons the Design Influences on page 27 -

*Consistent roofing material across the site will assist in **embedding the development into the urban context** [ECNF emphasis]-*

are inappropriate.

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 responses to Versions V13, V17 and V23 requested deletion of the word “*informal*”. The MDC cannot be approved whilst that misrepresentation persists.

5.3 Although the MDC (page 18) says that only

limited weight can be afforded to the policies within [the Neighbourhood Plan] at this stage,

ECNF submits that the MDC needs to be amended to conform with the AECOM Design Code - see paragraph 4.8.3.2 above.

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 21 June 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 4 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 4.8.4.2 and 4.8.4.3 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 108 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 108, in Code US 01 -

Development across the entire allocation should achieve a range of housetypes and tenures, including affordable housing and self build homes in line with Policy HS3 of the Local Plan. The Council will monitor planning applications submitted across the allocation and take account of the fact that applications below 10 units could also deliver and provide suitable opportunities for residents that have registered on the Council's self build register -

"Policy HS3", dealing with Affordable Housing, should be changed to "Policies HS3 and HS16". According to 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 proportionally between the various ownerships and, if not, how they will be distributed numerically. Otherwise, the MDC will not comply with Local Plan policy.

7.8.2 Page 93 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 93 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 4.8.4.2 and 4.8.4.3 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 92:

- *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 93 and 110) 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 In the Local Plan, 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 4 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 Code MO 04 provides (page 86):

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 85 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 Unwarranted 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 84 add to the confusion by implying a two-way emergency connection between TW's land and the Methodist Church land:

[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 84] *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, onto the above-mentioned bridge over the A56 and then along 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.

The dry stone wall between H66 and properties on Alderwood Grove should have been mentioned too. 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 90-116 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.

9.2.1 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.

9.2.2 That commitment needs to be stated on page 42 and carried forward into a Nature Code (pages 74 to 78 and 109).

9.2.3 There is no excuse for the failure of the MDC to mention at page 16 Policy ENV5 as part of relevant local planning policy.

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 statement 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 that is 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 in the MDC or HCM itself about layout, dimensions of the bays or how many parking spaces it would provide., although the RSA appended to the HCM shows 43 spaces.

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 had received 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. 90 – 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'*, the HCM states 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 1.78,

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.

The HCM 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 108 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 (14, according to paragraph 1.24 of the HCM). 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 Site Wide Code US 03 on pages 72 and 108 -

Subject to specific requirements associated with educational need being identified through subsequent planning applications, the delivery of off-site community car parking and/or school expansion shall be delivered in the location identified on the Masterplan -

also wrongly conflates school expansion land and a site for public open space/parking, but aside from that it is fundamentally defective. According to the wheel diagram and key on page 19,

Uses Defines codes for the proposed mix of land uses on the allocation.

The availability of sites outside H66 for school expansion, parking or any other purpose is irrelevant to the land uses on the allocation. Code US 03 is therefore wholly misconceived and must 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 80 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 80 redrawn accordingly, because it fails to meet the parameters set out in the MDC (page 82):

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, the suggested car park would not 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

11.1.1 It is crucial that the Transport Assessment should be settled before or at the same time as RBC approves the MDC. It is insufficient to regard it as only indicative. A Transport Assessment is provided in the HCM.

11.1.2 The SSP provides that development of H66 will be supported if eleven criteria are met. The first two criteria require the MDC. The third is

A Transport Assessment is provided demonstrating that the site can be safely and suitably accessed by all users, including disabled people, prior to development taking place on site. In particular:

- i. safe vehicular access points to the site are achieved from the field adjacent to no. 5 Blackburn Road and from the field opposite nos. 88 – 116 Market Street. Full details of access, including the number of access points, will be determined through the Transport Assessment work and agreed with the Local Highway Authority;
- ii. agree suitable mitigation measures in respect of the capacity of Market Street to accommodate additional traffic. Improvements will be needed to the Market Street corridor from Blackburn Road to the mini-roundabout near the Rawstron Arms. Measures to assist pedestrian and vulnerable road users will be required;

11.1.3 Maps from the HCM form an integral part of the MDC at pages 47 to 49 and 64 to 68. The plans on pages 07 and 55 of the MDC show the sites of three ‘*proposed community parking areas*’, which are not said to be merely indicative.

11.1.4 The fact is that the MDC and transport issues are so closely connected that the HCM needs to be approved before or at the same time as the former. There is an example of this inter-connection in RBC’S letter of 8th December 2023, which does not relate to any planning application, to the developers’ agents:

By way of an illustration regarding the level of detail that should apply to all the items of infrastructure to be included in your programme/schedule, I refer to your plan of off - site highway improvements on pages 46 and 47 of the latest iteration of the Masterplan (September 2023).

The specific examples I will refer to are the proposed 2 metre wide car parking bay depicted on the east side of Market Street and the new parking spaces that are illustrated within close proximity to the proposed access to the Taylor Wimpey development.

I would expect the programme/schedule to include a reasonable indication at what stage of the development, these specific works would commence and then be implemented/ made available. Therefore, residents will be able to understand approximately how long the disruption of not having on street parking in front of their properties will last and how long it will take to deliver the new/alternative provision.

If the information in the HCM and MDC about the parking bay on Market Street and the proposed parking areas is only indicative, the consequence is that no reliance can be placed on the infrastructure delivery schedule which the letter rightly sought.

11.1.5 That letter continued:

Highways

From the Council's discussions with Lancashire County Council in their role as the Highway Authority, it is understood that you will be submitting further information, in an attempt to overcome concerns. Please can you submit those details as soon as possible. It was noted that you previously suggested that you would be providing the Council with further details of gateway features/traffic calming measures, yet we are not in receipt of them. Please provide these details for the Council's consideration.

If the Transport Assessment and Highways matters were not going to be considered as part of the MDC, there would have been no point in calling for that information in the evaluation of the MDC.

11.1.6 By way of further example, that letter of 8th December requested more detail in the MDC about Education (criterion 9) and Biodiversity Net Gain, which is not mentioned at all in the SSP.

11.1.7 The fact is that there there is no limit to the planning-related subjects that a MDC might include. There is no reason why inclusion of a subject in criteria 3 to 11 of the SSP should preclude its consideration in the MDC on more than an indicative basis.

11.1.8 Submissions from SK on behalf of ECNF relating to the HCM are being submitted concurrently with these representations. Further commentary on the HCM is provided at Appendix 3 to 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. See also paragraph 11.13 below.

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 not fit for purpose: they show the junction of Market Street and Pilgrim Gardens but fail to delineate the extent of the Pilgrim Gardens roadway, they show the houses 1 - 6 Pilgrim Gardens but do not mark 81 - 85 Market Street, they still show the long-demolished Horse & Jockey public house, and there is a partial representation of 79 Market Street.

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 on Exchange Street 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. Similarly, it is pointless to interrupt the prohibition in order to retain the APM at 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 by an APM at the entrance to number 153. Consideration should be given to a bus stop clearway order.

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 vehicle lawfully displaying a disabled person's badge 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 therefore 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 MDC's own Site-Wide Code PS 01 (pages 83 and 109) - *All areas of public space should be designed to minimise opportunity for crime by following Secured by Design recommendations.*

11.11 Nor does the proposed parking area meet 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). See also concurrent representations by SK on behalf of ECNF.

11.13 The seventh bullet on page 90 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).

It is not clear whether the symbol '/' means 'and' or 'or'. If the locations are yet to be agreed, there is no guarantee that sufficient parking provision will be provided. The bullet suggests 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. See also paragraph 11.2.2 above.

11.14 There are various errors and omissions in the HCM - see Appendix 3 hereto. It is therefore apparent from the HCM that the compilers either lacked a clear understanding of the subject or were incapable of expressing it.

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 84 -

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
1	Exchange Street to Woodlands Road	Caption at east end: Proposed pedestrian connection Caption at south end Potential pedestrian connection	East end: Proposed pedestrian/cycle route (indicative alignment) South end: Potential pedestrian/cycle route (indicative alignment)
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 84 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.** (National Highways emphasis)*

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 the bullet:

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 109 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 109) 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.

13.3.5 For foul drainage, page 76 states:

Two pumping stations will be required with one located within Phase 1b and one within Phase 3 as indicatively illustrated on the drainage infrastructure plan due to site levels.

Phases 1B and 3 are the sites belonging to Mr Warren and the Methodist Church respectively (pages 58 and 59). Page 77 has an uncaptioned plan which might be a drainage infrastructure plan and on which an unexplained long broken white arrow and two pumping stations, one in Phase 1A (TW land) and one in Phase 3, are marked. The plan needs a caption and the arrow an explanation, and the pumping station locations must be clarified.

13.3.6 There is more confusion when page 76 turns to surface water outfalls:

Outfall locations for surface water run off are illustrated on the indicative drainage infrastructure plan. Phases 1 and 2 can connect to existing watercourses. Phase 3 can only connect to the combined sewer system as there is no scope to link into Phase 1 due to no common site boundary and dense woodland separating the two phases.

It is not clear how Phase 2 (Peel land) would connect to a watercourse or why Phase 3 could not connect to the watercourse flowing through it. Could it be that the authors and checkers were in a muddle about which is Phase 2 and which is Phase 3? It is unacceptable and needs to be resolved.

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 78 in the third paragraph and on pages 78 and 109 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 109 -

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' after 'should'.

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 98) 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 99 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 100) 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 100 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 97

- *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 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.

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 97.
- *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 4.8.4.2 and 4.8.4.3 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 100) it

Reflects proximity to services & public transport network

This has the appearance of an excuse where the authors could think of nothing better. It could be applied to all four Area Types, but is still a wholly inappropriate reason - 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 100) are

Complements terraced built form found in the centre of Edenfield

Page 100 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 4.8.4.2 and 4.8.4.3 above)

14.2.9 The reasoning and influences for height (page 100) 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 Alderwood Grove 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 sixteen brick buildings: 21/23 and 25/27 Exchange Street, 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 100)

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 4.8.4.2 above.

14.4 The “Key (glimpsed) views to be considered” for Village Streets (page 100) 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 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 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 100) 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 104) 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 98 and 104), 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 96 -

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 101 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 102) 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 104). 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 98, 100, 102 and 104) 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 100) -

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 98, 100, 102 and 104), 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 98 and 100) 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 4.8.4.2 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.

Row	SHLAA ref	Owner	Gross area (ha)	Available area (ha) for development	Net development area (ha)	Dwellings yield at 30 dph
1	16263	Methodist Church	4.75	3.1	2.32	70
2	16262	TW	12.5	12.16	9.12	273
3	16256	Peel L&P (some) & Richard Nuttall (some)	3.69	2.79	2.09	63
4	TOTALS		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 86) 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 100 (*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.

Row	Location	Density (dph)	Source
1	Moorlands View, 14/16 Crow Woods and 57-61 and 97/99 Burnley Road	30	MDC, page 29
2	24/26 Blackburn Road, 21/23 Burnley Road and Esk Avenue	13	MDC, page 29
3	Church Court and 2 Church Lane	21	MDC, page 29
4	Alderwood Grove and 115-129 Market Street	25	MDC, page 30
5	49-77 and 58-82 Market Street	45	MDC, page 30
6	24-46 & 69-95 Eden Avenue and 2-6 Highfield Road	28	MDC, page 31
7	Acre View and 1-45 & 30-58 Bolton Road North	39	MDC, page 31
8	Site of Hawthorn House, Rochdale Road	18	Planning application 2021/0454
9	Pilgrim Gardens and 79-85 Market Street	43	Planning application 2015/0238
10	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 102) 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 104 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 98, 100, 102 and 104. 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.

15.12 The MDC misleads again at page 59 when it says that the Methodist Church land would deliver *up to 90 dwellings*. It is clear, as shown in paragraph 15.11 above, that a yield of 105 dwellings is contemplated.

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 text of the MDC does not support the Executive Summary's claim (page 09) of a commitment:

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 shall 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 educational need 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". The claim on page 09 that there is a commitment 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.

17.5 Site Wide Code US 03 (page 72), in so far as it relates to school expansion, provides

Subject to specific requirements associated with educational need being identified through subsequent planning applications, the delivery of . . . school expansion shall be delivered in the location identified on the Masterplan.

This wording falls short of a commitment. It might be no more than a statement that the MDC acknowledges that the Policies Map identifies an area for school expansion and is copying that site onto its own maps. It might be merely an aspiration. We repeat (see paragraph 17.3 above) that it is doubtful whether the MDC can direct the use of land outside H66 and whether a masterplan can make any such commitment at all.

17.6 Even if the MDC could make a commitment, a Uses Code would not be an appropriate method. According to the wheel diagram and key on page 19,

Uses Defines codes for the proposed mix of land uses on the allocation.

The availability of sites outside H66 for school expansion or any other purpose is irrelevant to the land uses on the allocation. Site Wide Code US 03 is therefore wholly misconceived and must be deleted.

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* 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 Page 51 wrongly lists twice *Woodland planting to the rear of Edenfield C.E. School.* It suggests *Dedicated footpath link to Edenfield C.E. School*, but, whilst this would be in the Green Belt, it would not be on land within the developers’ control and would, it is understood, be opposed by the School for security and safeguarding reasons.

18.1.6 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 plans on pages 07, 39, 42 and 55 mis-name Chatterton Hey.

19.2 The Green infrastructure and play provision plan on page 80 marks a proposed LEAP on TW land and three proposed LAPs (on Peel land, Methodist Church land and off site on Peel land), but the proposed LAPs 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. The plans on pages 07 and 55 water down the plan on page 80 by using the description *play area* rather than LEAP for the feature located on TW land and saying *indicative location*. The robustness of the text on page 80 and associated Site Wide Code NA 07 (from which *future* should in any case be deleted) is therefore questionable:

The H66 allocation will provide a range of play experiences which will appropriately supplement the existing Locally Equipped Area for Play (LEAP) located off Exchange Street, allowing a dispersed range of play experiences throughout Edenfield.

NA 07 Unless otherwise reasoned and justified, future planning applications relating to the H66 allocation should, as a minimum, include play provision in accordance with the 'Green Infrastructure and play provision' plan.

The Executive Summary (page 09) misleads in relation to criterion 5 iv of the SSP ([Public open space to be provided along the woodland area south of the brook/Church enclosure](#)) by saying,

The Masterplan includes public open space in this location, including a LEAP, with further detail provided/to be agreed within the TW Phase 1 planning application,

but the plans on pages 07 and 55 do not commit to a LEAP or its location.

19.3 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.

19.4 The MDC does not explain how the impact of construction on flora and fauna will be assessed and mitigated.

19.5 The MDC fails to provide for a detailed risk assessment for potential environmental hazards.

19.6 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.

19.7 At page 108 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 unnumbered page 70. 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.

19.8 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.

19.9 The purpose of the apostrophe in *paver's* on page 89 is difficult to understand.

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 is riddled with false or misleading statements.

21.4 The desire for progress in delivering houses on H66 must not be allowed to outweigh the importance of ensuring compliance of the MDC with planning policy, national, local and site-specific, and of requiring the MDC to be free from accuracy and inconsistency.

21.5 The MDC should, for all the reasons set out in these representations, be rejected, and the site promoters should be advised to produce in its place a document that accords with those principles.

Richard W. Lester for self and on behalf of Edenfield Community Neighbourhood Forum

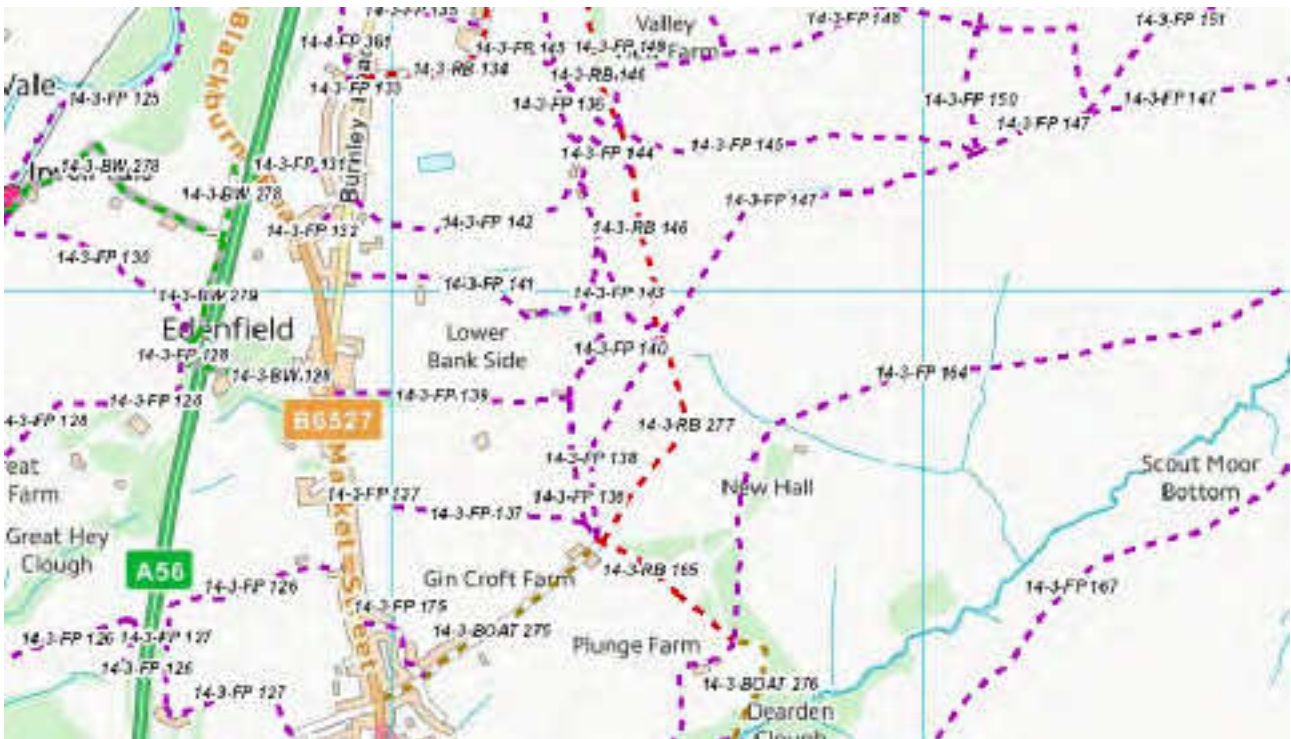


15th July 2024

Appendix 1

Extract of map of Public Rights of Way in Edenfield

Paragraph 7.4.1



Appendix 2

Examples of references in the MDC to Edenfield as a village

Paragraph 4.8.4.4

- *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 83
- Area Type designation '*Village Streets*' - pages 52, 96, 97, 100 and 101
- *Historic core of the village . . . historic centre of the village* - both on page 98
- *Key characteristics of the village . . . urban form within the village the village . . . central village location* - all on page 98
- *Village core* - page 102
- *Northern part of the village . . . northern fringe of the village . . . traditional building materials of the village* (twice) - all on page 104

Appendix 3

Commentary on HCM and the Road Safety Audit appended thereto

Paragraphs 3.2.8.2.3, 11.1.8 and 11.14

Availability of parking

1. Paragraphs 1.21 and 1.24 - the proposed parking area off Burnley Road should be described as being subject to planning permission being granted. Given the Green Belt location, it cannot and must not be assumed that such permission will be granted - see paragraphs 3.2.8.2.4, 10.1, 10.9.1, 10.9.7 and 10.10 of the representations.

2. Paragraph 1.23 suggests that despite a prohibition of waiting on the highway,

an area of hardstanding outside properties 157 and 159 . . . would continue to allow parking

for two cars. That cannot be right. A prohibition of waiting usually applies to the whole highway: carriageway, footway and verge (if any). This so-called hardstanding is in fact perceived and used as the footway and is separated from the carriageway by a shallow kerb. There is a further surfaced area in front of numbers 157 and 159, but that appears to be their forecourt rather than the highway and is too narrow to park a car. See the upper right photograph on page 12 of the Road Safety Audit (RSA) reproduced at Appendix 2 to the HCM.

3. Paragraph 1.24 sums up the change in parking provision north of Pilgrim Gardens as a net gain of *circa* 10 spaces, but for the reasons in the last preceding paragraph, the figure should be reduced to *circa* 8. However, that is subject to planning permission being given for a 45-space car park in the Green Belt. That does not tally with the plans at page 3 of and Appendix B to the RSA - this shows 10 drop-off bays and 33 parking spaces, a total of 43. It must be noted that according to paragraph 1.24 the car park would involve the loss of 14 street parking spaces. The Plans following paragraph 1.79 and in the MDC show no marked bays or spaces at all. The figure of *circa* 10 should therefore be further reduced to *circa* 6.

4. It is presumptuous of Eddisons to write in paragraph 1.25 that the residents of 43 to 47 Market Street will not be disadvantaged by the prohibition of parking outside their homes, unless they have conducted a thorough inquiry with the residents and established that that is the case. In any case other local residents are likely to be disadvantaged.

5. Paragraphs 1.25 and 1.26 postulate a loss of 14 spaces in the remainder of Market Street, although according to the Plans following paragraph 1.79 the six spaces outside commercial premises will still be available except between 8.00am and 6.00pm on Mondays to Saturdays. It is a matter of concern that vehicles will be prevented from waiting outside shops during the working day.

6. Paragraph 1.27 concludes that with the proposed car park on Methodist Church land there will be a reduction of 2 to 4 parking spaces in the southern area. That is based on 10 to 12 spaces in the Methodist Church site car park, but that figure is described as '*currently identified*' and is therefore unreliable.

7. Paragraph 1.26 suggests that cars could utilise the TW parking area, but that has already been accounted for.

8. The Plans following paragraph 1.79 and in the MDC show some unexplained yellow lines on Exchange Street. If those represent further prohibition of waiting, they have not been taken into account.

Misconception of Anwyl's involvement

9. Just once in the actual HMC (paragraph 1.26) do Eddisons refer to the Methodist Church land as 'the Church land'. They wrongly state at paragraph 1.35 that 'Anwyl has an interest in' it. References in paragraphs 1.43, 1.44 and 1.47 and Figures 1 to 17 to 'Anwyl site' or 'the Anwyl land' perpetuate that error.

10. Paragraph 1.69 refers to the 'Anwyl proposals' and 'Anwyl scheme', although there are none, if indeed there ever were. Paragraph 1.71 speaks of 'the Anwyl element'. Figures 12 and 13 refer to 'Proposed Anwyl Development', but there is no such current proposal. There are four inappropriate references to Anwyl Homes (three on page 3 and one on page 11) by the authors of the RSA. The Designer's (Eddisons') Response to Problem 8 in the RSA (page 11) uses the expression "Church land site' but in the Response to Problem 9 (page 11) reverts to 'Anwyl'.

Other errors

11. Figures 3 and 4 state that they refer to 2023 surveyed flows, but paragraph 1.13 says that they are based on the 2022 surveyed flows. Eddisons need to explain and amend, as necessary.

12. Paragraph 1.16 - 'derived TEMPro' does not make sense. Is a word missing?

13. Paragraph 1.69 also states that 'one-way (eastbound) operation' is proposed on Exchange Street. The Plans following paragraph 1.79 indicate one-way westbound working.

Exchange Street/Highfield Road junction

14. The statement (paragraph 1.47) -

As access to the Anwyl land will simply be gained via an extension of Exchange Street, there is no junction to assess -

is astounding in its disregard for reality

15. The assertion at paragraph 1.69 that

it is not considered that the increase in traffic associated with the Anwyl scheme and the proposed one-way operation will make any meaningful change in the operation of the Exchange Street/Highfield Road junction

seems excessively optimistic.

16. Paragraph 1.70 states,

For the purpose of the analysis, it has been assumed that any traffic travelling to/from Market Street via Exchange Street would also pass through the Exchange Street/Highfield Road junction.

This is, however, likely to be an onerous assumption given residential development is located along

the eastern section of Exchange Street and much of the traffic referred to will likely be associated with this development.

If Exchange Street were made one-way westbound, all traffic that had entered Exchange Street would have to leave at its Highfield Road junction via either the main carriageway or the unadopted section in front of 21 - 29 Exchange Street. That is a fact - it does not need to be an *assumption*, '*onerous*' or otherwise. (The only exception would be vehicles that were entitled to exercise private rights of way over FP126.) Moreover, there would be no *traffic travelling to . . . Market Street*.

17. As noted at paragraph 3.2.8.5.1 of ECNF's accompanying representations, Page 60 of the MDC 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 and HCM is that, if Exchange Street is made one-way from Market Street up to its junction with Highfield Road, as the plans on pages 47, 49, 65 and 67 of the MDC and the Plans following paragraph 1.79 of the HCM show, before the Methodist Church site parking area or site road is open for public use, 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.

18. There are issues with the pump track access to and from Exchange Street opposite Highfield Road. These are considered at paragraphs 39 to 48 below.

Failure to identify streets correctly

19. Eddisons' Figures 1 to 17 following the Plans after paragraph 1.79 wrongly call Wood Lane 'Wood Street'.

20. There are more errors and omissions in Eddisons' contractors' Figures in Appendix 1 to the HCM. Figures 1 and 5 wrongly show A56 Walmersley Road at its junction with the M66 off-slip as 'A56 Manchester Road'. Figures 2 and 6 wrongly show B6527 Market Place, the southern arm of the B6527/Exchange Street junction as 'Market Street'. Figures 3 and 7 wrongly show B6527 Market Place, the northern arm off the mini-roundabout, as 'Market Street' and in the drawings of Junctions 5 and 6 omit the classified road number for Bury Road. Figures 4 and 8 omit the classified road number for the northern arm of Bury Road at Junction 7 and Bolton Road North at Junctions 7 and 8.

21. Eddisons titled Appendix 6 to the HCM '*ARCADY Output for the Market Street/Bury Road/Rochdale Road Mini Roundabout*' but the reference should be to Market Place, not Market Street.

22. The HCM speaks at paragraphs 1.53 to 1.56 of the Market Street/Northstone Site Access Junction, but the Local Plan is clear that the Northstone site would take access from Blackburn Road.

23. The HCM goes on to consider the 'Market Street/Blackburn Road/Burnley Road Signalised Junction' at paragraphs 1.57 to 1.59 and its Appendix 5. This junction has four arms under signal control. An accurate HCM would have included the fourth arm, Guide Court, in the description. Table 4 at paragraph 1.58 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 HCM does not show

this. The HCM states two options (right/left) for traffic from Guide Court, but in fact there are three (right/ ahead/left). Appendix 5 to the HCM repeatedly and mistakenly refers to 'Blackburn Road (S)'.

Missing information

24. The exclusion in paragraph 8 on page 3 of the RSA is noted:

The audit team has examined and reported only on the road safety implications of the scheme as presented and has not examined or verified the compliance of the designs to any other criteria.

25. The caveat in paragraph 10 on page 4 of the RSA is noted:

The audit team would also advise that they have not been provided with any information as to the forecast development traffic flows and therefore the potential highways safety implications of the redistributed traffic flows on the highway network due to the proposed one-way operation of Exchange Street could not be assessed.

This information is crucial to the road safety assessment and should have been taken into account.

26. At page 7 of the RSA the Designer's Response is that

the [B6527/Burnley Road/Guide Court] junction will be upgraded to incorporate a pedestrian phase

but the vital information, about how this will be achieved and at whose expense, is missing.

27. Likewise the Designer's Response (RSA, page 13) to Problem 10 (trip hazards at various locations) -

dropped kerbs and tactile paving will be provided, where practicable (Note: some footways are too narrow to accommodate tactile paving) -

is silent about how and at whose expense.

28. 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.

29. The plan following paragraph 1.79 fails to take account of the potential new or improved access to site H65 (Land east of Market Street), which is allocated in the Local Plan with an estimated yield of nine dwellings.

30. The plan is not fit for purpose: it shows the junction of Market Street and Pilgrim Gardens but fails to delineate the extent of the Pilgrim Gardens roadway, they show the houses 1 - 6 Pilgrim Gardens but do not mark 81 - 85 Market Street, they still show the long-demolished Horse & Jockey public house, and there is a partial representation of 79 Market Street.

31. The Plans following paragraph 1.79 of the HCM and on pages 49 and 67 of the MDC show that the traffic calming feature on Exchange Street is still to be agreed. The proposed feature must be specified before the MDC and HCM can be approved

Traffic Regulation Orders

32. Paragraphs 1.28 and 1.29 provide:

1.28 The highway improvements identify items that would require the promotion of a Traffic Regulation Order (TRO). Only the LHA has the necessary legal powers to promote/secure a TRO, so the Developer(s) will enter into a legal agreement with the LHA in advance. All costs will be reasonably born (sic) by the Developer(s).

1.29 If a condition is to be attached, this should specifically state that a TRO is to be 'promoted' (rather than 'secured'). The condition will be considered discharged once the Developer has completed an Abortive Cost Agreement with LHA for the TRO to be promoted and has made an up-front fee deposit. The LHA will then complete the legal process to 'secure' the TRO. If the legal process fails to complete, the development can still progress if all planning stakeholders accept any risk that the intended highway works may not be delivered.

If the mooted condition uses the word 'promoted' rather than 'secured', there would be nothing to stop the development from proceeding, even if the highway authority decided after considering responses to the statutory notices not to make the proposed TRO.

Proposed regulation of traffic indicated on plan following paragraph 1.79 of the HCM

33. As noted at paragraph 11.7.1 of these representations, 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 convenient place to park.

34. As noted at paragraph 11.7.2 of these representations 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 on Exchange Street adjacent to his premises would facilitate unloading.

35. As noted at paragraph 11.7.3.1 of these representations, if prohibition of waiting is proposed, it is ridiculous to retain the APMs outside numbers 21 and 47 Market Street and 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 APMs. The prohibition would be enforceable, an APM is not.

36. As noted at paragraph 11.7.3.2 of these representations, similar considerations apply to the proposed prohibition of waiting 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 by an APM at the entrance to number 153. Consideration should be given to a bus stop clearway order.

37. As noted at paragraph 11.8 of these representations, 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.

Up-to-date traffic survey is required

38. The traffic survey data (paragraphs 1.10 et seq. and Appendix 1) are stale. There is reason to believe that traffic levels have returned to pre-pandemic levels. For example, the average daily flow along the A56 between its junctions with the M66 and A682, *i.e.*, the Edenfield bypass, was 63,382 motor vehicles in 2019 and 69,840 in 2023. See <https://roadtraffic.dft.gov.uk/manualcountpoints/56534> . It is reasonable to assume a similar trend in the number of vehicles passing through Edenfield. The pressure on the local road network is of course increased whenever there is a planned closure of or unforeseen incident on the bypass. Therefore an up-to-date survey is required.

Pump Track access, opposite Exchange Street/Highfield Road junction

39. Problem 8 in the RSA (page 10) is summarised as:

Gradient from skate park ramp and omission of pedestrian crossing facilities may increase the risk of vehicle/pedestrian collisions.

With the aid of a photograph, paragraphs 16 and 17 describe the issues:

16. There is an existing ramped access on the northern side of Exchange Street that provides access to a skate park/pump track . . . The gradient of the path, omission of suitable level landing point and omission of pedestrian crossing provision could increase the risk of pedestrians on scooters/skateboards etc inadvertently rolling out into the carriageway which may increase the risk of vehicle/pedestrian collisions.

17. The audit team note that this is an existing problem, although would note that the proposed development(s) may increase the use of the skate park, and that Exchange Street which is currently a dead end at its western extent will be opened up to form the access to the Anwyl Homes development which will increase vehicle traffic and potentially exacerbate this problem.

40. In order to solve the problem, paragraph 18 of the RSA -

*recommended that a level dwell area be provided at the base of the ramp, the footway on the northern side of Exchange Street proposed as part of the Anwyl Homes Development be extended to join the footway to the skatepark and appropriate pedestrian crossing facilities *i.e.* uncontrolled crossings with dropped kerbs and tactile paving are provided in the vicinity of the access to the skatepark to facilitate access to the park from the south.*

The difficulty with that solution is that it requires either the Pump Track access to be reconstructed or the carriageway of Exchange Street to be narrowed to accommodate the construction of a footpath on the northern side. The onus is on RBC, having caused or acquiesced in creating the problem, to resolve it (see paragraph 47 below).

41. The Designer's Response initially dismisses the concerns:

The skatepark and associated access is a newly installed facility and any risk will have been assessed at the time the scheme was being promoted. In this regard, it is noted that chicane barriers are installed along the ramped access to prevent the risk of users inadvertently rolling out into the carriageway.

One glance at the photograph reveals the inadequacy of the Response -

a) the assumption about a risk assessment is unwarranted, not to say foolish, and

- b) the chicane barriers are less than half the width of the access, are thus not fit for purpose and immediately challenge daredevils to negotiate them at speed.

42. The Response continues:

Notwithstanding this, it is understood that the Skate Park, which was approved under application reference 2021/0693 did have a highway condition that sought the development to provide a footway along the skate park frontage. Therefore, should a footway scheme for the skate park come forward following enforcement action, any proposed footway from the Church land site will tie into it.

The Designer has not done their homework. The Pump Track, as laid out, bears no resemblance to the approved Drawing (see paragraph 46 below). Therefore, the highway condition (set out at paragraph 43 below) in the planning approval has no relevance. One school of thought (based on Class A of Part 12 - Development by local authorities - of Schedule 2 to the General Permitted Development Order) is that the Pump Track does not require express planning permission at all, and, in that case, the highway condition has no relevance.

43. For completeness, the highway condition in approval 2021/0693 is as follows

No development shall take place until a scheme of off-site highway works / improvements has been submitted to and approved in writing by the Local Planning Authority (in consultation with the Local Highway Authority).

The scheme shall include measures to improve pedestrian links between the recreation areas on both sides of Exchange Street, dropped kerbs where appropriate, tactile paving where appropriate, a new section of footway on Exchange Street and new road markings where appropriate.

The approved scheme shall be implemented in full prior to the first use of facility.

Reason: In the interests of highway and pedestrian safety.

44. Apart from the location plan, there seems to have been only one drawing for the planning application: Edenfield Pump Track Sketch Design V3 November 2021. There is no obvious record on the RBC website of any approval of revised plans after the application was granted. The Drawing states that the exact layout would be subject to change, but no importance can be attached to that statement, as the decision notice is clear (condition 3) that the development shall be carried out in strict accordance with Edenfield Pump Track Sketch Design V3 November 2021.

45. There are at least two fundamental problems with the Sketch Design. First, it shows a footway on the north side of Exchange Street, where there is none. Secondly, there are numerous issues left unclarified, e.g., "exact design to be agreed" in the case of both the proposed pump tracks, "exact position [of seating] to be agreed on site, and access (or maybe just chicanes - it is not clear) 'to be agreed with Highway Authority'.

46. The Sketch Design shows an entrance from and a separate exit to Exchange Street. The entrance is shown just to the west of the opposite junction with Highfield Road, and the exit is shown further west. The photograph on page 10 of the RSA shows an entrance directly opposite Highfield Road and no other entry or exit. In other words the development bears no resemblance to the approved plan.

47. Responsibility for the safety hazard identified in the RSA rests with RBC *qua* landowner, and the danger obviously needs to be removed quickly before someone is seriously injured.

48. In the meantime, it is pointless for the HCM and MDC to include designs for the junction before RBC provides safe access to and from the Pump Track. The HCM and MDC must be held in abeyance until this is done.

HCM under-estimates housing yield

49. It would have been prudent for the HCM to examine the worst-case scenario as regards the impact of development of H66 on traffic. However, whilst paragraph 1.33 rounds up the TW application figure from 238 to 240 dwellings, the HCM -

- makes no allowance for development at Alderwood, where there is a pending planning application for nine dwellings
- makes no allowance for development near the former Vicarage
- allows for only 65 new dwellings on Peel's and Richard Nuttall's land north of Church Lane (paragraph 1.34), although the MDC (page 102) contemplates a density of up to 34 dph, which could yield 71 dwellings
- allows for only 95 dwellings on the Methodist Church land (paragraph 1.35), although the MDC (page 100) contemplates a density of up to 45 dph, which could yield 105 dwellings.

Together with the failure to take account of H65 (paragraph 29 above), the under-estimate is in the order of 35 dwellings.

Confusion over Market Street accident record

50. Paragraphs 1.74 and 1.75 report that

only one accident . . . occurred along the Market Street corridor during the most recent 5 year period available . . . adjacent to the Church Lane junction and . . . only slight in nature.

It would have helped if the exact '5 year period' had been specified. The RSA is at paragraph 4 on page 2 more precise:

A review of the Personal Injury Collisions (PIC) data between January 2018 and December 2022 (based on information in the crashmap database) has indicated that during this period there has been 1 PIC recorded in the immediate vicinity of the proposed highways works which resulted in an injury that was slight in severity.

However, all three of those paragraphs are contradicted by page 13 of Appendix 2 to the HCM where the Designer's Response to the RSA states.

a review of accident statistics confirms that no pedestrian (or indeed, any) accidents have occurred along the [Market Street] corridor in the most recent 5-year period available.

51. In any case, the Crashmap data are not the most recent available. LCC's MARIO database shows more recent data, including a collision at Market Street / Exchange Street in May.

Swept path analysis at access to TW land from Market Street

52. The Plans following paragraph 1.79 of the HCM appear to show that a refuse collection vehicle could not turn left from Market Street into TW's site or right from the site into Market Street without crossing the centre line of the TW access road. The junction must be re-designed to eliminate this hazard.

53. The presence of the letters 'urch' on those swept path drawings is odd.

Appendix 4

Strategic Policy ENV1: High Quality Development in the Borough

Paragraphs 6.8 and 7.11.3

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.

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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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Aerial view of Edenfield Neighbourhood Area and surroundings



Introduction

01

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

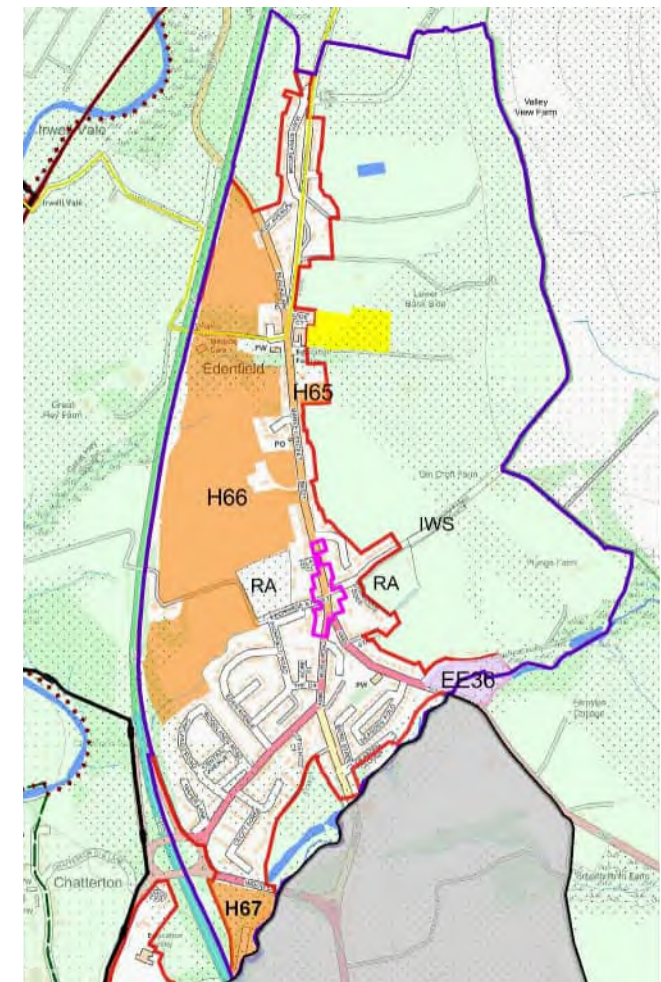
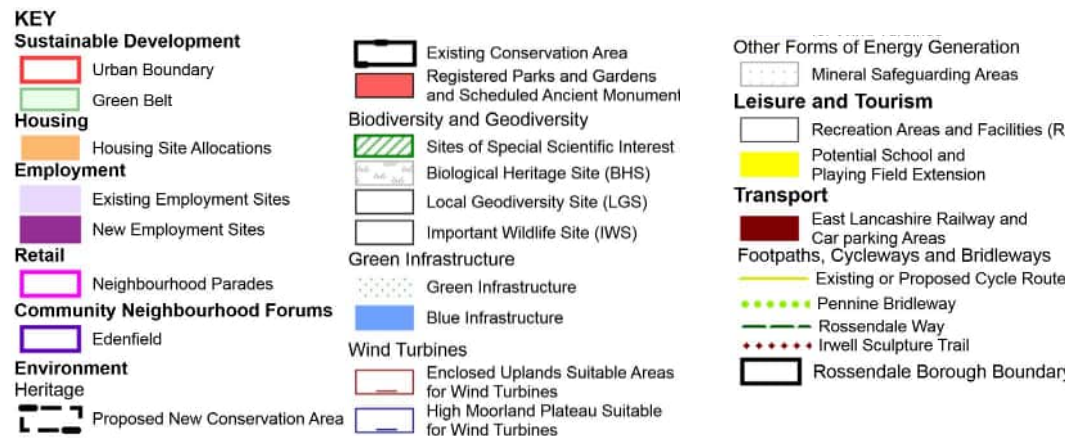


Figure 2.1: Rossendale Policies Map

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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.

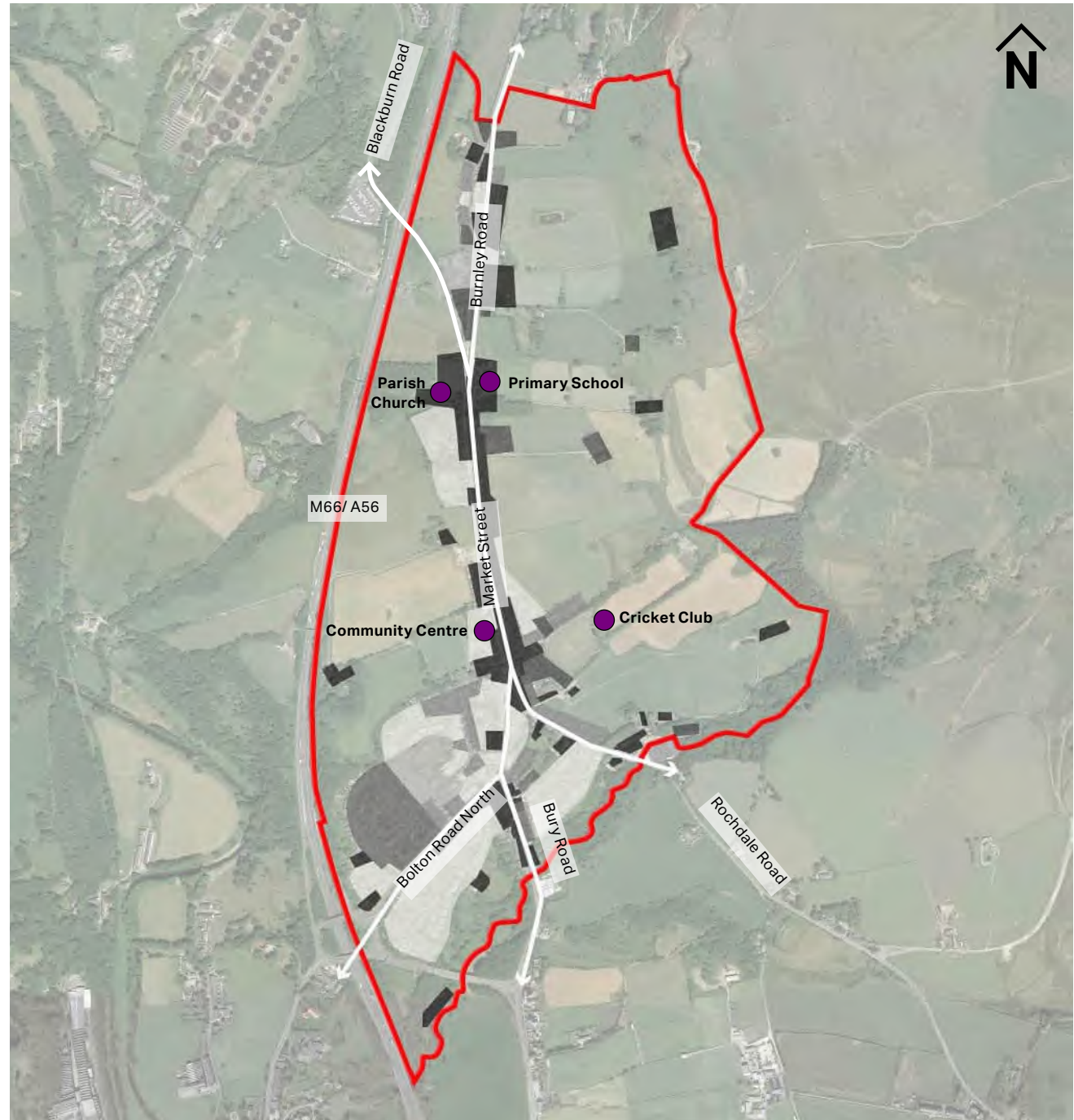


Figure 2.2: Village Structure and Growth

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 terraced 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.

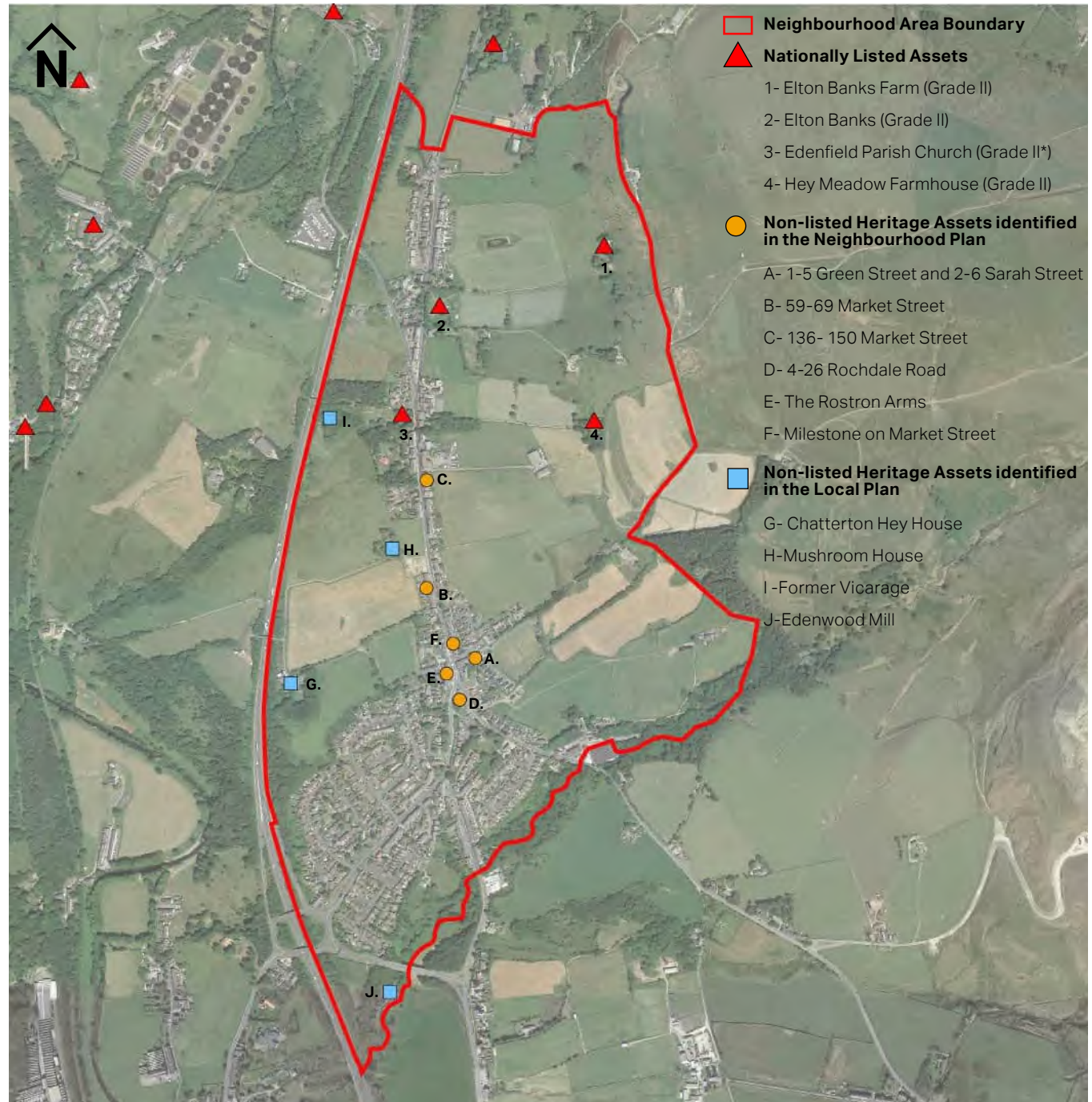


Figure 2.4: Heritage Assets



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.

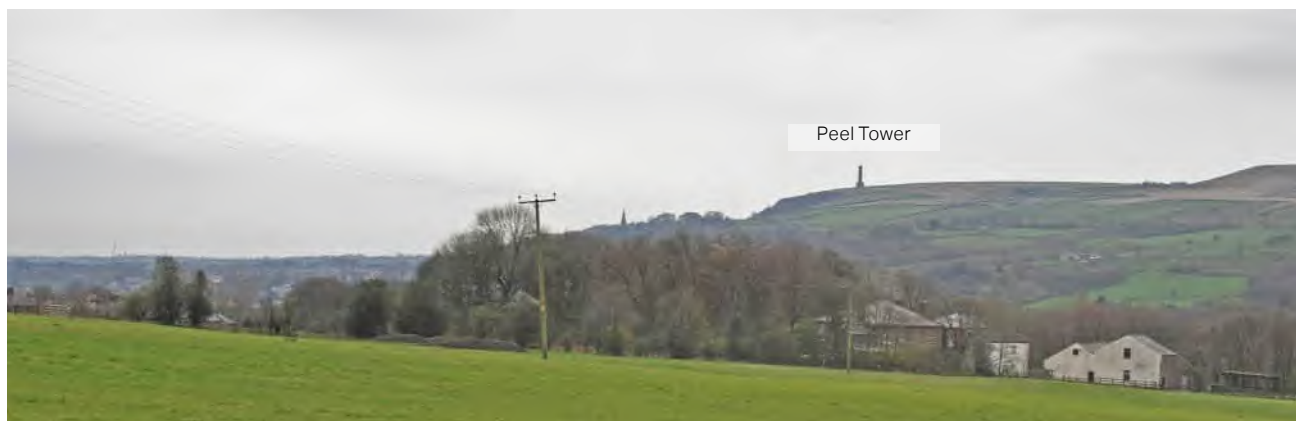
As per the Lives and Landscapes Assessment for Rossendale Borough Council (December 2015), the landscape character type of Rossendale is defined as a series of interlocking valleys, with ribbon development extending along the primary valley between Rawtenstall and Bacup. The southern part of the borough 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.



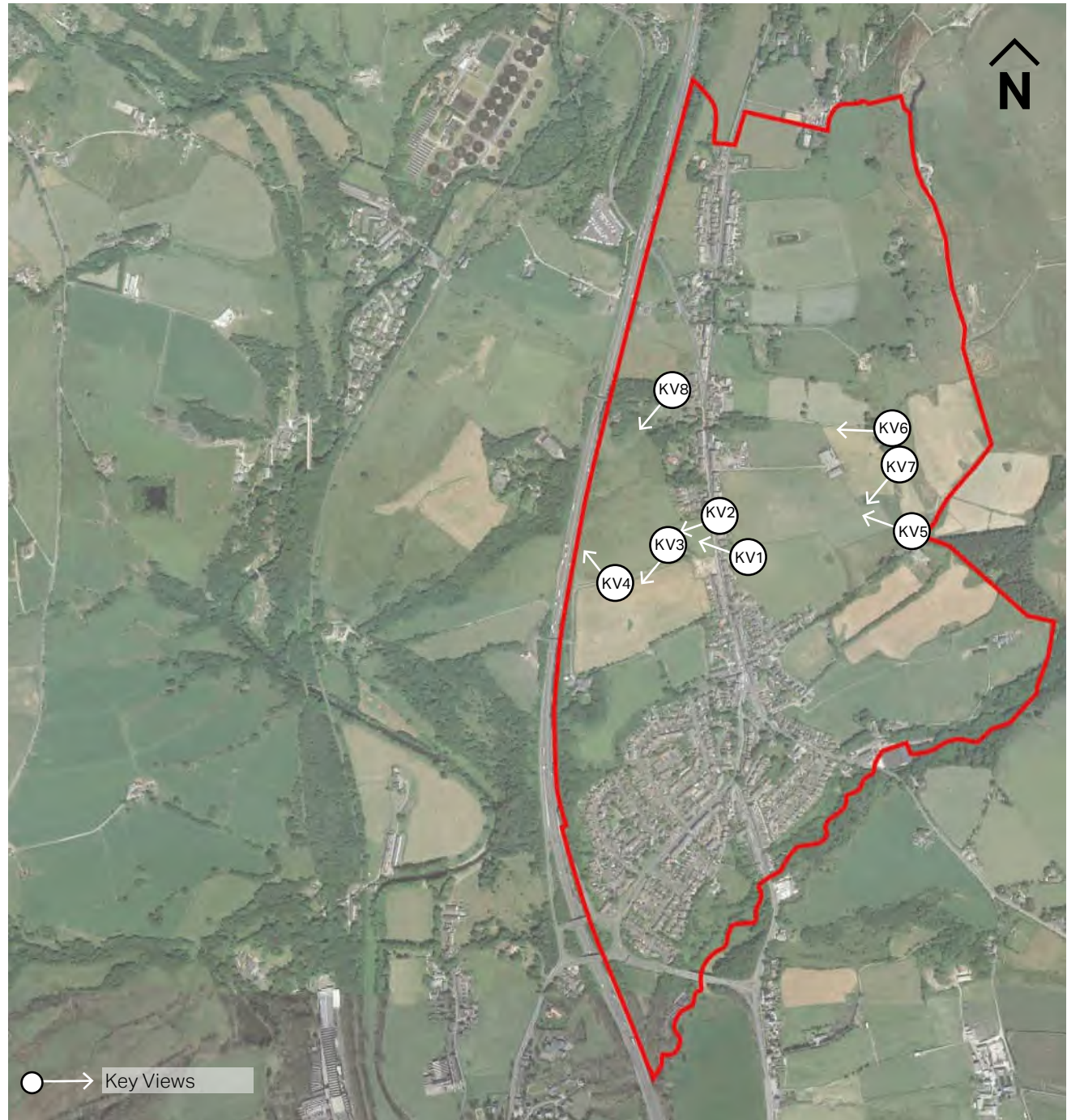
Key View 1- Hope View



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

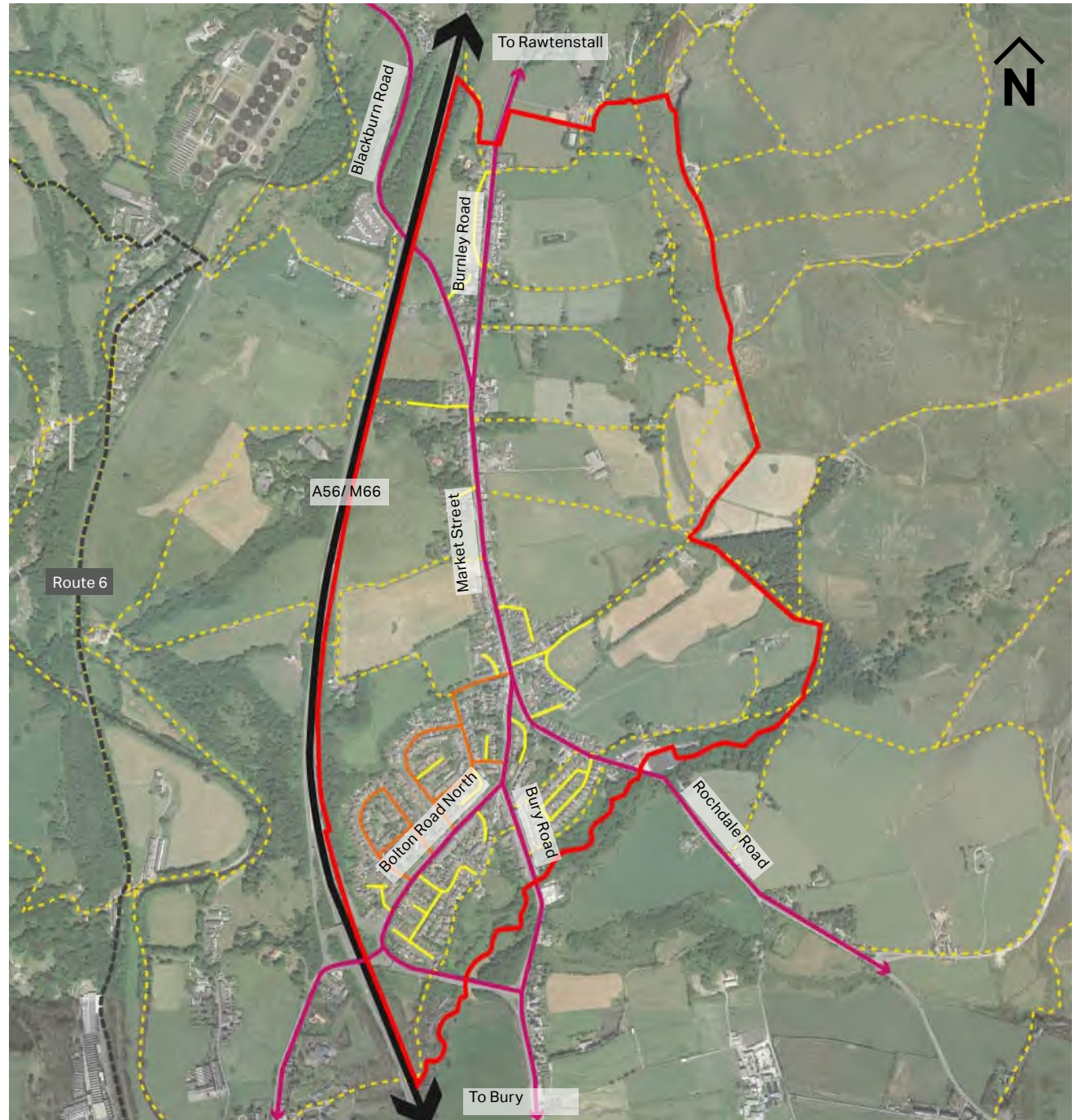


Figure 2.6: Existing Movement Network

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

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





Traditional terraces of Bury Road

Character Areas

04

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

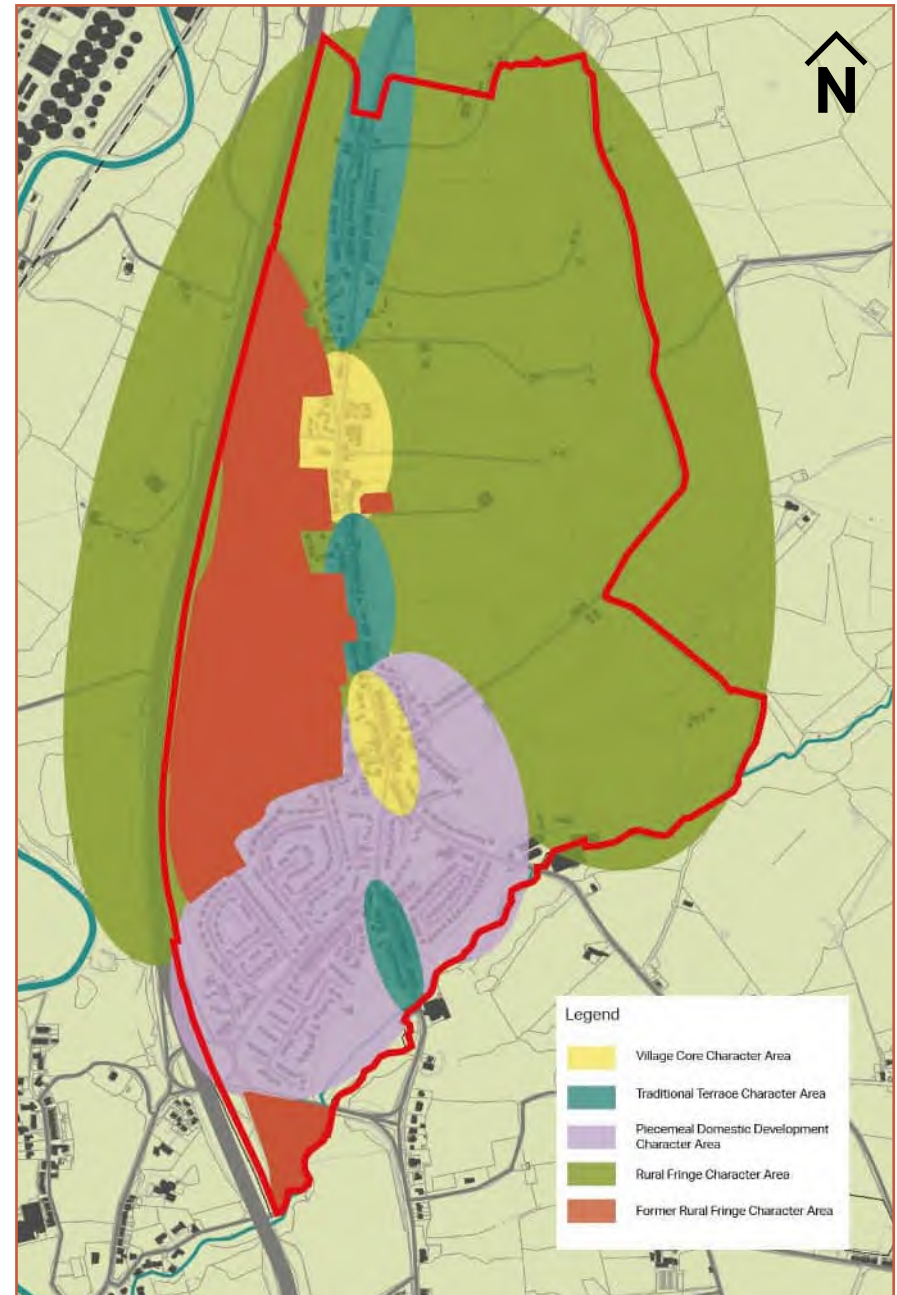


Figure 4.2: Character area for application of design codes

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.

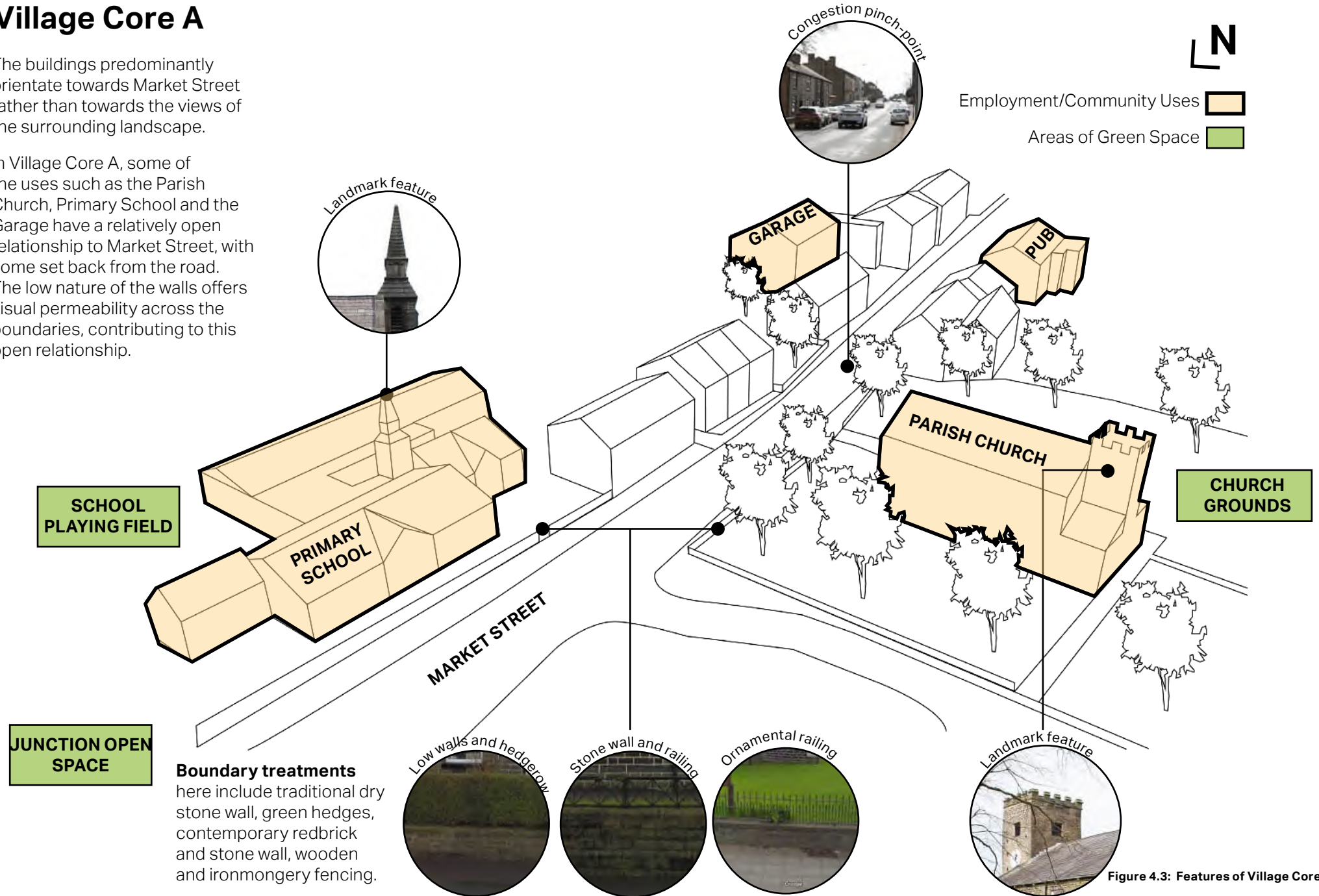


Figure 4.3: Features of Village Core A

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.

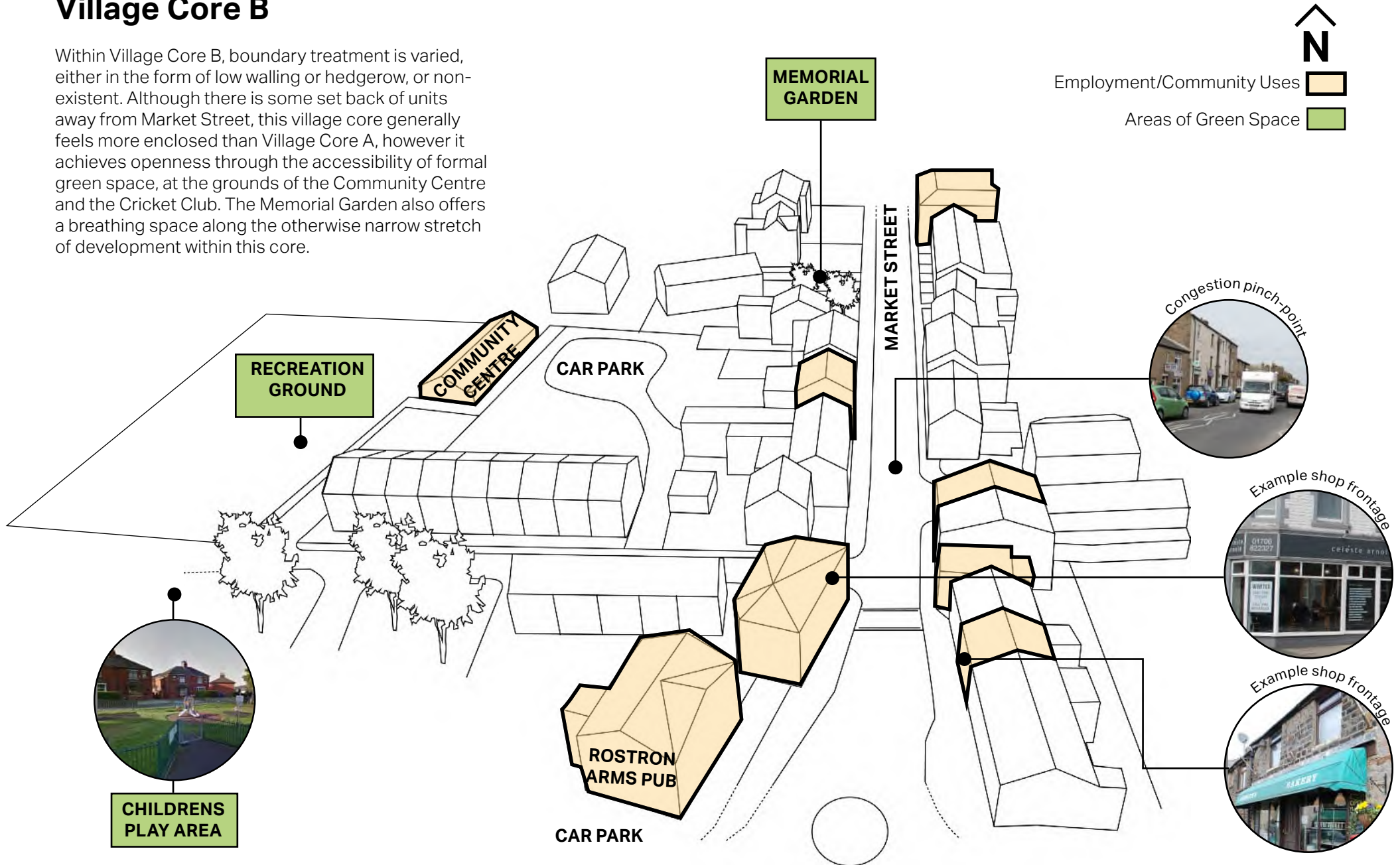


Figure 4.4: Features of Village Core B

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

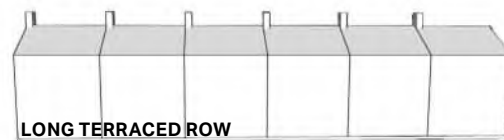
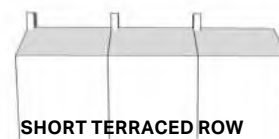
Block structure, orientation and rhythm

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.

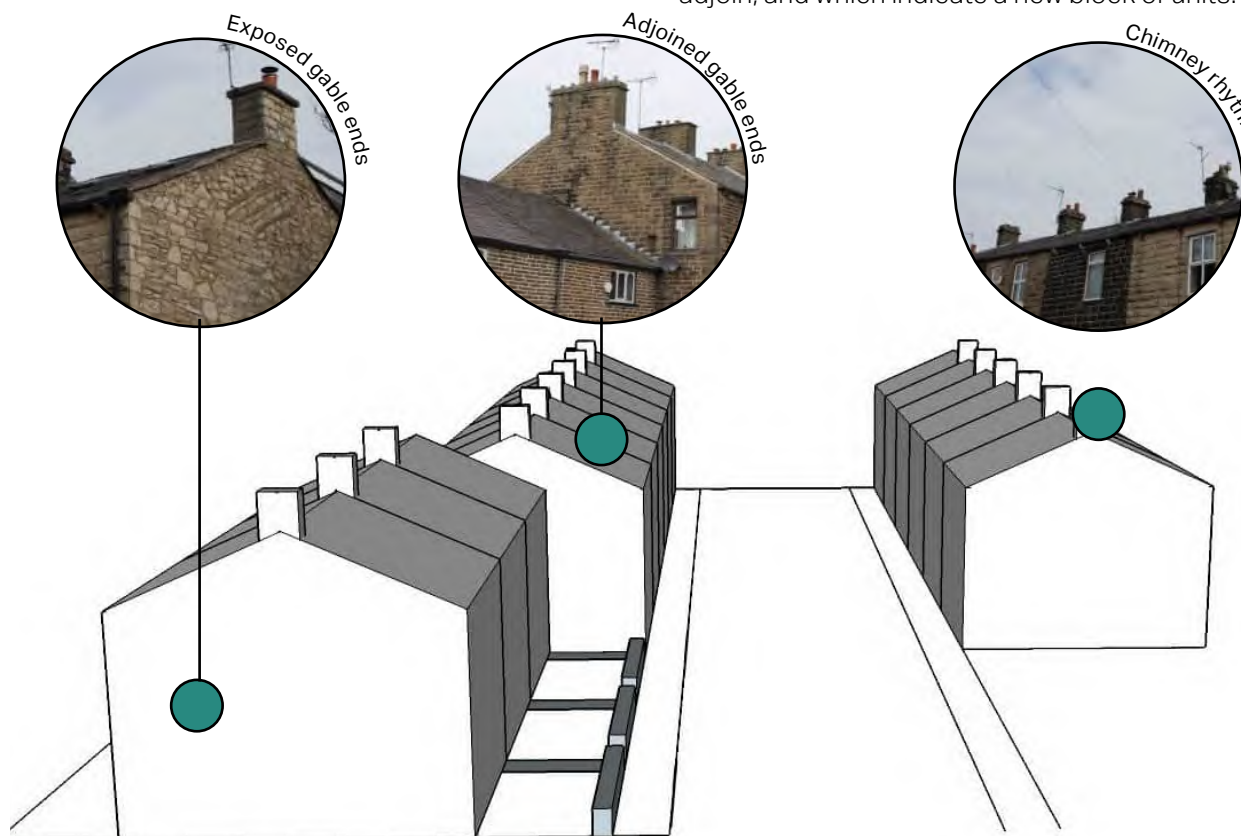


Figure 4.5: Traditional-Terraces structure and features

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.

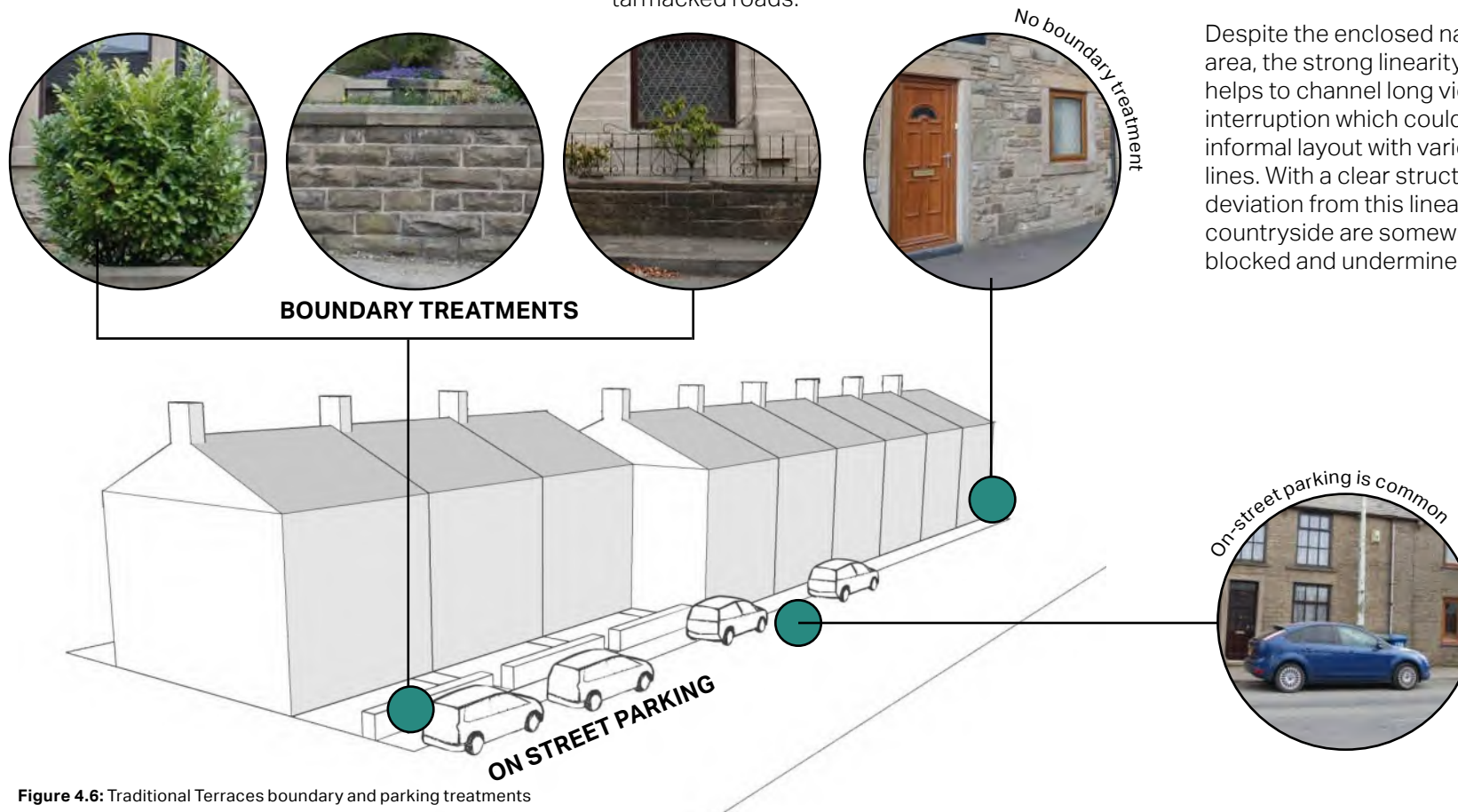
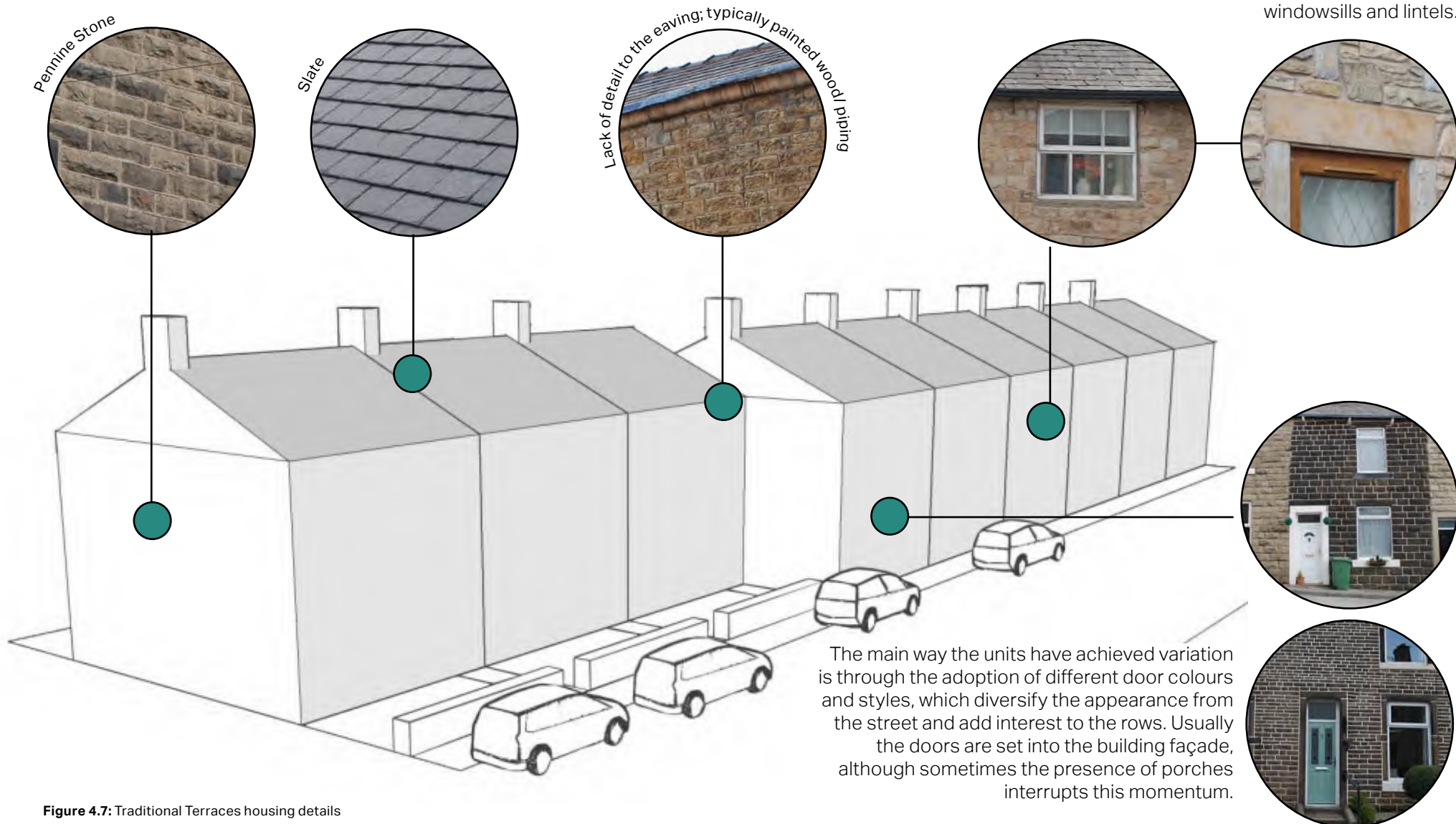


Figure 4.6: Traditional Terraces boundary and parking treatments

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

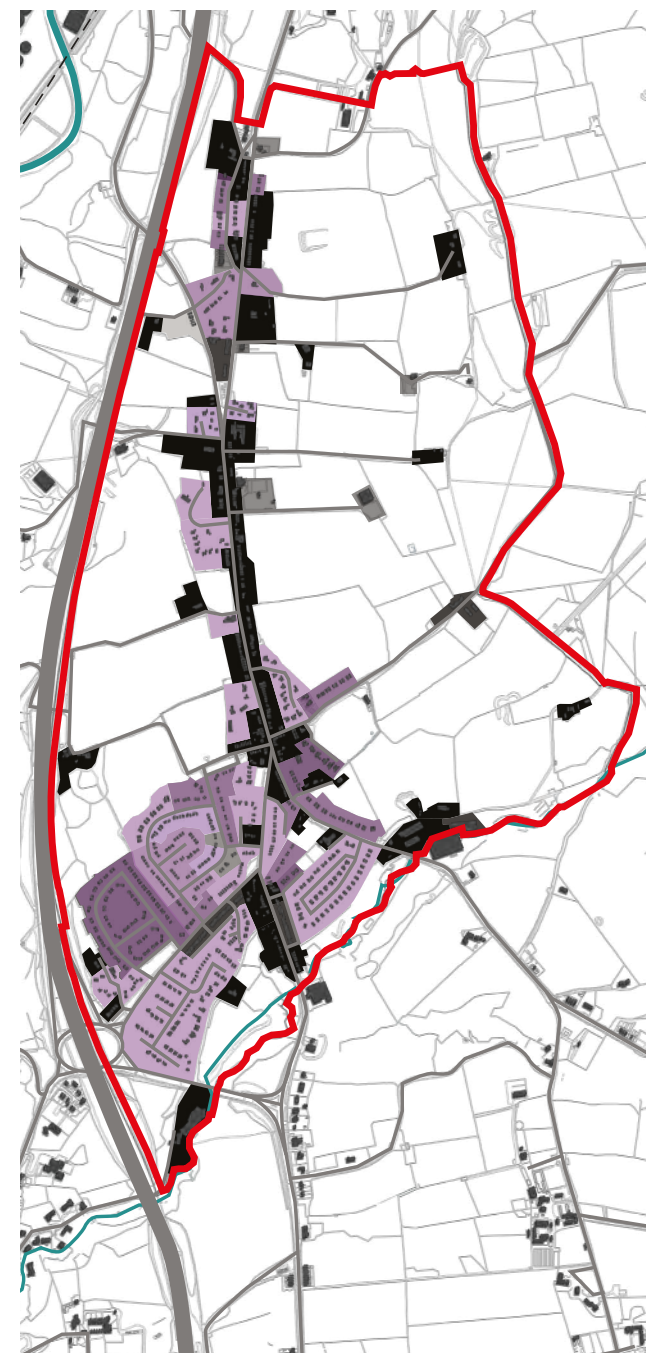


Figure 4.8: Map showing incremental parcels of domestic development within Neighbourhood Area based on period of delivery.



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.

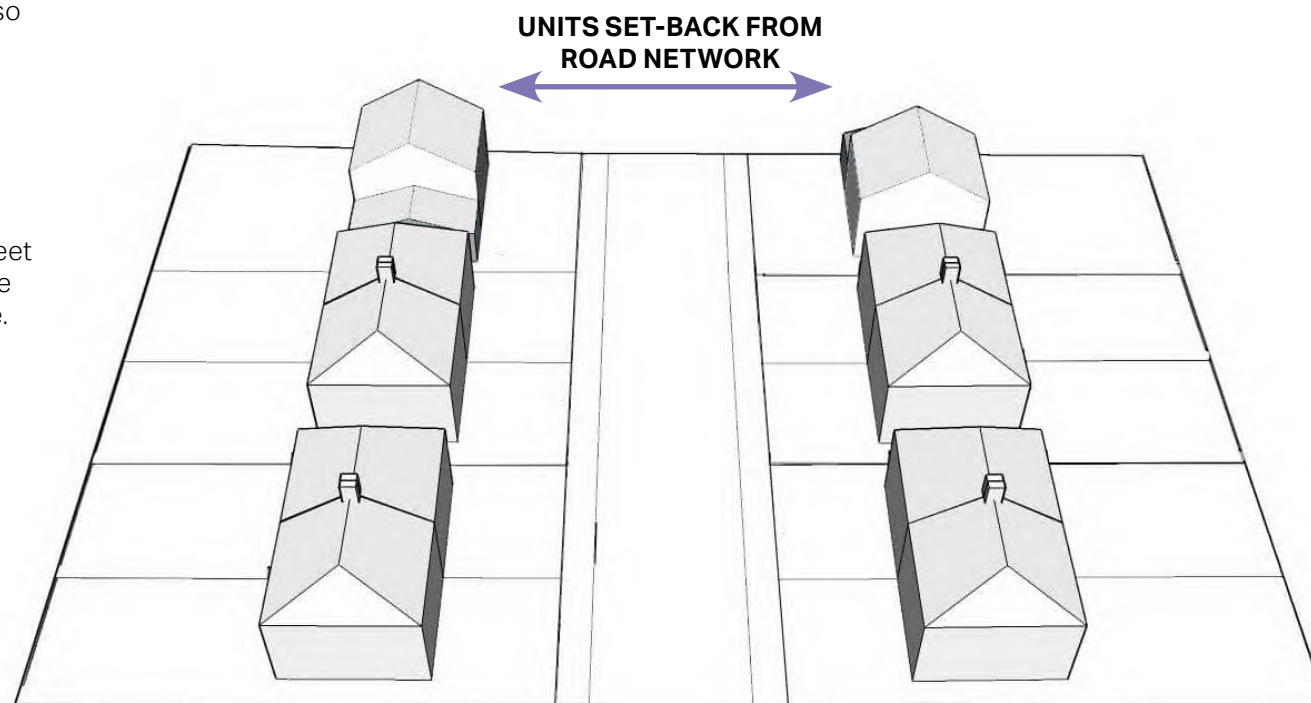


Figure 4.9: Enclosure of piecemeal domestic development character area

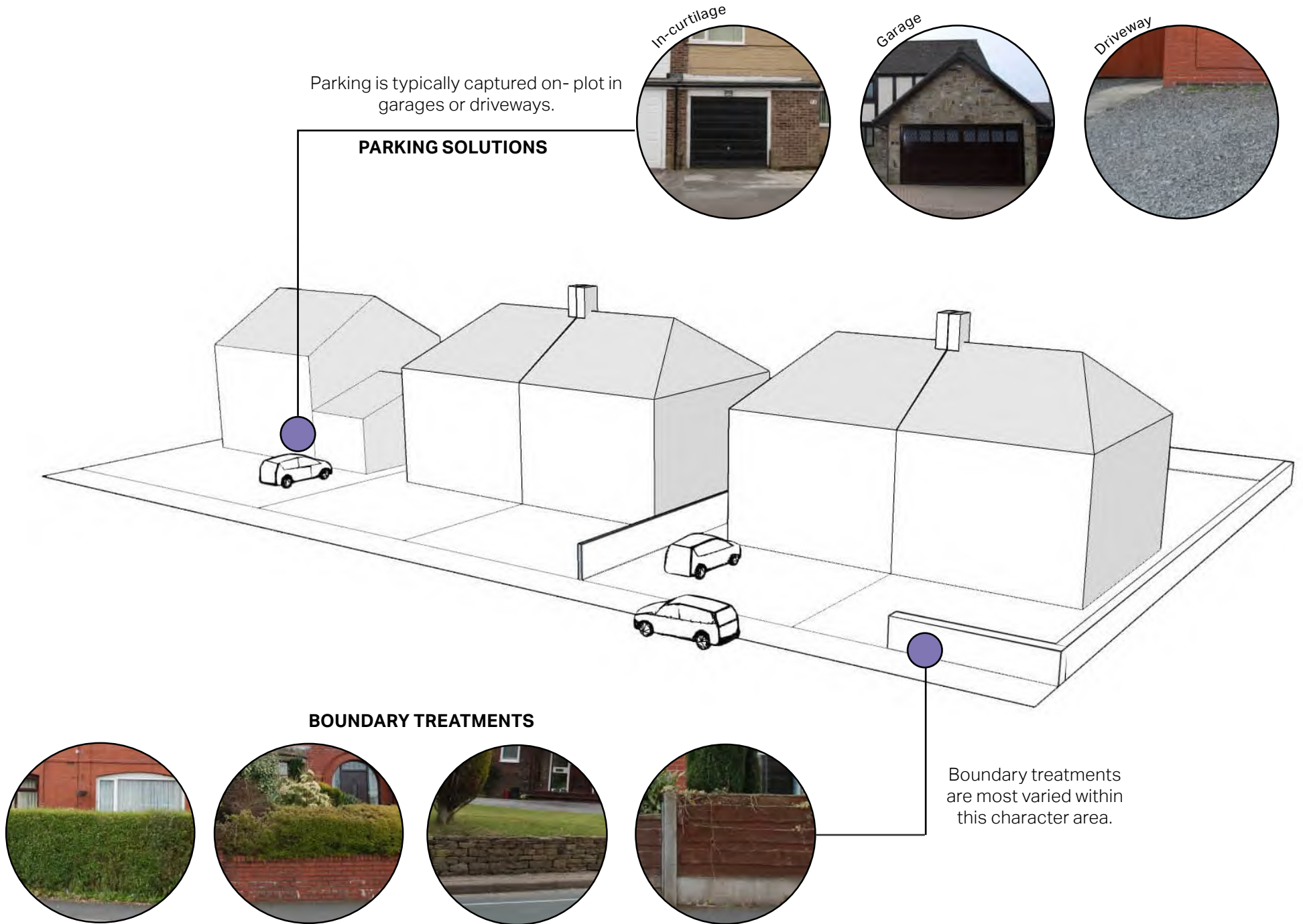


Figure 4.10: Piece meal domestic development boundary and parking treatments

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.

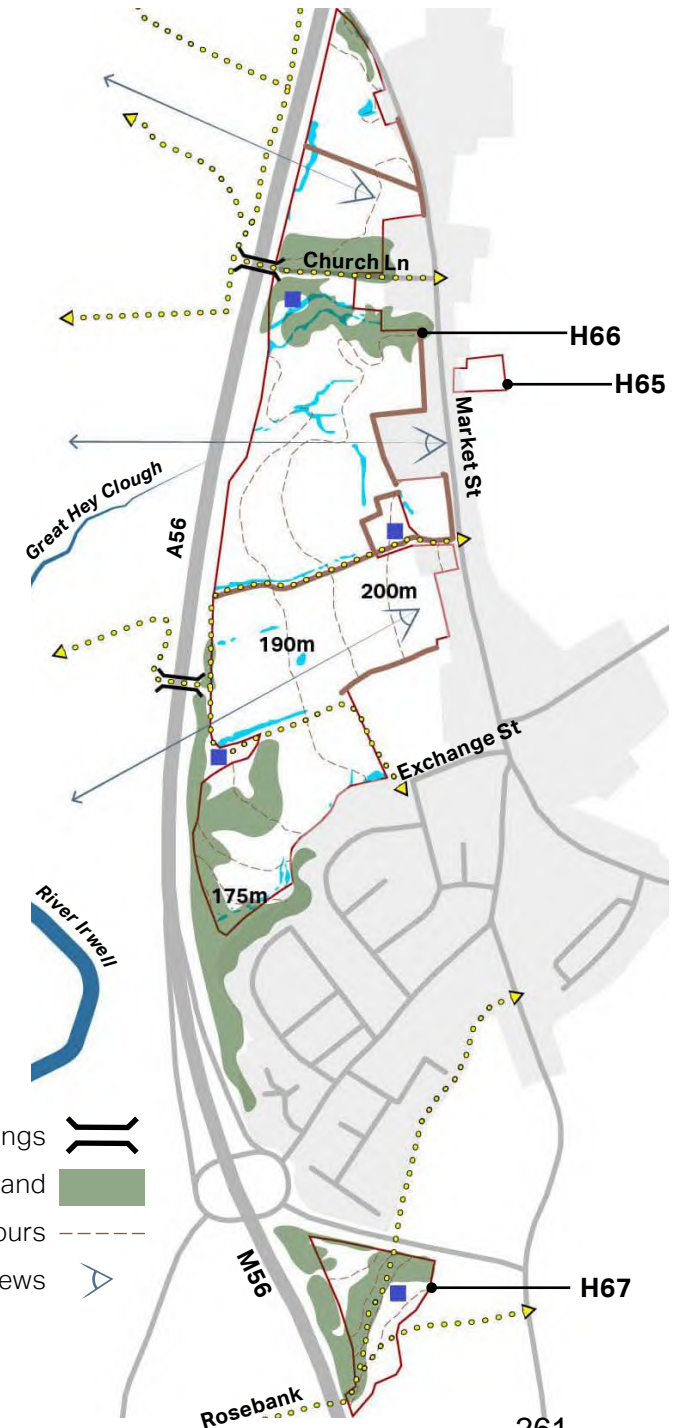
Trees and woodland

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.

- Settlement area A56 bridge crossings
- Site boundaries Trees and Woodland
- Public right of way 5m Contours
- Roads Landscape views
- Non-listed heritage asset
- Stone boundary walls
- Surface water flood risk areas





Design Codes

05

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, for example, in 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

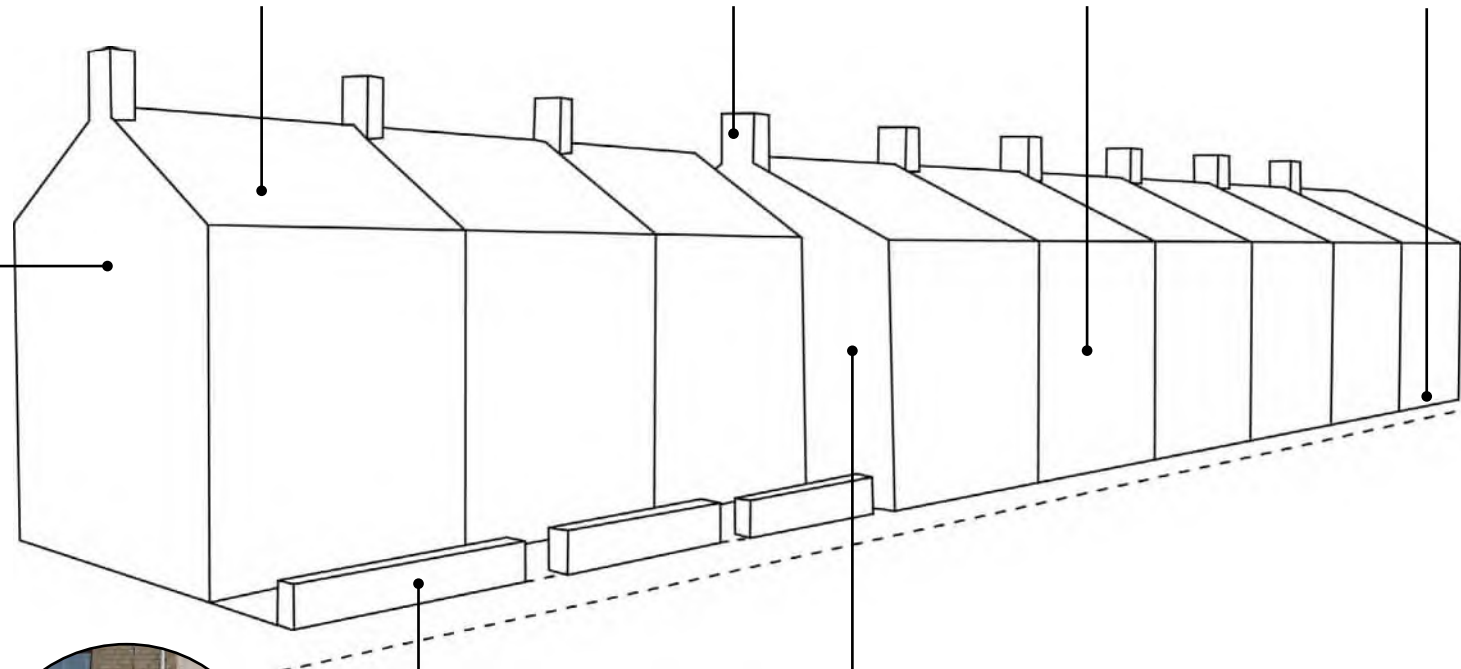


Size, proportion and style to closely mimic existing features



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.

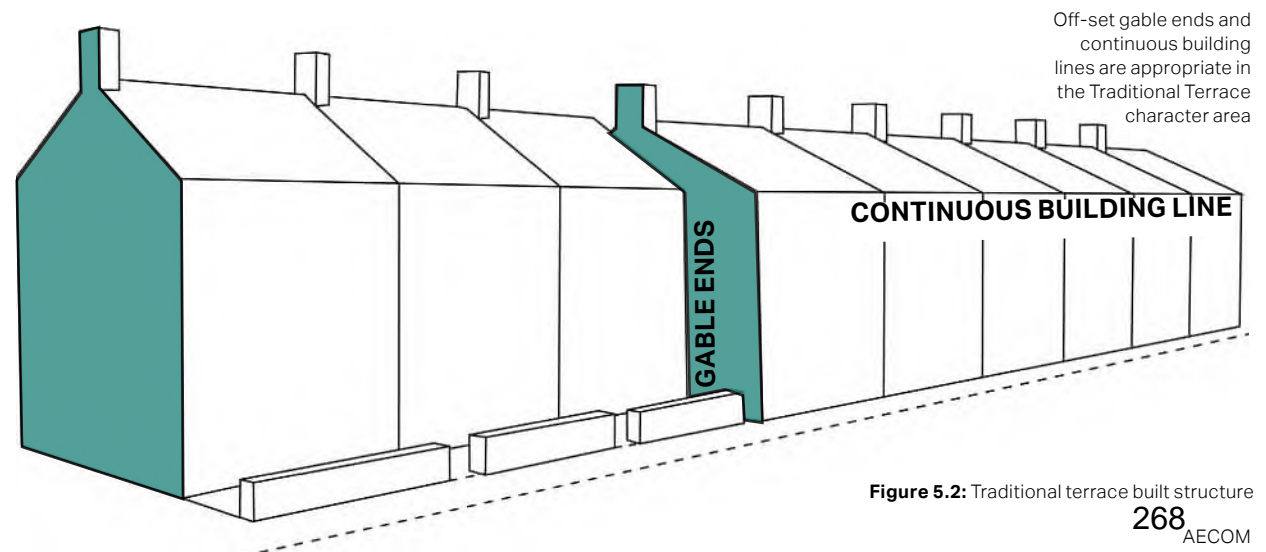


Figure 5.2: Traditional terrace built structure

Code USB3- Developed Urban Structure

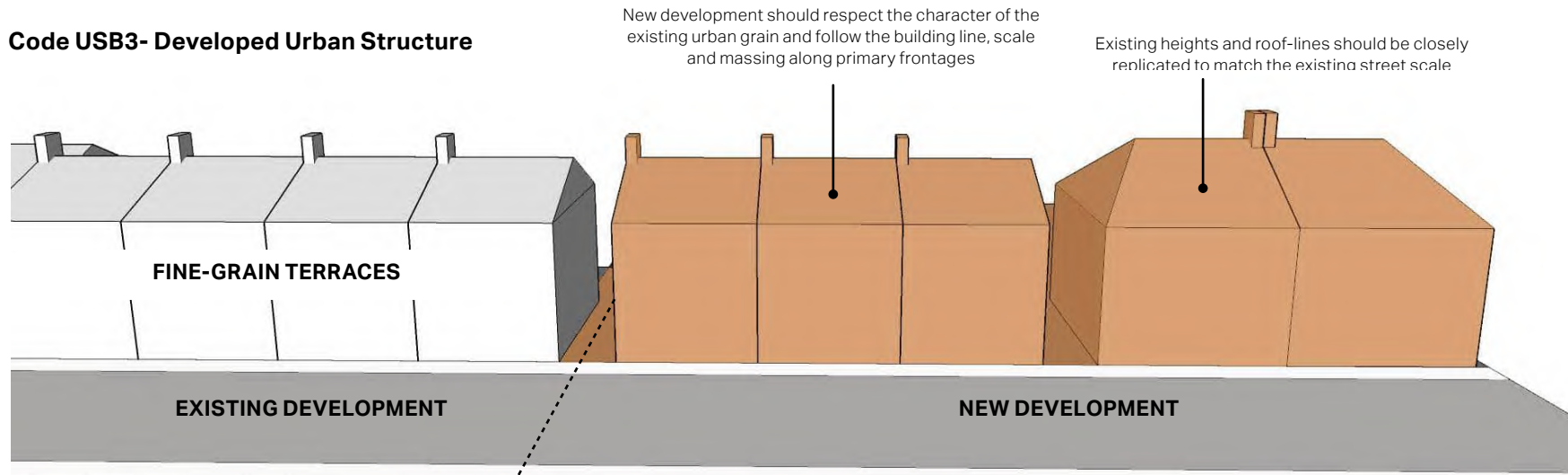


Figure 5.3: Example of development responding to Traditional Terraces structure

Code USB4- Edge Urban Structure

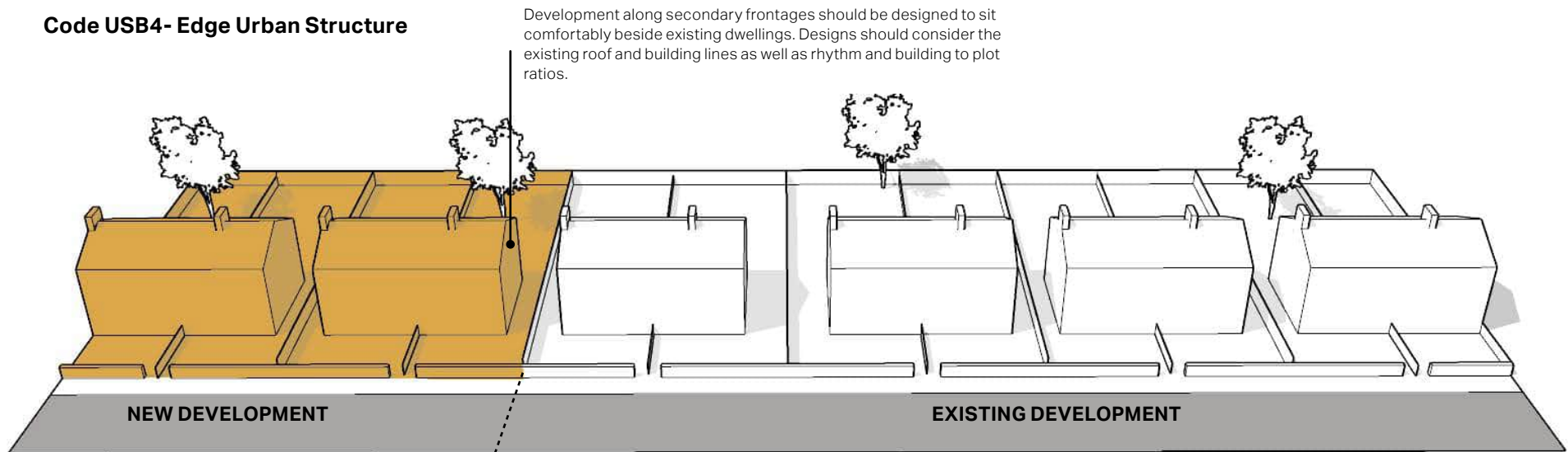


Figure 5.4: Example of development responding to Piecemeal Domestic structure

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.

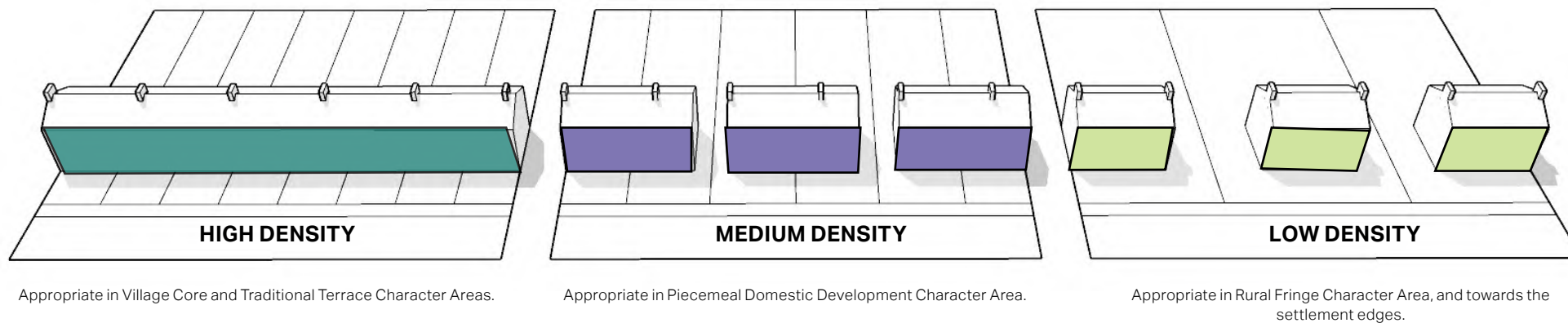


Figure 5.5 Application of density

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.

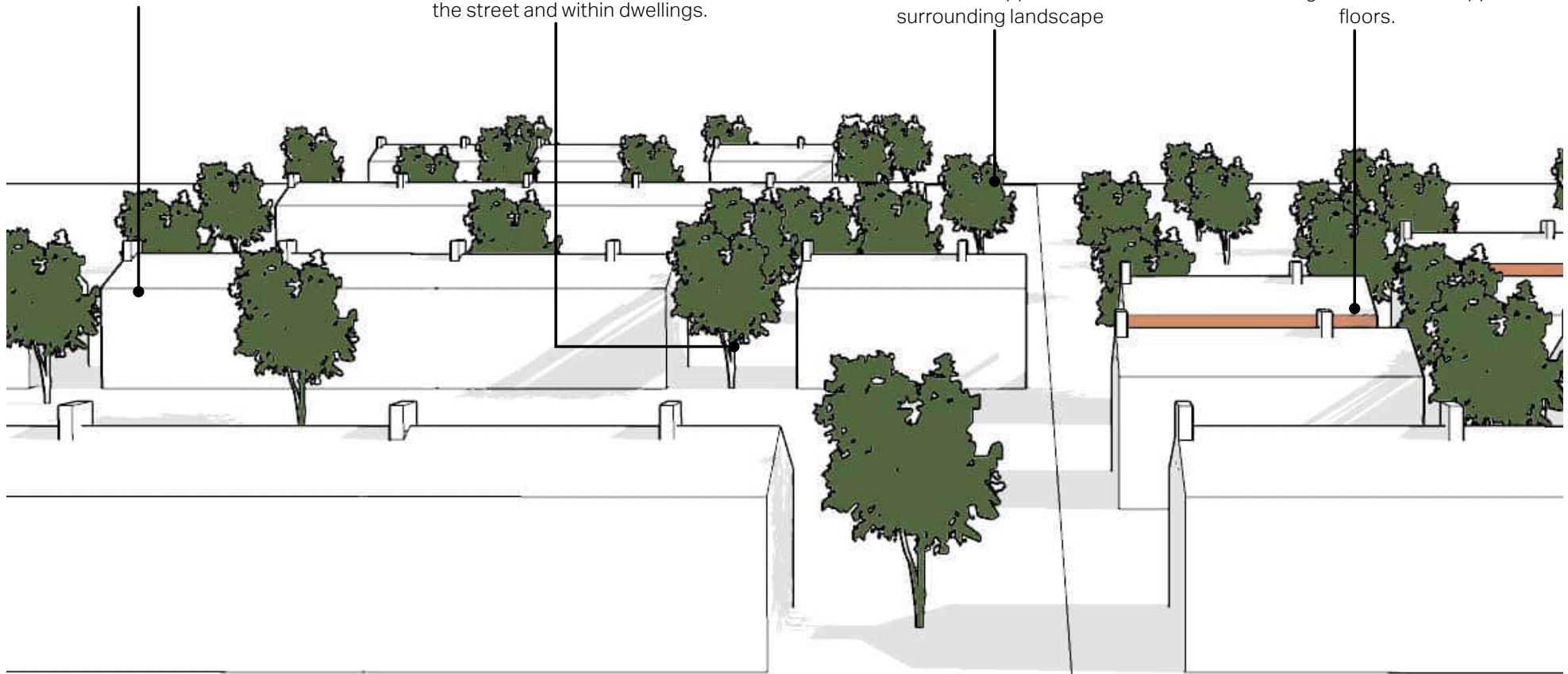


Figure 5.7 Diagram illustrating the protection of views on a sloping site.

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

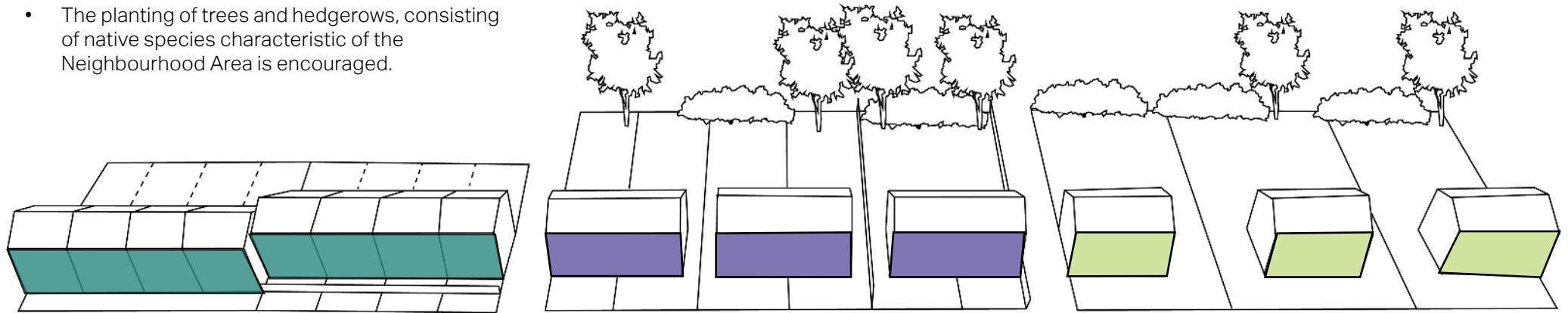
- Ensure the nature of any boundary treatment is appropriate to its character. Closed board fencing should not be used at the landscape edge or onto the public realm. This is appropriate for garden division only
- Retention and planting of locally native trees and hedgerows along property boundaries is encouraged.
- The planting of trees and hedgerows, consisting of native species characteristic of the Neighbourhood Area 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.

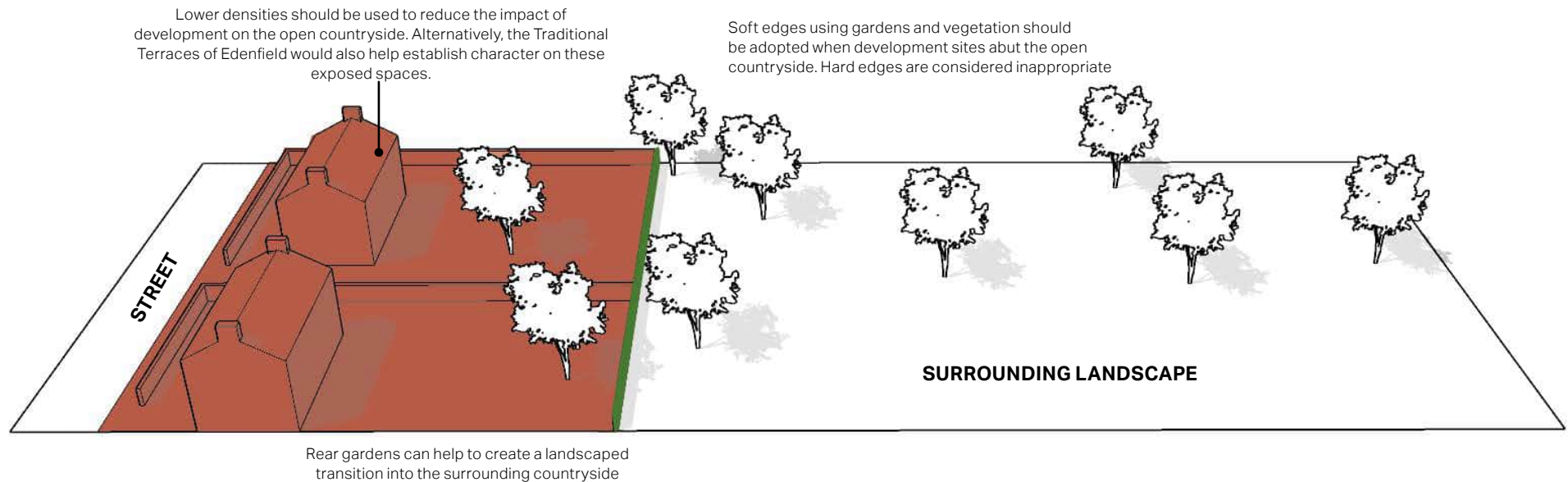


Figure 5.9: Settlement edge treatment

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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.

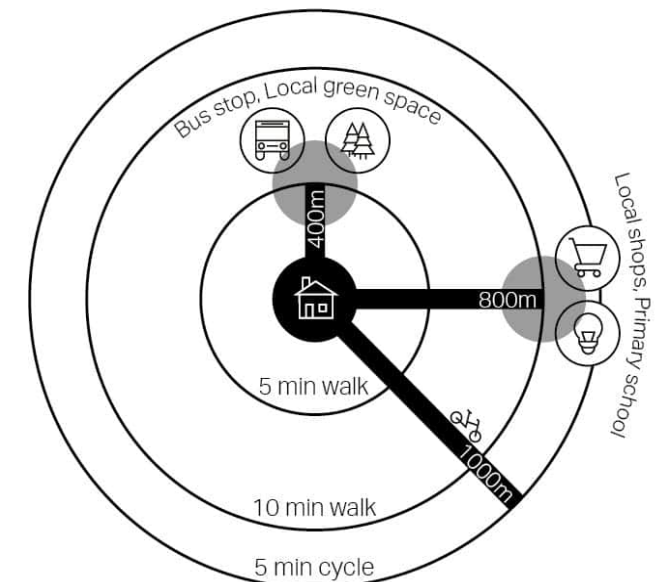


Figure 5.10: 'Walkable neighbourhood' Diagram

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

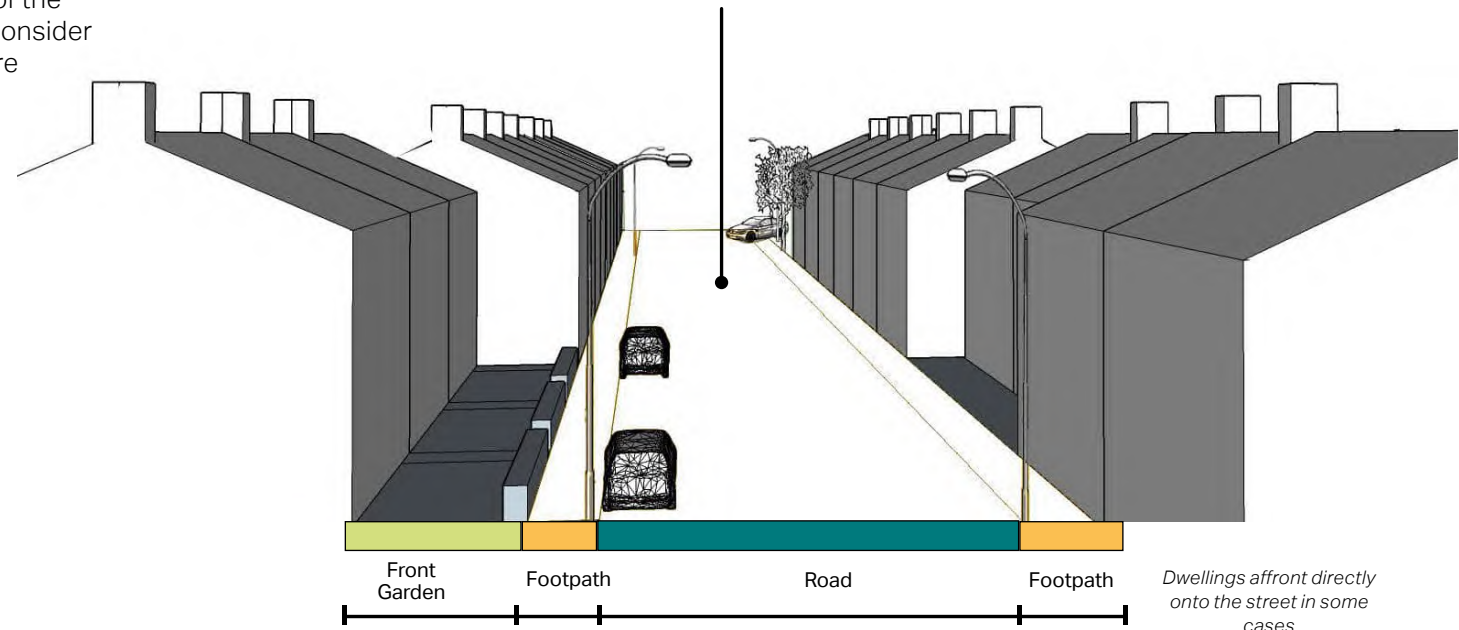


Figure 5.11: Primary street diagram

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.

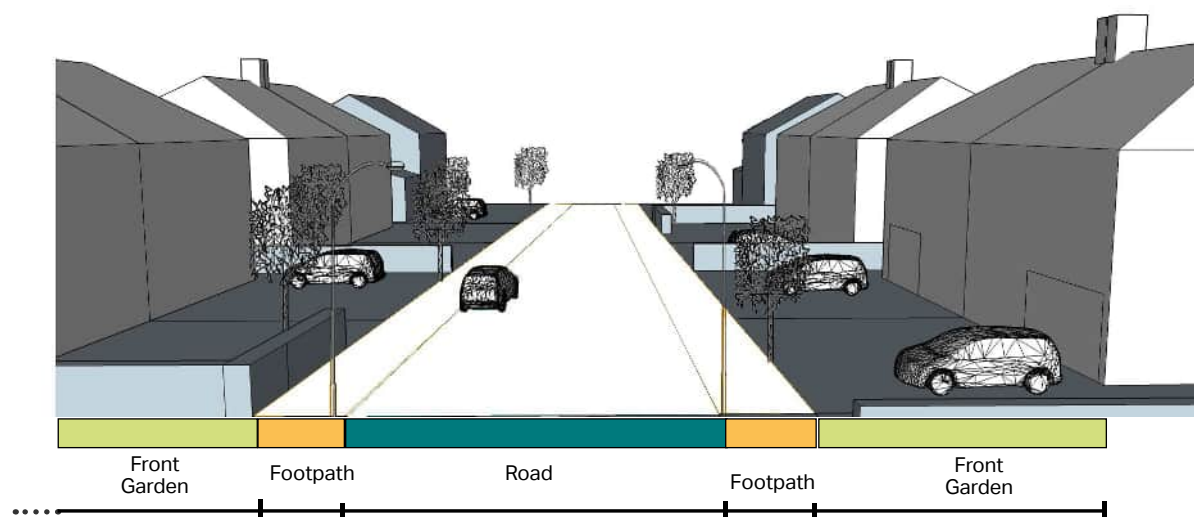


Figure 5.12: Secondary Street Diagram

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.

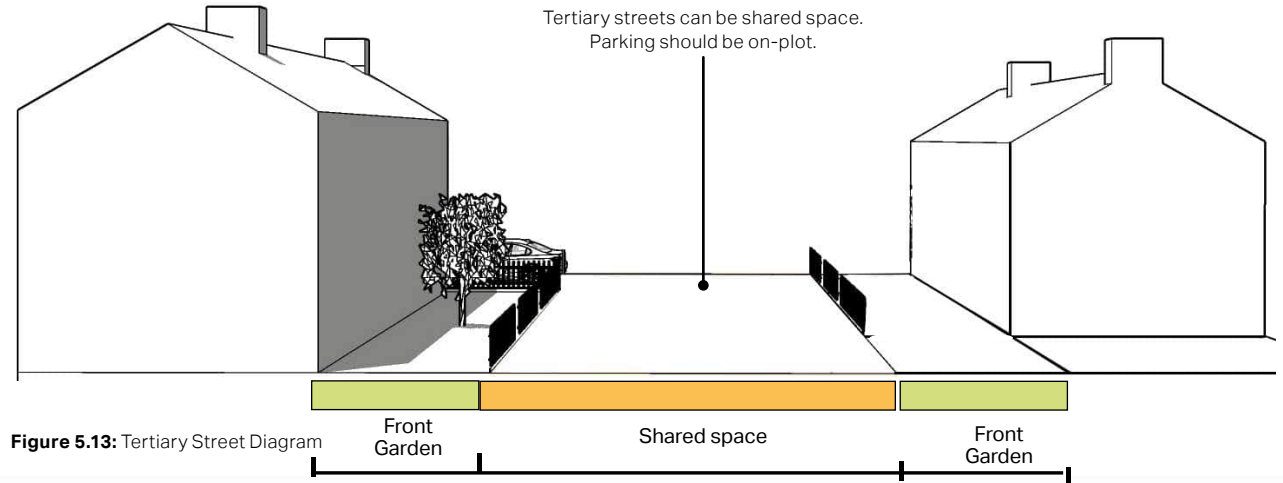


Figure 5.13: Tertiary Street Diagram

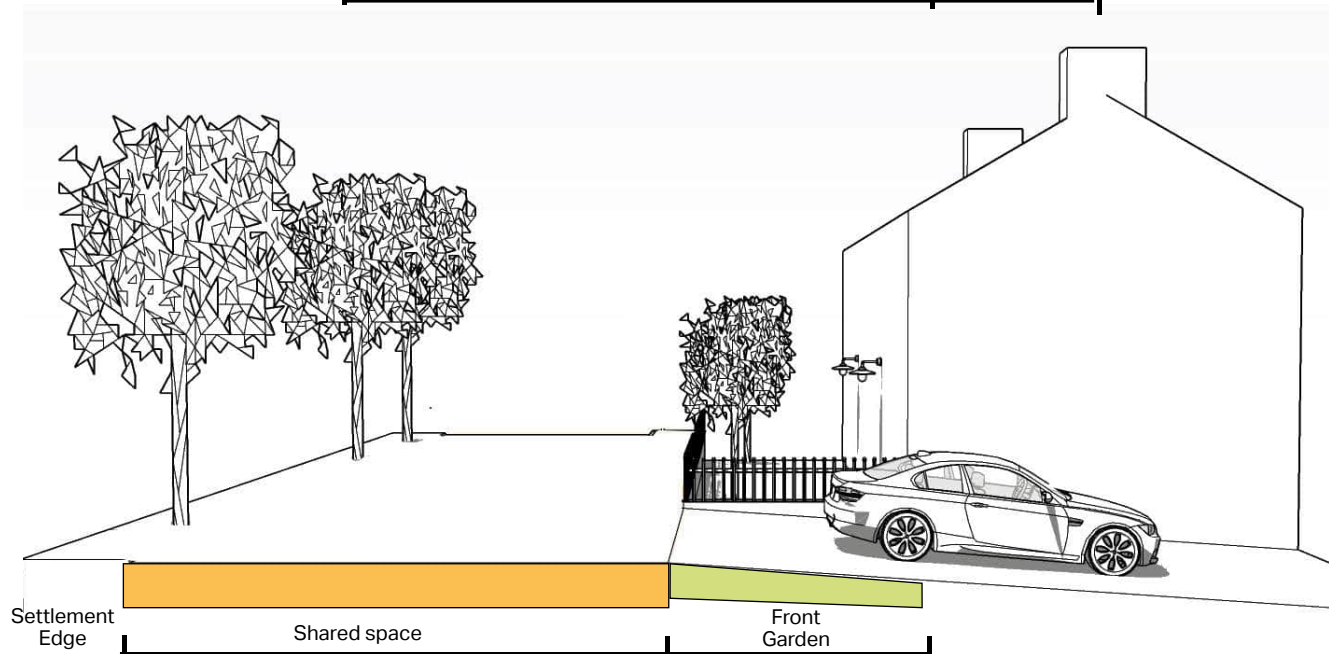


Figure 5.14: Tertiary Street Diagram 02

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.

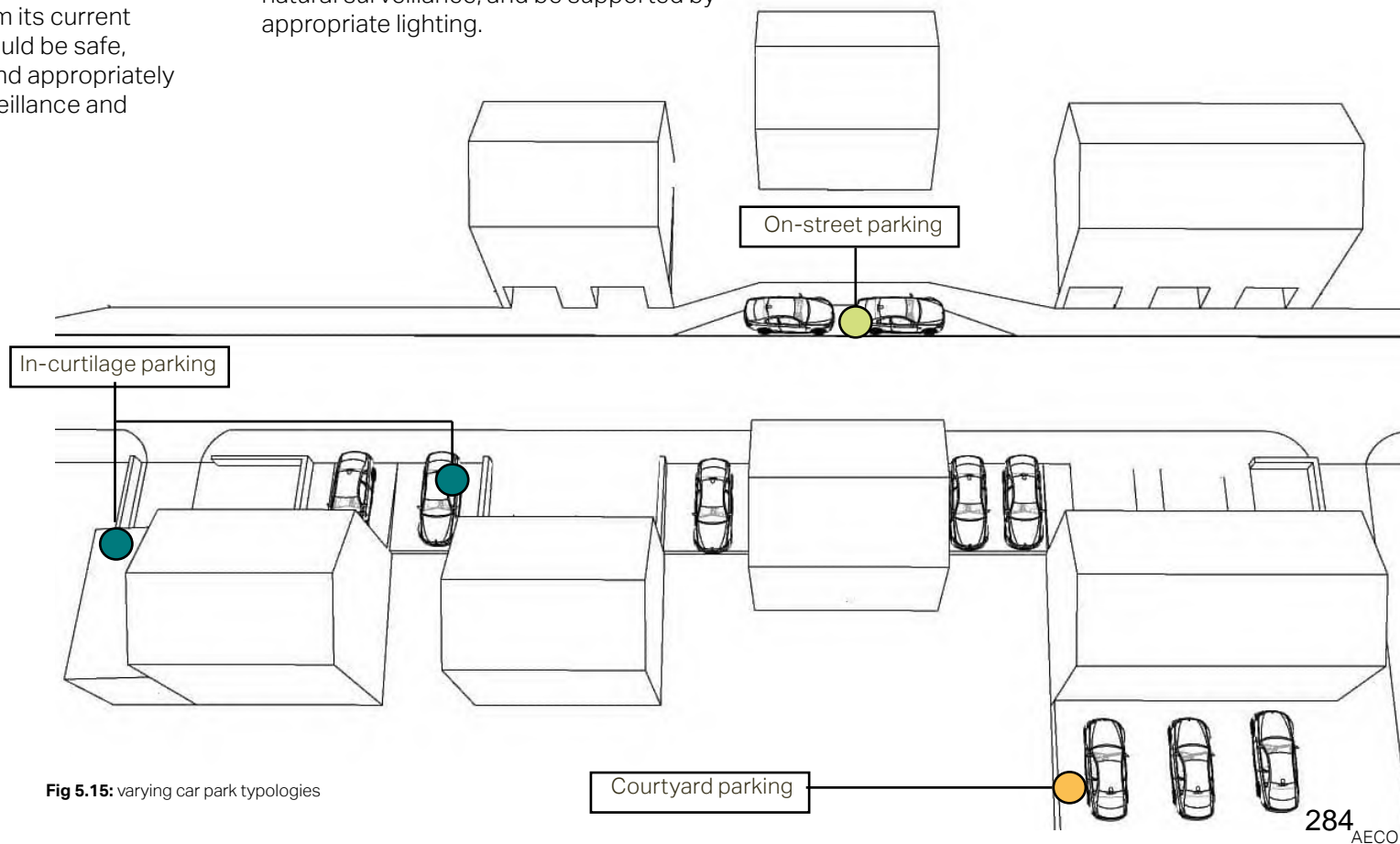


Fig 5.15: varying car park typologies

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

6.1 Next Steps

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.

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SUBMISSION VERSION

Edenfield Neighbourhood Plan

2021 - 2036



**Edenfield Community
Neighbourhood Forum**

January 2024



Edenfield Community Neighbourhood Forum
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Foreword

Neighbourhood Plans were introduced by the Localism Act 2011 as a way for local people to influence planning and development of the area in which they live and work. They can be prepared by Parish Councils or Neighbourhood Forums. The Edenfield Community Neighbourhood Forum (ECNF) was established in 2018 with one of its aims being to prepare a Neighbourhood Plan for Edenfield.

This is the submission draft of the Edenfield Neighbourhood Plan 2021-2036 which sets out a vision and objectives for the future of Edenfield. It has been prepared by ECNF informed by the consultations detailed in the Plan.

It is a requirement of the Neighbourhood Planning regulations that Neighbourhood Plans should conform with the strategic local policies. The latest strategic policies of Rossendale Borough Council (RBC) are contained in the Rossendale Local Plan 2019-2036 which was adopted by the Council in December 2021. ECNF are confident that the Edenfield Neighbourhood Plan conforms with the strategic policies of the Rossendale Local Plan.

The Neighbourhood Plan was subject to a six-week consultation before being submitted, known as the Regulation 14 consultation. All comments received during the consultation period were considered by ECNF and, where considered appropriate, the Plan has been amended. The amended Plan has now been submitted to Rossendale Borough Council to check that the proper legal process has been followed.

The Council will publicise the Plan for a further six-week period (Regulation 16 consultation) and any comments received during the consultation will then be submitted to an independent Examiner. After approval by the Examiner the Council will arrange for a referendum of the residents of Edenfield. Once approved the Plan will form part of Rossendale's development plan. Together with other adopted planning policies it will form the legal basis for planning decisions across the Edenfield Neighbourhood Area.

The Neighbourhood Plan is important for the future of Edenfield and is driven by the views of residents. Please consider this draft carefully and let RBC have your comments before the end of the consultation period.

Mervyn MacDonald

Chair, Edenfield Community Neighbourhood Forum

1. Introduction

A Plan for Edenfield

- 1.1 This is the submission version of the Edenfield Neighbourhood Plan. It covers the Neighbourhood Area designated by Rossendale Borough Council. The Area includes the village of Edenfield, as shown in Figure 1 and is intended to guide and shape the development of the area up to 2036 alongside the Rossendale Local Plan. Neighbourhood planning is intended to give communities the power to develop a shared vision for their neighbourhood and to further shape the development and growth of their local area.
- 1.2 This locally driven exercise can influence design standards for new housing, the location of shops and services, protection of the environment, and will be used for determining planning applications as part of the Development Plan for the area.
- 1.3 The Neighbourhood Plan, upon approval at referendum, forms part of the Borough development plan and carries equal legal status to the Local Plan prepared by the local planning authority. This means the Neighbourhood Plan is given statutory consideration for applications regarding planning matters.
- 1.4 The first draft of the Neighbourhood Plan was prepared having regard to the Rossendale Core Strategy (2011 – 2026), in accordance with the basic conditions that a draft Neighbourhood Plan must meet, as set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 as applied to neighbourhood plans by section 38A of the Planning and Compulsory Purchase Act 2004. The Rossendale Local Plan 2019-2036 which was adopted by Rossendale Borough Council in December 2021 supersedes the Rossendale Core Strategy (2011-2026). The first draft was subsequently updated to ensure that the policies of the Neighbourhood Plan were not in conflict with the Local Plan.
- 1.5 The Edenfield Neighbourhood Plan has been informed through a four-year consultation process by the Edenfield Community Neighbourhood Forum (ECNF), outlined below and in the consultation statement (Appendix 6), as well as preparation of an evidence base, vision and objectives, and meetings with Rossendale Borough Council.

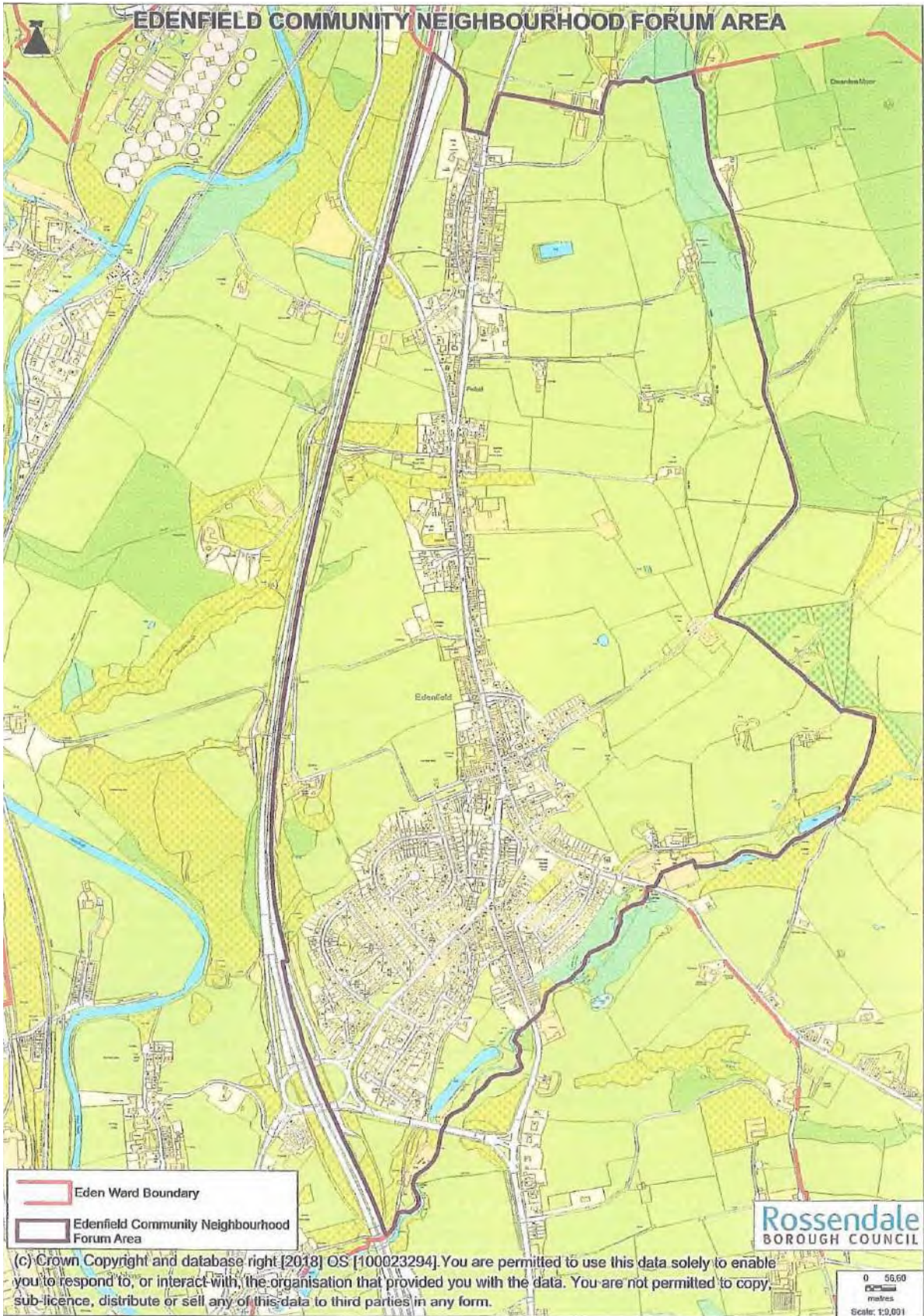


Figure 1: Map of the designated Neighbourhood Plan area

Engagement by the Neighbourhood Forum

- 1.6 Figure 2 identifies key engagement activities undertaken by the ECNF to date. For more information on each of these events please see the attached Consultation Statement in Appendix 6. The engagement that has taken place has greatly informed this Neighbourhood Plan by providing a community-led approach to the values, objectives and policies brought forward. ECNF has been in regular communication with Rossendale Borough Council throughout the preparation of the Neighbourhood Plan including multiple meetings.

Structure of the Neighbourhood Plan

- 1.7 Following the introduction, the Plan comprises thirteen further sections, followed by appendices. These sections are:
- Section 2: 'History, Local Characteristics and Heritage Assets' lays out Edenfield's long and rich history, how the area's development has been informed by this history, and the key characteristics and heritage assets which will be considered in this Plan.
 - Section 3: 'Edenfield Today' provides an overview of key facts about Edenfield. It presents an overview of the area's demographics and land use factors (including population breakdown, health and education, access to greenspace and other socio-economic data), and the key issues that have been identified from area analysis.
 - Section 4: 'Edenfield Tomorrow' presents the vision and objectives for the Edenfield Neighbourhood Area as informed by the community, and the overarching principles which guide the development of this Plan.
 - Sections 5 – 14: These sections present the policies for the Edenfield Neighbourhood Area and the justifications for these policies. The policies have been grouped under the following themes:
 - i) Development within and beyond settlement limits
 - ii) Housing
 - iii) Design
 - iv) Heritage assets
 - v) Transport and travel
 - vi) Local community infrastructure facilities
 - vii) Local centre and commerce
 - viii) Green infrastructure
 - ix) Natural environment
 - x) Delivery monitoring and review



Figure 2. Key Engagement Activities by ECNF

Who has prepared the Neighbourhood Plan?

- 1.8 Unlike Local Plans which are prepared by local authorities, Neighbourhood Plans are prepared by local communities. The Localism Act 2011 granted parish and town councils the ability to produce neighbourhood development plans and neighbourhood development orders. In unparished areas, like Edenfield, community groups can apply to designate neighbourhood areas and form a neighbourhood forum of at least 21 people who represent the area.
- 1.9 In Edenfield, the Neighbourhood Plan has been prepared by the Edenfield Community Neighbourhood Forum, whose members either live or work in Edenfield. Any individual aged 18 or over living or working in Edenfield may become a member. The creation of the Plan has also been influenced through outreach and consultation with Edenfield residents and workers who are not part of the neighbourhood forum. Details of the Forum's purposes can be found within its constitution¹.
- 1.10 All preparation has been informed through a common purpose and objectives: to protect and enhance the rural character of Edenfield, to ensure that future development will reflect the historic character of the village, that new growth meets local and strategic policy needs, and that new transportation options enable a range of mobility choices for all. Collectively, this Plan helps to make Edenfield as desirable, green and safe a place to live, work and play as can possibly be.

What is in the Neighbourhood Plan

- 1.11 A Neighbourhood Plan can contain a broad range of policies, and is largely influenced by visions, objectives, preceding consultations and the local evidence base. Ultimately, there is no standard for what a Neighbourhood Plan should contain, as such plans are meant to be tailored to the individual circumstances of each area.
- 1.12 The National Policy Planning Framework (December 2023) (NPPF) paragraph 13 states that Neighbourhood Plans should support the delivery of strategic policies contained in Local Plans and should shape and direct development outside of these strategic policies.
- 1.13 Key themes identified within the Edenfield Neighbourhood Plan have emerged through the evidence base, visions and objectives, and ongoing consultations. We believe there are opportunities in Edenfield to influence the quality of future development, improve the look and feel of the village, preserve and maintain

¹ ECNF, 2019, ECNF Constitution:
<https://www.rossendale.gov.uk/downloads/file/16385/forum-constitution-march-2019->

historical characteristics of the village and surrounding countryside, enhance the quality of green spaces, improve access and movement, and proactively plan for housing delivery in a manner that respects the village's rural character. These themes are reflected in the locally specific policies as set out in sections 5-14 of this document.

What is not in the Neighbourhood Plan

- 1.14 Existing policy for Edenfield is set out in the adopted Rossendale Local Plan 2019-2036 and the Joint Lancashire Minerals and Waste Local Plan and is further guided by NPPF and Planning Practice Guidance (PPG). The Edenfield Neighbourhood Plan is informed by all of these documents and will not be the only policy document that affects development in Edenfield upon adoption. The Rossendale Local Plan includes strategic policies for Edenfield, as noted at paragraphs 5.4 to 5.6 below, as well as site-specific policies for three housing allocations located in the Edenfield Neighbourhood Area.
- 1.15 In this broad context, the Edenfield Neighbourhood Plan does not allocate sites for development, but rather seeks to ensure that all potential development in the area, particularly housing, is appropriate to the area through its contribution to good quality design, greenspace allocation, protection of the natural environment and respect to neighbourhood heritage and character.

The process for preparing the Neighbourhood Plan

- 1.16 A number of stages are involved in preparing a Neighbourhood Plan. These stages, including the current status of the Edenfield Neighbourhood Plan, are identified in Figure 3 overleaf.
- 1.17 The Department for Levelling Up, Housing and Communities (DLUHC) has further details regarding the neighbourhood planning process, which can be found online at www.gov.uk/guidance/neighbourhood-planning--2 .

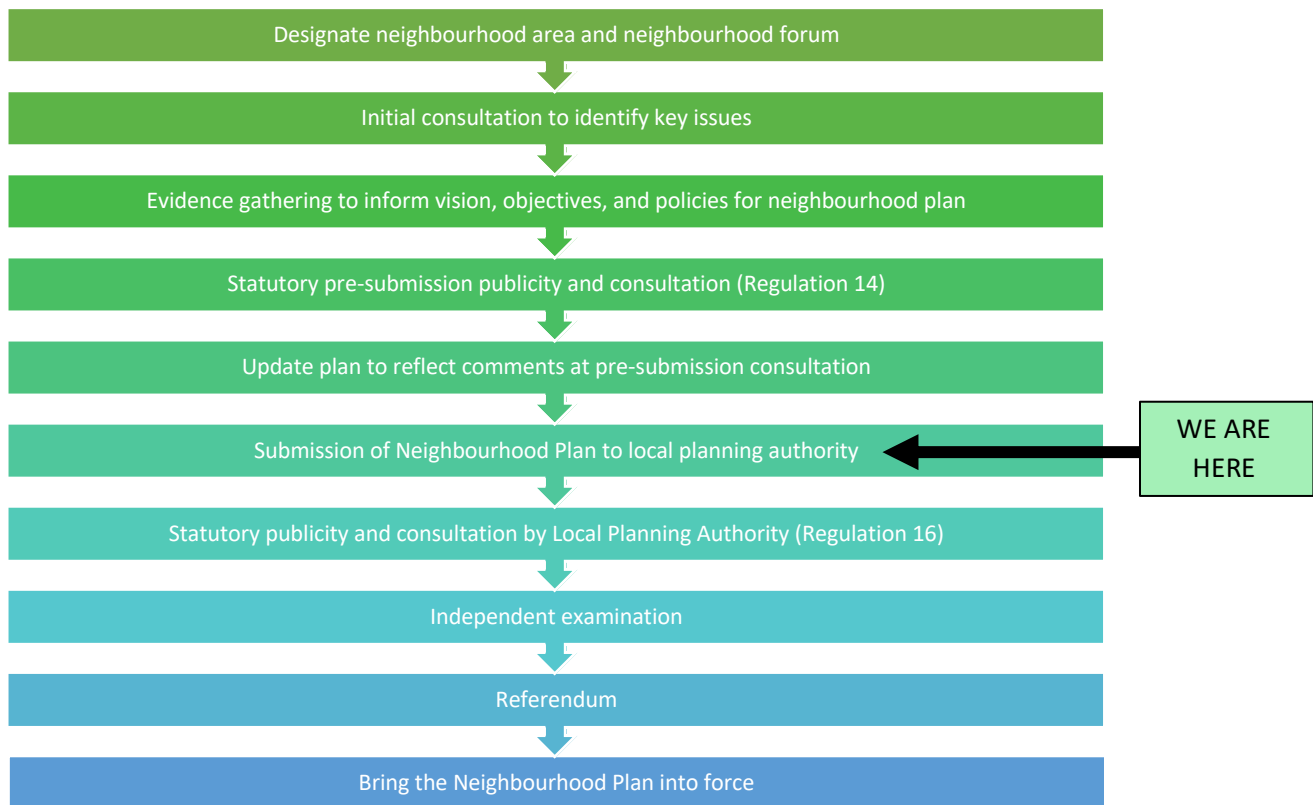


Figure 3. Neighbourhood Planning Process

2. History, Local Characteristics and Heritage Assets

- 2.1 Edenfield's history can be traced from its farming and clergy origins, through the industrial revolution, to its present-day role as a post-industrial dormitory village. Edenfield Chapel, the precursor to the village's current parish church, was likely built in the 16th century and for several centuries was the main cultural landmark of the area. In the 18th century, only the church, a school, and a few farmhouses dotted the surrounding countryside. This changed with the Industrial Revolution. By the 1840s significant development had come to Edenfield, including turnpikes that would later become the A56, railways to the west, and mills to the east which generated much of the village's employment, character, and historical events into the 20th century.
- 2.2 Surrounding farmland has greatly informed Edenfield's character over the centuries, at one point with over 70 farms in existence in Eden Ward at the end of the 18th century. Industrial expansion through the late 18th century including mills, quarries, and coal mines, eventually led to a decline in farmable land and pastures. Much of Edenfield's housing stock through the 19th century was built to accommodate mill workers, with small cottages and Victorian era terraced housing overtaking, and in some instances demolishing, the area farmhouses.
- 2.3 As common with towns in the North, Edenfield had a burgeoning wool industry, with 21 mills at one point in operation within the wider Eden Ward. This demand for worker lodging combined with land speculation resulted in the creation of almost entirely new settlements, and encroachment onto existing farmland. Following the First and Second World Wars, newer factory-brick houses were built, further eroding available farmland. The older Pennine stone houses continue to inform the post-industrial character of Edenfield, providing a visually pleasing and historic identity to the village.
- 2.4 Most mills have now been demolished, many for housing projects. The remaining mills still provide limited employment but virtually none is textile-related. One mill lies empty and is the subject of allocation for housing under H67 in the adopted Rossendale Local Plan. The community is mindful that without appropriate planning and development control, increased growth will further erode the countryside.
- 2.5 It is consequently important that any future development should pay respect to the industrial character of the area; adapt existing assets for local use; and preserve the natural beauty of the surrounding countryside.

2.6 Listed buildings are designated as such because of their special architectural or historical interest. Within the designated Edenfield Neighbourhood Area there are three listed buildings of Grade II² quality and one of Grade II*³ quality. These are detailed in Table 1 and reflect both the natural and historic characteristics of Edenfield.

List Entry	Name	Grade	List Date	Easting	Northing
1072820	Elton Banks	II	1984-11-30	379945	420081
1072821	Hey Meadow Farmhouse	II	1984-11-30	380326	419808
1163639	Elton Banks Farm	II	1984-11-30	380350	420239
1318084	Edenfield Parish Church	II*	1966-08-09	379858	419809

Table 1. Listed Buildings in Edenfield Neighbourhood Area

2.7 Edenfield also contains a number of buildings that are proposed by the Rossendale Civic Trust for inclusion in Rossendale Borough Council’s list of buildings of local interest or importance. This list is to identify buildings which are not statutorily listed but are considered to be of local significance and importance for architectural, historical and local merit. These are identified in Table 2.

2.8 Historic England Advice Note 7 (Second Edition) Local Heritage Listing: Identifying and Conserving Local Heritage at paragraph 36 summarises commonly applied selection criteria for assessing the suitability of assets for inclusion in a local heritage list. These include age, rarity, architectural and artistic interest, group value and historic interest. The buildings identified in Table 2 all satisfy one or more of those criteria.

2.9 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

² Grade II Listed buildings are buildings that are of special interest, warranting every effort to preserve them

³ Grade II* Listed buildings are particularly important buildings of more than special interest.

for housing allocation reference H66 Land west of Market Street) and Edenwood Mill (paragraph 1 of the site-specific policy for site H67).

Building and grid reference	Description and Reason for Local Interest/Importance
Chatterton Hey House 7961 1919 Off Exchange Street	Elegant stone built two-storeyed house with eaves cornice and hipped slate roof. Glazed and panelled door with depressed arch (keystone dated 1765) and cornice. Long stair window with small panes for full height of house. Three windows on each floor. Similar wing on right. Chatterton Hey stands on one of the oldest sites in Edenfield and has connections with some of the most important families in the village's history (Haworths, Rostrons, etc.).
1-5, Green Street and 2-6, Sarah Street. 8003 1923 Off Gin Croft Lane	Well-built back-to-back cottages, c.1840. These houses have an interesting history being built on land let by the trustees of the 'Sarah Green' charity. The original lettings conditions survive and specify the standards to which the houses were to be built.
59-69, Market Street. 7992 1940 Market Street.	Early example of speculative building in the village. Row of cottages known as 'Badger Row' built c.1782 by the landlord of the 'Horse and Jockey'.
136-150, Market Street. 79911967 Market Street	A good example of the piecemeal development of a row of houses encouraged by the textile industry and the advent of the turnpike roads. The old name for the houses is 'Temple Row' and they were built over the period from 1791 to c.1830. No.144 was 'lately erected' in 1806. The name 'Temple' is often associated with places where there were handloom weavers and there is a blocked taking in door in the gable of no.150.
4-26, Rochdale Road 8000 1913 Rochdale Road	Early 19th century (c.1825) row of millworkers' houses built by the Rostron family, important millowners in Edenfield. Very few houses of this date and type survive in the village. Formerly called 'Commercial Row'.
Rostron Arms	A public house at Market Place.
Milestone on Market Street. 7996 1927	On footway outside 16 Market Street. Defaced in anticipation of a German invasion in World War II and bears an Ordnance Survey bench mark with a small metal-domed brass rivet on top at the apex of the cut arrowhead marks.

Table 2. Buildings of local interest or importance in Edenfield

3. Edenfield Today

The study area

- 3.1 Edenfield is a village within Eden Ward in the Borough of Rossendale in the County of Lancashire, in the north west of England. Edenfield is the largest of six villages in the area of the former Ramsbottom Urban District Council that was transferred to Rossendale Borough Council in 1974. The other villages are Turn (south east), Irwell Vale (north west), Stubbins, Chatterton and Strongstry (all in the south west).
- 3.2 Edenfield is at the southern border of Rossendale and is adjacent to the Metropolitan Borough of Bury. The village lies to the east of the M66, where it terminates and becomes the A56. Beyond the M66/A56 is the River Irwell and Edenfield lies above the east bank of the River. The village is 8km north of Bury and 14km south east of Blackburn.
- 3.3 The designated Edenfield Neighbourhood Area encompasses Edenfield village. The boundary follows the A56 to the west of the village and the Dearden Brook to the south. To the east the boundary follows Michael Wife Lane and Gincroft Lane due north, until it is in line with Fish Rake Lane, the northern boundary.
- 3.4 The population is mostly concentrated in the south of the designated Edenfield Neighbourhood Area, with ribbon development from the centre to the northern boundary along the Market Street/Burnley Road corridor.
- 3.5 Some key facts and issues identified within Edenfield's evidence base are shown in Figure 4 below.

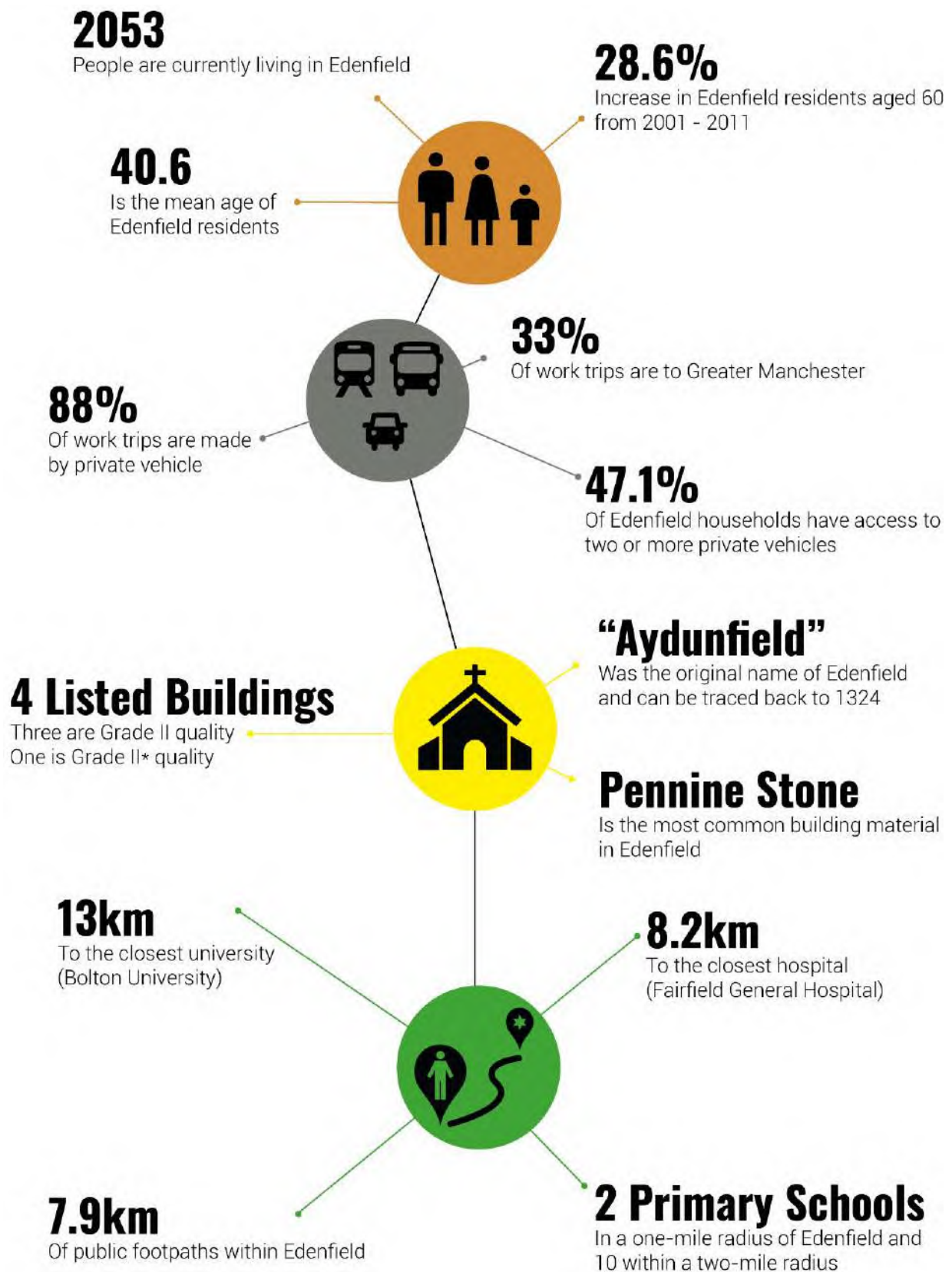


Figure 4. Edenfield Key Facts

Views of the community

- 3.6 Through the Neighbourhood Plan's engagement process, a range of matters were identified as important to address in the Neighbourhood Plan including:
- Recognition that Edenfield is a **rural settlement** with picturesque views of the countryside, and the Neighbourhood Plan must retain and strengthen this characteristic of the area.
 - A desire to protect connections to the natural environment through open and green spaces which are valued by local residents and visitors.
 - Clear support to enhancing the accessibility of important local services, especially doctors, dentists, post offices, recreational areas, and secondary schools.
 - A desire for policy requirements on new developments in the village to reflect the local scale and historic character of surrounding buildings
 - Acknowledgement that the private car and its impacts such as on-street parking, traffic, congestion, and speed of vehicles have an impact on journey times, and on pedestrian and cycle safety which must be addressed
- 3.7 These matters have informed the vision and objectives of the Neighbourhood Plan, outlined in the 'Edenfield Tomorrow' section of this document. Where planning policies cannot directly address these matters (for example, allocating a new dentist in Edenfield), the Plan has laid the conditions for future improvement, and enabled alternative solutions to the issues faced by the Edenfield community.

4. Edenfield Tomorrow

Vision

4.1 This vision for Edenfield is:

“Over the Plan period the rural character of Edenfield will be retained and strengthened. New growth will reflect the historic character of the village and its setting, with the role of the Community Centre and Cricket Club reinforced as focal points of the local community.

New growth that takes place will be in response to meeting local needs and those specified for Edenfield in adopted Rossendale Local Plans. Growth will also help Edenfield become more self-sufficient, supporting existing and new amenities and services, including improved public transport, walking and cycling facilities, providing a range of mobility choices for all to reduce the reliance on the private car”.

Objectives

4.2 The objectives of the Neighbourhood Plan as identified through engagement with the local community are as follows:

- 1) Using sustainable, high quality, traditional materials for new development to maintain and strengthen the character and heritage of Edenfield, whilst still allowing for high quality and sustainable design innovation and growth.
- 2) To ensure that any development on land designated as Green Belt is consistent with the purposes of that designation
- 3) To support sustainable development that reflects local housing needs and requirements of the local community – considering affordability, type and mix. The size, density and design of these dwellings should reflect the rural character of Edenfield.
- 4) To maintain, conserve and enhance the natural environment, particularly through designated Local Green Spaces and the retention of public views particularly of the Irwell Valley and Edenfield Parish Church, ensuring connections to the natural environment are maintained.
- 5) To ensure Edenfield Recreation Ground, the playground on Exchange Street, Edenfield Community Centre and Edenfield Cricket Club and are retained for their current use and maintained to a high standard.

- 6) To support existing local services and promote the establishment of new local services to serve the community through the utilisation of existing buildings for alternative purposes. Establishment of retail services will be subject to the provisions of policies R1, R3, R4, R5 and R6 of the Rossendale Local Plan 2019-2036 particularly in relation to the Edenfield Neighbourhood Parade as defined in that Plan.
- 7) To support the preservation of existing community facilities for community events and support the establishment of new facilities.
- 8) To improve the pedestrian and cycling infrastructure and network.
- 9) To ensure that, where parking is provided, it is well-designed and suitably located, so that it is used as intended and does not have a detrimental impact on the street scene, character and amenity.

Vision/Objectives/Policy Table

- 4.3 The vision and objectives identified above have been instrumental in the creation of Edenfield’s neighbourhood planning policies, as demonstrated in Table 3 below.

Vision	Objective	Policies
Over the Plan period the rural character of Edenfield will be retained and strengthened.	1, 2, 3, 8	UB1, D1, D2, HE1, LC1, E1, GI1, GI2, NE1, NE2, NE3, NE4, NE5, NE6
New growth will reflect the historic character of the village and its setting, with the role of the Community Centre and Cricket Club reinforced as focal points of the local community.	2, 4, 5, 6	UB1, D1, D2HE1, HE2, HE3, LC1, LC2, E1, E2, GI2, GI3, NE1, NE2, NE4, NE5, NE6
New growth that takes place will be in response to meeting local needs and strategic housing policy and help Edenfield become more self-sufficient, supporting existing and new amenities and services, including improved public transport, walking and cycling facilities, and providing a range of mobility choices for all to reduce the reliance on the private car.	2, 5, 6, 7, 8	UB1, HO1, HO2, HO3, T1, T2, LC1, LC2, E1, E2, GI1, GI2, GI3, GI4, DMR1, DMR2

Table 3. Vision, objectives and policies

5. Development Within and Beyond Settlement Limits

- 5.1 Edenfield itself is inset from the Green Belt, but virtually all the land surrounding the village is designated as Green Belt. It is particularly important that local development is directed in the most sustainable locations and sprawl is avoided.
- 5.2 Edenfield is a classic example of the 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. Through the development of Site H66, some change to the existing pattern of development of the settlement will take place with the northern extent of the settlement becoming less linear. This will deliver a sustainable pattern of development by bringing new homes, population and associated expenditure into the settlement in close proximity to the settlement's centre and associated services.
- 5.3 Maintaining the rural character of Edenfield is an important vision for its community. It is appropriate that the village is able to manage and accommodate an appropriate level of growth in order to prosper. However, this must be balanced against the need to preserve its role as a rural settlement that does not encroach into the open countryside and Green Belt that surrounds the village.
- 5.4 The Rossendale Local Plan 2019 - 2036 is part of the current adopted development plan. An extract from the Policies Map of relevance to Edenfield is presented in Figure 5. Here the settlement boundary is clearly displayed with Green Belt surrounding. The adopted Rossendale Local Plan removed the Green Belt designation that applied to most of housing allocation reference H66, on the basis that the A56 provides a strong defensible boundary and the site offers the opportunity to provide good quality, well-designed housing to meet Rossendale's housing needs, including local affordable housing, and associated infrastructure benefits.
- 5.5 The adopted Rossendale Local Plan 2019-2036 is a key part of the current development plan. The preamble to Strategic Policy SS: Spatial Strategy in the Local Plan identifies Edenfield as an Urban Local Service Centre, as distinct from a Key Service Centre or Rural Local Service Centre. This "settlement hierarchy is based on the facilities that are offered at present [December 2021] at each location" (Local Plan, paragraph 25). Geographically, it remains a rural settlement.
- 5.6 Strategic Policy HS1: Meeting Rossendale's Housing Requirement, of the Local Plan, stipulates: "The housing requirement figure for Edenfield Community

Neighbourhood Area from 2019-2036 is 456 dwellings". Policy HS2 allocates three sites in the Neighbourhood Area for housing development: H65 (9 dwellings), H66 (400) and H67 (47).

- 5.7 The Neighbourhood Plan policies support the Government's objective to protect Green Belt land and reiterate that only in very special circumstances will inappropriate development be permitted in the Green Belt.

Policy UB1. Development and the settlement boundary

1. Future development in the Edenfield Neighbourhood Area shall be focused within the settlement boundary as identified on the Policies Map.
2. Development proposals will be supported within the settlement boundary subject to compliance with other policies in the Development Plan.
3. Inappropriate development is, by definition, harmful to the Green Belt. Only in very special circumstances will inappropriate development be permitted in the Green Belt. Exceptions to inappropriate development are set out in the National Planning Policy Framework (NPPF).
4. Where development is proposed on land which was removed from the Green Belt by the Rossendale Local Plan 2019-2036, the developer will be required to provide for compensatory measures in the remaining Green Belt in accordance with Policy SD4 of the Local Plan and other guidance.

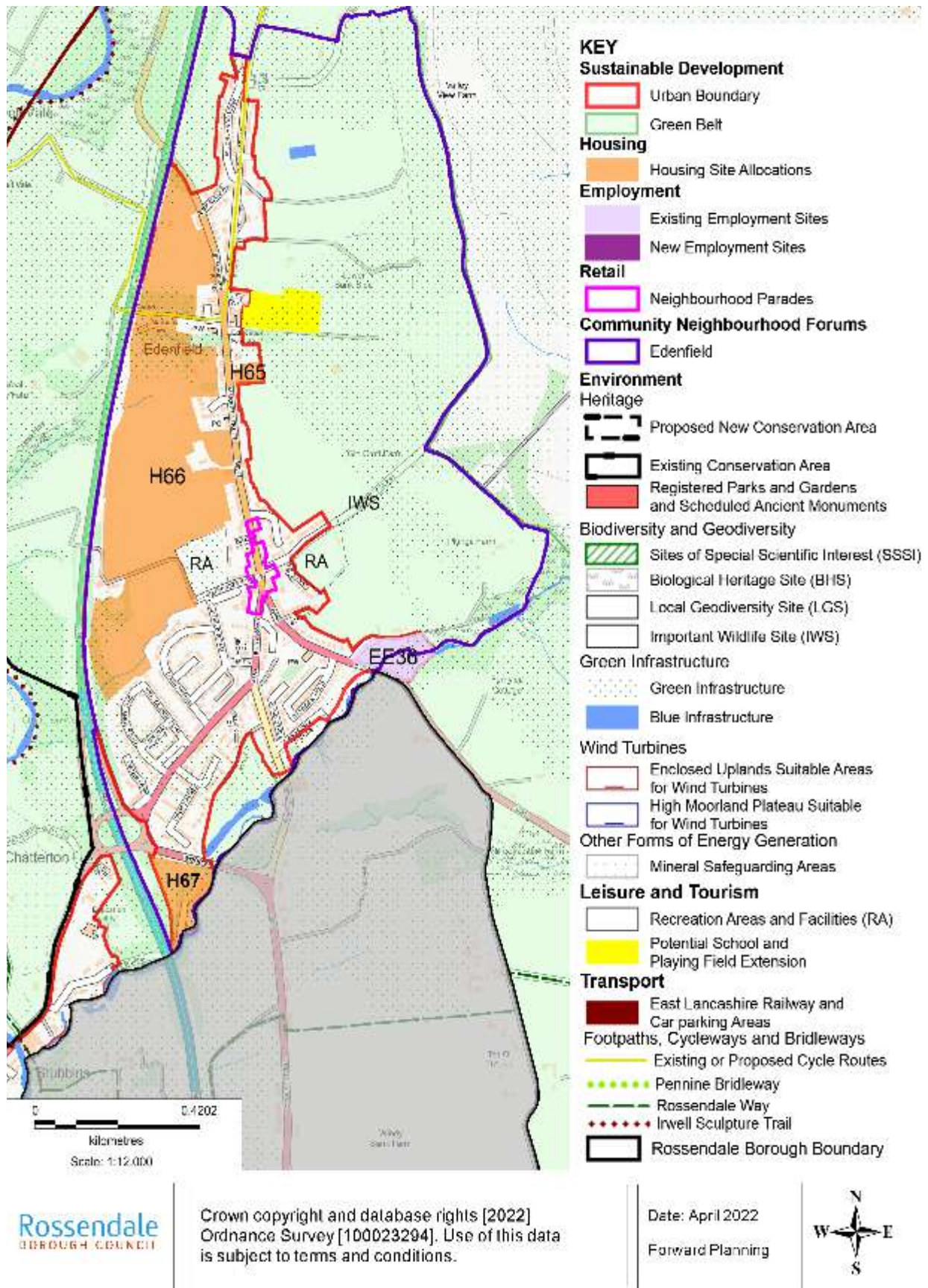


Figure 5. Rossendale Local Plan 2019 – 2036. Adopted Policies Map 2021

6. Housing

- 6.1 Rossendale Borough Council's 2019 updated Strategic Housing Market Assessment (SHMA) identifies that there is considerable need for affordable housing in Rossendale and that this matter must be tackled urgently. Furthermore, the SHMA highlighted that there is a particular need to provide for the growing elderly population as well as a growing need for housing for families with children.
- 6.2 As established within this Plan's evidence base⁴, housing within Edenfield is on average more expensive than in the wider borough of Rossendale and a lack of high-quality affordable housing was also raised as a key issue during the consultation process. The Neighbourhood Plan seeks to address this issue through supporting housing development which meets the needs of the local population.

Policy HO1. Identified housing needs

1. Proposals located within the Settlement Boundary, which meet the identified housing needs (including affordable housing) will be supported subject to the other policies in the Neighbourhood Plan and wider Development Plan.

Policy HO2. Affordable housing delivery

1. Proposals for new residential development that secure the delivery of affordable housing and provide for the size, type and tenure of homes to meet local needs will be supported, provided they comply with other policies of the development plan and with policy HS3 of the adopted Local Plan, the objective of which is the provision of 30% on-site affordable housing from market housing schemes including 10% affordable home ownership. The application of this policy will maintain a focus on affordable housing but will be sufficiently flexible to take account of viability and changing market conditions over time. The size (number of bedrooms), type (flat, house, etc) and tenure (social and affordable rented, intermediate, shared ownership or other) of affordable homes for each proposal will be based on up-to-date evidence of local needs. It is recognised that housing need in the Neighbourhood Area in relation to tenure, mix and type will change over the lifetime of the Neighbourhood Plan.

⁴ Troy Planning + Design, 2020, Edenfield Factbook

Policy HO3. Affordable housing eligibility

1. The eligibility for affordable housing will be administered by Rossendale Borough Council as the Housing Authority. However, priority will be given in the first instance to applicants who can demonstrate a local connection to the Edenfield Neighbourhood Area through either of the qualifications below.
2. Residency qualification:
 - a) have had their principal residence in the Edenfield Neighbourhood Area for a continuous period of twelve months immediately prior to the application; or
 - b) have lived in the Edenfield Neighbourhood Area for 3 out of the previous 5 years or for 6 out of the previous 12 months; or
 - c) have close family (parent, sibling, child or grandparent) who have been resident in the Edenfield Neighbourhood Area for 5 continuous years and continue to reside there.
 - d) Members of the Armed Forces, veterans of up to 5 years and their spouses/civil partners are exempt from any local connection criteria. Armed Forces members are defined as: a member of the Royal Navy, the Royal Marines, the British Army or the Royal Air Force or a former member who was a member within the five years prior to the purchase of the First Home, a divorced or separated spouse or civil partner of a member or a spouse or civil partner of a deceased member or former member whose death was caused wholly or partly by their service.
3. Employment qualification:

An individual will be considered to have a local connection if he/she or his/her partner meets all of the following criteria:

 - a) works at or from an office or business establishment based in the Edenfield Neighbourhood Area; and
 - b) has been in paid employment or self-employed for 12 continuous months at a minimum average of 16 hours per week over a period of 12 continuous months at the time of application.
4. In the situation where affordable housing is available but no applicant can demonstrate a local connection to Edenfield, priority will be given to applicants who can demonstrate a local connection to Rossendale, such connection to be determined by reference to paragraphs 2 and 3 above as if "Borough of Rossendale" had been substituted for "Edenfield Neighbourhood Area".

Policy HO4. Site H66 design and layout

1. Development of site H66 (land west of Market Street) as identified in the Rossendale Local Plan 2019-2036 will be supported if it also takes into account the following design and layout criteria specified in the Local Plan:
 - a) Retention and strengthening of the woodland enclosures to the north and south of the church.
 - b) The layout of the housing parcels should be designed to allow views to the Church to continue.
 - c) The relationship of the new dwellings to the Recreation Ground and to the Community Centre to ensure safe non-vehicular access is provided.
 - d) Public open space to be provided along the woodland area south of the brook/Church enclosure.
 - e) 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.
 - f) Materials and boundary treatments should reflect the local context.
2. Development of site H66 will be supported if it also takes into account the relationship of the new dwellings to Edenfield Community Centre to ensure safe non-vehicular access is provided.

7. Design

- 7.1 The achievement of high-quality design is a core principle of the NPPF. It states, at paragraph 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”. The importance of the design of the built environment and its contribution to making better places for people is emphasised. It states that “Neighbourhood planning groups can play an important role in identifying the special qualities of each area 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” (paragraph 132).
- 7.2 The Local Plan places great importance on the design of new developments, supporting the national objective of promoting good design.
- 7.3 Notwithstanding the policy drivers for achieving high quality design, it was also established through consultation events that the community of Edenfield also places high importance on the rural character of the village as this was identified as a key strength.
- 7.4 Through the plan preparation a Design Code for the area has been produced. The purpose of the Design Code 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 which aligns to the objectives of the Neighbourhood Plan and the ambitions of the Neighbourhood Forum,
- 7.5 The Neighbourhood Area is made up of a number of distinctive built character areas (as identified in the Design Code). These areas reflect the history of the area and are closely linked with phases of development over the years. These distinctive areas can be broadly identified as:
- Character Area 1- Village Cores
 - Character Area 2- Traditional Terraces
 - Character Area 3- Piecemeal Domestic Development
 - Character Area 4- Rural Fringe
 - Character Area 5- Former Rural Fringe
- 7.6 It is recognised that Edenfield has developed organically and consists of a variety of architectural styles. It is accepted that a number of properties (post 1940s) do not reflect the historic local vernacular and incorporate contemporary building

materials that are not in keeping with their environs, however this is not a reason to allow further inappropriate development within it. Therefore, this plan seeks to ensure that new development is sympathetic to its rich built heritage and outstanding landscape by using design principles and key design elements that are reflective of local character and context and use appropriate building materials in their construction.

- 7.7 The Design Code provides guidance for new development in the Edenfield neighbourhood area. Fundamentally, design policies aim to conserve and enhance the character and quality of the village's built environment and ensure contextually appropriate design. A design-led response to development, referencing good practice principles⁵, will help create successful places. The design guidance provided in the Design Code seeks to protect the existing character of Edenfield and this is reflected in policy D1. The document also recognises the importance of enhancing the sense of place and this is reflected through Policy D2.

Policy D1. Design and amenity standards and village character

1. All development within the Edenfield Neighbourhood Area must:
 - a) meet the highest standards of design, make a positive contribution to the character of Edenfield; and
 - b) respect and enhance the built character of the village and its high-quality countryside setting; and
 - c) be of a good standard of amenity for all existing and future occupants; and
 - d) reflect the vernacular of Edenfield and be in keeping with local character.
2. Any innovative and contemporary designs shall be complementary to their context.
3. To achieve this, and in support of the Design Code, development proposals will be supported, subject to their satisfying the following criteria as appropriate to the particular development:

⁵ Ministry of Housing, Communities & Local Government, 2021, National Design Guide: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/843468/National_Design_Guide.pdf

- a) The context of the site in relation to topography, landscape, setting, character, local distinctiveness and building types; and
 - b) A density, scale, height and massing that is appropriate to its context; and
 - c) A layout that demonstrates how buildings, spaces and parking spaces relate to each other to create a practical coherent and legible structure; and
 - d) A hierarchy of linked routes and space that are permeable, relate to local facilities and provide parking provision that makes a positive contribution to the setting of buildings; and
 - e) The creation of a sense of place through massing and built form and sensitivity in respect of edge treatment, entrances, enclosures, active frontages, heights, detailing and rooflines; and
 - f) Landscape design and green infrastructure that contributes to a sustainable sense of place, such as wild areas for outdoor play, shelters, biodiversity buffers and wildlife corridors, and which softens the impact of the built form and is reflective of distinctive local landscape features; and
 - g) Materials and detailing relating to the design and context of development, including walls, roofs, openings, paved surfaces, signage and external lighting; and
 - h) Sustainable principles such as the curtilage storage of waste and recyclable material, cycle storage, homeworking and the durability and adaptability of buildings over time; and
 - i) Development forms and layouts that help reduce greenhouse gas emissions and utilise energy efficiency measures and water efficiency measures and the use of renewable de-centralised and low carbon energy generation; and
 - j) Proposals for development within the Green Belt will be supported only if they accord with national policy (currently set out at paragraphs 152-156 of the NPPF December 2023; and
 - k) The ten Principles of Active Design identified by Sport England and supporting guidance – <https://www.sportengland.org/guidance-and-support/facilities-and-planning/design-and-cost-guidance/active-design>
4. Where planning permission is required extensions to dwellings, residential annexes, residential care institutions (Class C2) and detached buildings in residential curtilages shall be:
- a) In character with the host dwelling and subservient in scale taking into account any previous extensions or outbuildings added after the original building was constructed; and
 - b) Detached curtilage buildings shall be sited in a manner which minimises landscape intrusion; and
 - c) Proposals shall not be detrimental to the amenities of neighbours as a result of scale, siting, massing, impact, or overlooking.

Policy D2. Built heritage and character

1. All new development should actively respond to the rich built heritage and character of the Neighbourhood Area, with particular attention to layout, density, form, massing (on plot), setbacks, roof form, and boundary treatment to contribute to an improved quality of place. This should be achieved by:
 - a) Incorporating similar architectural features into the design as those that are found in traditional buildings in the village.
 - b) Having external materials reflect the palette of materials found in traditional buildings within the Neighbourhood Area.
 - c) 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.
 - d) Other materials may also be appropriate, for example, in sustainably focussed, energy efficient buildings which require different material application.
 - e) Utilising external building materials and features that reflect the rich heritage of the Neighbourhood Area including Pennine stone, slate pitched roofing, chimney columns and off-set gable ends to match adjacent properties
 - f) Building frontages that align with the existing built form and overlook the street clearly defining the public and private realm.
 - g) Creating landscape schemes for housing which include the planting of trees and/or hedges
 - h) In the case of residential development providing private amenity space to the front and/or rear of the properties;
 - i) In the case of residential development providing parking within the plot and in accordance with adopted standards, unless it can be evidenced that the proposal will result in fewer spaces being required.
 - j) Creating parking spaces that are visually unobtrusive and use permeable surfaces to allow for rainwater absorption.
 - k) Taking full account in any proposal of any relevant considerations concerning the historic environment and designated and non-designated heritage assets in the area and their setting.
2. Nothing in this Policy shall be construed as preventing or discouraging appropriate innovation or change in a proposal for development.
3. Rear parking courtyards should be avoided unless there are no other practical solutions. Where rear parking courtyards are provided development should be arranged such that some residential units front onto and overlook this space.

4. Applicants should demonstrate how they have responded to best practice design principles, including those set out in Building For a Healthy Life (or any subsequent update of this).

8. Heritage Assets

- 8.1 These policies support a positive approach to conserving the historic environment and their setting as set out in the NPPF chapter 16 (Conserving and enhancing the Historic Environment) and Policy ENV2 of the Rossendale Local Plan 2019-2036.
- 8.2 Edenfield has a long and rich history, which has heavily influenced the character of the village and surrounding areas. The surrounding farmland greatly influenced the character of the village until the end of the 18th century. Industrial expansion through the late 18th and 19th centuries led to a decline in farmable land and a significant increase in industrial mills and houses for workers. During the 20th century, many of these mills were demolished to accommodate housing developments. Notwithstanding this, a high proportion of the elements that reveal the significance of this rich heritage have been retained and relatively well preserved. Table 4 and Figure 6 provide further details about some of the non-listed historic elements in the Edenfield Neighbourhood Area.
- 8.3 There are three listed buildings of Grade II⁶ and one of Grade II*⁷ in the Edenfield Neighbourhood Area (See Table 5 and Figure 7).
- 8.4 The Design Guide notes that the listed and non-listed assets are concentrated along Market Street but also include farmhouses to the east. As such, these policies seek to conserve and enhance the heritage assets and their setting.
- 8.5 The importance of these heritage assets to the local community has been acknowledged within the objectives of this Neighbourhood Plan.
- 8.6 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).

⁶ Grade II Listed buildings are buildings that are of special interest, warranting every effort to preserve them

⁷ Grade II* Listed buildings are particularly important buildings of more than special interest.

Name	Justification/Description
Chatterton Hey House	Elegant stone built two-storeyed house with eaves cornice and hipped slate roof. Glazed and panelled door with depressed arch (keystone dated 1765) and cornice. Long stair window with small panes for full height of house. Three windows on each floor. Similar wing on right. Chatterton Hey stands on one of the oldest sites in Edenfield and has connections with some of the most important families in the village's history (Haworths, Rostrons, etc.).
1-5, Green Street and 2-6, Sarah Street	Well-built back-to-back cottages, c.1840. These houses have an interesting history being built on land let by the trustees of the 'Sarah Green' charity. The original lettings conditions survive and specify the standards to which the houses were to be built.
59-69, Market Street	Early example of speculative building in the village. Row of cottages known as 'Badger Row' built c.1782 by the landlord of the 'Horse and Jockey'.
136-150, Market Street	A good example of the piecemeal development of a row of houses encouraged by the textile industry and the advent of the turnpike roads. The old name for the houses is 'Temple Row' and they were built over the period from 1791 to c.1830. No.144 was 'lately erected' in 1806. The name 'Temple' is often associated with places where there were handloom weavers and there is a blocked taking in door in the gable of no.150.
4-26, Rochdale Road	Early 19th century (c.1825) row of millworkers' houses built by the Rostron family, important millowners in Edenfield. Very few houses of this date and type survive in the village. Formerly called 'Commercial Row'.
Rostron Arms	A public house at Market Place.
Milestone on Market Street	On footway outside 16 Market Street. Defaced in anticipation of a German invasion in World War II and bears an Ordnance Survey bench mark with a small metal-domed brass rivet on top at the apex of the cut arrowhead marks

Table 4. Edenfield Buildings of Local Interest or Importance



© Mapbox, © OpenStreetMap

Figure 6. Edenfield Buildings of Local Interest or Importance Map

Map No	List Entry	Name	Grade	List Date	Easting	Northing
1	1072820	Elton Banks	II	1984-11-30	379945	420081
2	1072821	Hey Meadow Farmhouse	II	1984-11-30	380326	419808
3	1163639	Elton Banks Farm	II	1984-11-30	380350	420239
4	1318084	Edenfield Parish Church	II*	1966-08-09	379858	419809

Table 5. List of Designated Heritage Assets in Edenfield



© Mapbox, © OpenStreetMap

Figure 7. Map of Listed Buildings in Edenfield

Policy HE1. Conservation and enhancement of heritage assets

1. Within the Edenfield Neighbourhood Area, any listed or non-listed heritage assets and their setting will be conserved and enhanced in a manner appropriate to their historic significance. Development within the Edenfield Neighbourhood Area must ensure that the local distinctiveness and character of these listed heritage assets are conserved or enhanced.

Policy HE2. Non-designated heritage assets

1. The Neighbourhood Plan identifies the properties in Table 4 of the Plan as locally important, non-listed heritage assets. Proposals for development that affect non-listed historic assets shall be considered taking account of the scale of any harm or loss and the significance of the heritage assets.
2. The effect of a proposal in a planning application on the significance of these non-listed heritage assets will be taken into account in determining the application in order to avoid or minimise conflict between the heritage asset's conservation and any aspect of the proposal.

Policy HE3. Planning applications and heritage assets

1. A planning application for or impacting a listed or non-listed heritage asset or its setting will be required to:
 - a) provide a description of the significance of any heritage asset affected, including any contribution made by its setting. The level of detail should be proportionate to the asset's importance and sufficient to understand the potential impact of the proposal on its significance. This should be undertaken by a suitably qualified expert.
 - b) where a site on which development is proposed includes or has the potential to include a heritage asset with archaeological interest submit an appropriate desk-based assessment and, where necessary, a field evaluation. This should be undertaken by a suitably qualified expert.
 - c) take account of potential harm to the significance of non-listed heritage assets;
 - d) avoid the total loss of significance or substantial harm to listed heritage assets in their setting through alterations or new development except where this accords with local and national policy requirements.

Policy HE4. Site H66 mitigation measures

1. Development of site H66 (land west of Market Street) as identified in the Rossendale Local Plan 2019-2036 will be supported provided suitable mitigation measures identified in the Local Plan are identified and secured to conserve, and where possible, enhance the setting of the Church and the non-designated heritage assets Chatterton Hey House (Heaton House) and Mushroom House and the former Vicarage.

9. Transport and travel

- 9.1 The village lies to the east of the M66, where it terminates and becomes the A56. The A56 allows vehicles to travel in a north/south direction and bypasses the village to the west. Burnley Road/Market Street is the main road which runs directly through the village. To the south, the road forks into Bury Road and the A680.
- 9.2 Within the Neighbourhood Area, there is a high reliance on private motor vehicles. The dominance of the private car and impacts were highlighted as a key issue during consultation events. Particularly, the volume of traffic along the main central routes has been identified as an issue through the consultation exercise.
- 9.3 Consultation responses showed a desire to improve walking and cycling conditions, in and around the Neighbourhood Area, providing travel choice and opportunity for all and this has been reflected within the vision of the Neighbourhood Plan. There are significant social, economic, health and environmental benefits to be gained through a modal shift from private vehicles to walking and cycling. As such, policy T1 seeks to ensure that any new development will promote sustainable forms of transport to support this modal shift.
- 9.4 Policy T2 seeks to address the transportation issues in the area by minimising the potential impacts of new developments. The policy also has a particular focus on minimising the impacts of new developments on the central routes which have been identified as being particularly problematic.

Policy T1. Promotion of sustainable forms of transport

1. Proposals for new development in the Neighbourhood Area should promote sustainable forms of transport, including measures to promote walking, cycling and the use of public transport and electric and low emission vehicles.

Policy T2. Mitigation measures and Transport Assessments

1. Mitigation of traffic impacts may be required in order to address the negative impacts of traffic generation arising from development proposals. Such mitigation measures could include the requirement for improved facilities for pedestrians, cyclists and public transport in the area, and will be secured by legal agreements linked to planning permissions granted.
2. Where a Transport Assessment (or equivalent) is required to support a planning application, this must evaluate the effects of additional traffic movements generated by the development on the core local road network comprising Market Street, Burnley Road, Bury Road, Bolton Road North, Rochdale Road, and Blackburn Road. Such traffic analysis must also evaluate the impact of additional traffic flows on/off these major thoroughfares.
3. Given the proximity of the Strategic Road Network, any development proposal within the Neighbourhood Area that would be expected to generate more than 30 two-way vehicle trips per day should include within the accompanying Transport Assessment an assessment of the impact of traffic generated at the M66 junctions 0 and 1 with the A56.

10. Local Community

Infrastructure facilities

- 10.1 The Local Plan recognises the importance of community facilities to the areas that they serve both for local residents and visitors. Figure 8 maps the community infrastructure facilities within the designated neighbourhood area.
- 10.2 During the consultation exercises, it was identified that whilst there are some community facilities within Edenfield, the current provision needs to be increased and improved. The provision of infrastructure is critical to ensuring that local residents have access to essential services and facilities to maintain a high standard of living and is important for community building. Locating such uses in easy access of the home and co-located with other activities will help increase access and use by the whole community.
- 10.3 Services which were highlighted as desirable during consultation by the community included a permanent library, local shop with fresh produce and an enlarged Community Centre.
- 10.4 The Rossendale Infrastructure Delivery Plan 2018 and its March 2019 update state that the Edenfield Community Centre, in line with other community centres in the borough, has been affected by cuts in central and local government funding. The consultation process also raised concerns regarding the current state of the village's infrastructure, where deficiencies were identified in both social and physical infrastructure, including transportation issues and local facilities. In order to address this and ensure that new development does not exacerbate the deficiencies, policy LC2 seeks to ensure that new housing developments are well supported by Infrastructure.

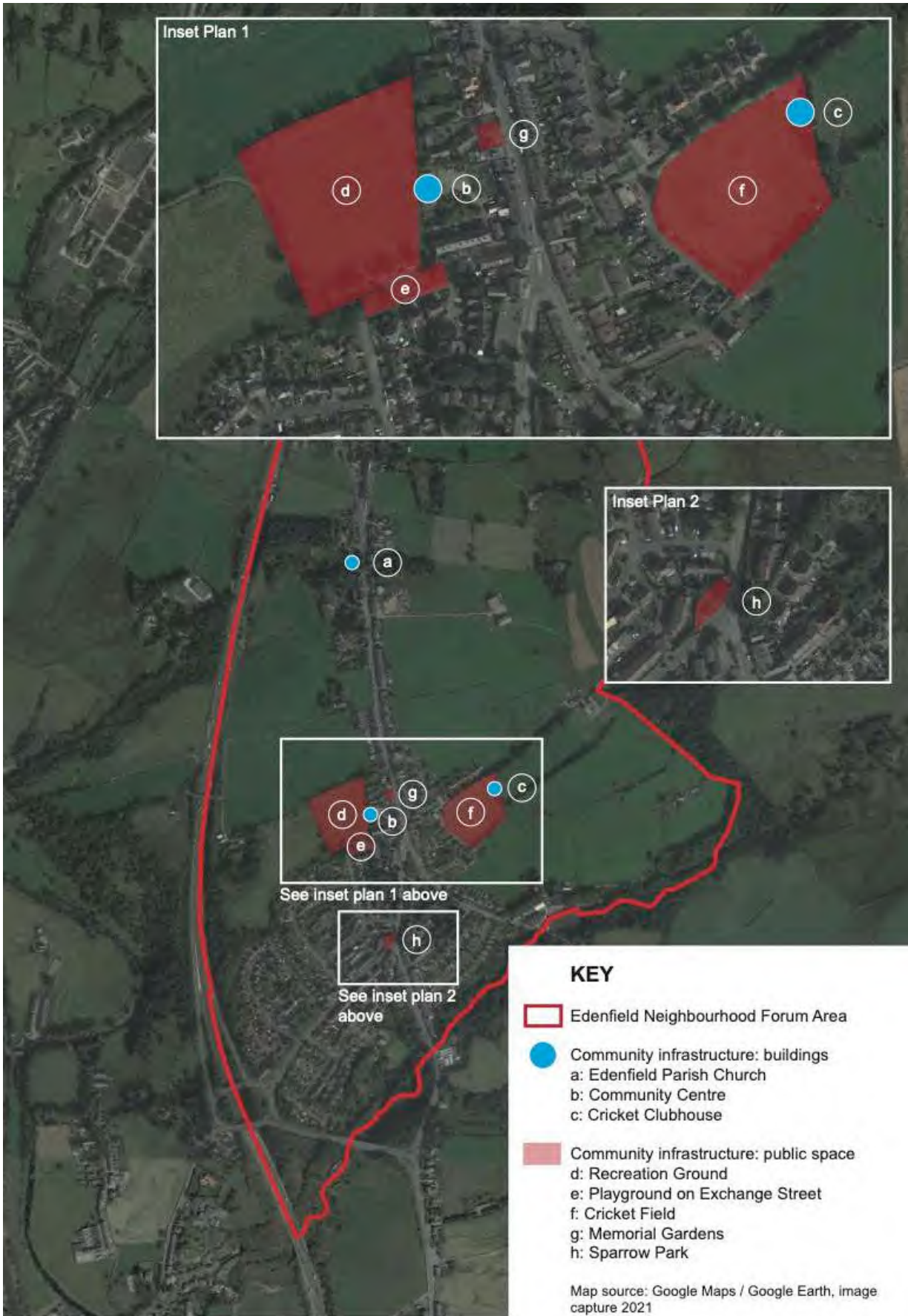


Figure 8. Edenfield Community Infrastructure Facilities

Policy LC1. New, improved or extended community facilities

1. Proposals for new, improved or extended community facilities will be supported subject to Policy GI1 and subject to the following criteria:
 - a) The proposal would be compatible with the character of the site and its surroundings.
 - b) The proposal would be well related to the built form of the settlement and close to existing development.
 - c) The site is accessible by a variety of modes of transport, including walking and cycling.
 - d) The amount of traffic generated by the proposal can be accommodated on the local highway network without harming road safety.
 - e) The proposal would not be detrimental to the amenity of neighbouring residents by reason of noise or traffic.
 - f) A need for the facility has been established.
 - g) Any new or improved sports facility in the Neighbourhood Area shall be designed in accordance with the latest design guidance issued by Sport England: <https://www.sportengland.org/guidance-and-support/facilities-and-planning/design-and-cost-guidance/active-design>
2. a) All existing premises last used as a community facility will be protected for that use unless a clearly justified case can be made for development of the premises for other purposes.
 - (b) Any proposal for such development will be required to demonstrate:
 - i. that the premises have not been in active use for a sustained period (normally at least twelve months)
 - ii. through a rigorous marketing strategy to be agreed with the local planning authority and normally of twelve months' duration and a full valuation report, that there is a lack of demand for their use as a community facility; and
 - iii. that the proposal is appropriate for the premises, having regard to other policies of the development plan and planning guidance.
3. Community facilities are community centres, sports facilities, places of worship, parks and recreation grounds

Policy LC2. Sports facilities

1. If existing sports facilities do not have the capacity to absorb the additional demand for sport generated by new housing development in the Neighbourhood Area the developer will be expected to ensure that new sports facilities, or improvements to existing sports facilities, are secured and delivered. Proposed actions to meet the demand should accord with the development plan and priorities resulting from any assessment of need or set out in Rossendale Borough Council's Playing Pitch and Outdoor Sport Strategy and Action Plan (current edition dated January 2021 and approved March 2022:

<https://www.rossendale.gov.uk/downloads/download/11571/playing-pitch-and-outdoor-sport-strategy-2022> ("The RBC Sports Strategy")

Policy LC3. Required local infrastructure

1. The provision of required local infrastructure will need to be planned and delivered alongside new housing development to ensure that local infrastructure is provided for and / or improved in relation to the size and scale of development proposed. This requirement will apply to all infrastructure including physical, social and green infrastructure.
2. A Local Infrastructure Delivery Plan will be kept up to date by the Neighbourhood Forum which prioritises infrastructure needs, estimates costs and assigns delivery responsibilities.

Policy LC4. Policies for sports facilities

1. Notwithstanding policies LC1, LC2 and LC3, any development proposals concerning current or proposed sporting facilities in the Neighbourhood Area will be required to comply with:
 - i) The national policy for sport (as currently set out in NPPF, December 2023, especially paragraphs 102 and 103),
 - ii) The Playing Fields Policy and Guidance promulgated by Sport England: https://www.sportengland.org/guidance-and-support/facilities-and-planning/planning-sport#playing_fields_policyand
 - iii) The RBC Sport Strategy: <https://www.rossendale.gov.uk/downloads/download/11571/playing-pitch-and-outdoor-sport-strategy-2022>

11. Local Centre and Commerce

11.1 The NPPF highlights the role that local centres play at the heart of local communities and that development should seek to ensure the vitality of these areas. The Neighbourhood Area provides employment opportunities for the local population, as well as an accessible place to shop for residents.

11.2 Class E uses` are those listed in the Town and Country Planning (Use Classes) Order 1987, as amended, under Use Class E – Commercial, Business and Service, which took effect from 1st September 2020. Planning permission is not required to change between any of the uses within Class E. Class E is, in summary, use for any of the following purposes:

E(a) Display or retail sale of goods, other than hot food (excluding small shops selling essential goods, including food, where there is no such facility within one kilometre).

E(b) sale of food and drink for consumption (mostly) on the premises.

E(c) Provision of: (i) financial services, (ii) professional services (other than health or medical services), or (iii) other services which it is appropriate to provide in a commercial, business or service locality.

E(d) Indoor sport, recreation or fitness (not involving motorised vehicles or firearms and excluding swimming pools and skating rinks).

E(e) Provision of medical or health services (except the use of premises attached to the residence of the consultant or practitioner).

E(f) Creche, day nursery, or day centre (not including residential use).

E(g) Uses which can be carried out in a residential area without detriment to its amenity:

- (i) offices to carry out any operational or administrative functions,
- (ii) research and development of products or processes,
- (iii) industrial processes.

Class E uses benefit from permitted development rights that include:

- Changes to use Class C3 (dwelling houses) subject to prior approval
- Changes to mixed use for anything within Class E and as up to two flats (and back again) subject to prior approval
- Change to a state funded school or back to a previous lawful use.

- 11.3 The Local Plan for Rossendale supports this objective of the NPPF through focusing retail and other town centre uses within defined centres. Edenfield is identified as a neighbourhood parade in the Local Plan. The Local Plan makes reference to the Town Centre, Retail, Leisure and Tourism Study (2017). This study identified that while neighbourhood parades are not 'centres' in the same way that town, district and local centres are, they should still be afforded some protection.
- 11.4 Policies E1 and E2 seek to support these national and local objectives through supporting proposals which generate and develop local business and opposing the loss of these services unless evidence to justify the loss can be provided. In order to generate employment and develop local business, policy E1 also highlights that these proposals may be supported outside of the local centre if appropriate.
- 11.5 While Policy E1 supports the national and local objectives of ensuring the vitality of local centres, it also seeks to ensure that proposals will not create significant adverse effects within the Neighbourhood Area. Proposals should have particular regard to factors which have been raised as key issues throughout the consultation events and these include neighbouring amenity, local and rural character and traffic-related nuisance.

Policy E1. Planning permissions – commercial, business and service establishments

1. Where planning permission is required for proposals for the provision of new E(a), E(b), E(c) uses or a drinking establishment with or without the provision of food within the Neighbourhood Parade or at other locations in the Neighbourhood Area these proposals will be supported, provided that they are in compliance with other policies of the development plan and in particular policies D1, D2 and T2 of the Neighbourhood Plan and avoid significant adverse effects in terms of:
 - a) Impact on neighbouring properties, or the locality in general in terms of noise, air pollution, odour or other nuisances; and
 - b) Impact on local and rural character in terms of scale, visual impact and nature of operations; and
 - c) Traffic generation, congestion and other vehicular traffic-related nuisance

Policy E2. Loss of commercial, business and service establishments

1. All existing premises last used for E(a), E(b), E(c) uses or as a drinking establishment with or without the provision of food will be protected for those uses unless a clearly justified case can be made for development of the premises for other purposes.
2. Any proposal for such development will be required to demonstrate:
 - a) that the premises have not been in active use for a sustained period (normally at least twelve months)
 - b) through a rigorous marketing strategy to be agreed with the local planning authority and normally of twelve months' duration and a full valuation report, that there is a lack of demand for their use for E(a), E(b), E(c) uses or as a drinking establishment; and
 - c) that the proposal is appropriate for the premises, having regard to other policies of the development plan and planning guidance.

12. Green Infrastructure

- 12.1 Paragraph 105 of the NPPF allows the designation of land as Local Green Space through Neighbourhood Plans. This will afford protection from development other than in very special circumstances. Paragraph 106 of the NPPF says that Local Green Space should only be designated where it is:
- in reasonably close proximity to the community it serves;
 - demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and
 - local in character and is not an extensive tract of land.
- 12.2 A number of areas were identified by the community as being of value to them and in need of protection. These areas have been assessed against the criteria in the NPPF and the following areas are considered to be appropriate for designation:
- Playground on Exchange Street
 - Recreation Ground
 - Edenfield Cricket Club
- 12.3 The methodology used to consider the above areas is outlined in the Local Green Space report as part of the evidence base for this Plan.
- 12.4 It is further considered important to seek to enhance the green infrastructure assets of the area where possible as their inclusion in an area has a number of social and environmental benefits. Both the adopted and emerging development plans for Rossendale acknowledge the importance of Green Infrastructure and state that development should protect, manage, enhance and connect Rossendale's green infrastructure network.
- 12.5 The consultation exercises have identified that the form and function of these connections is highly valued by the local community and should be recognised as part of any new development proposals. This includes the existing relationship between built development and the countryside beyond, the relationship with locally important views and connections to the surrounding landscape. As such, policy GI3 seeks to ensure that any new developments will establish new connections to maintain this positive attribute of Edenfield.

- 12.6 The assessment of Chatterton Hey Field, showed this space was unsuitable for designation as a local green space, but revealed that the site was locally valued by the community as the only space for off-lead dog walking. As such, policy GI4 seeks to expand the opportunity for this activity throughout the village.

Policy GI1. Local Green Space designations

1. The following areas below, and as shown on the map in Figure 9 are designated as Local Green Spaces:
 - a) Playground on Exchange Street
 - b) Recreation Ground
 - c) Edenfield Cricket Club
2. Development will only be permitted in the Local Green Spaces in very special circumstances where it is compatible with the aims and objectives of the designation.

Policy GI2. Wildlife areas and green spaces connectivity

1. Proposals that seek to improve the connectivity between wildlife areas and green spaces will be encouraged in order to enhance the green infrastructure of the Neighbourhood Area and its contribution to landscape character and local identity.

Policy GI3. Footpaths, cycle paths and green spaces accessibility

1. New development will establish publicly accessible links from development sites to the wider footpath and cycle-path network and green spaces wherever possible.

Policy GI4. New development and Local Green Spaces

1. New development that impacts or affects Local Green Spaces or which will contribute to the increased use of Local Green Spaces through population growth will make provision for a proportionate increase in Local Green Spaces and/or enhancement of existing on-site facilities. Such provisions may include but are not limited to those as set out in policy DMR1.



Figure 9. Designations Map for Local Green Spaces

13. Natural Environment

- 13.1 The Lives and Landscape Assessment for Rossendale Borough Council (2015) highlighted that the irregular topography of Rossendale means that there are a number of expansive views across the area. The report makes specific reference to Edenfield, citing that “the cumulative effects of developments needs to be taken account of” with regards to their effects on the landscape character of the borough.
- 13.2 The 2015 Assessment defines Edenfield as being located within Settled Valleys character area: 8b Irwell Valley. This is characterised as an area with reduced densities of housing and extensive areas of open pasture. The report recognises that development is generally acceptable within the townscapes of this area, however specific regard should be had to where suburban areas abut the rural landscape.
- 13.3 One of the distinctive features of Edenfield Neighbourhood Area is the visual connectivity with the surrounding countryside from the village and public footpaths. The landscape character type of Edenfield is defined as a series of interlocking valleys with the built form laid out as ribbon development within the valley.
- 13.4 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 Holcombe 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. As such, the importance of Locally Important Views is highlighted within the Design Code.
- 13.5 Recent consultation events have highlighted that residents value highly the visual connection across the settlement and into the surrounding countryside. Through this a number of views were highlighted which bear importance for the local community. These views were critically assessed by consultants and shortlisted. It is important to protect and enhance the character and natural beauty of the countryside more generally whilst protecting the footpaths which allow access to it. Thus, the focus of the Key Views Assessment are those views of and from Edenfield Neighbourhood Area which contribute to local character and amenity.
- 13.6 Notwithstanding the views which have been regarded as locally important, the overall rural nature of the settlement and its countryside setting are fundamental to Edenfield’s character and this was highlighted as a key strength through the consultation exercises.

- 13.7 It is important that development should involve biodiversity net gain and the protection, and enhancement where possible, of watercourses and their ecological habitat value.

Policy NE1. Locally Important Views

1. The following, as identified in Figure 10, are identified as Locally Important Views which will be maintained to ensure continued visual connectivity with the surrounding countryside:
 - 2) KV1 - Market Street, adjacent to its junction with Footpath 14-3 FP 126
 - 3) KV2 - Market Street, adjacent to no 117 Market Street
 - 4) KV3 - Lane leading west off Market Street by Mushroom House. 14-3 FP 126.
 - 5) KV4 - Lane Leading west off Market Street by Mushroom House 14-3 FP 126.
 - 6) KV5 - Gincroft Lane adjacent to Gincroft Farm. 14-3 BOAT 275.
 - 7) KV6 - Footpath leading south from Hey Meadow Farmhouse 14-3 FP136
 - 8) KV7 - Footpath leading south from Hey Meadow Farmhouse 14-3 FP136
 - 9) KV8 - Church Lane and the Graveyard.
2. Development proposals should take into account Locally Important Views and minimise their adverse affect on the views.

Policy NE2. Development proposals and the local environment

1. All development proposals should seek opportunities to conserve or enhance the local environment commensurate with their scale and location and in accordance with other policies within the development plan. Proposals should demonstrate that they have taken account of locally distinctive landscape features and landscape character types contributing to the identity of locations within the Neighbourhood Area.

Policy NE3. Development and landscape and topography

1. Development will retain and enhance well-established features of the landscape, including mature trees, hedgerows and ponds. Any proposal for removal of such features must be justified by substantive evidence. If there is significant loss of trees and shrubs as part of development, then new provision will be expected elsewhere on the site or if not possible on sites elsewhere within the Neighbourhood Area providing equivalent coverage and acceptable contribution towards the natural environment and local character.
2. Development will be expected to reflect local topography and mitigate any adverse impact on views into and across the development from other locations through changes to skyline, hill slopes, height or mass.
3. Proposals for development will be expected to provide for biodiversity net gain (BNG) where possible in accordance with national policy (NPPF, December 2023, paragraphs 180(d), 185(b) and 186(d) and the Natural Environment Planning Practice Guidance). Developments shall comply with the requirements of the Environment Act 2021, including demonstrable minimum 10% BNG, when these come into force through the Town and Country Planning Act 1990 as amended.
4. Any trees or plants to be provided in a development as part of a landscaping scheme shall be of a species native to England and characteristic of the local area, in the interests of affording sources of suitable nectar and seed for bees and birds and of making a positive contribution to the local landscape.

Policy NE4. Development and ecology

1. Development should not adversely affect priority habitats and other areas of ecological importance and should, wherever possible, contribute to wider ecological networks.

Policy NE5. Site H66 watercourses and ecology

1. Development of site H66 (land west of Market Street) as identified in the Rossendale Local Plan 2019-2036 will be supported provided that existing watercourses on or adjoining the site are protected and, if possible, enhanced and that the site layout does not encroach into riparian corridors and does not negatively impact upon flood risk, water quality or ecological habitat value.

Policy NE6. Site H67 watercourses and ecology

1. Development Proposals for re-development of site H67 (Edenwood Mill) as identified in the Rossendale Local Plan 2019-2036 should, where possible, incorporate the removal of man-made structures from the river channel and the restoration of riverine habitats to reduce flood risk, improve water quality and enhance ecological habitat value.

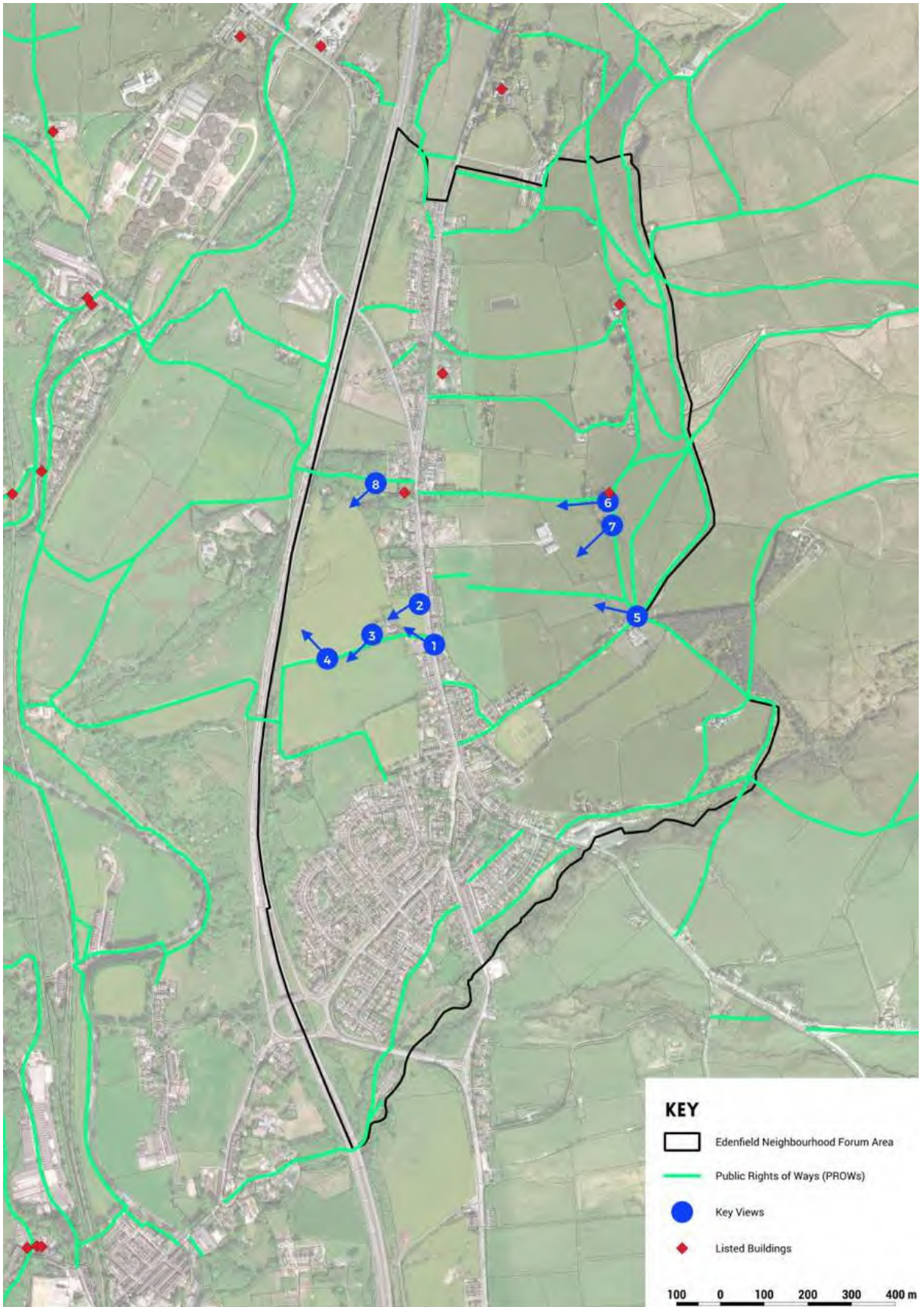


Figure 10. Map of Key Views in Edenfield

14. Delivery, monitoring and review

- 14.1 The Neighbourhood Plan is intended to guide development for a period of 15 years. It is recognised that there may be significant changes in national and local policy within this timeframe which the Neighbourhood Plan should respond to.

Policy DMR1. Local infrastructure delivery plan

1. The improvement or development of locally important infrastructure will be supported where it is needed to serve existing or new development, provided that the need for such facilities is consistent with other policies within this Plan. A Local Infrastructure Delivery Plan (LIDP) which prioritises infrastructure requirements, priorities, funding and responsibilities will be kept up to date by the Neighbourhood Forum. This LIDP will inform infrastructure decisions whether they be through developer contributions, Section 106 agreements, Community Infrastructure Levy (as and when applicable in Rossendale) or other sources of funding.

Policy DMR2. Neighbourhood Plan reviews

1. This Neighbourhood Plan has been developed to plan sustainable growth for a period of up to 15 years (2021 – 2036). A formal review process in consultation with the community and Local Planning Authority should be undertaken at least once every 5 years, to ensure the Plan is still current and a remains a positive planning tool to deliver sustainable growth.

15. Appendices

Appendix 1: Policies Map

Appendix 2: Edenfield Factbook

Appendix 3: Edenfield Design Code

Appendix 4: Edenfield Local Greenspace Report

Appendix 5: Locally Important Views Report

Appendix 6: Consultation Statement and supporting documents

Appendix 7: Glossary

Acknowledgements

The Edenfield Community Neighbourhood Forum would like to extend their grateful thanks to the residents and businesses of Edenfield and the organisations listed below for their input, assistance and support. Without them this Neighbourhood Plan would not have been possible.

AECOM

Edenfield Cricket Club

Edenfield District Community Association

Edenfield Village Residents Association

Locality

Rossendale Borough Council Forward Planning Department

Troy Planning + Design

Edenfield Community Neighbourhood Forum

Edenfield Neighbourhood Plan (ENP), 2021- 2036

(Submission version: January 2024)



Edenfield Community Neighbourhood Forum

www.edenfieldcommunityforum.uk

neighbourhoodplan@edenfieldcommunityforum.uk

I wish to register my strong objections to The Edenfield Masterplan V5. I set out below my reasons why the Plan must be rejected

1 Traffic

The Plan, if approved, will transform the village, and I object to any stringent traffic restrictions being 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 realistically 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 V5 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

Morning,

We would like to object to the Edenfield Masterplan & Design Code V5 (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.
11. A full Transport Assessment should be included in the masterplan and not the individual site planning applications.

Chris, Adele and Charlotte Hanson



To Whom It May Concern,

I am writing to formally object to the proposed development of the Land West of Market Street, Edenfield (Application H66), on the grounds that it will significantly and detrimentally impact the local community, environment, and infrastructure.

1. Traffic and Highway Safety

The proposed development, with up to 400 new dwellings, will dramatically increase traffic on Market Street and surrounding roads. The Transport Assessment acknowledges that improvements will be needed to the Market Street corridor from Blackburn Road to the mini-roundabout near the Rawstron Arms, including measures to assist pedestrians and vulnerable road users. However, the increased traffic will exacerbate congestion, particularly during peak hours, causing severe delays and potentially dangerous conditions for pedestrians, especially near Edenfield CE Primary School. The National Planning Policy Framework (NPPF) Section 9 emphasises the importance of promoting sustainable transport and ensuring safe and suitable access to sites for all users, which this plan does not adequately address.

2. Environmental Impact

The development will have a detrimental effect on the local environment, including the loss of green spaces and potential harm to local wildlife. The NPPF Section 15 stresses the need to protect and enhance valued landscapes, sites of biodiversity, and soils, recognising the intrinsic character and beauty of the countryside. The proposed development threatens these principles by potentially disrupting local ecosystems and reducing greenbelt land, which contradicts the aim of achieving a net gain in biodiversity as required by the 2021 Environment Act.

3. Impact on Local Amenities

The influx of new residents will put an immense strain on existing local amenities and services, including schools, healthcare facilities, and recreational areas. The Masterplan acknowledges the need for expanding Edenfield CE Primary School or Stubbins Primary School but provides no concrete plans or guarantees that these expansions will be adequately funded and completed in a timely manner. This raises concerns about overcrowding and diminished quality of education for existing and future students.

4. Construction Disruption

The construction phase of the project, estimated to span several years, will bring significant disruption to the daily lives of local residents. Issues such as noise pollution, dust, and increased traffic from construction vehicles will severely affect the quality of life in the village. The NPPF Section 12 states that new developments should create places that are safe, inclusive, and accessible and which promote health and well-being. The prolonged construction activities directly conflict with these goals.

5. Heritage and Local Character

Edenfield has a distinct local character that risks being undermined by the proposed development. The NPPF Section 16 highlights the importance of conserving heritage assets and the contribution of their settings to the character of a place. The development's scale and design are not sympathetic to the existing village's character, potentially impacting designated heritage assets such as the Church and non-designated heritage assets including Chatterton Hey and Mushroom House.

In conclusion, while the need for new housing is understood, the proposed development at Land West of Market Street, Edenfield, in its current form, is not suitable. The significant negative impacts on traffic, the environment, local amenities, and the character of the village outweigh the benefits. I urge the planning authority to reject this application and consider more sustainable and community-friendly alternatives.

Thank you for considering my objection.

Yours sincerely,

Emily Formby

Objection by Ian and Barbara Lord to the Masterplan & Design Code (MDC) for Edenfield allocation H66 (Version 5 dated June 2024)

We have reviewed this latest version of the MDC together with the revised Highways Consideration of Masterplan. It is not surprising to see that none of our objections to Version 4 have been addressed as our objections (as well as those by many others) were submitted on 9th June and Version 5 seems to have been completed on 21st June. That is an impossibly short period of time to read, consider and act upon multiple objections. The conclusion is that the objections have just been ignored which is not surprising considering the previous lack of consideration of resident objections by the developers.

Our objections to Version 4 contained many outstanding objections to Version 3 (and earlier versions) of the MDC and the Transport Assessment /Highways Consideration of Masterplan which could potentially have been addressed in Version 5 but sadly, but not surprisingly, this is not the case.

Consequently, as our objection to Version 5 we repeat below our objection to Version 4.

We also object to the proposal to exclude a comprehensive H66 Transport Assessment (TA) covering all of Edenfield from the consideration for approval of the MDC. It is quite clear that the Local Plan requires a TA for the whole of H66 which will not be the case if only TAs appended to individual site planning applications are considered. It has been universally understood since Version 1 of the MDC that a comprehensive TA is the requirement and this is confirmed by statements within the Planning Managers letters to the applicants in May 2023 and December 2023.

Ian and Barbara Lord

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

14th July 2024

Objection by Ian and Barbara Lord to the Masterplan & Design Code for Edenfield allocation H66 (Version 4 dated April 2024)

Originally submitted 9th June 2024

The following comments are in addition to those we submitted on 5th November 2023, 11th August 2023 and 17th 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 5th 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.

APPENDIX 1

Excerpt from objection dated 11th 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.

OBJECTIONS TO EDENFIELD MASTERPLAN/DESIGN CODE V4 and V5 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.



ADDITIONAL OBJECTIONS TO EDENFIELD MASTERPLAN/DESIGN CODE V5 SITE H66

The nomenclature is still incorrect. The document submitted is incomplete and does not meet the criteria to be called a Masterplan since it still does not include appropriate information with regard to 'Chatterton Hey South'. Therefore the planning application cannot be considered.

There remain the flaws identified in previous comments (see attachment - OBJECTIONS TO EDENFIELD MASTERPLAN/DESIGN CODE V4 and V5 SITE H66) which have not been resolved and, indeed, any contentious points – from traffic flows, displaced parking, SUDS - to name but a few, are left to some future unspecified date with complete lack of commitment to agreeing an outcome. Of additional concern is the visual misrepresentation throughout the document, e.g. in the aspirational illustrations of the proposed housing, which bear no relationship to the detailed layout and building types provided in separate planning applications, e.g. on page 99, supposedly 'indicative' of Edenfield Core and page 101 supposedly 'indicative' of Village Streets. This is typical of the manner in which the entire submission presents an 'idyllic rural image' that, by implication, it will produce, when in reality it actually illustrates the existing built environment supplemented with a few photographs of random and unrelated housing from elsewhere in the country. It is obvious that the submission does not meet the criteria quoted from the NPPF (page 14), in which paragraph 130 demands that developments should:

Function well and add to the overall quality of the area

(be) visually attractive as a result of good architecture, layout and landscaping

(be) sympathetic to local character and history

Establish or maintain a strong sense of place.

More specifically acknowledgement of the Neighbourhood Plan is still grudging and damned with faint praise, giving the impression that the speed with which this latest fantasy has been processed could be an attempt to rush it through before the Neighbourhood Plan can have an impact.

The issues of traffic and parking have been subjected to a desktop exercise completely removed from day-to-day reality. The so-called traffic surveys sheds little light and is misleading as the data are over a year old and, it is suggested, demonstrate reductions compared with pre-pandemic levels. However, this situation is fluid and traffic levels have been increasing over the last 18 months. Moreover traffic related to school attendance has certainly returned to pre-pandemic levels. The usefulness of the document is not helped by a plethora of meaningless tables (lacking any explanation) and pictograms to provide a cloak of evidential respectability.

As examples the relevant pictograms referring to traffic ingress, egress and travel from the three main sites are all treated separately, not **cumulatively**, as occurs in the real world. Similarly the traffic survey magically ceases (or does not provide data) after 8.45 – precisely the time that the school drop-off begins to produce an additional 40-50 vehicles at the northern end of Market Street and along Blackburn and Burnley Roads and continues until around 9am when the vehicles depart. The gridlock that can ensue from the traffic lights proximity to the school crossing patrol would be magnified exponentially by the proposed car park entrance off Burnley Road (land which is still Green Belt but has assumed a mythical status in the submission as part of the parking mitigation for Market Street – see below) and site entrance for the development on Blackburn Road.

Their understanding of the parking situation seems ill informed. They cite loss of parking facilities in the centre of the village as though it only relates to TW site access and in a manner that suggests the proposals will mitigate the majority of lost parking, which is untrue. Additionally the loss of parking near the Coach would lose all the spaces since the hardstanding to which they refer belongs to the property and is not public space. Restrictions on Blackburn Road would affect those attending the primary school and the eastern side of Burnley Road has no pavement so is rarely used as parking.

The proposed Northstone car park (still in Green Belt but by now taken as car parking fact!) will increase available capacity but is already being seen as mitigation for Market Street, compensation for Blackburn Road, a dropping off point for parents and guardians and parking for those at school during the day. Possibly it could resort to stacking to accommodate its multiplicity of uses! (Access is, of course, both problematic and potentially dangerous and the Road Safety Audit does not eliminate the problem nor address the likely ensuing gridlock).

At the south end of the village (which is nearly always completely parked up) the loss of capacity is airily dismissed with vague promises of space on Church land and the TW site (the latter again serving multiple masters!). This will be tremendously useful to the customers of the commercial premises which are situated there!!

It is impossible to ignore the lived reality that nearly 100 vehicles are parked during the day on Market Street (e.g. 88, 95 and 89 on three normal consecutive days recently and comparable with previous 'car counts' undertaken). Parking restrictions on the western side, of Market Street would dramatically reduce capacity leaving existing residents and those moving into the proposed developments fighting for space. (The development on the old Jockey site is already full of on street parking). The idea that a small parking allocation of 13 vehicles, together with capacity at the opposite ends of the village (Exchange Street and GREEN BELT land north of the school) will be adequate, or indeed appropriate, is ludicrous.

To conclude that "overall, therefore, given the proposed off-site provision, it is anticipated that there will be an increase in provision of circa 6-9 spaces along the corridor" (Eddisons, page 5) is self-evidently incorrect.

Finally the planned re-introduction of local authority housing targets is intended to vastly increase social housing and affordable rented property, unlike this submission which includes minimal such provision and is patently targeting a higher income bracket with a view to maximising profit.

Ann-Marie Coyne and Michael Coyne

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Dear Sir/Madam,

My name is Ken Parkes and myself and my wife live at 67 Market Street, Edenfield. 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

Dear Planning Team,

I am writing to strongly object to V5 of the Master Plan for Edenfield. This plan comes “hot on the heels” of V4 which was only published in May 2024. I am concerned that only 7 weeks have passed between these two publications, suggesting that constant resubmissions of large documents with only superficial changes are simply an attempt to swamp residents with paperwork and force through this poor plan.

The plan has changed only superficially in the last three revisions and the main concerns of residents remain unaddressed in this latest version. This lack of meaningful revision demonstrates a failure to engage seriously with community feedback and local needs.

My objections are as follows:

1. Infrastructure Inadequacies:

- The plan continues to fall short in addressing the impact of increased population on local infrastructure including schools, healthcare facilities and the provision of utilities. Detailed plans for enhancing water, drainage, and power supply infrastructure are still missing, especially considering the future increased demand from Electric Vehicles and Heat Pumps.

2. Transportation and Road Safety:

- The projected increase in car journeys and public transport is unrealistic.
- The transport assessment still fails to address road narrowing at Edenfield's pinch points and frequent damage to parked vehicles.
- Proposed double yellow lines will increase 'rat run' traffic, endangering all road users.
- Inadequate parking provisions pose unfair constraints on current residents, particularly affecting the elderly, disabled, and families with young children.
- The plan continues to ignore the traffic assessment produced by ECNF, showing a disregard for local residents' concerns.

3. Design and Environment:

- The site plan still lacks a comprehensive masterplan approved by all involved developers.
- Insufficient attention is given to the Neighbourhood Plan's design codes and landscaping.

4. Local Economy and Environment:

- Proposed parking restrictions will negatively impact local businesses.

- The suggested release of Greenbelt land for school, play areas, and car parking remains inconsistent with the RBC Local Plan, raising environmental and safety concerns.

Given that these significant issues persist in the latest version of the Master Plan, with only superficial changes made since the previous objections, I strongly urge the council's forward planning team to reject this proposal. The lack of substantial revisions demonstrates a failure to address the community's valid concerns and the potential negative impacts on Edenfield's infrastructure, safety, and character.

Yours faithfully,
James Bishop

A solid black rectangular redaction box covering the signature area.

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15 July 2024

Dear Sirs

Objection to Revised Edenfield Masterplan/Design Code- (version 5)

Introduction

Reference has been made within this version of the Masterplan to Stakeholder engagement. A public consultation exercise for the H66 Masterplan has taken place but clearly given the deadline for the submission for feedback to v4 was 10 June 2024, to issue v5 with a checked date of 21 June is a clear indication the LPA have not fully considered any feedback. To allow residents until 19 July to submit any feedback is wholly unreasonable and would indicate the LPA are not taking matters raised seriously. To suggest matters can be addressed at the planning stage is not acceptable, the fundamentals of traffic, schools, local services should be addressed within the Masterplan.

Key Points

Traffic Assessment

The TA has not been updated, it is only that the 186 page document has been disclosed. Given the complexity of the document the time allowed for public comment is unacceptable.

It appears the whole assessment is based on data taken over a period of 3 days in April 2023. Clearly, this is wholly inadequate given the potential impact on the area with a 50% increase in houses.

Within the Northstone traffic assessment which appears to be based on the same professionally provided data, it suggests that across the masterplan site, as a whole, there will be in excess of 297 vehicle movements in the busiest part of the day.

Table 6.2: Traffic generation of 50 units

	Arrivals	Departures	Two-Way
AM Peak	7	22	29
PM Peak	22	11	33

6.4 The site could generate up to 33 vehicle movements in the busiest hour of the day. This is equivalent to one additional vehicle on the network every two minutes.

The estimates according to the full TA are provided by a computer program. The computer report clearly states in red

Junctions 9
PICADY 9 - Priority Intersection Module
Version: 9.5.2.1013 © Copyright TRL Limited, 2019
For sales and distribution information, program advice and maintenance, contact TRL: +44 (0)1344 379777 software@trl.co.uk www.trlsoftware.co.uk
The users of this computer program for the solution of an engineering problem are in no way relieved of their responsibility for the correctness of the solution

The output is only as good the data input.

Further, the program is not able to take into account the impact of schools traffic both within Edenfield and to schools further afield due to the over subscribed Edenfield school capacity.

Crashmap data now updated, however, in any event the LPA are on notice there was a fatality on the road in May 2023.

Based on this data, the suggestion that the “site will operate within capacity following the completion of the allocation development” is clearly incorrect. The Planning Department have a professional responsibility to all residents in Edenfield and should clearly consider:

Is a three day traffic count in April 2023 reasonable for a 50% increase to the number of houses in the area?

Does it accurately reflect the traffic created by schools given this wasn't taken in account previously?

Traffic, Car Parking and Safety

- The Masterplan quite rightly highlights the parking challenges, but the LPA mitigations are unacceptable. On the surface 'Off road parking' seems sensible but there is no mention of security of the vehicles or residents accessing their cars. One of the biggest crimes in Edenfield is car crime.
- Apparently, every new home will have a charge point installed. The street residents, many of whom have been here for decades not only can no longer park near their homes but have no facilities for charging.
- The Masterplan proposes releasing yet more green belt for parking, rather than design the required parking within the development reducing the size of the development which would address some of the issues above.
- The Northstone proposal for the 'Off street parking' area, is 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 further 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, for a reasonable period of time, suggested in October/November ie the darker months, would allow all interested parties to review the risks and consider whether the measures proposed to address those risks are adequate.

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. This has not been addressed.
- 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
- 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

Schools and other essential services

- 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.

- 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.
- Currently Market Street has a number of potholes which are clearly a risk to all road users, in particularly cyclists yet no consideration has been given to the impact of the construction traffic on the roads, aswell as the longer term impact of 400+ houses worth of vehicles on maintainance frequency of the current roads.

Overall Summary of Objections

Criterion	Policy requirement	Masterplan & Design Code Compliance
Policy H66	Development for approximately 400 houses would be supported provided that:	
1	Comprehensive development is demonstrated through a Masterplan with agreed programme of implementation and phasing.	Fully addressed within this document (Masterplan included in Section 02/Page 55, phasing and implementation in Section 03). Objection: The Masterplan does not address the plan for phasing. Any of the phases can be started at any time at the whim of the developer. There is no requirement of co-operation between the developers. It is basically 3- 4 separate developments connected by chaos
2	Development is implemented in accordance with an agreed design code.	Fully addressed within this document (Sections 04 and 05, and Appendix A). Objection: ECNF design code has not been adequately considered.
3	A Transport Assessment (TA) is provided demonstrating safe and suitable access for all users, including:	Detailed TA has been submitted with the Taylor Wimpey Phase 1 application, including a cumulative analysis for the full allocation (as summarised in Appendix C), to be refined through subsequent individual planning applications. Northstone have also submitted a detailed TA, NIA and SI with their planning application.
3		Objection: The TA is a 'Cut and Paste' job. The survey period was too short and doesn't take into account

			schools traffic, both to the local school and the ones further afield due to over subscription of the local school. The LPA owe a non delegable duty to ensure the Masterplan takes into account the impact. Based on the comment, simply referring to a computer generated model, which contains a disclaimer is not acceptable.
	i	Safe vehicular access points adjacent to no 5 Blackburn Road and 88-116 Market Street.	Masterplan and TA work includes approved access points, and an access via Exchange Street, which have been worked up in dialogue with Lancashire Country Council (LCC) (and will be refined through subsequent individual planning applications). Objection: Exchange street is already congested daily. Parking is difficult for local houses. 'Refined' means future promises that may or may not materialize. The parking restrictions are excessive and speed cushions inconvenience regular drivers and are ignored by anti-social drivers. The Masterplan should define the clear strategy.
	ii	Suitable off-site mitigation on Market Street (between Blackburn Road and the Rawstron Arms) to accommodate additional traffic and assist pedestrians.	An overview of off-site mitigation measures is included at pages 46 - 49 , which have been worked up in dialogue with LCC (and respond to their latest comments in August 2023), and will be refined and secured through subsequent individual planning applications. Objection: The measures are insufficient and based on a future possible planning permission. This misses the whole point of a masterplan.
4		A Heritage Statement and Impact Assessment is provided with mitigation to conserve/ enhance the setting of the heritage assets in the area.	Masterplan fully accounts for existing heritage assets (pages 36 - 39), and is supported by the Council's heritage consultee Growth Lancashire. The TW Phase 1 application includes a Heritage Statement (which has also been supported by Growth Lancashire), as will subsequent applications to allow detail to be refined/agreed.
	5	The design and layout needs to take account of:	
5 (cont. overleaf)	i	Retention and strengthening of woodland to the north and south of the Church.	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. Objection:

			<p>The plans indicate almost a 50% reduction in the woodland area. Hardly thinning. Its almost a tree hedge in the plans</p> <p>Yes, the wood could benefit from some thinning but it should be within the original footprint.</p>
	ii	Layout of the housing parcels to allow views to the Church to continue.	<p>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.</p> <p>Objection: Again, it's a future promise to be addressed</p>

Criterion		Policy requirement	Masterplan & Design Code Compliance
5	iii	Relationship of new dwellings to the Recreation Ground to ensure safe non-vehicular access.	<p>The Masterplan shows positive frontages onto the Recreation Ground from the north and west along with additional foot and cycle paths. Detail to be refined/agreed through individual planning applications.</p> <p>Objection: Again future promises</p>
	iv	Public open space to be provided along the woodland area south of the brook/Church enclosure.	<p>The Masterplan includes public open space in this location, including a LEAP, with further detail provided/to be agreed within the TW Phase 1 planning application.</p> <p>Objection: Why cant this be 'agreed' as part of the master plan</p>
	v	Landscaping throughout the site to 'soften' the impact of the development and provide a buffer to the new Green Belt boundary.	<p>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 larger development parcels.</p>
	vi	Materials and boundary treatments should reflect the local context.	<p>Section 01 includes analysis of the existing local vernacular which is then reflected in the character areas (page 52) and area specific design codes (Section 05), with detail to be refined/agreed through individual planning applications.</p>

6	An Ecological Assessment is undertaken with mitigation for any adverse impacts on the Woodland Network and stepping stone habitat located within the site.	<p>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.</p> <p>Objection: Details should be agreed rather than refined The ecological assessment should cover the whole master plan</p>
7	Compensatory improvements to provided to the adjacent Green Belt land in accordance with Policy SD4.	<p>The Masterplan confirms that applications will improve accessibility to wider Green Belt through enhancement of PROWs and local recreation facilities. Off-site compensation for improvements to the wider PROW network and local recreation facilities are noted at page 51 and can be secured through S106 contributions from individual applications.</p> <p>Objection: Pages 51 contains examples of what could be done. Equally nothing could be done...</p>
8	Geotechnical investigations to confirm land stability and protection of the A56, and suitability of locating SUDs close to the A56.	<p>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.</p> <p>Objection: The council might like to review the ground issues facing the development on the former Horse and Jockey site. The original footing proving unstable and resulting in significant pile driving. The council might also review how long the site took to complete.</p>
9	Provision to contribute or expand local schools if there is a need, with land to the rear of Edenfield CE Primary School identified as suitable for expansion.	<p>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 shall 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.</p> <p>Objection: There is no requirement for the school to expand despite the shortage of places. Expansion of the school would involve considerable expense and even more parking challenges</p>

10	Noise and air quality impacts will need to be investigated and necessary mitigation measures secured.	<p>The Masterplan accounts for air and noise constraints across the allocation (most notably the western buffer with the A56). The TW Phase 1 application includes detailed Noise and Air Assessments, as will subsequent applications to allow detail to be refined/ agreed.</p> <p>Objection: There is no provision or budgets to cover this cost or an indication of who will pay. Also, no provision for the continue use of Burnley Road / Market street as a relief road during the regular works on the A56</p>
11	Consideration to potential future road widening on amenity of any dwellings facing the A56.	<p>The Masterplan does not directly consider the widening of the A56 as there is no committed or costed scheme for this; however it does include a stand-off along the western boundary in the relevant southern part of the allocation, which would not physically prejudice widening of the A56 in the future.</p>

We ask Rossendale Borough Council to reject the Masterplan v5 until the above issues have been fully addressed with the Masterplan document.

Yours faithfully

Claire Jewell & Graham Jewell

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 is 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]

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

Jahn Hanson

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

15-07-24

Dear Rossendale Borough Council

Subject: Objection to Proposed Development of 400 New Homes in Edenfield

I am writing to express my strong objection to the proposed development of 400 new homes in Edenfield. While I understand the need for housing, this development raises several serious concerns that I believe need to be addressed.

- **Traffic and Safety:** The addition of 400 homes will significantly increase traffic in our area. This influx of vehicles will lead to congestion, particularly on roads near our schools. The heightened traffic poses a substantial risk to the safety of children, pedestrians, and cyclists. The current infrastructure is inadequate to handle such a surge, potentially leading to more accidents and longer travel times.
- **Environmental Impact:** The proposed development threatens our local green spaces and wildlife habitats. These areas are not only vital for the local ecosystem but also provide recreational spaces for residents. The destruction of these habitats will have a lasting negative impact on local wildlife and reduce the quality of life for the residents who cherish these green areas.
- **Strain on Local Services:** Our local schools and healthcare facilities are already operating at or near capacity. The introduction of 400 new homes could overwhelm these services, leading to larger class sizes, longer waiting times for medical care, and an overall reduction in the quality of education and healthcare available to current residents.
- **Construction Disruption:** The construction of such a large development will inevitably lead to years of noise, dust, and general disruption. This will affect the daily lives of current residents, potentially causing health issues due to dust and noise pollution, as well as reducing the overall enjoyment of our homes and community spaces.
- **Village Character:** Edenfield is known for its unique character and heritage. The scale of this development threatens to undermine the very essence of our village, transforming it into a more urbanised area and eroding the sense of community that makes Edenfield special. Preserving the village's character is crucial for maintaining our local identity and heritage.

In conclusion, while recognising the need for new housing, I urge the council to reconsider the scale and impact of this development. I believe that with careful planning and consideration of the points raised, a more balanced approach can be found that addresses housing needs without compromising the safety, environment, services, and character of Edenfield.

Thank you for your attention to this matter. I hope my concerns will be taken into account during your deliberations.

Yours sincerely,

Jahn Hanson

Sent from [Outlook for Android](#)

Dear Forward Planning team,

Last year, I wrote to you as an 18-year-old, lifelong resident of Edenfield, writing to express my strong objection to Taylor Wimpey's Master Plan. Less than one year later, I find myself writing another letter in response to an almost identical, still-flawed Master Plan for my village.

It's deeply concerning that this plan appears to have changed minimally since its previous iterations, despite the numerous valid concerns raised by Edenfield residents. This lack of substantial revision alone, together with the publication of this latest version before comments related to V4 of the plan could have been considered should be grounds for rejection.

Traffic & Congestion: The plan fails to address the inevitable traffic problems that it will create, it simply shifts congestion from Rossendale towards Bury and fails to enhance our public transport infrastructure. As a new driver, I'm alarmed by the prospect of even more congested roads.

Green Fields vs Brown Fields: It's perplexing that this plan targets our cherished green spaces when numerous brownfield (and "grey field") sites in Rossendale could and should be developed as per the new government's plans outlined in their manifesto. This selection of this site and its overdevelopment appears to be driven by developer profits or administrative convenience rather than sustainable community planning.

Lack of Local Services: The plan still fails to adequately address how local services will accommodate this population increase. Our schools are at capacity, and healthcare services are stretched. The plan doesn't mention how new residents will access these essential services.

Design & Village Character: The proposed 50% increase in Edenfield's size and the out-of-character designs remain unchanged, threatening to irreversibly alter the unique essence of our village.

I note that my objection last year wasn't published on the council website. This oversight, combined with the minimal changes to the plan, suggests that both the council and the developers are failing to engage with the community whether by accident or deliberately. As a young resident who has grown up cherishing Edenfield's character and green spaces, I implore you to reject this proposal. Our community deserves thoughtful, sustainable development that preserves its essence for future generations, not a rehashed plan that continues to disregard our valid concerns.

Yours faithfully, Katie Bishop

████████████████████

Hi,

I would like to mention that it's totally wrong to build houses on the field that Taylor Wimpey are trying to build in in Edenfield Village.

Edenfield is a village and known for countryside views and allowing this is ruining it. This place is my home , where i grew up, playing and exploring and it made summer holidays amazing.

There are plenty of other places that you or another council can allow.

Stop ruining the traditional countryside this part of Lancashire is known for.

It's just greed and money. Do the right thing!!

Kind regards

Miss Dawson

Sent from [Outlook for Android](#)

By email only: forwardplanning@rossendalebc.gov.uk

Forward Planning Team
Rossendale Borough Council
Business Centre
Futures Park
Bacup
OL13 OBB

Your ref:
Our ref:
Date: 12-JUL-24

Dear Sir / Madam

ROSSENDALE BOROUGH COUNCIL – LAND WEST OF MARKET ST, EDENFIELD (H66) - MASTERPLAN & DESIGN CODE – JUNE 2024

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.

In our previous consultation responses, we highlighted various matters requiring additional consideration. Our main area of concern in our previous responses related to the absence of a site-wide drainage strategy. We were specifically concerned with the site in the ownership of Peel / Northstone. The reason for our concern related to the intention of Northstone to discharge surface water to the combined sewer. This included a proposal to discharge land drainage from the acoustic bund to the combined sewer. Our concerns were outlined in response to application reference number 2023/0396. I understand that the drainage proposals for the Northstone parcel are being discussed in detail with the Developer Services team at U UW. On conclusion of these discussions, the Developer Services team will be able to confirm its position in respect of the drainage arrangement.

In relation to the other parcels of development in the wider masterplan, U UW notes the intention to discharge surface water to watercourse. As such, we have no in principle objection to these phases.

U UW would like to continue to emphasise previous comments regarding the integration of multi-functional sustainable drainage systems into the wider site design. In this regard, the drainage drawing on page 77 suggests that the northern parcels of development will bring forward below ground SuDS rather than above ground multi-functional SuDS. The local planning authority should consider whether this is acceptable in accordance with the relevant development plan policy namely Policy ENV9 which states:

'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.'

Notwithstanding the ongoing discussions relating to the drainage strategy for surface water management for the Northstone proposal, we note the following paragraph on page 76 of the masterplan:

'Outfall locations for surface water run off are illustrated on the indicative drainage infrastructure plan. Phases 1 and 2 can connect to existing watercourses. Phase 3 can only connect to the combined sewer system as there is no scope to link into Phase 1 due to no common site boundary and dense woodland separating the two phases.'

This statement appears to incorrectly label the phases and is inconsistent with the phasing plan on page 56 of the masterplan. We suggest that the labelling of the phasing in this paragraph is amended as necessary. For example, the plan on page 56 identifies phase 3 as that owned by the Methodist Church. Our understanding is that this will discharge surface water to watercourse and not to the public sewer as suggested in the above statement.

Uuw notes the land stability appraisal prepared by Mott MacDonald. This is not something on which the planning team at Uuw can comment however, I will share this document with my colleagues so that they can consider this issue in any assessment of the adoption of the drainage proposals for the site. If Uuw is not the adopting authority for the drainage, the applicant/s and the local planning authority should ensure that the alternative adopting authority is aware of the land stability concerns that have been raised by this appraisal.

Uuw notes key recommendation iii) at section 3.1 of the land stability appraisal which states:

'iii) Prior to commencement of construction an assessment of anticipated water flow and drainage capacity of the A56 outfall culvert will be undertaken for RBC/LLFA and NH approval.'

Noting that the final discharge rate into this culvert could be material to the design of the drainage proposals and the wider site design, we would suggest that it would be more appropriate for the assessment of the drainage capacity of the culvert to be undertaken prior to the grant of any detailed planning permission rather than prior to '*commencement of construction*'.

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 Leysens
Planning, Landscape and Ecology
United Utilities Water Limited

To whom it may concern, I wish to object to the newest version of the Edenfield Masterplan on the following grounds:

1. Page 16: There is still no cohesive Masterplan for the four separate proposed developments, and there is still no obvious Design Code.
2. Page 35: the brochure makes liberal use of photos of heritage assets such as the Fingerpost raised beds and Edenfield Recreation area, now wooded, which are supported by Rossendale Borough Council and voluntary groups, but are used here to imply that the proposed development will enhance and/or adopt these.
3. Page 44: this shows, among other things "Proposed School Expansion Area", whilst on Page 51, the same area is suggested as a possible site of "Woodland Planting" as part of the Green Belt Compensation proposals. This is contradictory and possibly disingenuous.
4. Page 49: Traffic Management on Market Street near the shops, and Exchange Street, take no account of the needs of the working and residential population of the village. The proposed No Parking at Any Time markings on Market Street are detrimental to both businesses and residents, and only designed to ease access to the proposed developments. Thanks to the high price of housing, the small houses on Market street are mostly owned by two-car households while having frontages only large enough for 1 car. This has not been taken into consideration. The proposed 1-way on Exchange Street, whilst easing congestion, makes no allowance for current residential or business parking.
5. Page 51: The "dedicated Footpath to Edenfield school" does not specify, or even hint at, how this will compensate for the loss of Green Belt land. Further, "Community amenity and play areas which include gardens focused on food production and edible plants promoting the Incredible Edible Rossendale Scheme" again depends on volunteer support, with no indication of any intent to support the Incredible Edible group. Equally, the "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" seeks mostly to ease traffic on the streets most affected by the extra housing, and offers no obvious enhancement to the natural environment.
6. Pages 58 & 59: in the 5 phases to the proposal only the plots owned by Peel Holdings and The Methodist Church make any mention of Affordable Housing. The largest plot of 238 proposed dwellings contains no "Policy compliant affordable housing at appropriate triggers". This is totally unacceptable, just as is TW's original proposal included only "Up to 30% affordable housing (subject to viability)". Given the current desperate need for affordable and social housing, this largest plot should be **required** to include at least 30% social and affordable housing, which should be the **first tranche** of any construction, not "subject to viability". Furthermore, there should be no possibility for anyone to buy any of these houses on a "Buy-to-Let" basis, as this further restricts the availability of housing to first-time buyers and lower earners.

Yours, Christine Blow

Dear Sir/Madam,

I refer to the above proposed housing development application, and I would like to object against it.

I am a resident of Edenfield, and my children attend Edenfield Primary School. We walk to school every day, as the traffic is already very congested. It is a hazard as there is insufficient places to cross roads safely. With an increase in housing, residents and vehicles, this would become unbearable, and I believe very dangerous for the school children and parents.

The traffic currently results in poor air quality, and we often struggle to breathe whilst out walking. The fumes from vehicles are, without a doubt, getting worse with the volume of traffic that already passes through Edenfield. This is made worse, if there are issues on the by-pass, diverting more traffic through the village. Again, this creates further dangers for residents.

The disruption that that the construction would create would be a nightmare, along with the volume of traffic we already experience. The dust and fumes would only add to the discomfort we have to deal with now.

I also feel that the building would have a major impact on wildlife habitats and the farming community. We already have other areas of green land which are quickly sold up and built on, and a plan such as this one would be hugely detrimental to our environment and wildlife.

There is insufficient infrastructure in place for this number of new homes. The schools in the area are already over subscribed to, and no plans are in place to expand schools to make further places available.

It is already almost impossible for residents to see a GP when needed, and there are no plans to provide any new healthcare facilities to cope with so many new residents. I feel this would create chaos, and would have a major impact negatively on the residents who already live here.

As a village, we can all see that this is such a ridiculous building application, and is purely about financial greed. I feel it is so important that we are heard. Edenfield is not the right place for these new houses. Please respect our calls for this application to be rejected.

Many thanks

Amy Giblin

Dear Sir/Madam,

I am writing to formally object to the Amended H66 Masterplan/Design Code Representation 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

Objection to Masterplan: Land West of Market Street, Edenfield (H66) – Further Amended Masterplan and Design Code (June 2024)

This latest version of an attempted Masterplan has been issued within one month of the closing date for objections to the 4th attempt. This is clearly designed to confuse residents and ensure that insufficient time is given to review the document and revise objections.

The authors of this plan have no regard for the overpopulation in the area; the turning of a village into an insufficient town; the lack of health care available for the new inhabitants; the lack of available school places for the new inhabitants; and the fact they are building on a flood plain and are considering putting sewage pumping stations / underground storage tanks onto the site with little regard to their upkeep. With these in mind there is every chance that this new build / estate will become a messy, smelly and unsanitary ghetto.

With that in mind I would now like to turn to my objections to the document:

1. Traffic – the inherently flawed (3 days in April 2023) traffic survey is again quoted in unaltered form. The addition of ‘turning points’ in the previous document are again mentioned. These are meant to indicate traffic usage at the entrance / exit points of the build sites, when completed. The assumption is that each dwelling will use these points only once per day! This is an incredibly low estimation as most dwellings are projected (by parking provision on sites) to have 2 or more vehicles.

The ‘traffic calming measures’ on Highfield Road, Exchange Street, The Drive and Eden Avenue, are unnecessary as they are already designated as 20mph limit streets. These streets are, at the moment, used only to access current dwellings and, at present, virtually no vehicles come anywhere near to exceeding this speed. So why put the traffic calming measures in? To plan for making it a no parking zone to allow, initially, for construction traffic and then, ultimately, for the traffic to the new estate at a cost to the existing residents in terms of parking restrictions for their own vehicles and the inability of their children to walk or play safely in the street.

2. SuDs – the siting of this drainage system for the majority (60%) of the build is sited at the low point adjacent to the A56 Dual-Carriageway. I mentioned previously the risk to human and animal life. No consideration to the safety of animals and children (other than some greenery around it – so perhaps it should be referred to as the ‘swimming pool’ as I’m sure the local children will) and no consideration for the potential flooding and disaster (risk to life) this will cause on the A56 being placed on an estate that is being built on a flood plain.

3. Phasing – there is clearly not going to be any phasing, all builders want to start as soon as possible to maximise their profits at the expense of the existing / local residents. This is shown in the statement “as a result of the ordering of development phasing may be varied or delivered simultaneously” undermines this completely.

4. Compensatory Car Parking – this is said to involve 3 allocated areas. All are subject to further green belt erosion and planning permission and will be not be sufficient for the 70+ cars to be displaced on Market Street (I've counted them although only 45 cars may actually be unable to park outside their homes) and nor will it take into account the poor parking allocation on the new estate which will result in further parking overflow (2 parking spaces for 4 bedroom houses?!).

These points have been raised previously and ignored by developers. There is no reference to problems with build style / character / build density / increased traffic volume / drainage problems that will undoubtedly be brought about by this flawed and dishonest plan. I therefore contend that this document is wholly incomplete and does not constitute a Masterplan.

Joanne Ash

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

This is my response to the Rossendale Borough Council consultation:

The Edenfield Masterplan/Design Code (V5) 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 " They will build, enhance, alter and adjust. Widening pavements here, planting trees there, extending, phasing , balancing, integrating, improving, modernisingon 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 in it. 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!.

This version 5 addresses very little of the stipulations demanded by the Council or the objections sent in response to previous versions.

Now we have been told the Councils Planning Dept are going to submit this so called Masterplan to the DCC for approval...on 23rdJuly. Presumably they have been told by the developers not to worry about the areas that everyone is objecting to because they can be dealt with by future individual planning applications.!

Well, shame on you!..You know this is not a Masterplan ..You know these insurmountable problems cannot and more likely will not be dealt satisfactorily at a later date.

Once again I urge Rossendale Borough Council to reject this Revised Masterplan /Design Code (V5) for site H66.

Elizabeth Stooke [REDACTED]

Absolutely disgusting once again.

Tell me where all the traffic is going? How will my children cross the road safely? How will I leave my cul de sac safely? A million traffic lights for a million cars?

It's GREEN BELT we live in EdenFIELD.

You are poisoning our village. I don't have a dentist. My doctors is in Ramsbottom and takes months for an appointment. There are no local secondary schools.

WHAT ABOUT THE TRAFFIC?!?

It's unmanageable thinking about that many people and cars!!

There are so many other issues that you haven't responded to as well and I'm sick of it. Making residents reply to yet ANOTHER "amendment". All the while knowing you're beating us until we fight not more.

The village CANNOT sustain these numbers. Focus on the infrastructure, surely you're not all imbeciles, surely one of you has to have a brain and recognise if traffic can only cope single file now then it can't and won't cope with another 1000 cars. SURELY you can merge enough brain cells between you all to see that?

Have a go at addressing the actual serious concerns before sending another waste-my-time form to read.

Melissa Mukuna,
Edenfield

To whom it may concern

I would like to object.

1. **Traffic and Safety:** 400 new homes will increase traffic, causing congestion and safety risks, particularly near our schools.
2. **Environmental Impact:** The development threatens local green spaces and wildlife habitats.
3. **Strain on Local Services:** Our schools and healthcare facilities may struggle to cope with the influx of new residents.
4. **Construction Disruption:** Years of construction will cause noise, dust, and disruption to daily life.
5. **Village Character:** The development's scale may undermine Edenfield's unique character and heritage.

Your voice matters in preserving our community's future. Please submit your objection to the planning authority before Friday, emphasizing how these issues could affect you and your children.

Kind regards

Jamie

17th July 2024

Dear Sir

RE: Amended Masterplan and design code in association Housing Allocation H66 ref :V5

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 26 June 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 issues raised by Rossendale Council and Partners.

The purpose of a Masterplan is to help balance the needs of the developer with that of the existing local community in order to improve the local area and preserve the character of the existing community. The current version of the Masterplan fails to do this and will have a detrimental effect on the village of Edenfield. The potential cost of the new masterplan proposals to established businesses, households and the community is unacceptable.

Below are details of the objections to the H66 Masterplan, these have been explored in more detail on page 2.

1. *This is not a comprehensive masterplan; it does not include information from all stakeholders in relation to the redevelopment of Edenfield and the local community has not been consulted on this version of the Masterplan.*
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3. *Traffic flow on Market Street - Proposed new junctions unsafe and not fit for purpose.*
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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.

Full details of objection to the Edenfield Masterplan are listed below.

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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.
- The potential cost of the new masterplan proposals to established businesses.
 - Closure of local business due to the lack of parking provision – The propose ‘no parking and restricted’ on Market Street will have a major impact on footfall to the local shops, café, Pubs in the village.

- 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.

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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 considered, 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.

The developer has now submitted 5 versions of the Masterplan, residents have had very little time to consider each version before the developers resubmitted a new version. This is unacceptable and the developers are not following their own Statement of Community Involvement.

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

The pressure on infrastructure, causing congestion, and road safety issues have not been addressed. The traffic survey carried out on behalf of the developer, monitored traffic on the road infrastructure for 1 hour in the morning from 07:45 to 08:45 and 1 hour in the evening from 16.45 to 17.45 on 3 days during April 2023. The limited amount of data and evidence from this limited survey has supported the developers' conclusions in relation to transport and road use. This is data sample too small to provide accurate information to inform such a large development.

Other major concerns have not been addressed and the developers have not provided a traffic assessment for the whole site. They have stated 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.

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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.

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

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

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

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

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

5. Removal of Greenbelt land

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

6. The proposed expansion of Edenfield School

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

7. Housing Development

The proposed development by Taylor Wimpy has not 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.

9. Flood risk

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

GP Hoyle

Mr CJ Hoyle & Mrs GP Hoyle

Sent on Behalf of Mr R J Barlow and Mrs HP Barlow -



17th July 2024

Dear Sir

RE: Amended Masterplan and design code in association Housing Allocation H66 ref :V5

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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

Roger Barlow and Helen Barlow

Mr and Mrs RJ Barlow

Hello,

I would like to wholeheartedly denounce and implore you to do the right thing and reject the updated master plan for the following reasons.

1. How can this be considered a complete masterplan when not all of the applications / interested parties have submitted their plans?
2. The updated plan does not consider properly the issues in terms of parkings. Market street is already over filled with cars and will be impacted further by the addition of up to 400 new houses.
3. There is no real plans for schools, for the updated potential population. This needs to be considered further.
4. There is still no plan for flooding, just that test shall be done. How can this be still not tested further?
5. What makes Edenfield and the surrounding areas unique is the small town, rural feel. By adding a population of potentially 800 plus people this would be lost. And even then there's no guarantee that it stops with edenfield, out of principal Greenbelt land should not be built on. In a world where pollution and a supposed striving for net zero and the reduction of carbon emission what an oxymoronic thing it would be to build on a green belt and take that from our community.

I do hope that you truly consider the consequences of your actions when voting on this proposal.

Kind regards,

Tom and Tahreema Shepherd,

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

Sent via BT Email App

Dear Sir/Madam

I am writing to object to the above updated Taylor Wimpey (TW) planning application. It is shameful that V5 has been submitted so soon after V4, presumably because Taylor Wimpey is tired of delays and simply wish to overwhelm and railroad residents into giving up on their objections.

I am not going to reproduce all my earlier objections - they all still stand. I shall bullet point my concerns as follows. In addition, I fully support any detailed concerns raised by the Edenfield Community Neighbourhood Forum which I myself may have overlooked due to the size, scope and complexity of documentation (which, incidentally, I believe is a barrier to many people engaging in this process, sadly):

- This is not a masterplan
- Greenbelt development will have adverse environmental impacts including on local ecology and water drainage. The impact on local flora and fauna during development is not addressed
- The visual impact of the development will negatively affect the character and heritage of the village
- The potential increase in water usage and its impact on local water resources is not addressed
- The plan lacks a details strategy for promoting public transport use
- The proposed housing density seems too high for the available land leading to overcrowding
- I don't believe the short time spent on assessing traffic is a true reflection of the lived daily experience for road users and residents
- The increase in traffic congestion and its management is not clearly defined
- School places remain inadequate to support the proposed development
- The plan does not adequately address the potential impact on local healthcare facilities
- The plan lacks a detailed risk assessment for potential environmental hazards
- The benefits to current residents and businesses from parking restrictions is not addressed.
- Air quality will deteriorate from construction and increased traffic
- Subjecting residents to 15 year construction work and all it will entail is unethical. The likelihood is it will be greater than this
- Noise pollution from construction and increased traffic has not been adequately addressed
- The plan does not provide sufficient details on the proposed community parking areas nor how the potential for increased vandalism and antisocial behaviour will be managed

Yours faithfully,

Janet Smith

██████████
██████████

I write to object to the Edenfield Masterplan / Design Code (rec Version 5 or V5), based on the following points:

- serious traffic and road safety concerns have not been addressed. The sample sizes used for the traffic report are so small I can't believe that is the basis for any judgement or forecasting.
- 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



Dear Sir/Madam,

I wish to object to the latest version of this Masterplan as I feel several significant concerns must still be addressed. My reasons for this objection are:

1. Road safety concerns.

The roads in our village are already very busy, and the increase in traffic raises road traffic and pedestrian safety concerns, especially near the primary school. The current road network, and Market Street in particular, is not designed to handle the additional volume of traffic.

2. Overdevelopment of a small village.

I feel that the scale of the proposed housing development is inappropriate for a small village like ours. The local area doesn't have enough local services like doctors, dentists etc. to accommodate such a large increase in the number of houses.

3. Flood concerns.

Building so many houses in a small area will increase surface runoff, overwhelming the drainage systems. Areas such as Irwell Vale already have a history of flooding issues and this development would likely exacerbate the problem.

Kind regards,

Charlotte Kennedy.

Good Morning,

Further to my previous comments regarding this masterplan, and as a long time resident of Edenfield, I would like to make the following comments.

The Masterplan indicates that a total of over 400 new houses could be built within Edenfield over the next few years.

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

I think it a probability that the majority of these houses will be "two car families", with a number of the larger dwellings consisting of maybe 3 or even possibly 4 vehicles.

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

They would use already busy, narrow roads constructed in the days of the horse and cart, and this could cause gridlock, particularly so at rush hour.

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

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

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

Regards,

[Redacted signature]

[Redacted address line 1]
[Redacted address line 2]

[Redacted address line 3]

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

RE: land west of market St, Edenfield (Site H66) - further revised Masterplan and design code Version 5 (V5) (July24)

Dear Sirs,

We understand that another Masterplan, Now version 5, has been produced and objectors have very little time to engage with this new version. However, we still want to express our objections as matters that we have raised before have not been really dealt with or recognised or redressed sufficiently to make them less problematic. Of course it is of note that now a new Labour government is in place the Labour Council in Rossendale will now run roughshod over the villagers of Edenfield. It looks like a foregone conclusion that the Planning dept are pushing the Masterplan through for approval on 23rd July, without any further consultations with residents or any alterations to the inadequately thought out plans.

As there is little time, I repeat my objections done for V4 below..... I have highlighted in red MAJOR concerns and in green any new dialogue.

Whilst we appreciate that the revised Masterplan, (Now version 5), 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.

Saying that more detailed proposals will be done as part of each individual site planning application is ridiculous as any will have knock on effects on other areas of the village, and added together will have far greater impact on the current residents, their lifestyles and amenities.

I feel that you are deliberately stalling and ignoring the obvious regards the traffic assessment and its consequences. Kicking the can down the road but then I guess you don't live here.

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.

What is the 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

████████████████████

To whom it may concern,

As a resident of Market Street in Edenfield I would like to voice my objection to version 5 of the Masterplan.

The plan does not take into account the combined effects of individual developments on the village and the well-being of its residents. Each profit-oriented developer will act in their own interests, and will not cooperate with each other for the benefit of those of us who live here. Plans to develop the village will seriously impact the health of existing residents, with an increase in traffic that the village does not have the infrastructure to support, an increase in noise and air pollution, an increase in risk for children, adult pedestrians and cyclists, a loss of wildlife habitat, and demands for public services such as schools and healthcare facilities that the village cannot support.

Personally I will be deleteriously affected by these changes; as an older person with declining mobility who lives alone I will not cope with not being able to park outside my home. I have a herniated disc in my neck which means that I am not able to lift heavy objects over anything but the shortest distances. How, then, will I be able to carry shopping or other items into my house? How are we supposed to have work done on our homes? How are we supposed to park anywhere near our properties, when the number of cars vastly outweighs the proposed number of parking spaces near Market Street properties?

As with many people in Edenfield, I do not object to some development in the village. It's a wonderful place to live. However the scale of the combined developments is vastly disproportionate to the capability of the village infrastructure and the residents to cope.

I strongly object to version 5 of the Masterplan.

Yours faithfully,

Dr Susan Bellass
[REDACTED]



18 July 2024

Forward Planning Team
Rossendale Borough Council
Business Centre
Newchurch Road
Bacup
OL13 0BB

Letter sent by email only to: forwardplanning@rossendalebc.gov.uk

Dear Sirs

Edenfield Market Street Master Plan V5

The above document may be an update to its predecessor V4 but in essence both these documents fail to address many of the significant concerns that were present in the September 2023 Masterplan.

Whilst the objections raised in our letter dated 6th November 2023 are not reproduced in full in this letter it would nevertheless be remiss not to include some of the most significant particularly those of personal concern to us by virtue of their immediacy to our location i.e. Exchange Street and these are as set out below:-

Further general points:

- 1. Flood risks overall are a known issue along with the specific concerns from National Highways about the A56. These cannot be ignored put perhaps what is equally significant is that it is also possible that the matters raised by National Highways are not capable of being resolved. Allied to the above is the proposed SUDS location being too near to the A56 posing a further serious road safety concern.*
- 2. The infrastructure required for such a major development as this is still being substantially ignored especially in terms of schools and healthcare.*
- 3. Design codes as detailed in the Neighbourhood Plan produced by ECNF and referred to positively in the Places Matter Design Review report are given very limited consideration whereas they are very much a key issue in this development.*

4. *The importance of the above is enforced when looking at the Taylor Wimpey development and observing that it is both cramped as well as being lacking in green spaces/landscaped areas thereby ignoring the recommendations in the Places Matter Design Review report.*

Exchange Street Area and associated Safety Concerns

1. *The lower reaches of Exchange Street are bordered by a Play Area on one side and a Recreation Ground on the other along with a new Cycle Pump Track. The existence of the above facilities necessarily means the area is regularly used by children both on foot and riding pedal cycles not to mention other pedestrians such as dog walkers etc.*
2. *These aspects alone should be sufficient to make the case that any proposed increase in traffic here is just not realistic, safe or sensible and really would be an accident waiting to happen.*
3. *The proposal to make the street one way with double yellow lines in some parts could make the situation even worse in that traffic would be capable of going faster. Enforcement measures and calming schemes are not likely to satisfactorily resolve matters.*
4. *The street is used for car parking by both residents and those who are working at or who are customers of the local shops - where will they go?*
5. *The left turn into the street from Market Street is blind which considerably compromises safety aspects further exacerbated by double yellow lines and narrow footpaths.*
6. *The proposed changes to Exchange Street will also considerably impact on The Drive – Highfield Road and Eden Avenue creating significant safety issues throughout the area. These are all main access routes to the facilities for those persons noted in 1 above further compounding the safety issues.*
7. *It appears to me that no proposals could come close to creating an environment that would produce the required degree of safety for those using the area.*
8. *In consequence I am bound to say that any proposal to utilise any of the above routes for access to either the Anwyl site or the Taylor Wimpey site is on safety grounds alone just not feasible and must be rejected at all costs.*

A key issue in V5 and one of its most significant (as has always been the case) relates to the roads and road traffic and in this respect it is alarming to see that Planning consider that the limited detail in V5 is sufficient to address these issues.

It is of even greater concern that they feel such issues can be considered as part of individual site planning applications and this is especially so given the number of different developers. Equally it has never been understood that such an approach would be taken which is entirely understandable given that it could never hope to address matters adequately.

The issue of traffic in the whole of H66 must be seen and considered as a whole and not a part and to proceed on any other basis is totally inappropriate and should in itself mean that V5 cannot be accepted.

Other issues of concern about V5 are set out below:-

1. Phasing of building works is still unclear but appears to suggest that the two main sites could be developed simultaneously leading to chaos, congestion and significant safety issues for a period of construction that could span 7 years.
2. Proposed parking restrictions particularly on Market Street and Exchange Street would be detrimental at many levels and the references to compensatory parking remain unclear. These must be clarified in detail and more consideration needs to be given as why parking restrictions are needed in the first place. The following points are also noted in connection with this issue.
 - a. Current residents will be displaced from parking outside their homes.
 - b. The development is skewed toward new residents at the detriment of existing ones.
 - c. Many existing residents in the affected areas are known to be frail and disabled.
 - d. These restrictions will have a negative effect on local businesses and hence the local economy with the potential that businesses will be forced to close as a result of reduced footfall
 - e. How do these issues sit in terms of direct and indirect discrimination when viewed in the light of the Equality Act 2010?
3. Proposed further release of Greenbelt for the school play area at the North end of the village is not aligned to the Local Plan and will have an adverse impact on the environment as well as raising significant safety concerns at what is already a busy junction close to the school.

Based on the above we are firmly of the view that this revised version of the Masterplan remains inadequate at many levels and must be rejected.

By way of further comment we confirm that we fully support the views and objections more comprehensively put forward by the Edenfield Community Neighbourhood Forum (ECNF) and any of its representatives.

Yours faithfully

David Fisher and Sandra Fisher

Good afternoon

I wish to object to the above plan, again!

My children attended Edenfield primary school and this proposed plan baffles me where these additional children it will bring shall be taught.

The whole disruption to school drop off and pick up, not only due to parking (a car park is not the the answer to ridding the area of yet more green space) but to the endless roadworks of prior during and after the proposed build.

The area is currently a beautiful green space which shall be filled with boxes, I don't understand how any local resident could think of any positive outcome of this monstrous amount of boxes you're propping to build.

Traffic!! Prolonged disruption!!!

Please note some of my objections.

Kind regards
Zena Worthington

Good afternoon,

Further to my earlier objections, I am concerned that the council planning committee is still not listening to the people of Edenfield on the following grounds:

- The resulting impact on the village from this substantial development, which is hugely out of proportion with the current size of Edenfield, would be exceedingly detrimental to the rural nature of the area & to the current residents & businesses already residing here
- This isn't a case of 'not in my back yard.' The objection is to the density of the housing. Even if there are only 2 residents to each property (which is unlikely in 3+ bedroom homes) the increase of 800 people is equivalent to over a third of the existing population. Hence the village would jump from some 2,051* to nearly 3,000 residents. And still no mention of single storey dwellings for the projected increase in older people*

*According to the latest Local Authority Profile from LCC

- Recent articles & interviews with Labour politicians elected on 4/7/24 have stated the importance of local infrastructure as part of the planning process. Apart from a passing reference to the primary school, there is no further references to any other supporting infrastructure eg. health care, GP surgeries, dentists, nurseries, availability or expansion of social care etc
- There still remains major concerns regarding transport issues despite residents' substantial opposition, including how the site will be accessed, the vast increase in vehicles through the village, street & parking restrictions, & increased pollution & noise levels within the area. We live here. We see the daily problems of buses & lorries trying to get through the village. We see the delivery vans trying to negotiate narrow road ways. We see the result of accidents on other routes resulting in vehicles detouring through the village. Please listen to our concerns.
- Why are the council so set on this development when there are still many so called grey & brown sites around the valley?

Thank you for considering my comments.

Regards,
Carol Jary

Edenfield resident.

Dear Sir/Madam,

**Objections to Land West of Market Street, Edenfield, Further (Allocation H66)
Masterplan & Design Code, Version 5, dated June 2024**

The consultation for v4 of the Masterplan only closed on 10th June 2024, having received v5 dated only eleven days later on 21st June 2024 and with a very short window to submit comments, it is hard not to question whether comments submitted on v4 have been adequately considered and conclude that the LPA's aim is to push this matter through as quickly as possible regardless of the impact on existing and future residents in the H66 area.

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

The transport assessment within the Masterplan v5 (page 118) is identical to that in v4 (page 116). Our comments on Eddisons' highways consideration of the Masterplan disclosed with v5 of the Masterplan are below. Please note that we do not believe sufficient time has been allowed for public comment on this lengthy and complex document.

- The traffic survey Eddisons' report is based on took place on only 3 days in April 2023. Three days is a very small sample, and this survey only looked at traffic flows in spring. Additional surveys at different times of year are needed, e.g. in autumn/winter when people are more likely to use their cars rather than walk or cycle, to give a more accurate picture. The proposals to increase the number of houses in Edenfield by almost half again, require a more extensive traffic survey to assess the implications for traffic levels throughout the H66 area.
 - Eddisons' Stage 1 Road Safety Audit:
 - Problem 3, page 6: Eddison recommend 'keep clear' carriageway markings are provided on Burnley Road to reduce the risk of side-impact collisions at the access to Northstone's proposed car park. Given the volume of traffic in this area at the start and end of the school day, and the proximity to the traffic lights at the 'fingerpost' junction of the entrance to this proposed car park, we doubt this provision would be sufficient to address the risk of collisions in this area.
 - Problem 4, pages 6-7: further detail is required about the proposed signalised pedestrian crossing at the fingerpost junction e.g. would all crossing points at this junction have pedestrian push buttons and pedestrian crossing signals?
 - Problem 5 page 7: Eddisons have pointed out that introducing gateway features risks increasing pedestrian and vehicle collisions. Even if care was taken to avoid any gateway feature in this location restricting intervisibility splays, why consider introducing a new risk? Is safety not more important than design features?

- 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

- Eddisons' assessment of the number of parking spaces that would be lost by the proposed parking restrictions at the north end of Edenfield and the number of spaces that would be provided by the car park Northstone propose building on green belt land, does not appear to address the volume of traffic and cars parked at the start and end of the school day. Side streets are already congested at these times and we cannot see how the proposed new car park, available for everyone to use, would prevent further congestion in these areas
- Parking restrictions proposed for Market Street would disadvantage current residents many of whom are frail and disabled. Even if the compensatory 'community/visitor' parking areas 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 v5 (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 v5 (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**'.

RBC's Forward Planning Team, in their response to the Masterplan v3 in August 2023 and also included in the 'Table of Developers Responses to the Council's Comments', 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 v5 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 v5 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. This conflicts with the statement quoted above (Masterplan v5, page 8, point 5i) that *"The Masterplan shows how existing woodland has been retained and strengthened where necessary/practicable (including selective thinning and replacement)."* **We request RBC's forward planning team seek further clarification of these proposals for the woodland north of Church Lane now, and do not wait for further planning applications to be submitted.**

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. This version of the Masterplan includes (V5, page 76) that 'Phase 2 will include rain gardens and underground storage containers' – what evidence is there that this is sufficient to prevent flooding onto the A56 dual carriageway which runs next to the Phase 2 boundary?

Overall design: overall impression remains 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. These issues should be addressed within the Masterplan not piecemeal at the planning stage. The approach so far suggests the aim is to not to develop Edenfield as a thriving community but only to provide new housing that requires the occupants to travel, most likely by car, to other areas to access the services they need.

For the reasons above we ask Rossendale Borough Council to reject the Masterplan v 5.

Yours faithfully,

Ann E Durie and Nigel S Stacey,

A solid black rectangular redaction box covering the names of the signatories.

I object to the current proposed planning application, based upon the following points.

1/ The Design Code as detailed in the Neighbourhood Plan, produced for ECNF [referred to positively in the Places Matter Design Report] continues to be given very limited consideration, ignoring the community voice.

Development remains cramped with limited green/landscaped spaces within the site, ignoring the recommendations in the Places Matter Design Review Report.

2/ Serious traffic, cycle and pedestrian safety concerns remain particularly in respect of the Market Street mitigation measures, and at the locations for new proposed junctions in the North, Central and the 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.

3/ Proposed parking restrictions particularly on Market Street and Exchange Street would be to the detriment of existing residents and compensatory car parking is unclear[referred to as community/visitor parking] - this needs clarification as does why there is a need for parking restrictions at all.

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 disabled and frail resulting in direct and indirect discrimination. There is a duty of 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.

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 also continues to raise safety issues at the already busy junction close to the school.

4/ Phasing of building works continues to suggest simultaneous development of the two major sites Taylor Wimpey and Peel - this could lead to chaos, further road congestion and safety concerns for the 7 years of construction.

5/Flood risk and land stability 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.

Vincent W Brady

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Dear Rossendale Planning, I would like to object to Version 5 of the H66 planning application of building west of Market Street.

I still cannot see that this is a valid masterplan as not all builders are involved in the plan and application. This was stipulated at the outset.

The traffic assessment enclosed here states that Rostrons Roundabout will be adequate for traffic in the foreseeable future. This contradicts the traffic assessments done by the Rossendale Council which stated that the Rostrons Roundabout in Edenfield was one of several points in Rossendale, which would be unable to cope with extra traffic in the near future over the next decade or sooner.

There is no satisfactory parking mitigation. Displacing current Edenfield residents from parking outside their homes with double yellow lines is discriminatory and not a solution. Unwanted car parks, sometimes in inconvenient locations, far from the houses, and certainly much further than I could walk as a disabled person from a house in Exchange St if I wanted to buy one affected there excludes residents from certain houses in Edenfield and will devalue those residents houses.

The yellow lines and restricted parking are also outside the few shops in Edenfield. This will restrict parking and could damage business here in Edenfield.

The phasing of the building is unclear and raises the prospect of a small village with multiple developments and builders lorries coming along an already busy Market St, for many years to come.

The suggested car park off Burnley Rd was not in the original strategic plan. It is in greenbelt. It seems vague as to why it is there. However it is badly placed at a busy junction. It also seems unneeded. I would think it is a security/ safeguarding concern for the school, being an extra entrance which will need security to stop unwanted visitors and harm to schoolchildren. The field is known to flood badly.

The fields of the west of Edenfield is known to flood badly in heavy rain. This will be worse when houses are built.

Similar with the Blackburn Road site. This is low lying and marshy.

To where are the bus stops going to be moved? There is one at Pilgrim Gardens, one at Alderwood, and one at Vale Mill Court past the Blackburn Rd allocation. All it says is these bus stops will be "improved". That means nothing. Some of these bus stops will have to be moved. A bus stop can only be moved so far and it is too near/far from another bus stop. This will be another inconvenience to Edenfield Residents, especially the elderly and disabled. There was also an agreement for the developers to part fund the X41 Manchester- Accrington bus because it was I think uneconomic. Please can this be confirmed.

The plan says it will use loose chippings for traffic control

There is a plot of land behind Edenfield School for the extension of Edenfield School. How will this work? How many children would be expected? I assume they would not be whole new class rooms of children? How would you fit in a few extra children in each year? What about SEND pupils who need extra support? Where will the children go after primary? Will the builders support secondary education?

Will the builders pay for the repairs to the roads that their heavy wagons and other vehicles cause?

Edenfield Community Neighbourhood Forum worked hard on the plans and seem to have been ignored. They helped people in Edenfield to do likewise. I can only say thank you for all their hard work.

Thank you

Yours faithfully

Jane Hartley Jacques

████████████████████
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██████████

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Edenfield Community Neighbourhood Forum worked hard on the plans and seem to have been ignored. They helped people in Edenfield to do likewise. I can only say thank you for all their hard work.

Thank you

Yours faithfully

Robert Henderson

[REDACTED]
[REDACTED]
[REDACTED]

Dear sirs,

I wish to register my objections to the above plan for the following reasons:

1. The Neighbourhood plan for Edenfield contains a Design Code which continues to be largely ignored in any of the planning applications, thereby ignoring the wishes of the Community.
2. There are serious concerns regarding the increase in traffic which will occur as a result of the development and also the difficulties involved in accessing the sites in the north, south and central areas. There are serious concerns regarding the safety of pedestrians, in particular, school children and disabled people despite the requirements of the Local Plan for a whole site approach to this issue.
3. The proposed parking restriction, particularly on Market Street and Exchange Street will create serious disruption for current residents and any visitor to the area. There is no clear indication as to the reasons for the parking restrictions or to any to the siting of any compensatory parking.
4. The impact of these restrictions on local businesses does not appear to have been addressed at all.
5. The building works, which it is suggested could take over 7 years is surely likely to create significant congestion and the lack of infrastructure, including /schools and healthcare need to be addressed urgently. The National Highways Agency have expressed serious concerns about flood risk and land stability issues at the site

Yours sincerely,

Gaynor Brady(Mrs)

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We object to the above recent submission for the following reasons:

1. Increase in traffic

An already existing issue with heavy traffic through the village, particularly on Market Street, will be further exacerbated to a level of inevitable gridlock at busy periods during the day. This is a regular occurrence at the moment and has been over recent years, especially with regular issue on the bypass meaning that the village is used as a diversion.. The village simply cannot take another 400 houses based on the existing road usage. The existing parking is on-street for those residents on Market Street which means that the road is narrowed to just over a single carriageway at all times. This causes continual congestion throughout the day, everyday. The additional traffic from 400 extra houses would render the situation chaotic at best. There are lots of elderly residents who have to park outside their houses and it would not be physically possible for them to have to park elsewhere. There is no clear detail as to how these issues will be eradicated with the proposals. There has been no indication of an increase in public transportation to help alleviate the traffic issues. Also, it doesn't bear thinking about what the situation will be like during the construction phase which is planned to last for 7 years!

2. Flooding

The land around Edenfield is already saturated due to inadequate land drainage based on the current infrastructure. There are regular instances of serious flooding on the surrounding roads and properties. This would be worsened with the additional houses. There are no details of plans to address this situation by the developers.

3. Schools and Healthcare

There are details of how the additional population within the village will be catered for in terms of schooling and healthcare. This will also have a huge impact on existing residents.

Regards

Greg Webster, Anna Webster and Oliver Webster

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██████████

Hello

I strongly object to the latest version (5) of the above Masterplan. Many issues are still unresolved. Please refer to my objections to and comments regarding previous versions. Unresolved issues are:-

Parking
Transport and road safety
Flood concerns
Phasing of development
Schools and facilities

Also concerns of further release of greenbelt for a car park, and the neighbourhood plan work done so far being ignored.

I also strongly object to the way that you are suddenly now trying to push this through to the Development Control Committee at such short notice and without resolving all of the above issues. I understand that it has been added to an already full agenda at the last minute, giving interested parties and councillors no time to prepare. In a similar vein, you commenced this very short public consultation on version 5 extremely hot on the heels of version 4 and during a time when many people will be on, or about to go on holiday.

I thought that you were there to help us, not to make things as difficult as possible.

Regards

Elizabeth Latham

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██████████

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I thought that you were there to help us, not to make things as difficult as possible.

Regards

Trevor Latham

[REDACTED]

[REDACTED]

Dear Forward Planning

I am emailing my objection to Masterplan V5

The revised Masterplan leaves me more concerned than ever for the development of the H66 site, for the same reasons detailed in my previous objections which I ask you to refer to, the issues raised still not being resolved. These include: -

- Transport assessment, road safety and road infrastructure for the development - the issues regarding traffic and pedestrian, particularly the Market Street Corridor mitigation measures and surrounding streets, are still not resolved - data used to format the traffic assessment is out of date by almost 18 months, the road safety audit is less than adequate and a token gesture it taking only 50 minutes to complete for the whole of site, with admittedly insufficient information and at the quietest time of day, with no response to the requirements highlighted. The phasing of the road infrastructure is vague and lacks detail, hence open to interpretation by developers. A more firm plan for the whole site is required before the Masterplan is ratified, rather than a piecemeal approach by individual developers as part of their planning application to avoid unprecedented disruption to the village over the next 10 years making it unpleasant for residents to live here.

Road infrastructure should be phase one of the development so that there is as little disruption to existing residents as possible.

- Compensatory car parking for parking lost by residents

One of my biggest concerns and that of residents is removal of parking on Market Street and surrounding streets without sufficient compensatory car parking and phasing of development. The community car parking proposed is not compensatory as it is open to all to use. The phasing of the building of car parking is vague.

Compensatory car parking and road infrastructure should be phase one, not building development, to ensure existing residents are not unfairly discriminated against for the sake of development. The Masterplan should not be ratified until a more detailed plan and phasing of car parking is resolved for the whole H66 site.

The proposal to build a car park on green belt land and further loss of green fields in Edenfield is detrimental to the environment and shouldn't be allowed. The H66 site was released for development and this should be sufficient to cover housing development as well as facilities such as car parks.

- Phasing of development not only of the build but the road infrastructure and compensatory parking required for development

The phasing of development is too vague and open to interpretation.

A more detailed programme of development should be detailed within the Masterplan to ensure that Edenfield isn't one big building site for the next ten years and it having a detrimental effect on existing residents life's, making it difficult to commute in and out of

Edenfield, and avoiding impact of noise and building pollution. This was a promise in the local plan when the H66 site was released from Greenbelt.

As mentioned above it is imperative that phase one is the road infrastructure and parking, then phasing of development can come after. The Masterplan mentions simultaneous development which contradicts the requirement of the local plan and hence any suggestion of this should be removed before the plan is ratified.

- Flood risk

The flood risk remains a significant concern particularly on the Edenfield By Pass, again any issues relating to this needs to be considered as a whole as part of the Masterplan, rather than a piecemeal approach as part of planning applications. As a resident the flooding on the bypass is getting worse year on year, a constant flood warning sign being put up throughout the winter months, the development of the site has the potential to make this worse if the risk not resolved from a whole site approach causes a serious safety concern.

- Provision of facilities, particularly school provision - whilst the Masterplan talks about the development of school provision this is very vague and there should be a more detailed approach, taking account of the impact of the whole site. Until this is resolved the Masterplan should not be ratified. As a resident of Edenfield my children had to go through a humiliating appeal panel to have their children placed in a school in Edenfield due to lack of school place when they moved into the village. This shouldn't have to happen and issues regarding schooling need to be planned for as part of the Masterplan.

Having got the above concerns I now find it even more concerning to be informed that V5 Masterplan will go to the development and control committee next week, the report being written and circulated prior to this close of consultation. This provides me no reassurance that residents and consultee voices are being listened to and acted upon. On this basis I feel even more strongly that the Masterplan should be rejected until all these issues are resolved.

I appreciate your time reading this email and hope to hear that some of these issues can be resolved in the future before the Masterplan is ratified. I do hope that the infrastructure required for development and requirements of existing residents particularly in relation to car parking, traffic and phasing remains a key priority and is not compromised for the sake of building houses or a piecemeal approach taken. If it means creating more open spaces and reducing the size of development to ensure the correct infrastructure and safety for residents, surely this could be a good compromise. I fear, if not, that existing residents are being discriminated against for the sake of development which is wrong.

Yours sincerely

Helen McVey


Audrey Davis

Hi,

I wish to register further objections to the latest version of the Masterplan V5 as I feel previous objections have still not been addressed. The scope of the plan is too vast for the village (proposed 'Urban service centre' - EDENFIELD would no longer be a village) and local services will not cope. The required infrastructure should be addressed and implemented before any further development in Rossendale is undertaken. There are already insufficient doctors, school places, dentists etc and the continual development within the borough is putting all services under duress. The main roads in the valley, especially through Rawtenstall and on the A56 Edenfield bypass at peak times, hardly cope with existing traffic, let alone with the additional significant increase in traffic that a development of another 400 houses would produce. The Edenfield bypass was built to take traffic away from the roads through the village - this proposal would add several hundred extra cars to the village roads. Public transport is not an option for many journeys - insufficient bus services and non-existent rail links. In the traffic report accompanying the Masterplan it was noted that there had only been a single accident in the village, minor in nature, but fails to address the numerous accidents that occur on the bypass. Every time the bypass is closed, for whatever reason, travel through the village is virtually impossible. It would be irresponsible to pass planning permission without this critical infrastructure being addressed.

Taylor Wimpey have continually stressed that their proposed plan is community led. Why then are they not listening to the concerns and views of existing residents? Why should residents who have previously been able to park outside their properties now be expected to use car parking away from their houses? Why should parents have to worry if their children are going to have a place at their local school or be able to register with a doctor or dentist? What will be the effect on daily lives throughout a possible SEVEN YEARS of disruption due to construction noise and traffic? Is making Exchange Street one way an 'improvement'?

Regarding the Chatterton South allocation. I feel the high housing density is inappropriate to the size of the plot. The proposed access to the area is wholly unsuitable - the potential extra traffic would have to travel along already congested roads, past the Childrens playground, pump track and recreation field making it extremely hazardous for children accessing these amenities. Exchange Street, Highfield Road, The Drive and Eden Avenue were not designed to cater for the extra traffic that will be inevitably created by an additional 90 houses. The exit from Eden Avenue onto Bolton Road North suffers from a limited view of the traffic travelling up the road due to the bend in the road and is quite often further limited due to cars parked at the shop. I would suggest that access from the site is dangerous and ill thought through. I would like to ask whether a proper assessment has been carried out regarding the feasibility of this route for all the extra traffic which would result from a development of the proposed size of the site?

Finally as a resident of Edenfield for 63 years I have witnessed many changes to the village. Services have been depleted - there used to be regular bus services to all the surrounding towns, there was a doctor's surgery, several shops ranging from greengrocers to antiques, 4 pubs, Italian and Chinese restaurants. However there are still several well established businesses eg the bakery, butcher and hairdressers. Also there have been several small new housing developments which have been well absorbed into the village. I realise that there is a need for housing on a national level. I am not a NIMBY just a realist. I know there should be some further development of the village but it should not be on such a huge scale. PLEASE DO NOT DESTROY EDENFIELD VILLAGE.

Kind Regards,
Audrey Davis.

OBJECTION



Complete objection to Edenfield Masterplan (V5) due to the following concerns still not being addressed;

Parking provision throughout the entire village

Transport & Road safety specifically traffic concerns & safety of pedestrians

Phasing of building works

Required infrastructure & availability of essential amenities, specifically school facilities

Flooding concerns & detrimental effects on the environment & local ecosystem

Further release of green belt

Regards

Rob Neave

Sent from my iPhone

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 fact that new proposal that has been put in has very few changes and very little time for people to object during the summer is disgraceful. The council should be ashamed by the whole thing. This development is not right for Edenfield on any level.

The main points brought to my attention are as follows

- Disruption to local schools with extensions is disgraceful. As is using there playing fields for it!
- 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

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 that we feel have still not been resolved.

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 (



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Yours Sincerely

Frances Hartley 

I would like to object (again) to the proposed housing development on Land West of Market Street (Application H66). This could significantly impact our community, especially our school and road safety. My main concerns are:

1. **Traffic and Safety:** 400 new homes will increase traffic, causing congestion and safety risks, particularly near our schools. Roads around Edenfield are already busy and the addition of possibly 800plus cars entering and leaving Edenfield each day will obviously massively impact the infrastructure and safety of our children.
2. **Environmental Impact:** The development threatens local green spaces and wildlife habitats.
3. **Strain on Local Services:** Our schools and healthcare facilities may struggle to cope with the influx of new residents. I find it hard to understand how the local schools will cope with no concrete plan to ensure there will be enough school places for local children.
4. **Construction Disruption:** Years of construction will cause noise, dust, and disruption to daily life.
5. **Village Character:** The development's scale may undermine Edenfield's unique character and heritage.

Kind regards
Natalie Paintin
Edenfield resident