

**Responses Received to Edenfield Neighbourhood  
Plan 2021-2036 - Submission Version**

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**MESSAGE SENT ON BEHALF OF Dr JOHN O'MALLEY (Clinical Lead for Rossendale East PCN) and Dr ABDUL MANNAN (Clinical Lead for Rossendale West PCN)**

Dear Planning Team

We anticipate that this application will lead to additional homes. If correct this will place additional pressure on local services, such as the ability of those residents being able to register with a local GP Practice.

Without both the opportunity and enabling resources for those local GP Practices who are able to expand, this additional pressure will negatively impact on the General Medical services provided to both existing and any new patients in the area. The nine Rossendale GP Practices are already either at their limit or very close to it in terms of GP patient registrations and on that basis, without the provision of additional funding, we object to this proposal and trust that this objection to be considered by the council.

However, in support of local GP Practice expansion, both of the Rossendale PCNs would like to explore with Rossendale Borough Council, the opportunities provided by section 106 / CIL funding initiatives. Potentially a successful application would provide much needed additional resources to those GP Practices who are able to expand, so as to leave them best placed to respond to the increased workload that housing developments create.

Regards

**Andy Laverty**

**Rossendale PCNs**

Tel.

Email:



I have reviewed the Edenfield Neighbourhood Plan submitted documents and I have no additional comments to make.

Kind regards,

**Olivia Birks**

**Heritage and Conservation Advisor**

**Growth Lancashire**

A:

M:

E:

W: [www.growthlancashire.co.uk](http://www.growthlancashire.co.uk)

Growth Lancashire Limited is a Company incorporated under the Companies Acts (reg. no. 05310616). Registered office : Lancashire County Council, County Hall, Fishergate, Preston PR1 8XJ.

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]



The Coal  
Authority

[Redacted]

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

**For the attention of: Forward Planning Team**  
Rossendale Borough Council

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

18<sup>th</sup> July 2024

Dear Forward Planning Team

**Re: Edenfield Neighbourhood Plan Regulation 16 Consultation**

Thank you for your notification of the 18th June 2024 seeking the views of the Coal Authority on the above.

The Coal Authority is a non-departmental public body sponsored by the Department for Energy Security and Net Zero. As a statutory consultee, the Coal Authority has a duty to respond to planning applications and development plans in order to protect the public and the environment in mining areas.

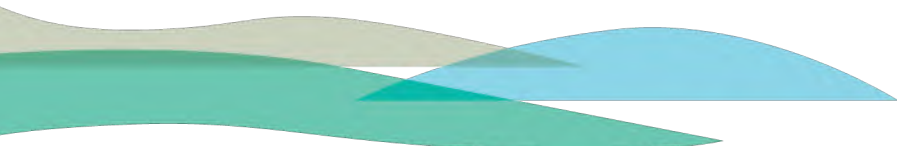
Our records indicate that within the Edenfield Neighbourhood Plan area there are recorded coal mining features present at surface and shallow depth, in this case coal outcrops which may have been subject to historic workings. If shallow coal workings are present then these may pose a potential risk to surface stability and public safety.

It is noted however that the Neighbourhood Plan does not propose to allocate any new sites for development. On this basis the Planning team at the Coal Authority have no specific comments to make on this document.

Yours faithfully

[Redacted Signature]

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





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



Our ref: PL00792180

22 July 2024

Dear Forward Planning

**Edenfield Neighbourhood Plan - Regulation 16 consultation**

Thank you for consulting Historic England on the above consultation. We are the Government's statutory adviser on all matters relating to the historic environment in England. We are a non-departmental public body established under the National Heritage Act 1983 and sponsored by the Department for Culture, Media and Sport (DCMS). We champion and protect England's historic places, providing expert advice to local planning authorities, developers, owners and communities to help ensure that our historic environment is properly understood, enjoyed and cared for.

We do not wish to make comments in relation to this regulation 16 consultation. To avoid any doubt, this does not reflect our obligation to provide further advice or potentially object to specific proposals which may subsequently arise as a result of the proposed neighbourhood plan, where we consider these would have an adverse effect on the historic environment.

Thank you once again for providing Historic England with the opportunity to comment. Please do keep us informed of any future progress on this plan.

Yours sincerely,

Pippa Brown  
Historic Places Adviser



cc:



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



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

Thank you for inviting National Highways to comment on the following document intended for consultation by Rossendale Council:

FAO: Forward Planning Team, Rossendale Borough Council

Edenfield Neighbourhood Plan

**Policy T1** seeks to ensure that any new development will promote sustainable forms of transport to support this modal shift.

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*

NH support the inclusion of this Policy within the Neighbourhood plan to promote sustainable forms of transport.

**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 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*

NH fully support the inclusion of this policy T2 encouraging the requirements to carry out Transport Assessments including an assessment of the impact of traffic generated on the SRN.

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

Kind Regards



Lindsay

**Lindsay Alder, PGCE,  
Pronounced: Lind-say AI-der  
Pronouns :She/Her/Hers  
Spatial Planner  
Network Development & Planning Team  
OD EDI Lead  
Equality Diversity and Inclusion NW Champion**

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

[REDACTED]  
[REDACTED]  
[REDACTED]

[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/>

As a resident of Edenfield I am contacting you to confirm my support for the Edenfield Neighbourhood Plan as currently subject to consultation.

Over recent years I have been a committee member of the Edenfield Community Neighbourhood Forum so have seen the plan progress over various stages to its current format. Whilst I have not personally been very involved in the production of the plan I am aware that a considerable amount of time and effort has been spent by others on the plan.

I believe the plan has been produced to really reflect the needs of Edenfield which like many small communities has its own unique characteristics. Furthermore I feel that the plan has been very well tailored to reflect the comments/views received on previous consultations whilst also reflecting the input of third party professionals.

In view of the above I hope the plan can progress through its final stages in due course.

Mervyn MacDonald

Sent from my iPad

# EDENFIELD NEIGHBOURHOOD PLAN: CONSULTATION REPRESENTATIONS

July 2024

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## Introduction

These representations have been prepared by NJL Consulting on behalf of Northstone Development Ltd (referred to as the 'Northstone' hereunder) in response to the consultation on the draft Edenfield Neighbourhood Plan, which will run for 6-weeks, closing on the 30<sup>th</sup> July 2024.

Northstone seek to bring forward new development within Edenfield, and more specifically the H66 allocation. They represent a key stakeholder within Edenfield, having already prepared the Edenfield Masterplan Design Code in partnership with other key landowners within H66 allocation, and have submitted a detailed planning application to bring forward development of their land holdings as part of the delivery of this adopted allocation.

The Neighbourhood Plan is intended to set a framework for future development in Edenfield up to 2036, and if adopted will be a material consideration in determining planning applications in this area, alongside the Local Plan.

These representations pay regard to site-specific implications for the H66 allocation with a particular focus on our Client's application site. The representations also consider the requirement for consistency with the existing development plan and weight the Neighbourhood Plan should be afforded in decision making, in accordance with the policy hierarchy.

Our Client is pleased to see that the Council recognises the need for scrutiny at this stage of the Plan's adoption by those parties that are going to be investing within Edenfield, in order to deliver a document with sound policies and guidelines. Northstone wish to continue to be involved in the preparation and implementation of the Neighbourhood Plan so that the document is genuinely effective in delivering a shared vision for high-quality placemaking.

## Policy Hierarchy

In the first instance, it is understood that a Neighbourhood Plan forms part of the development plan and sits alongside the adopted Local Plan. Decisions on planning applications will be made using the Local Plan, Neighbourhood Plan, and any other material considerations (PPG Paragraph 003, Reference ID: 41-003-20190509).

## EDENFIELD NEIGHBOURHOOD PLAN: CONSULTATION REPRESENTATIONS July 2024

A Neighbourhood Plan must be in **general conformity** with, and plan positively to support, the strategic policies of the development plan (PPG Paragraph 036, Reference ID: 41-036-20190509)

In this context, the adopted Rossendale Local Plan (2019 to 2036) includes the site-specific **Policy H66: Land West of Market Street, Edenfield**. Our Client's application site forms part of this allocation. The Policy confirms that 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."*

As required by the Policy, our Client, in partnership with the other key landowners within the H66 allocation, has prepared the Edenfield Masterplan Design Code ('MDC') which has been subject of extensive stakeholder and public consultation. The MDC has now been presented to a Special Planning Committee on 23<sup>rd</sup> July 2024 and members recommended that the Cabinet now approve the document for use to address the requirements of Condition 1 above.

The document provides ongoing design guidance for subsequent planning applications relating to the H66 allocation. It identifies key themes and character areas throughout the development. It presents the full allocation Masterplan, a phasing and implementation strategy, and sets out the key principles to be applied to the future development of the land parcels within it.

The Neighbourhood Plan, in its current form, appends the Design Code Report prepared by AECOM (dated January 2024). The Design Code Report is intended to aid the preparation of the Neighbourhood Plan and is not a Neighbourhood Plan policy document (Page 2, Design Code Report).

The Neighbourhood Plan and Design Code Report fails to reference the MDC. There are also inherent conflicts between codes suggested within the Design Code Report and the MDC. These relate to the proposed density in certain locations of the H66 allocation and the use of Green Belt land to accommodate residential development within H66. This conflict is discussed in more detail later in these representations.

## EDENFIELD NEIGHBOURHOOD PLAN: CONSULTATION REPRESENTATIONS July 2024

It is our view that site specific masterplans are considered to be the most appropriate and logical approach to embedding urban context to deliver design solutions that are both creative and complementary to the existing character.

We therefore strongly recommend that wider community aspirations than those relating to the development and use of land, such as the Design Code Report, are set out in a separate companion document, and not appended to the Plan. In this way, it is clear that the document will not form part of the statutory development plan, as per PPG Paragraph 004 Reference ID: 41-004-20190509.

Overall, clarification is needed on the implementation of the Neighbourhood Plan alongside area specific guidance to prevent undue weight being afforded to the Neighbourhood Plan at the expense of significant design driven factors.

### **Land at Blackburn and Burnley Road**

As above, Northstone's site forms part of the H66 allocation. Our Client's site is split into two development parcels;

- **Parcel 1:** Land at Blackburn Road; and
- **Parcel 2:** Land at Burnley Road.

Parcel 1 is proposed for residential development and is identified as part of the H66 allocation. Proposed development at Parcel 2 will deliver a community car park and associated public open space to accommodate the residential allocation, H66.

### **Parcel 1 Comments/Feedback**

The Design Code Report provides guidance on housing density. Parcel 1 is identified as being located within the Former Rural Fringe character area. According to Code HD1: Housing density, low density detached homes are appropriate for this character area. However, within the MDC, Parcel 1 is located in the Edenfield North character area. The area type guidance (AT/EN 01) code of the MDC expects a density of 30-34 dph, lower than the Edenfield Core to reflect the position at the northern fringe.

The low density as diagrammed on Page 52 of the Design Code Report does not consider site-specific constraints such as the acoustic implications for Parcel 1. This is another example of

## EDENFIELD NEIGHBOURHOOD PLAN: CONSULTATION REPRESENTATIONS

**July 2024**

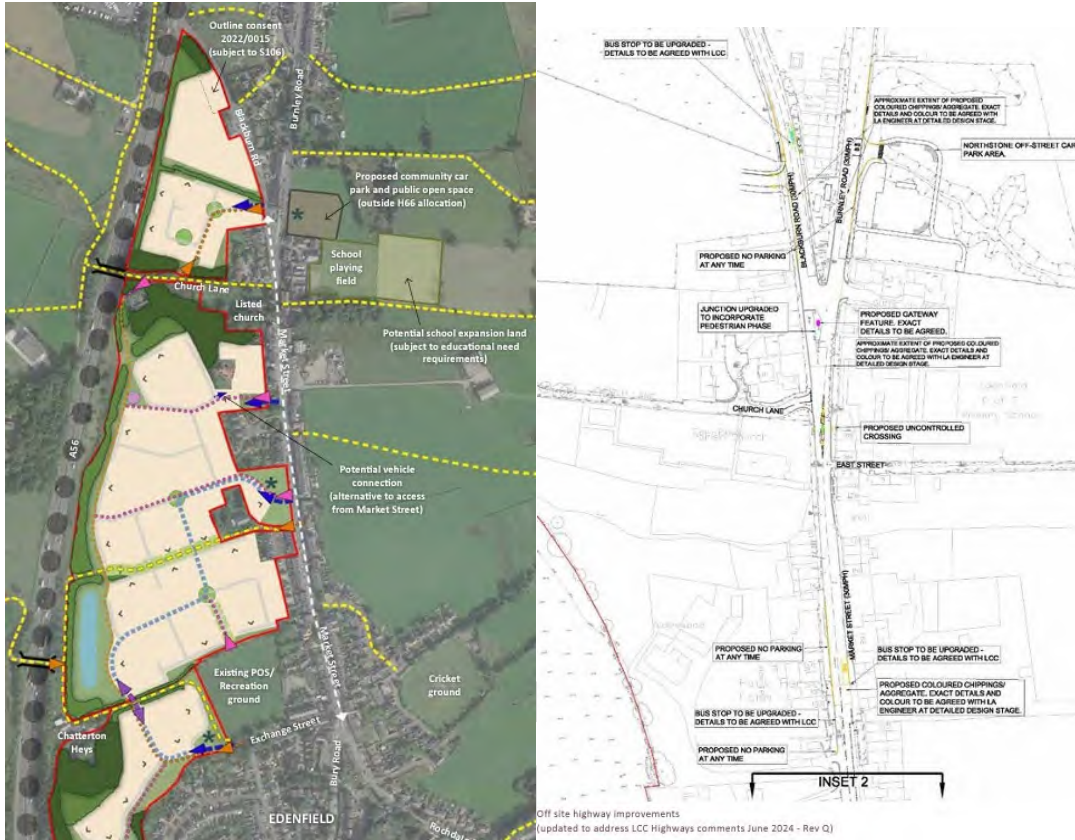
where the Neighbourhood Plan and associated Design Code Report needs to be revised to align with the site-specific guidance for the H66 allocation. This alignment is particularly important since the MDC has been approved by a Special Planning Committee in advance of the Neighbourhood Plan. If this was not remedied, the emerging Neighbourhood Plan would not accord with adopted development plan policies.

### **Parcel 2 Comments/Feedback**

The emerging Edenfield H66 Masterplan has been prepared to address the requirements of Condition 1 of Policy H66. This includes an area for a community car park and public open space – this being Parcel 2. The car park is a core component of the Market Street Corridor Improvements required to facilitate the residential allocation in directly dealing with the requirements of Condition 3 ii which requires *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.*

These works have been developed collaboratively with the highways authority and local authority and are fully laid out in a Transport Assessment prepared by Eddisons to support the MDC and form an integral part of the MDC in relation to relieving pre-existing transportation issues affecting the village, improve access and promote better pedestrian and cycle connectivity.

# EDENFIELD NEIGHBOURHOOD PLAN: CONSULTATION REPRESENTATIONS July 2024



*Land West of Market Street, Edenfield Masterplan and Design Code Extract*

The Neighbourhood Plan makes reference to and acknowledges the Market Street Corridor solution, more specifically the car park at Burnley Road within the site-specific Policy HO4: Site H66 Design and Layout.

The proposed car park at Parcel 2 will deliver critical infrastructure specific to the Market Street Corridor solution. It is identified within the MDC as being the best available location in the village for this infrastructure to provide future improvements to complement the road improvement works, public transport infrastructure and public realm improvements.

This reinforces the need for a site-specific transport policy for the allocation that aligns with the MDC and it forms a local infrastructure policy permitted under the NPPF. Policy DMR1 Local infrastructure provides a delivery and monitoring policy within the Neighbourhood Plan that could be expanded to cross refer to the specific works and its delivery timeframe and milestones.

## EDENFIELD NEIGHBOURHOOD PLAN: CONSULTATION REPRESENTATIONS July 2024

Overall given the advanced stage of preparation to accord with the conditions of Policy H66, we consider it is necessary that the Neighbourhood Plan and its appended evidence base incorporate the proposed infrastructure works delivered in conjunction with site allocation H66 for it to be consistent with the adopted development plan.

### **Neighbourhood Plan General Policies**

The emerging Neighbourhood Plan includes Policy HO2: Affordable Housing Delivery. For avoidance of doubt, we have provided the policy wording below:

*"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.***

Our Client welcomes the support of a flexible approach to affordable housing to take account of viability and changing market conditions overtime. It is critical that flexibility is built into the application of this policy, allowing for changes to people's live / work patterns to be considered, which will influence registered provider's (RPs) preferences. We therefore support the non-prescriptive reference to up-to-date evidence of local needs, as this can relate to both Housing Needs Assessments commissioned by the Council and independent localised evidence from RPs, which can be more up-to-date and area-specific. As currently worded, Policy HO2, supports a flexible site-specific approach to affordable housing in Edenfield, which we welcome.

As per National Planning Policy Framework Paragraph 30, it is our view that Policy HO2, once made, takes precedence over existing non-strategic policies in the Local Plan covering the neighbourhood area. It therefore presents the best approach to affordable housing in Edenfield, allowing the Neighbourhood Plan to be effective in shaping development.



## EDENFIELD NEIGHBOURHOOD PLAN: CONSULTATION REPRESENTATIONS

**July 2024**

Notwithstanding the above, there is an absence of localised housing evidence supporting the Neighbourhood Plan above and beyond the Strategic Housing Market Assessment (SHMA) (updated 2019) that informed the adopted Local Plan. We would therefore strongly urge any housing needs evidence supporting the Plan be made publicly available so that it can inform developments within the neighbourhood area.

DRAFT

# Representations to Edenfield Neighbourhood Plan Regulation 16 Consultation

On behalf of Taylor Wimpey (UK) Ltd

Date: July 2024 | Pegasus Ref: MAN\_0299\_R012\_PL\_MAN\_KW\_ST

Author: KW/ST

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## Document Management

Version	Date	Author	Checked/ Approved by:	Reason for revision
V1	24/07/24	KW	ST	



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# 1. Introduction & Background

- 1.1. Pegasus Group has been instructed on behalf of our client, Taylor Wimpey, to submit representations to the Edenfield Neighbourhood Plan (“NDP”) Regulation 16 consultation which runs until 30<sup>th</sup> July 2024. These representations are made in respect of their land interests west of Market Street, which is located within the Neighbourhood Plan area.
- 1.2. Taylor Wimpey is the freehold owner of 12.5 Ha of land west of Market Street which is included within a wider allocation for approximately 400 homes (reference H66), within the Rossendale Local Plan adopted in December 2021. A plan is provided at **Appendix 1** for clarity. A planning application for the erection of 238 dwellings (2022/0451) is currently pending determination.
- 1.3. Taylor Wimpey, as a Landowner in Edenfield, has previously sought to engage with the Neighbourhood Forum and submitted representations to the Regulation 14 consultation. As this comprises a Regulation 16 consultation, we are now formally submitting our comments to Rossendale Borough Council in respect of the Neighbourhood Plan.
- 1.4. The adopted Rossendale Local Plan includes detailed policy H66, which requires the agreement of a Masterplan and Design Code across the entire allocation. Significant work has been undertaken on the Design Code to take account of the Local Planning Authority’s and other consultee comments. There have been five rounds of consultation, starting in June 2023. At the 24<sup>th</sup> July Development Control committee, it was resolved to approve the Officer’s recommendation to recommend Cabinet approve the Edenfield Masterplan and Design Code (V5 – dated June 2024).
- 1.5. It is understood that the next Cabinet meeting will take place in September 2024. Whilst the Masterplan & Design Code will not be formally adopted until Cabinet resolves to do so, it is clear that the contents of the Design Code are deemed acceptable in planning and design terms by the local planning authority. Once adopted, it will become a material consideration in the determination of planning applications. Given how advanced the Design Code process is, it is important that the Edenfield Neighbourhood Plan generally accords with the contents of the Design Code. It is acknowledged and appreciated that there will be differences between the two Design Codes due to differences in professional opinion on design matters. The key is to ensure that the Design Codes are broadly aligned so they do not undermine delivery of the strategically important H66 allocation. The Edenfield Neighbourhood Plan must also be in general conformity with the strategic policies of the Local Plan.
- 1.6. These Representations are made in the context of national planning policy requirements. Specifically, NPPF paragraph 37 outlines how neighbourhood plans must meet certain ‘basic conditions’ and other legal requirements before they can come into force.
- 1.7. Following this introductory section, these Representations are structured as follows:
  - **Section 2** outlines the national planning policy requirements in respect of Neighbourhood Plans;
  - **Section 3** discusses the Visions and Objectives of the draft Plan, as set out in chapters 3 and 4;



- **Section 4** discusses Development and Housing matters, as covered in chapters 5 & 6;
- **Section 5** outlines our comments on design matters, as covered in chapter 7;
- **Section 6** outlines our comments in respect of heritage, as covered in chapter 8;
- **Section 7** discusses transport and travel matters, as set out in chapter 9;
- **Section 8** discusses local community infrastructure facilities as set out in chapter 10;
- **Section 9** outlines comments in relation to green infrastructure matters, as covered in chapter 12;
- **Section 10** outlines our comments on the Natural Environment, as set out at Chapter 13;
- **Section 11** outlines our comments on infrastructure matters, as set out at Chapter 14; and
- **Section 12** provides our overall conclusions.

## 2. National Planning Policy and Guidance on Neighbourhood Plans

- 2.1. Paragraph 29 of the NPPF sets out how neighbourhood planning gives communities the power to develop a shared vision for their area. Neighbourhood plans can shape, direct and help to deliver sustainable development, by influencing local planning decisions as part of the statutory development plan. Neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies.
- 2.2. Footnote 18 states neighbourhood plans must be in general conformity with the strategic policies contained in any development plan that covers their area.
- 2.3. Paragraph 30 notes that once a neighbourhood plan has been brought into force, the policies it contains take precedence over existing non-strategic policies in a local plan covering the neighbourhood area, where they are in conflict; unless they are superseded by strategic or non-strategic policies that are adopted subsequently.
- 2.4. As per paragraph 132, 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.
- 2.5. Further guidance regarding neighbourhood planning is set out within the NPPG. The key elements of the guidance of relevance here are included below. Critically, the Neighbourhood Plan must meet 'basic conditions' – against which the Plan will be tested by an independent Planning Inspector.

### ***What should a neighbourhood plan address?***

*A neighbourhood plan should support the delivery of strategic policies set out in the local plan or spatial development strategy and should shape and direct development that is outside of those strategic policies (as outlined in paragraph 13 of the revised National Planning Policy Framework). Within this broad context, the specific planning topics that a neighbourhood plan covers is for the local community to determine.*

*Paragraph: 004 Reference ID: 41-004-20190509*

### ***How should a community ensure its neighbourhood plan is deliverable?***

*Plans should be prepared positively, in a way that is aspirational but deliverable. Strategic policies in the local plan or spatial development strategy should set out the contributions expected from development. This should include the levels and types of affordable housing required, along with other infrastructure. Neighbourhood plans may also contain policies on the contributions expected from development, but these and any other requirements placed on development should accord with relevant strategic policies and not undermine the deliverability of the neighbourhood plan, local plan or spatial development strategy. Further guidance on viability is available.*

*Paragraph: 005 Reference ID: 41-005-20190509*

**How should the policies in a neighbourhood plan be drafted?**

*A policy in a neighbourhood plan should be clear and unambiguous. It should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications. It should be concise, precise and supported by appropriate evidence. It should be distinct to reflect and respond to the unique characteristics and planning context of the specific neighbourhood area for which it has been prepared.*

Paragraph: 041 Reference ID: 41-041-20140306

**What are the basic conditions that a draft neighbourhood plan or Order must meet if it is to proceed to referendum?**

*Only a draft neighbourhood Plan or Order that meets each of a set of basic conditions can be put to a referendum and be made. The basic conditions are 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 basic conditions are:*

- a. having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the order (or neighbourhood plan).*
- b. having special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses, it is appropriate to make the order. This applies only to Orders.*
- c. having special regard to the desirability of preserving or enhancing the character or appearance of any conservation area, it is appropriate to make the order. This applies only to Orders.*
- d. the making of the order (or neighbourhood plan) contributes to the achievement of sustainable development.*
- e. the making of the order (or neighbourhood plan) is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).*
- f. the making of the order (or neighbourhood plan) does not breach, and is otherwise compatible with, EU obligations.*
- g. prescribed conditions are met in relation to the Order (or plan) and prescribed matters have been complied with in connection with the proposal for the order (or neighbourhood plan).*

Paragraph: 065 Reference ID: 41-065-20140306



### 3. Edenfield Today & Edenfield Tomorrow (Chapters 3 & 4)

- 3.1. Chapter 3 of the Draft Plan discusses the existing characteristics of Edenfield and how this has shaped the Visions and Objectives of the Plan moving forward. Paragraph 3.6 outlines the recognition that Edenfield is a rural settlement with picturesque views of the countryside, and that the Neighbourhood Plan must retain and strengthen this characteristic of the area.
- 3.2. Whilst the above clearly relates to local perceptions of Edenfield's existing character, it is important to recognise that Edenfield is defined as an 'Urban Local Service Centre' in adopted strategic policy SS (Spatial Strategy) of the Local Plan. Policy SS states that a level of growth and investment appropriate to the settlement size will be encouraged at the Urban Local Service Centres to help meet housing, employment and service needs. Separately, Policy HS1 (Meeting Rossendale's Housing Requirement) confirms that Edenfield community Neighbourhood Area has a housing requirement of 456 dwellings between 2019-2036.
- 3.3. As part of our previous representations, we outlined how the Neighbourhood Plan failed to acknowledge, reference and specifically deal with allocation H66. We welcome that this has now been addressed as part of the Regulation 16 draft under new Policy HOU4 – which we discuss in further detail in the following chapter.
- 3.4. However, there remains a failure to explicitly acknowledge that Edenfield is now defined as an Urban Local Service Centre, which will play a crucial role in delivering Rossendale's strategic housing needs up to 2036. As such, the Vision and Objectives of the Plan, and accompanying policies, need to be written more positively to facilitate housing delivery, not to restrict it.
- 3.5. Notwithstanding the above, Taylor Wimpey support and welcome the second paragraph of the draft Vision of the Plan, which acknowledges that Edenfield is helping to meet the wider needs of the Borough:
- “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 daily 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”.***
- 3.6. Taylor Wimpey also fully support the recognition that residential growth is a positive thing, as it will also help Edenfield become more self-sufficient and help to drive footfall for both existing and new amenities.
- 3.7. Noting our earlier comments above, it is important recognise that national and regional housebuilders will be delivering the H66 allocation due to its scale. Therefore, given the quantum of allocated residential development, future development will not be able to

exactly replicate and maintain the existing character of the settlement. Where appropriate, the historic character of parts of the village will warrant the use of traditional building materials but this also has to be balanced with innovation and the requirement to meet a range of housing needs, whilst recognising that the scale of the H66 allocation at Edenfield has the ability to create its own unique character areas within it.

3.8. Turning to the proposed objectives, Objective 1 states:

*"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"*

3.9. Taylor Wimpey support this amended objective and the decision of the Neighbourhood Forum to utilise the suggested wording above, which we suggested in our Regulation 14 representations.

3.10. Taylor Wimpey has no comments in respect of objective 2.

3.11. Objective 3 states:

*'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.'*

3.12. Again, we support the amended wording of objective 3, which has taken account of Taylor Wimpey's suggested wording in our Regulation 14 Representations.

3.13. We do not have any specific comments on objectives 4 and 9.

3.14. In respect of objectives 6,7 and 8, housing growth will help to support services, increased patronage and improved pedestrian and cycle facilities. Taylor Wimpey's proposals and Masterplan seek to do this and are therefore well aligned with these Neighbourhood Plan objectives.

## 4. Development Within and Beyond Settlement Limits & Housing (Chapters 5 & 6)

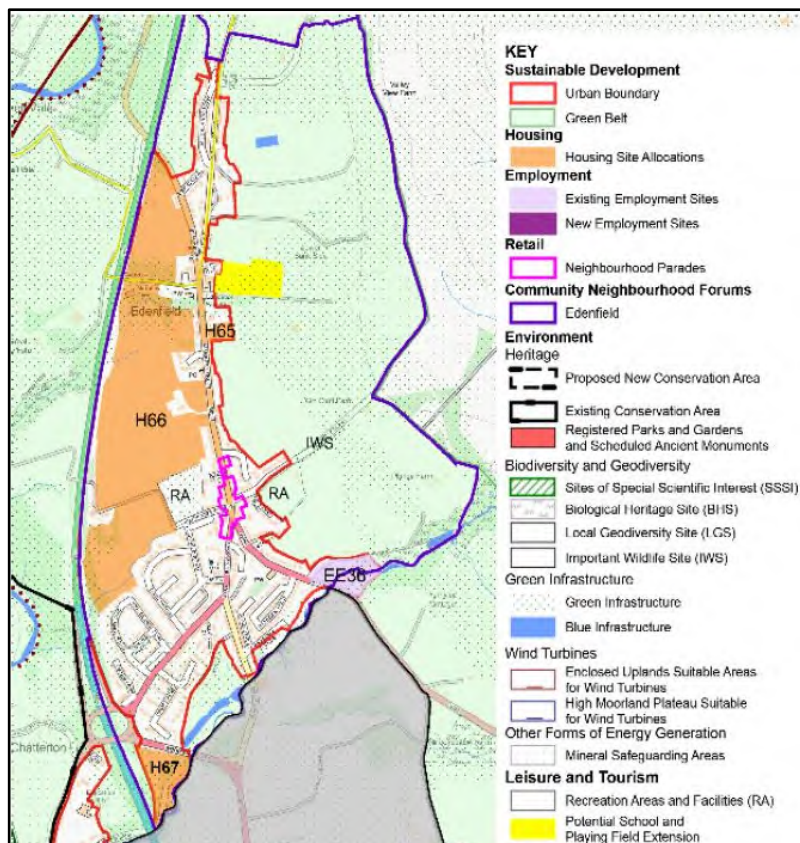
- 4.1. We support the amendments made to Chapter 5 since the regulation 14 consultation, which now explicitly references and recognises the H66 allocation. We particularly support the addition at paragraph 5.2, which now includes the text previously suggested in our Regulation 14 representations:

*'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 more sustainable pattern of development and bring new homes, population and associated expenditure into the settlement in close proximity to the settlement's centre and associated services.'*

### **Policy UB1. Development and the settlement boundary**

- 4.2. Chapter 5 discusses development within and beyond settlement limits, with Policy UB1 outlining where growth will be delivered. Part 1 of Policy UB1 notes how future development shall be focused within the settlement boundary as identified on the Proposals Map:
- 4.3. Taylor Wimpey continue to support the inclusion of the Local Plan Proposals Map, which confirms that allocation H66 is now located within the defined settlement boundary.

Extract of Adopted Proposals Map



4.4. We reiterate our earlier comments that clarity should also be provided in Policy UB1 in respect of the land reserved for the potential expansion of Edenfield Primary School. Wording should be added into the policy to recognise that the Green Belt land in yellow, as shown on the Proposals Map, is reserved for this purpose if required and to ensure that the educational needs of the local area can be met when accommodating future residential development.

4.5. Criterion 4 of Policy UB1 relates to Green Belt compensation. In line with the wording of the draft Edenfield Design Code, we recommend that 'where feasible' is added as suggested below:

*"Where development is proposed on land which was removed from the Green Belt by the Rossendale Local Plan 2019-2036, **where feasible** 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."*

4.6. This is because compensatory Green Belt measures are primarily Council led, and subject to 3<sup>rd</sup> party land control, therefore this matter is not in the sole control of the Developers and flexibility needs to be added in to the policy wording to account for this.

#### **Policy HO1. Identifying housing needs**

4.7. Policy HO1 is positively worded in its reference to identified housing needs, but as previously highlighted in our Regulation 14 representations would benefit from specific reference to allocation H66 (and allocation H67).

#### **Policy HO2. Affordable housing delivery**

4.8. Taylor Wimpey is supportive of Policy HO2, which recognises the importance of delivering affordable housing but also acknowledges the importance to take account of viability and changing market conditions over time. The policy also notes how the size, type and tenure of affordable homes will be based on up to date evidence of local needs. Taylor Wimpey also welcome the decision to change wording in the first sentence of the policy to reflect our previous comments.

#### **Policy HO3. Affordable housing eligibility**

4.9. Policy HO3 discusses affordable housing eligibility/requirements. Taylor Wimpey object to the policy as currently drafted, which is overly prescriptive, onerous and does not align with national and local planning policy.

4.10. The policy notes how the eligibility for affordable housing will be administered by Rossendale Council, however priority will be given in the first instance to people who can demonstrate a local connection to Edenfield, subject to a series of qualifications. This includes residential and employment qualifications, such as living in Edenfield for 12 continuous months or a close family member living in Edenfield.

4.11. Whilst Taylor Wimpey acknowledge that the aim of this policy is to ensure affordable homes go to local residents or people with local connections, this could lead to delays in delivery, by deterring potential Registered Providers from taking on the affordable plots with such restrictive eligibility criteria; and/ or delays working through these criteria if insufficient eligible people are found locally. It is also not justified on the basis that it could

be exclusionary in nature to parties who can not afford to live or work in Rossendale currently.

- 4.12. The NPPF does not stipulate such requirements, nor does Policy HS3 of the adopted Local Plan. As previously noted, the H66 site is of strategic importance to meet Rossendale's Borough wider market and affordable housing needs. It is therefore absolutely critical that the H66 allocation delivers much needed affordable housing as soon as practically possible.
- 4.13. The suggested cascade approach in HO3 is likely to lead to delays in delivery, therefore in order for the Neighbourhood Plan to be found sound at Examination, Policy HO3 should be deleted.

**Policy HO4. Site H66 design and layout**

- 4.14. Taylor Wimpey support the inclusion of a site-specific policy for the H66 allocation. Criteria a – f) replicate the wording of Policy H66 of the Local Plan verbatim, therefore we have no comments to make on this matter.
- 4.15. Part 2 of the policy states that:

*'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.'*

- 4.16. Taylor Wimpey wish to highlight that a pedestrian connection point is located at the southern extent of the proposed site layout currently pending determination under application reference 2022/O451.





- 4.17. This will provide connectivity to Edenfield Recreation Ground the south – however, it is important to note that Taylor Wimpey (and other Developers of the H66 allocation) can only deliver links within their land ownership, not on 3<sup>rd</sup> party land. We therefore recommend the policy wording is re-worded as follows:

*“Development of site H66 will be supported if it also takes into account the relationship of the new dwellings to Edenfield Community Centre, by **where possible, facilitating** non-vehicular access”*

## 5. Design (Chapter 7)

### *Edenfield Design Code*

- 5.1. Chapter 7 discusses design matters, including references to the Edenfield Design Code. We do not intend to provide detailed comments on the contents of the Design Code – other than to note that we welcome the additional references made to allocation H66 and how this needs to be considered as part of the future growth of Edenfield.
- 5.2. As outlined in the introductory chapter, the Edenfield Masterplan & Design Code for the H66 allocation is now at a very advanced stage of preparation. Version 5 of the Design Code (dated June 2024) was signed off at the 24<sup>th</sup> July Development Control committee and recommended for sign off at the next Cabinet meeting. Subject to sign off at Cabinet (which is anticipated in September 2024), the Design Code will be formally adopted and be a material consideration in the determination of planning applications. It is therefore important that the neighbourhood plan policies & Design Code broadly align with its contents to ensure the delivery of H66 in a sustainable and prompt manner.
- 5.3. In this regard, we acknowledge that there are some differences between the Neighbourhood Plan Design Code and H66 Design Code. This is inevitable and not surprising – due to differences in professional opinions in respect of urban design. For example, the character areas differ between the two design codes. This is not considered to pose an issue/policy conflict and development proposals will (and already have) duly considered the key design themes of both Design Codes.

### ***Policy D1. Design and amenity standards and village character***

- 5.4. In respect of Policy D1, it is recommended that the word 'must' is replaced with 'should' to allow for flexibility and for circumstances where it may not be possible to strictly accord with all of the policy criteria. We also make the following suggestions and comments:
- In respect of criterion b), this is generally supported however we suggest the following wording is added to reflect the fact that the H66 allocation will inevitably change the baseline/landscape setting around Market Street:  
  
*"respect and enhance the built character of the village and its high-quality countryside setting where practicable"*
  - In respect of criterion d), due to the scale of the H66 allocation the development will be delivered by national and regional housebuilders. Combined with the location and nature of the allocation and its location partly adjacent to the existing settlement and partly adjacent to the A56, there is the ability and desire to create distinct character areas within the allocation with a varying mix of house types, vernacular and built form patterns to create a number of distinct character areas, some of which will not precisely match the existing built form within other parts of the settlement but will create suitable variety within the settlement which is consistent with paragraph 135 of the NPPF. We therefore suggest the following worded is added to take account of this:

*"consider and reflect the vernacular of Edenfield and be in keeping with local character where appropriate whilst allowing for the creation of alternative new and innovative character areas within the settlement".*

- For part 2 of the policy, we repeat our previous comments regarding the lack of clarity on the meaning of 'innovative'. Further clarification needs to be provided on this.
- Part 3 refers to the Design Code – where we support the inclusion of the wording 'as appropriate to the particular development', which allows sufficient flexibility and is reflective of the need to approach design matters on a site by site basis.
- We do not have any particular comments on the other policy criteria at this point in time, albeit reserve the right to do so at a later date.

#### **Policy D2. Built heritage and character**

- 5.5. Taylor Wimpey is generally supportive of this policy but reiterate the need for design policies be sufficiently flexible to allow for the use of traditional materials and designs alongside more sustainable and innovative designs where this is appropriate, practical and viable. Such an approach would be consistent with Paragraph 135c of the NPPF which confirms planning policies and decisions should ensure that developments:

***'are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change...';***

- 5.6. In respect of criterion a), we suggest the following wording is added:

*"Where appropriate, practicable and viable, incorporating similar architectural features into the design as those that are found in traditional buildings in the village."*

- Again, to reflect the above, the following should be added to criterion b):

*"Where appropriate, practicable and viable, utilising external materials which reflect the palette of materials found in traditional buildings within the Neighbourhood Area"*

- Taylor Wimpey support the flexible/amended wording under criterion c), however suggest amended wording to reflect the contents of the H66 Design Code which is nearing adoption:

Current wording:

*"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"*





Proposed amended wording:

*"The use of traditional, local materials is always preferred. However, modern construction materials such as reconstituted or cast stone, **bricks (of different shades), timber, render and slate** may be appropriate materials provided that they result in an appearance that harmonises with the local area.*

- 5.7. We have no further comments to make on the other criteria outlined in Policy D2 – albeit reserve the right to do so at a later date.

## 6. Heritage Assets (Chapter 8)

- 6.1. In respect of heritage assets, it is helpful to note that Taylor Wimpey's live planning application (Reference: 2022/0451) for 238 dwellings has received no objections from heritage consultees, Historic England and Growth Lancashire. Accordingly, the statutory consultees are satisfied that the proposals will not generate any meaningful impacts of the Grade II \* Edenfield Parish Church or other non-designated heritage assets (including Mushroom House).
- 6.2. We do not have any particular comments to make on draft heritage policies HE1-HE3, other than to note there are already NPPF heritage tests and supporting heritage legislation to appropriately manage and conserve heritage assets. For this reason, there is arguably no need to provide the draft heritage policies at the Neighbourhood Plan level, given the substantial levels of existing policy protection at the national and development plan level. The policies do however meet basic condition a) should the Neighborhood Forum wish to proceed with the policies.

### **Policy HE4. Site H66 mitigation measures**

- 6.3. The wording of the policy reflects the contents of policy H66 of the Local Plan, therefore Taylor Wimpey do not have any particular comments on this policy.

## 7. Transport & Travel (Chapter 9)

### Policy T2. Mitigation measures and Transport Assessments

- 7.1. Part 2 of the policy notes how where a Transport Assessment is required to support a planning application, it must evaluate the effects of additional traffic movements generated by the development on the local road network comprising Market Street, Burnley Road, Bury Road, Bolton Road North, Rochdale Road and Blackburn Road. Part 1 of the policy also notes how mitigation measures may be required in order to address negative impacts of traffic generation arising from development proposals.
- 7.2. To confirm, the live Taylor Wimpey application for 238 dwellings has a Transport Assessment and a cumulative assessment of the entire H66 allocation has also been provided.
- 7.3. It is also to be noted that highways issues across Edenfield are being addressed within the H66 Masterplan and Design Code across the developer group, including a package of off-site mitigation. Further details are outlined in the 'highways consideration of Masterplan' technical note prepared by Eddison's, which was consulted on as part of the Design Code process. The highways note concludes that junctions in the vicinity of the site will operate within capacity following the completion of the allocated development. Notwithstanding this, a corridor improvement scheme is proposed that will improve transport movements along Market Street.
- 7.4. Part 3 of Policy T2 states the following:
- "Given the proximity of the Strategic Road Network, any development proposals 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."*
- 7.5. Taylor Wimpey object to this part of the policy – which is not consistent with discussions held with LCC highways. The aforementioned Eddison's technical note, at paragraph 1.9, states the following:
- "To inform the Masterplan, it was agreed with LCC that surveys would be carried out at the following junctions:*
- *Market Street/Burnley Road/B6527 signalised junction;*
  - *Market Street/Exchange Street priority junction;*
  - *Market Street/A680 Rochdale Road/Bury Road mini roundabout;*
  - *Bury Road/The Drive priority junction;*
  - *Bury Road/Bolton Road N priority junction; and*
  - *Bolton Road N/Eden Avenue priority junction.*



- 7.6. LCC, as highways authority, are responsible for setting the scope of traffic impact analysis and have not requested analysis of M66 junctions. It is not the role of Neighbourhood Planning policy to do so.
- 7.7. We therefore politely suggest that paragraph 3 of the policy is removed.

## 8. Local Community Infrastructure Facilities (Chapter 10)

### Policy LC2. Sports facilities

- 8.1. The draft policy states that 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. If required, these matters will be dealt with via a financial contribution as secured within a Section 106 Agreement – which is paid to the Council who will then deliver/implement the improvements as they see fit. We therefore suggest the following amended wording to reflect this:

*“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, financial contributions will be sought from the Developer through negotiation with Rossendale Borough Council and secured as appropriate within a Section 106 Agreement”*

### Policy LC3. Required local infrastructure

- 8.2. Part 2 of the policy states the following:
- “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.”*
- 8.3. It is important to highlight that viability matters were tested as part of the H66 allocation and Local Plan examination. This work included assumed/estimated infrastructure costs. It is important to ensure that any Local Infrastructure Delivery Plan takes account of this and does not introduce new requirements which could lead to viability issues and to ensure that they are CIL compliant.
- 8.4. Notwithstanding the above, Taylor Wimpey is wholly committed to ensure the required local infrastructure is delivered alongside their development proposals and are discussing required Section 106 contributions with the local planning authority.

## 9. Green Infrastructure (Chapter 12)

9.1. Taylor Wimpey fully acknowledge the importance of Green Infrastructure, and welcome the Neighbourhood Plan seeking to identify and protect such areas. Indeed, Taylor Wimpey's development proposals have carefully considered green infrastructure matters for their site at Market Street.

9.2. In respect of Policy GI1, Taylor Wimpey is supportive of the three Local Green Spaces outlined in the policy, namely:

- a) Playground on Exchange Street
- b) Recreation Ground
- c) Edenfield Cricket Club

### **Policy GI4. New development and local green spaces**

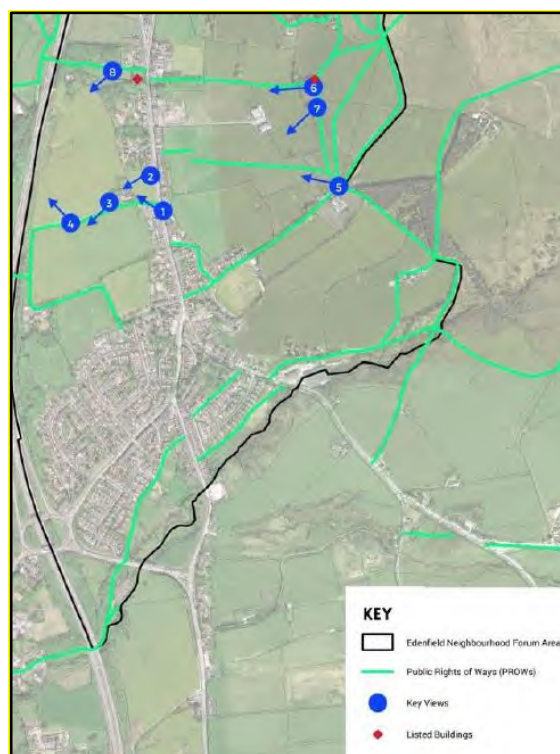
9.3. The policy states that new development that impacts or affects Local Green Spaces or which will contribute to the increased use of Local Green Spaces through population growth will make provision for a proportionate increase in Local Green Spaces and/or enhancement of existing on-site facilities. This is a matter to be considered at the local authority level, with the LPA assessing such matters on a site by site basis and in respect of planning applications. If required, such matters are secured through Section 106 Agreements.

9.4. It is therefore considered that this policy is an unnecessary duplication and it is recommended that it is removed.

## 10. Natural Environment (Chapter 13)

- 10.1. Taylor Wimpey acknowledges and supports the importance of protecting the natural environment, important views and landscape character. They therefore welcome the Forum's commitment to protect the natural environment, as set out in Chapter 13 of the Regulation 16 Plan.
- 10.2. Chapter 13 of the Plan refers to the Lives and Landscape Assessment prepared on behalf of Rossendale Council in 2015. It is important to note that this Assessment was undertaken by a third-party landscape architect (Penny Bennett) and that many of their findings were challenged through the Local Plan process on several sites, including H66 and not upheld by the Council in the now adopted Local Plan. This is most notably demonstrated by the fact that several sites which Penny Bennett suggested were undevelopable were considered developable and formally allocated in the Local Plan.
- 10.3. In respect of the H66 allocation, this document can only be given limited weight, given the fact the site has now been allocated and that Edenfield has now been upgraded to an Urban Local Service Centre in the Spatial Strategy. Both of these points are of critical note, given the fact that the landscape character of the area will inevitably change due to the H66 allocation (a matter deemed acceptable by the Council and Local Plan Inspector), therefore relying on existing landscape character is no longer applicable. For this reason, the landscape policies and supporting evidence contained at Appendix 5 should not use the Lives and Landscape Assessment as a basis for assessment.
- 10.4. Draft Policy NE1, supported by the Locally Important Views Document contained at Appendix 5 of the Plan, outlines 8 Locally Important Views as denoted at Figure 10:

*Extract from Locally Important Views Plan (Fig 10)*



- 10.5. As already noted, upon review of the supporting evidence base at Appendix 5 it is clear that a number of these views have in part being designated as locally important on the basis of the 2015 Lives and Landscape Assessment (for example KV1 and KV2).
- 10.6. Both of these key views are located within Taylor Wimpey's landholding, therefore it is important to note that the live planning application for 238 dwellings is supported by a detailed Landscape and Visual Impact Assessment prepared by Pegasus's Landscape Architects. Furthermore, the H66 Masterplan and Design Code has been led by Randall Thorp, who are also landscape architects and have addressed the comments and issues raised by Penny Bennett and other consultees in this document.
- 10.7. Accordingly, the LVIA and Masterplan and Design Code currently being considered as part of application 2022/O451 are more up to date and the Neighbourhood Plan evidence should take account of these documents, rather than relying on 2015 evidence that is largely out of date and has been superseded by the adopted Local Plan and H66 allocation.
- 10.8. Notwithstanding the above, we can confirm that Taylor Wimpey's planning application pending determination for 238 dwellings:
- Respects KV1 & KV2, through the retention of footpath 1403126 and creation of a green corridor;
  - Respects KV4, through the green buffer/development offset located east of the A56; and
  - Respects KV8, where a green buffer/landscape planting is proposed to protect the setting of the Grade II\* Edenfield Parish Church
- 10.9. Turning to Policy NE3, whilst Taylor Wimpey generally support the policy, some of the wording is overly prescriptive and onerous. It is recommended that the following changes and wording are added to allow for flexibility:
- ~~"Where possible, 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 should be justified by substantive evidence and considered on its overall merits. 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.~~*
- 10.10. In respect of reference to new tree/shrub provision elsewhere within the Neighbourhood Plan area, concerns are raised in respect of how this could actually be delivered due to third party land considerations. Furthermore, it is considered that this is a matter for determination at the Local Plan and LPA level when considering planning applications on a case by case basis. Accordingly, we politely suggest this clause of the draft policy is removed.
- 10.11. Part 2 of Policy NE3 also fails to recognise the landscape changes that will occur as a result of the H66 allocation. It is stated that development should avoid any adverse impact on views into and across the development from other locations through changes to skyline, hill slopes, height or mass. The H66 allocation will inevitably affect the skyline, height and mass





at land west of Market Street, therefore it is politely suggested that Policy NE3 is reworded to recognise the H66 allocation.

- 10.12. Policy NE5 specifically discusses allocation H66. Upon review of the policy wording, it is noted that it largely duplicates the detailed requirements of Local Plan Policy H66, which is already detailed, so it is considered the policy is unnecessary. If the policy is to be retained, we recommend it is covered under Chapters 5 and 6 of the Plan.

## **11. Delivery, Monitoring and Review (Chapter 14)**

- 11.1. Policy DMR1 discusses how a Local Infrastructure Delivery Plan will be kept up to date by the Neighbourhood Forum. The Plan will inform infrastructure decisions whether they be through developer contributions, Section 106 Agreements, Community Infrastructure Levy or other sources of funding.
- 11.2. In relation to H66, we repeat our earlier comments that this should not include anything that was not included/tested for within the Local Plan viability exercise, to ensure that the viability and deliverability of this strategically important allocation is not undermined.

## 12. Conclusions

- 12.1. Pegasus Group have been instructed on behalf of our client, Taylor Wimpey, to submit representations to the Edenfield Neighbourhood Plan (“NDP”) Regulation 16 consultation which runs until the 30<sup>th</sup> July 2024, in respect of their land interests west of Market Street, within the Neighbourhood Plan area.
- 12.2. As noted throughout these representations, Taylor Wimpey is supportive of the draft Neighbourhood Plan, subject to the following comments and recommended changes:
- Taylor Wimpey support the recognition of allocation H66 within the Neighbourhood Plan, however consider the draft policies largely focus on the preservation of existing character and built form patterns, which is inevitably set to change due to the requirement to deliver the H66 allocation to meet Rossendale’s strategic housing needs.
  - The Plan and draft design policies also need to recognise that national and regional housebuilders are set to deliver the H66 allocation due to the scale of development. It will therefore not be possible to fully maintain existing development patterns and traditional materials due to the quantum of development, albeit it is to be noted that Taylor Wimpey have carefully considered these matters where possible in their development proposals currently before Rossendale Council. There is the ability and desire to create distinct character areas within the H66 allocation with a varying mix of house types, vernacular and built form patterns to create a number of distinct character areas, some of which will not precisely match the existing built form within other parts of the settlement but will create suitable variety within the settlement which is consistent with paragraph 135 of the NPPF.
  - Draft Policy HO3 should be removed, as it contains strict affordable housing eligibility criteria which could slow down housing delivery. Furthermore, it is not consistent with national planning policy which does not contain such criteria – therefore fails to meet basic condition a).
  - In respect of heritage matters, we reiterate that heritage has been carefully and sufficiently addressed in Taylor Wimpey’s development proposals – with no objections raised from statutory heritage consultees. Heritage matters have also been carefully considered and accounted for in the wider H66 Masterplan.
  - In terms of highway considerations, highway matters across Edenfield are addressed within the H66 Masterplan and Design Code which is a very advanced stage. This has been prepared across the developer group and includes a package of off-site mitigation. Part 3 of Policy T2 should be removed as it seeks to introduce additional requirements which is not consistent with scoping agreed with LCC, who are the highways authority.
  - In respect of the draft landscape policies and suggested key local landscape views, these should not be based on the 2015 Lives and Landscapes Assessment – as this evidence base has been superseded by the now adopted Local Plan. Landscape matters are being robustly addressed as part of Taylor Wimpey’s planning application as well as the H66 Masterplan and Design Code process, with 2 chartered landscape architects instructed. The landscape policies also need to be updated to take

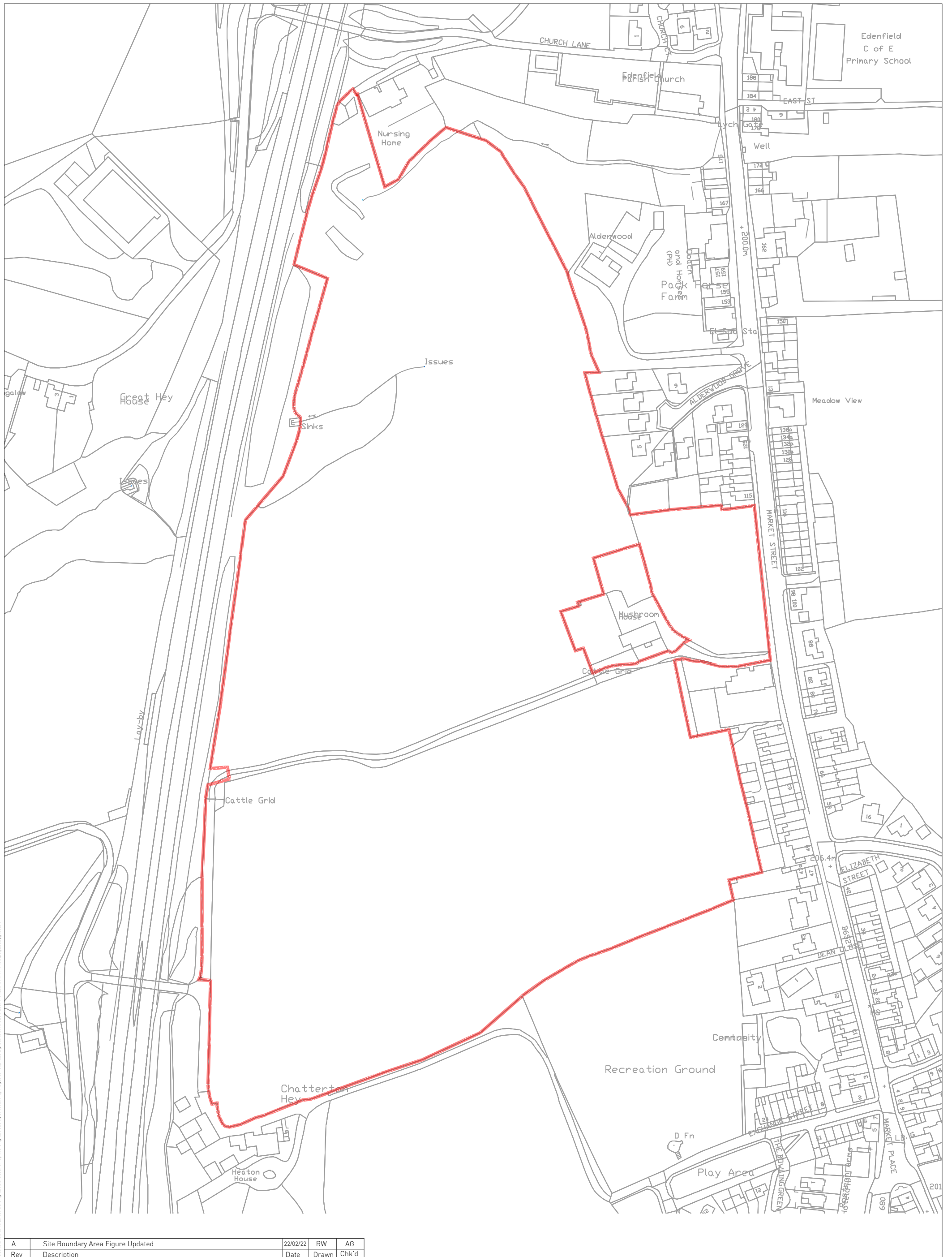


account of the H66 allocation and how this will inevitably change the landscape character in this location of Edenfield.

- It is important to ensure that any Local Infrastructure Delivery Plan prepared by the Neighbourhood Forum does not introduce new requirements which were not included within the viability work undertaken at the Local Plan examination stage. This could lead to viability issues and it is also important to ensure that any costs are CIL compliant.



## Appendix 1: Taylor Wimpey's Land Interests



Rev	Description	Date	Drawn	Chk'd
A	Site Boundary Area Figure Updated	22/02/22	RW	AG

**KEY**



Site Boundary (12.46 Ha)

**MARKET STREET, EDENFIELD**  
For Taylor Wimpey



**Site Location Plan**

Town & Country Planning Act 1990 (as amended)  
Planning and Compulsory Purchase Act 2004

**Manchester**

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Manchester, M2 5HT  
T 0161 3933399  
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**Your ref:**

**Our ref:**

**Date:** 30-JUL-24

Dear Sir / Madam

## **EDENFIELD COMMUNITY FORUM – EDENFIELD NEIGHBOURHOOD PLAN 2021-2036 (SUBMISSION VERSION) & EDENFIELD VILLAGE DESIGN CODE**

Thank you for your consultation seeking the views of United Utilities Water Limited (U UW) as part of the Neighbourhood Plan (NP) for Edenfield. U UW wishes to build a strong partnership with neighbourhood groups to aid sustainable development and growth.

### **Edenfield Neighbourhood Plan 2021-2036**

#### **Allocations for New Development**

Following our review of the NP, we note that there are no site-specific allocations for new development above and beyond those already identified in the wider development plan for Rossendale. If this were to change, we would request early dialogue so that we can inform the site selection process and ensure any issues that are a concern to us are highlighted to you as early as possible.

#### **Our Assets**

It is important to outline the need for our assets to be fully considered in any proposals in the NP Area.

**U UW will not allow building over or in close proximity to a water main.**

**U UW will not allow a new building to be erected over or in close proximity to a public sewer or any other wastewater pipeline. This will only be reviewed in exceptional circumstances.**

**Site promoters should not assume that our assets can be diverted.**

On occasion, an asset protection matter within a site can preclude delivery of a proposed development. It is critical that site promoters / applicants engage with U UW on the detail of their design and the proposed



construction works.

All UUW assets will need to be afforded due regard in the masterplanning process for a site. This should include careful consideration of landscaping and biodiversity proposals in the vicinity of our assets and any changes in levels and proposed crossing points (access points and services).

We strongly recommend that the LPA advises future applicants / promoters of the importance of fully understanding site constraints as soon as possible, ideally before any land transaction is negotiated, so that the implications of our assets on development can be fully understood. We ask site promoters to contact UUW to understand any implications using the below details:

Developer Services – Wastewater Tel:

[REDACTED]  
[REDACTED]

Developer Services – Water Tel:

[REDACTED]  
[REDACTED]

#### **Policy HO4. Site H66 design and layout**

UUW recommends that this policy includes the following additional criteria:

*'The design of proposals must assess and respond to the existing hydrological characteristics of a site to ensure a flood resilient design is achieved and water / flooding is not deflected or constricted.'*

*'The design of the proposals will be required to incorporate sustainable drainage, which is multi-functional, in accordance with the four pillars of sustainable drainage, in preference to underground piped and tanked storage systems, unless there is clear evidence why such techniques are not possible. The sustainable drainage must be integrated with the landscaped environment and the strategy for biodiversity net gain.'*

#### **Policy D1. Design and amenity standards and village character**

UUW recommends the following criteria are added to part 1 of Policy D1.

1. All development within the Edenfield Neighbourhood Area must:

*'e) assess and respond to the existing hydrological characteristics of a site to ensure a flood resilient design is achieved and water / flooding is not deflected or constricted.'*

*'f) incorporate sustainable drainage, which is multi-functional, in accordance with the four pillars of sustainable drainage, in preference to underground piped and tanked storage systems, unless there is clear evidence why such techniques are not possible. The sustainable drainage must be integrated with the landscaped environment and the strategy for biodiversity net gain.'*

As an alternative approach, the above proposed criterion e could be added to Policy NE5. Site H66 watercourses and ecology.

In addition, UUW is supportive of the reference to water efficiency measures in criterion 3i). Notwithstanding this support, we suggest that the reference to water efficiency is defined as:

*‘Residential development which achieves, as a minimum, the optional requirement set through Building Regulations Requirement G2: Water Efficiency or any future updates.*

*Major non-residential development which achieves water efficiency measures so that predicted per capita consumption does not exceed the levels set out in the applicable BREEAM ‘Excellent’ standard.’*

### **Policy DMR1. Local infrastructure delivery plan**

UUW is supportive of Policy DMR1. Local infrastructure delivery plan. We suggest, however, that this is amended to state:

*‘1. The improvement or development of locally important infrastructure will be supported where it is needed to serve existing or new development, **and / or required in response to new environmental drivers,** provided that the need for such facilities is consistent with other policies within this Plan.’*

### **Policy D2. Built heritage and character**

We are supportive of criterion 1 j), which refers to the use of permeable surfaces for car parking to allow rainwater absorption.

We are also supportive of criterion 4, which refers to adherence to the principles in Building for a Healthy Life (or any subsequent update). Critically this refers to the inclusion of SuDS in accordance with the four pillars of sustainable drainage which are referenced in our wider representation.

## **Edenfield Village Design Code**

### **5.8 Green-Blue Infrastructure Code**

We welcome the reference for the need to understand drainage paths in this section of the Design Code. We also support the first bullet point of GB1 – Green Blue Infrastructure. That being said, we recommend that these matters are expanded upon with the following additional text. We believe that this is important given the steeply sloping topography that is a characteristic of Edenfield.

*‘The design of proposals must assess and respond to the existing hydrological characteristics of a site to ensure a flood resilient design is achieved and water / flooding is not deflected or constricted.’*

This can be supplemented by the following explanatory text:

*‘The hydrological assessment of the site must consider site topography, naturally occurring flow paths, ephemeral watercourses, high water tables and any low-lying areas where water naturally accumulates. Resultant layouts must take account of such circumstances. Applications will be required to consider exceedance / overland flow paths from existing and proposed drainage features and confirm ground levels, finished floor levels and drainage details. Drainage details, ground levels and finished floor levels are critical to ensure a proposal is resilient to flood risk and climate change. It is good practice to ensure the external levels fall away from the ground floor level of the proposed buildings (following any regrade), to allow for safe overland flow routes within the development and minimise any associated flood risk from overland flows. In addition, where the ground level of the site is below the ground level at the point where the drainage connects to the public sewer, care must be taken to ensure that the proposed development is not at an increased risk of sewer surcharge. It is good practice for the finished floor levels and manhole cover levels*

*(including those that serve private drainage runs) to be higher than the manhole cover level at the point of connection to the receiving sewer.'*

We also welcome the 3<sup>rd</sup> bullet point of the Green Blue Infrastructure Code, however, we suggest that this is amended as follows:

*'Provision of rain gardens, allotments, permeable landscape treatments and open/green spaces ~~are encouraged~~ **must be prioritised** to create sustainable communities and contribute to local SuDS provision. The design of the proposals will be required to incorporate sustainable drainage, which is multi-functional, in accordance with the four pillars of sustainable drainage, in preference to underground piped and tanked storage systems, unless there is clear evidence why such techniques are not possible. The sustainable drainage must be integrated with the landscaped environment, including at the plot level, and the strategy for biodiversity net gain.'*

This can be supplemented by the following explanatory text:

*'Foul and surface water drainage must be considered early in the design process. Sustainable drainage must be integrated with the landscaped environment and designed in accordance with the four pillars of sustainable drainage (water quantity, water quality, amenity and biodiversity). It should identify SuDS opportunities, such as green roofs; permeable surfacing; soakaways; filter drainage; swales; bioretention tree pits; rain gardens; basins; ponds; reedbeds and wetlands. Any drainage should be designed in accordance with 'Ciria C753 The SuDS Manual', sewerage sector guidance, or any subsequent replacement guidance.'*

We also recommend that a new bullet is added to the Green-Blue Infrastructure Code relating to water efficiency which states:

*'Development shall incorporate water efficiency measures. Residential development shall achieve, as a minimum, the optional requirement set through Building Regulations Requirement G2: Water Efficiency or any future updates. Major non-residential development shall achieve water efficiency measures so that predicted per capita consumption does not exceed the levels set out in the applicable BREEAM 'Excellent' standard.'*

Our supporting evidence to justify this position is enclosed.

### **Code P1 – On-street Parking**

We are supportive of the reference *'Landscape features and SuDS should be provided intermittently to help integrate it into the street-scene.'*

### **Summary**

If you have any queries or would like to discuss this representation, please do not hesitate to contact me at



Yours faithfully

Andrew Leysens  
Planning, Landscape and Ecology  
United Utilities Water Limited

*Enc. Water Resources West Supporting Evidence on Water Efficiency*

# WATER EFFICIENCY IN NEW HOMES

## Evidence to support adoption of the Building Regulations Optional Requirement for local authorities in North West England and the Midlands

### Background

Water is essential for life - yet here in the UK (as in many regions across the world) the future availability of water is a concern. The area covered by Water Resources West is an area the Environment Agency has described as having ‘moderate water stress’; water scarcity/stress occurs when demand is high compared to the water that is available<sup>1</sup>.

Population growth, climate change and environmental protection measures all put pressure on water resources and contribute to water stress in our region. On top of this, housing shortages mean that lots more housing is needed today and in the future. Hence, planning policy is a vital tool to help ensure long term sustainable management of water supplies, as well as helping protect our local rivers and wildlife. Achieving a balance between these conflicting demands is a challenge for us all.

### Water Efficiency Standards for New Homes

The Code for Sustainable Homes was launched in 2006 to help reduce UK carbon emissions and create more sustainable homes; it was the national standard for use in the design and construction of new homes in the UK and is still referred to in older Local Plans. In 2015 it was withdrawn and some of its standards were consolidated into Building Regulations including the requirement for all new dwellings to achieve a water efficiency standard of 125 litres of water per person per day (l/p/d). In the same year, the Government updated Building Regulations Part G, introducing an ‘optional’ requirement of 110 l/p/day for new residential development, which should be implemented through local policy where there is a clear need based on evidence. (See [Appendix 1](#)).

In 2018, Welsh Government amended building regulations so that new builds are built to a standard of 110 l/p/d<sup>2</sup>. In England however the standard of 110 l/p/d needs to be adopted as a local policy by each planning authority in its local plan before it can take effect.

In 2020, the government published a White Paper on future planning<sup>3</sup> in England. The focus is on clear requirements and standard approaches. It clear that water will remain an important consideration and that “sustainable development” will be a key test.

### The Need for Water Efficiency in New Homes

The Water Framework Directive (WFD) was adopted into UK Law in 2003. It was designed to change water management for the better by putting aquatic ecology at the heart of all management decisions. One of the most important features of the WFD is that it encourages public consultation, meaning everyone can have a say in what is needed to protect our water resources. It also takes into account the environmental, economic and social implications of any such investment/decisions.

Delivery of the WFD objectives in our region is set out in River Basin Management Plans for the Solway Tweed, North West, Dee, Severn and Humber River Basins. These documents highlight a number of issues that are affecting the achievement of the WFD objectives, one of these is the pressures from water supply. Thus, there are a variety of reasons why water efficiency is important for Local Authorities.

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<sup>1</sup> [Water stressed areas – final classification](#), Environment Agency and Natural Resources Wales, July 2013

<sup>2</sup> [The Building \(Amendment\) \(Wales\) Regulations 2018](#)

<sup>3</sup> [Planning for the future](#), Ministry of Housing, Communities and Local Government, August 2020

Local Authorities have a duty of care for communities and the environment and the reduction in water use can help to minimise the quantity of water taken from the environment as well as helping to control customer bills. There are some important factors to consider in this regard:

- The general Duty to Co-operate<sup>4</sup> can also apply to water efficiency and, across the region, there are several examples of exemplar project partnerships between Local Authorities and water companies.
- The National Planning Policy Framework<sup>5</sup> Section 2 requires strategic policies to make sufficient provision for water supplies. Section 14 of the NPPF concerns “Meeting the challenge of climate change, flooding and coastal change” and paragraph 149 make specific reference to water supply within this context. Paragraph 170 goes on to set out that planning policies and decisions should contribute to and enhance the natural and local environment including water. For reference we have included specific government guidance in relation to the optional standard in [Appendix 2](#).
- Local Authorities must “have regard to the River Basin Management Plans and any supplementary plans in exercising their functions” and this includes taking action on water efficiency.
- The production of mains water requires significant energy and chemical inputs and hence reducing demand for water can contribute significantly to reducing carbon emissions, especially where those savings are of hot water.

### Why do we need to save water?

The areas covered by Water Resources West are classed as an area under ‘water stress’ by the Environment Agency (Table 1). While local planning authorities are encouraged to draw on this existing evidence to establish the need for possible action government makes clear that this should not be the only consideration<sup>6</sup> – not least because current maps were not developed to establish areas where additional controls were required on new homes. A requirement for a higher water efficiency standard within a local plan should also follow on from consultation with the local water supplier and the Environment Agency. Additional reasons for the local need for action highlighted by the Environment Agency and the local water suppliers are set out below.

Table 1. Water Stress Classification for current and future scenarios<sup>1</sup> (L=low stress; M=moderate stress; S=serious stress). The four scenarios represent the range of pressures on water resources from climate change and future demands.

Water company area	Current Stress	Future Scenario 1	Future Scenario 2	Future Scenario 3	Future Scenario 4
Dwr Cymru Welsh Water	M	M	M	M	M
Severn Trent	M	M	M	M	M
South Staffs Water	M	M	M	M	M
United Utilities	M	M	M	M	M

<sup>4</sup> [Section 110 of the Localism Act](#) sets out the ‘Duty to Co-operate’. It requires cooperation between local planning authorities and other public bodies to maximise the effectiveness of policies for strategic matters in Local Plans. Even if the formal duty is removed in future legislation, the August 2020 White Paper<sup>3</sup> makes it clear that strategic, cross-boundary issues should still be considered in the context of sustainable development.

<sup>5</sup> [National Planning Policy Framework](#), Ministry of Housing, Communities & Local Government, February 2019

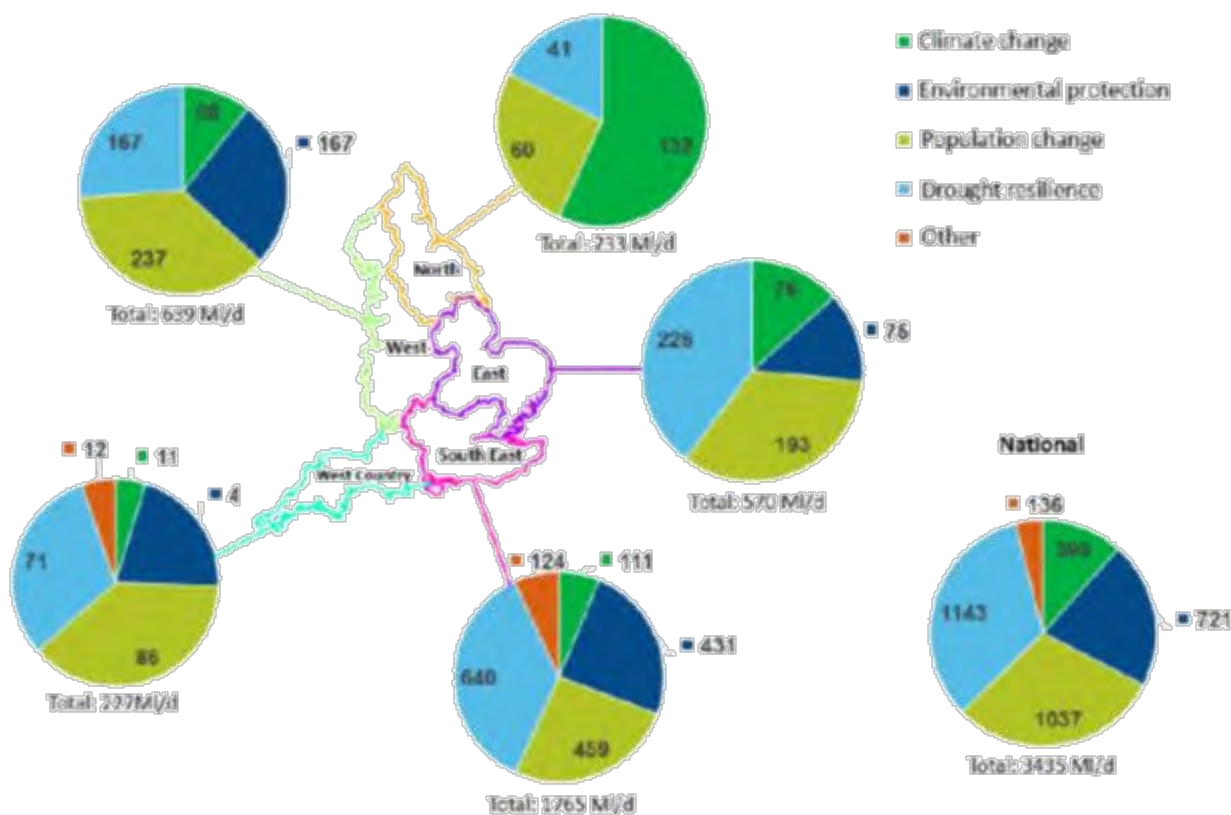
<sup>6</sup> [Housing Standards Review Consultation](#), Department for Communities and Local Government, August 2013

In March 2020, the Environment Agency published the National Framework for Water Resources<sup>7</sup>. This identifies strategic water needs for England and its regions across all sectors up to and beyond 2050. The National Framework identifies that our region faces the second highest pressures on Water Resources. Significantly, the National Framework identifies that increased consumption, driven by population increases, is the largest driver of additional water need in the region. Increased public water supply drought resilience, increased protection for the environment and the impact of climate change reducing water availability of existing supplies also have impacts on water availability (Figure 1).

Based on the best available evidence the National Framework adopted a planning assumption of reducing average per capita consumption (PCC) to 110 l/p/d by 2050 nationally. Water Resources West’s projections are broadly consistent with that, with average per capita consumption reducing to 111 l/p/d by 2050<sup>8</sup>. These projections are based on forecasts made for the water companies’ 2019 WRMPs.

Even with these reductions in consumption, parts of our region will need new water resources to be developed<sup>8</sup>. If the planned reductions are not achieved then more significant and more costly water resources will need to be developed. It is therefore important the measures are taken across the region to support the achievement of the lower per capita consumption.

Figure 1. Extract from the National Framework<sup>7</sup> showing how population growth results in Water Resources West having the second highest pressure on water resources in England. Numbers in the pie charts show the additional water needed by 2050 due to different drivers (in Ml/d).



<sup>7</sup> [Meeting our future water needs: a national framework for water resources](#), Environment Agency, March 2020

<sup>8</sup> [Initial Resource Position](#), Water Resources West, March 2020

Public concern also highlights the need to support water saving. Surveys<sup>9</sup> of water users in North West England and the Midlands have shown that, while there is little general awareness of the issues, once informed 70% are concerned about water scarcity. In addition to running out of water, customers are worried about the potential impact on water bills, restrictions and wastage

Water Framework Directive requirements are set out in River Basin Management Plans. Water efficiency measures have a direct effect in reducing the abstraction from water bodies assessed in those plans. Abstraction in turn affects the hydrological regime of those water bodies. River Basin Management Plans for the Solway Tweed, North West, Dee, Severn and Humber River Basins identify that there are waterbodies within all those areas for which the hydrological regime does not support good status. In turn the hydrological regime can affect water quality, species and habitats.

Changes to the natural flow and level of water is identified as a significant water management issue. Reduced flow and water levels in rivers and groundwater caused by human activity (such as abstraction) can mean that there is not enough water for people to use and wildlife might not be able to survive. Reduced flow affects the health of fish and exaggerates the impacts of barriers such as weirs.

Table 2. WFD classification of waterbodies in 2015 River Basin Management Plans

River Basin District	Percentage of surface water bodies <b>not</b> achieving good ecological status or potential	Percentage of groundwater bodies <b>not</b> achieved good quantitative status
<b>Solway Tweed</b> <sup>10</sup>	54% (305 out of 560)	28% (18 out of 64)
<b>North West</b> <sup>11</sup>	78% (480 out of 613)	11% (2 out of 18)
<b>Humber</b> <sup>12</sup>	86% (839 out of 987)	25% (13 out of 51)
<b>Severn</b> <sup>13</sup>	80% (604 out of 755)	21% (9 out of 42)
<b>Dee</b> <sup>14</sup>	73% (68 out of 93)	0% (0 out of 5)

### Summary of evidence on the need for the optional water efficiency standard

As we have seen above, there is a range of evidence on the water stress across the North West and the Midlands. This means there is a clear need for the 110 l/p/d water efficiency standard.

For inclusion in a local plan a local planning authority must be able to demonstrate at examination of the plan that the standard is required to address a clear need and as part of an approach to water efficiency that is consistent with a wider approach to water efficiency as set out in the local water undertaker's water resources management plan. We recommend that the following evidence is cited:

- The classification of moderate water stress for the water supplier in your area (Table 1)<sup>1</sup>.
- The National Framework for water resources noting that Water Resources West faces the second highest pressures on water resources in England due largely to population growth<sup>7</sup>.
- The National Framework for water resources planning assumption of 110 l/p/d<sup>7</sup>.
- The consistency between these planned reductions in consumption between the National Framework, Water Resources West's plans and your water supplier's WRMP<sup>8</sup>.

<sup>9</sup> [Customer Survey for Severn Trent, Thames Water and United Utilities](#), Verve, July 2018

<sup>10</sup> [River basin management plan for the Solway Tweed river basin district: 2015 update](#), Environment Agency and Natural Scotland, 21 December 2015

<sup>11</sup> [River basin management plan, Part 1: North West river basin district](#), Environment Agency, December 2015

<sup>12</sup> [River basin management plan, Part 1: Humber river basin district](#), Environment Agency, December 2015

<sup>13</sup> [River basin management plan, Part 1: Severn river basin district](#), Environment Agency, December

<sup>14</sup> [Dee River Basin Management Plan 2015 – 2021, Proposed Summary](#), Natural Resources Wales and Environment Agency, October 2015



- High levels of public concern (70%) in the region, when informed about issues of water scarcity<sup>9</sup>.
- Reference to the WFD ecological status of water bodies in your River Basin District, with changes to flow and level recognised as a significant water management issue in the River Basin Management Plan (Table 2).

## Water Companies

A consequence of the population and housing growth in our region has meant that water companies have been asked to accommodate the new growth, yet at the same time their abstraction licenses are being reduced. Therefore it is vital that water companies support and are supported in initiatives to help get 110 l/p/d in planning policies across local authorities in the region, to help meet their requirement to supply their customers. The water companies in Water Resources West are Dwr Cymru Welsh Water, Severn Trent, South Staffs and United Utilities.

In preparing your local plan you should consult with your local water supply company on specific local issues.

## New Homes

The scale of new development that is needed across our region is immense - the Government aiming for delivery of 300,000 new homes a year across England<sup>15</sup>. Within Water Resources West's region we estimate that there will be 1.6 million new properties by 2050. Yet at the same time there is need to share the already scarce water resources - therefore the need for implementing at least 110 l/p/d into local plans and policies is apparent.

## Impact on viability

The cost of installing water-efficient fittings to target a per capita consumption of 110l/d has been estimated as a one-off cost of £9 for a four bedroom house<sup>16</sup>. Research undertaken for the Welsh Government indicated potential annual savings on water and energy bills for householders of £24 per year as a result of such water efficiency measures<sup>17</sup>.

The Consumer Council for Water notes that the discretionary, tighter (building) standard of 110 l/p/d is something that should be pursued, also bearing in mind that saving water is not the only a driver of water efficiency<sup>18</sup>. This is because water efficiency could also have a positive effect on reducing energy bills, water bills of metered customers and carbon emissions.

The Greater London Authority carried out a survey of developers to test the viability of the 110 l/p/d standard. The results of this survey<sup>19</sup> made it clear that those associated with the development industry did not consider that the proposed changes would have any impact on building.

Viability is also evidenced by the examples from other local authorities who have adopted the standard. South Worcestershire adopted the 110 l/p/d standard in its February 2016 local plan. The standard remains the preferred option for next local plan. See the case study below. Bromsgrove and Redditch councils cooperated to require the 110 l/p/d standard for certain developments in their plans which were adopted in January 2017. Another example is Nottingham City Council who adopted the 110 l/p/d standard for all new dwellings in January 2020.

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<sup>15</sup> [Planning for the Future](#), Ministry of Housing, Communities and Local Government, March 2020

<sup>16</sup> [Housing Standards Review Cost Impacts](#), Department for Communities and Local Government, September 2014

<sup>17</sup> [Advice on water efficient new homes for England](#), Waterwise, September 2018

<sup>18</sup> [Response to Defra consultation on measures to reduce personal water use](#), Consumer Council for Water, October 2019

<sup>19</sup> [Greater London Authority Housing Standards Review: Evidence Of Need](#), David Lock Associates, May 2015

Water efficiency is therefore not only viable but of positive economic benefit to both private homeowners and tenants.

### Water Calculator

The Water Calculator was developed to help provide a working example of the calculator used for part G of the building regulations. It uses the method set out in the ‘Water Efficiency Calculator for New Dwellings’<sup>20</sup>. The Water Calculator contains information on water consumption for hundreds of products, enabling quick and easy specification, without the hassle of gathering data from several product manufacturers. To access the water calculator visit: [www.thewatercalculator.org.uk](http://www.thewatercalculator.org.uk)

### Case study

South Worcestershire’s current local plan was adopted, following examination, in February 2016<sup>21</sup>. It is a major sub-regional land use plan, prepared jointly by the three South Worcestershire Councils; Malvern Hills, Worcester City and Wychavon working together. Within the local plan, policy SWDP30c states that “for housing proposals, it must be demonstrated that the daily non-recycled water use per person will not exceed 110 l/p/d”. The reasoned justification for this policy highlights the following factors:

- This policy is central to the council’s response to the Framework, which advocates that local plans incorporate strategies to mitigate and adapt to climate change, in line with the objectives and provisions of the Climate Change Act 2008 over the longer term. This includes factors such as flood risk, water supply and changes to biodiversity.
- Without effective local planning and risk management, the consequences of climate change may also have a significant detrimental impact on budgets and service delivery. It may also compromise the Government’s ability to meet the statutory requirements under the Climate Change Act 2008.
- Local planning authorities have a general responsibility not to compromise the achievement of United Kingdom compliance with the Water Framework Directive (WFD(68)) (Directive 2000/60/EC). More specifically, the local plan has to take into account the River Severn Basin Management Plan, which in itself is a requirement of the WFD. All surface water bodies need to achieve “good ecological status” by 2015.
- The Localism Act 2011 enables the UK government to require local authorities to pay if their inaction results in a failure to meet WFD requirements.
- The Localism Act 2011 also requires local planning authorities to co-operate on strategic cross-boundary matters, for example the provision of water supply infrastructure, water quality, water supply and enhancement of the natural environment. Consequently, there is a need for developers to engage positively with the local water supplier to ensure that all the necessary infrastructure is secured, so as to ensure that there is no deterioration in the quality or quantity of water of the receiving water body(ies) and to avoid delays in the delivery of development.
- The 2006 Natural Environment and Rural Communities (NERC) Act imposes a duty on local planning authorities to have regard to conserving biodiversity in carrying out all of their functions.
- The South Worcestershire Water Cycle Study looks at the level of planned growth and the ability of the infrastructure (i.e. water supply and waste water treatment) to accommodate it without adversely affecting the natural water cycle. It identifies an overall shortage in future water supplies that necessitates the delivery of minimum water efficiency targets.
- The effective management of water is considered critical in the pursuit of sustainable development and communities. It reduces the impact flooding can have on the community, maintains water quality and quantity and helps to enhance local amenity / property value and biodiversity through the provision of Green Infrastructure. Effective water management also reduces the movement of water and sewage, thereby reducing energy requirements. Development proposals incorporating grey

<sup>20</sup> Appendix A of [Approved Document G, The Building Regulations 2010](#), HM Government 2015 edition with 2016 amendments

<sup>21</sup> [South Worcestershire Development Plan, Adopted](#), February 2016.

water recycling will therefore be supported and opportunities for the retrofitting of water efficiency measures will be encouraged.

The South Worcestershire Councils are currently preparing the next local plan. Following consultation its Preferred Options report<sup>22</sup> was published in November 2019. In relation to water efficiency the preferred option is to require new dwellings to meet the tighter Building Regulations optional requirement of 110 l/p/d as per the adopted policy.

## Recommendations

There is firm evidence in across the North West and the Midlands that clearly justifies the need for more stringent water efficiency targets for new residential development. Local Authorities should consider all the factors in their local plans and we strongly recommend they adopt 110 l/p/d for water efficiency using the suggested wording below:

**All new residential development must achieve as a minimum the optional requirement set through Building Regulations for water efficiency that requires an estimated water use of no more than 110 litres per person per day.**

Past experience has shown that successful adoption of 110l/p/d in local plans requires the following:

1. Significant engagement and consultation is required in developing local plans, including engagement with key stakeholders and public sector partners, responsible for delivering a range of services and infrastructure.
2. Recommend local plans are subject to public consultations (many people are concerned about water) and that where appropriate, comments from the public help shape the contents of this plan and helps with public buy-in.
3. Local plans should actively encourage the design of new buildings that minimise the need for energy and water consumption, use renewable energy sources, provide for sustainable drainage, support water re-use and incorporate facilities to recycling of waste and resources.
4. Local plans should have a positive approach to the adaptation of climate change –
  - by avoiding development in areas at greatest risk of flooding, and
  - promoting sustainable drainage, and
  - challenging water efficiency standards.

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<sup>22</sup>[South Worcestershire Development Plan Review, Preferred Options Consultation](#), November 2019.

## Appendix 1. Extract from Part G of the Building Regulations

### Extract from Part G of Building Regulations

**Optional requirement**

**2.8** The optional requirement only applies where a condition that the dwelling should meet the optional requirement is imposed as part of the process of granting planning permission. Where it applies, the estimated consumption of wholesome water calculated in accordance with the methodology in the water efficiency calculator, should not exceed 110 litres/person/day.

**2.9** The person carrying out the work must inform the **BCB** where the optional requirement applies.

**2.10** As an alternative to calculating the water consumption (as paragraph 2.8), a fittings approach that is based on the water efficiency calculator methodology may be used.

**2.11** Where the fittings approach is used, the water consumption of the fittings provided must not exceed the values in Table 2.2. If they do, the water efficiency calculator must be completed to demonstrate compliance. Similarly, where a shower is not to be provided or where a waste disposal unit, a water softener or water re-use is to be provided the water efficiency calculator must be completed.

**2.12** Where the fittings approach is used, the notice given under regulation 37 should state "Less than 110 litres/person/day using fittings approach".

Water fitting	Maximum consumption
WC	4.2.6 litres dual flush
Shower	8 l/min
Bath	170 litres
Basin taps	5 l/min
Sink taps	6 l/min
Dishwasher	1.25 l/place setting
Washing machine	0.17 kilogram

## Appendix 2 NPPF Planning Practice Guidance Housing: optional technical standards, Water efficiency standards<sup>23</sup>

### Can local planning authorities require a tighter water efficiency standard in new dwellings?

In setting out how the planning system should contribute to the achievement of sustainable development, the National Planning Policy Framework and guidance makes clear this includes planning to provide the high quality housing required to meet the needs of present and future generations, and helping to use natural resources prudently. The Framework's policies expect local planning authorities to adopt proactive strategies to adapt to climate change that take full account of water supply and demand considerations. Early engagement between local planning authorities and water companies can help ensure the necessary water infrastructure is put in place to support new development. See [water supply guidance](#). The local planning authority may also consider whether a tighter water efficiency requirement for new homes is justified to help manage demand.

Paragraph: 013 Reference ID: 56-013-20150327

Revision date: 27 03 2015

### What standard should be applied to new homes?

All new homes already have to meet the mandatory national standard set out in the Building Regulations (of 125 litres/person/day). Where there is a clear local need, local planning authorities can set out [Local Plan](#) policies requiring new dwellings to meet the tighter Building Regulations optional requirement of 110 litres/person/day.

Paragraph: 014 Reference ID: 56-014-20150327

Revision date: 27 03 2015

### How should local planning authorities establish a clear need?

It will be for a local planning authority to establish a clear need based on:

- existing sources of evidence.
- consultations with the local water and sewerage company, the Environment Agency and catchment partnerships. See [paragraph 003 of the water supply guidance](#)
- consideration of the impact on viability and housing supply of such a requirement.

Paragraph: 015 Reference ID: 56-015-20150327

Revision date: 27 03 2015

### What are the existing sources of evidence?

Primary sources of evidence which might support a tighter water efficiency standard for new dwellings are:

- The Environment Agency [Water Stressed Areas Classification \(2013\)](#) which identifies areas of serious water stress where household demand for water is (or is likely to be) a high proportion of the current effective rainfall available to meet that demand.
- Water resource management plans produced by water companies.
- [River Basin Management Plans](#) which describe the river basin district and the pressure that the water environment faces. These include information on where water resources are contributing to a water body

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<sup>23</sup> <https://www.gov.uk/guidance/housing-optional-technical-standards#water-efficiency-standards>

being classified as ‘at risk’ or ‘probably at risk’ of failing to achieve good ecological status, due to low flows or reduced water availability.

In addition to these primary data sources, locally specific evidence may also be available, for example collaborative ‘water cycle studies’ may have been carried out in areas of high growth.

Paragraph: 016 Reference ID: 56-016-20150327

Revision date: 27 03 2015

**Where can I find out more about the water efficiency standard?**

See further information on the [water efficiency standard](#).

Paragraph: 017 Reference ID: 56-017-20150327

Revision date: 27 03 2015

Please accept this email as my letter of objection against the Edenfield Masterplan Regulation 16 and ensure that it is registered.

The Occupant of

Tuesday 30th July 2024

Rossendale Borough Council

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

### **Edenfield Masterplan/Design Code V4**

Dear Sirs,

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

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

So yet again, we raise our objections as follows:

The parking proposals that have been submitted to support this version of the plan do not consider the existing Edenfield residents nor does it take into account the already serious traffic and parking problems that exist in our village. Introducing parking restrictions on Market Street, Exchange Street or Highfield Road will have a serious impact on those residents and those of the surrounding areas, like ourselves. Not all houses have the luxury of a drive to park their vehicles, this then forces them to park on the road. This already makes it difficult to navigate the footpaths as the cars are always parked across them. When I attempt to walk up to the children's play area with my family members and dogs we are forced onto the main road as we cannot walk on the footpaths. With the current flow of traffic on these roads, this is not a significant problem. Add another 400 plus houses and more than likely double that amount of cars, all of which you are going to

force down these roads to gain access to their houses, which will probably have nice big drives to park their cars on would have a seriously detrimental impact on the safety of the existing residents of this community. You may believe that the extra traffic would not be a problem on these side roads but with the park, pump track and recreation field you would be very wrong.

Recent road works on the A56 demonstrate the effect of a high number of vehicles attempting to travel through the village on its only road which ended in gridlock on Market Street. The amount of cars which tried to avoid the queuing traffic up Bolton Road North from the roundabout by driving around Eden Avenue, Highfield Road and Exchange Street was horrendous and dangerous considering all the children that make their way to and from the park area. Obviously when you did your monitoring on these roads it was at a time when the A56 was open, which is not really a surprise.

Any plans to make Exchange Street a one-way system is ludicrous. Travelling down Exchange Street leads to the children's playground, the recreation ground, and the new pump track. The number of children on bicycles in this area has increased 10-fold. To force traffic onto Highfield Road and Eden Avenue to navigate around a one-way Exchange Street will lead to a fatality. Exacerbate this with double yellow lines on Market Street and Exchange Street with restricted parking again will force additional vehicles onto Highfield Road and Eden Avenue. If this goes ahead will you then put double yellow lines on Highfield Road and Eden Avenue to facilitate the new houses? Is there any thought or consideration in this plan for the people who already live in Edenfield and on these roads where you plan to ban parking? We are struggling to understand how anyone can think these are satisfactory solutions to provide access to a new housing development. It has no regard whatsoever for the safety of the residents of Edenfield Village, our children or our community.

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

We repeat our earlier comments, we believe that this is a seriously ill-thought-out Masterplan, still lacking in any detail. This is not a Masterplan for existing Edenfield residents this is a plan with the only benefit we can see is to boost council tax income which no doubt will be spent in other areas of Rossendale. Edenfield is too close to the boundary for Greater Manchester for any funds or services to head in our direction. You only have to ring 999 for police or ambulance services to experience that or wait for it to snow and see how long it takes for the roads to be gritted or even just take



a walk around the village and look at the state of the roads and footpaths. Our public transport services are almost non-existent – Edenfield is the forgotten village. Until of course you want to buy a house here – inflated prices because of its idyllic location and picturesque scenery. That is until you allow over 450 new houses to be built, declassification of greenbelt land to accommodate it and potentially 7 years of ongoing construction. This alone would shut our village down and devalue our properties.

This is still not a Masterplan for the residents of Edenfield, this is more likely to be a funeral plan. Either for the death of our village community or one of our children and it is a shame that nobody but the residents of Edenfield can see this or more to the point care about Edenfield.

Yours faithfully,

Deborah Kenyon

Sent from my iPhone  
Sent from my iPhone

Thank you for your recent email on the above subject.

In my opinion there should be an integral and uniform plan for all the different projects that would address the traffic problems relating to the village as a whole. So far there does not seem to be such a plan.

Thank you for your attention

Sincerely

L. Whittaker

Sent from my iPad

Name	Ian Lord
Q5. Do you have any comments to make on Foreword / Section 1 - Introduction?	-
Q6. Do you have any comments to make on Section 2 - History, Local Characteristics and Heritage Assets?	-
Q7. Do you have any comments to make on Section 3 - Edenfield Today?	-
Q8. Do you have any comments to make on Section 4 - Edenfield Tomorrow?	-
Q9. Do you have any comments to make on Section 5 - Development Within and Beyond Settlement Limits?	-
Q10. Do you have any comments to make on Section 6 - Housing?	-
Q11. Do you have any comments to make on Section 7 - Design?	-
Q12. Do you have any comments to make on Section 8 - Heritage Assets?	-
Q13. Do you have any comments to make on Section 9 - Transport and travel?	-
Q14. Do you have any comments to make on Section 10 - Local Community Infrastructure facilities?	-
Q15. Do you have any comments to make on Section 11 - Local Centre and Commerce?	-
Q16. Do you have any comments to make on Section 12 - Green Infrastructure?	-
Q17. Do you have any comments to make on Section 13 - Natural Environment?	-
Q18. Do you have any comments to make on Section 14 - Delivery, monitoring and review?	-
Q19. Do you have any comments to make on Section 15 - Appendices?	-
Q20. Do you have any other comments to make on the Neighbourhood Plan?	-

Name	J. Q. Crossley
Q5. Do you have any comments to make on Foreword / Section 1 - Introduction?	-
Q6. Do you have any comments to make on Section 2 - History, Local Characteristics and Heritage Assets?	-
Q7. Do you have any comments to make on Section 3 - Edenfield Today?	-
Q8. Do you have any comments to make on Section 4 - Edenfield Tomorrow?	-
Q9. Do you have any comments to make on Section 5 - Development Within and Beyond Settlement Limits?	-
Q10. Do you have any comments to make on Section 6 - Housing?	-
Q11. Do you have any comments to make on Section 7 - Design?	-
Q12. Do you have any comments to make on Section 8 - Heritage Assets?	-
Q13. Do you have any comments to make on Section 9 - Transport and travel?	It probably won't be possible to travel through the village if upwards of an extra 900 cars from the proposed 450 new houses are out and about at peak times, it is a problem now so what the future holds!!
Q14. Do you have any comments to make on Section 10 - Local Community Infrastructure facilities?	Where are all these extra kids going to school? Is there a plan to bring medical facilities into Edenfield? If not, where will these 1000 plus extra people be accommodated with doctors, dentists, etc? Will there be an increase in local bus services?
Q15. Do you have any comments to make on Section 11 - Local Centre and Commerce?	-
Q16. Do you have any comments to make on Section 12 - Green Infrastructure?	What is meant by "green infrastructure"? Could it have anything to do with the loss of green belt to build these houses on in the first place, or the proposed loss of more green belt to build a car park half a mile from the nearest shops, or perhaps losing the school playing field so that the school can be extended to accommodate extra pupils. It does occur to many that Rossendale Council only worries about green infrastructure when it fits their own plans.
Q17. Do you have any comments to make on Section 13 - Natural Environment?	-
Q18. Do you have any comments to make on Section 14 - Delivery, monitoring and review?	-
Q19. Do you have any comments to make on Section 15 - Appendices?	-
Q20. Do you have any other comments to make on the Neighbourhood Plan?	-

Name	Jayne Hunsley
Q5. Do you have any comments to make on Foreword / Section 1 - Introduction?	None
Q6. Do you have any comments to make on Section 2 - History, Local Characteristics and Heritage Assets?	None
Q7. Do you have any comments to make on Section 3 - Edenfield Today?	Only to clarify that Edenfield is a rural settlement, the scale of the development will change that definition of our village.
Q8. Do you have any comments to make on Section 4 - Edenfield Tomorrow?	It states that: the development will 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  There is no evidence that I can see of new amenities or improved public transport in the proposed development plans.
Q9. Do you have any comments to make on Section 5 - Development Within and Beyond Settlement Limits?	Why is the Edenfield housing requirement for 456 dwelling? The scale of the development is huge compared to the size of the village. The current infrastructure does not lend itself to that many more houses. There are already proposals for further release of green belt land for car parking contrary to paragraph 5.7 which states green belt land is to be protected.
Q10. Do you have any comments to make on Section 6 - Housing?	No issue with the affordable housing proposals or eligibility. Materials for building should be appropriately sourced.
Q11. Do you have any comments to make on Section 7 - Design?	None, providing the builders actually adhere to the type of materials specified in the plans.
Q12. Do you have any comments to make on Section 8 - Heritage Assets?	None
Q13. Do you have any comments to make on Section 9 - Transport and travel?	Current proposals for improving traffic flow at the roundabout by the Rostron Arms going towards the new H66 development are inappropriate. It is a great bottleneck there at the moment. The proposal to remove parking in front of the shops and on towards the development cannot be a good thing for the businesses nor for the residents who have to use on street parking. To suggest that they would have to park a distance from their houses in future and walk back is not a good plan at all, particularly for the elderly or people with disabilities. There would definitely be a detrimental effect on the businesses as well who rely on customers being able to park outside or a short distance away, those customers would simply shop elsewhere.
Q14. Do you have any comments to make on Section 10 - Local Community Infrastructure facilities?	None
Q15. Do you have any comments to make on Section 11 - Local Centre and Commerce?	No, save for existing infrastructure is insufficient for the size of the development.
Q16. Do you have any comments to make on Section 12 - Green Infrastructure?	None
Q17. Do you have any comments to make on Section 13 - Natural Environment?	None
Q18. Do you have any comments to make on Section 14 - Delivery, monitoring and review?	None
Q19. Do you have any comments to make on Section 15 - Appendices?	None

<p>Q20. Do you have any other comments to make on the Neighbourhood Plan?</p>	<p>The over-riding concern is the scale of the development and the lack of existing infrastructure to support in, such as schools, shops and medical facilities. The transport assessment is lacking and has been throughout the consultation process and the proposals for changes are ill thought out with no regard for existing residents and shops.</p> <p>There are also concerns about flood risk and land stability issues that do not appear to have been addressed.</p>
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Name	Peter Cooke
Q5. Do you have any comments to make on Foreword / Section 1 - Introduction?	<p>I do feel very strongly that this document, in it's entirety, is of absolute value to preserve the quality of life for present and future residents of our village.</p> <p>Any building developments, regardless of stature, must be held to account and be absolutely in keeping with the unique nature of our habitat.</p> <p>I do suspect that given a free hand, any impending, or future developers would most definitely put profit before the welfare of current residents.</p> <p>This has been the work of long standing residents who have no motives whatsoever beyond the welfare of our precious village.</p> <p>Peter Cooke</p>
Q6. Do you have any comments to make on Section 2 - History, Local Characteristics and Heritage Assets?	Only positive comments.
Q7. Do you have any comments to make on Section 3 - Edenfield Today?	Edenfield today is to be preserved.
Q8. Do you have any comments to make on Section 4 - Edenfield Tomorrow?	I hope the Edenfield of tomorrow will not be destroyed by over development.
Q9. Do you have any comments to make on Section 5 - Development Within and Beyond Settlement Limits?	I do hope that all limits will be complied with.
Q10. Do you have any comments to make on Section 6 - Housing?	Nothing beyond my desire to witness housing which enhances our surroundings.
Q11. Do you have any comments to make on Section 7 - Design?	The design of all and any housing should not detract from the character of Edenfield.
Q12. Do you have any comments to make on Section 8 - Heritage Assets?	These should be fully respected.
Q13. Do you have any comments to make on Section 9 - Transport and travel?	<p>Transport is already hampered during busy traffic periods, particularly along Market Street.</p> <p>Therefore, any increase will require very careful consideration and planning.</p>
Q14. Do you have any comments to make on Section 10 - Local Community Infrastructure facilities?	<p>We are already suffering from dire infrastructure shortages, so any developers should have their feet held to the fire to provide ample facilities to at least, cover the increase in population.</p> <p>This should be an absolute condition, which cannot be deviated from.</p>
Q15. Do you have any comments to make on Section 11 - Local Centre and Commerce?	Our local shops should be protected by not introducing parking restrictions along Market Street.
Q16. Do you have any comments to make on Section 12 - Green Infrastructure?	This must be protected as far as possible.
Q17. Do you have any comments to make on Section 13 - Natural Environment?	Again, our Natural Environment should be protected as far as possible.
Q18. Do you have any comments to make on Section 14 - Delivery, monitoring and review?	I view it to be of paramount importance that monitoring is essential and that review may be required.
Q19. Do you have any comments to make on Section 15 - Appendices?	no
Q20. Do you have any other comments to make on the Neighbourhood Plan?	<p>Only to repeat my statement that the residents of our village are indebted to Ian Lord and his colleagues on the Edenfield Forum for their superb efforts in attempting to preserve the beautiful village that is Edenfield.</p> <p>I salute them all!!!</p>

Name	Alexandra Scanlon
Q5. Do you have any comments to make on Foreword / Section 1 - Introduction?	-
Q6. Do you have any comments to make on Section 2 - History, Local Characteristics and Heritage Assets?	The scale and type of development are inconsistent with the rest of the village and do not reflect the historical characteristics typical of the buildings described in section two. Additionally, the materials used and the layout of the development are similarly out of character with the village.
Q7. Do you have any comments to make on Section 3 - Edenfield Today?	As outlined in section three, nearly 50% of Edenfield households have access to two or more private vehicles, and nearly 90% of work trips are made by private vehicle. This reliance on private transport is due to the very limited public transport options available in the village. Parking, especially during school hours, is already problematic. I am concerned that the needs of existing residents, particularly regarding parking, are not being thoroughly considered. My primary concern is the increase in traffic, particularly in terms of congestion and safety.
Q8. Do you have any comments to make on Section 4 - Edenfield Tomorrow?	Section four states: 'Using sustainable, high-quality, traditional materials for new development to maintain and strengthen the character and heritage of Edenfield, while still allowing for high-quality and sustainable design innovation and growth.' However, the development plans proposed by Taylor Wimpey do not align with this objective. This includes both the building materials used and the density of the development. It fails to maintain, conserve, and enhance the natural environment, as it will destroy much of the local green space and wildlife habitats. Additionally, the plans mention 'supporting existing local services and promoting the establishment of new local services to serve the community,' but these factors will exacerbate the traffic issues previously discussed. My primary concern is ensuring adequate parking for existing residents and minimizing traffic congestion throughout the village.
Q9. Do you have any comments to make on Section 5 - Development Within and Beyond Settlement Limits?	What is most alarming about the H66 development is its size and scale; it is simply too large. This will lead to significant traffic congestion and put additional pressure on local amenities.
Q10. Do you have any comments to make on Section 6 - Housing?	As previously mentioned, the number of properties proposed is excessive and does not align with the character of the rest of the village. Additionally, the housing in Edenfield will not meet the affordable housing needs for Rossendale, as properties in Edenfield are significantly more expensive compared to other areas within the borough.
Q11. Do you have any comments to make on Section 7 - Design?	Section 7: Design emphasizes the importance of 'good design.' However, as previously mentioned, the current plans do not respect the rural character of the village or protect its existing character and countryside setting. This includes considerations of design, density, scale, height, and massing.
Q12. Do you have any comments to make on Section 8 - Heritage Assets?	-
Q13. Do you have any comments to make on Section 9 - Transport and travel?	As previously mentioned, there is a high reliance on private motor vehicles in Edenfield, and this is unlikely to change regardless of the introduction of pedestrian areas or cycle paths. The residents of Edenfield generally work outside the village, as there are few local job opportunities. Nearly 90% of people commute by private vehicle. With two



	<p>children in high school who cannot walk to school, and with no supermarkets or shops within walking distance, the situation is particularly challenging. The proposed double yellow lines across much of the village could lead to the closure of existing local shops, such as the butcher and bakery. The policy's efforts to address transportation issues and mitigate the impact of new developments seem inadequate, as they may exacerbate rather than alleviate existing problems. Additionally, the predominantly street-facing terraced properties in the village make it nearly impossible to provide electric car charging infrastructure. Traffic concerns are, for me, the most significant issue associated with these developments.</p>
<p>Q14. Do you have any comments to make on Section 10 - Local Community Infrastructure facilities?</p>	<p>The amount of traffic generated by the proposal cannot be accommodated by the local highway network without compromising road safety. This will be detrimental to existing residents due to increased noise and traffic congestion. However, the provision of new or enhanced sporting facilities, particularly for young people, would be a welcome addition.</p>
<p>Q15. Do you have any comments to make on Section 11 - Local Centre and Commerce?</p>	<p>-</p>
<p>Q16. Do you have any comments to make on Section 12 - Green Infrastructure?</p>	<p>The playground on Exchange Street, the recreation ground, and Edenfield Cricket Club are vital to the community. Any development should prioritize investment in these important facilities.</p>
<p>Q17. Do you have any comments to make on Section 13 - Natural Environment?</p>	<p>-</p>
<p>Q18. Do you have any comments to make on Section 14 - Delivery, monitoring and review?</p>	<p>-</p>
<p>Q19. Do you have any comments to make on Section 15 - Appendices?</p>	<p>-</p>
<p>Q20. Do you have any other comments to make on the Neighbourhood Plan?</p>	<p>-</p>

Name	Liz Stooke
Q5. Do you have any comments to make on Foreword / Section 1 - Introduction?	I understand and am in agreement with the contents of Section 1
Q6. Do you have any comments to make on Section 2 - History, Local Characteristics and Heritage Assets?	I am in agreement with the ECNF assessment of the history, local characteristics and Heritage assets of Edenfield
Q7. Do you have any comments to make on Section 3 - Edenfield Today?	I am in agreement with ECNF with regard to Edenfield today.
Q8. Do you have any comments to make on Section 4 - Edenfield Tomorrow?	I agree with the Forums assessment of what Edenfield could/ should be like in the future.
Q9. Do you have any comments to make on Section 5 - Development Within and Beyond Settlement Limits?	I agree with ECNF assessment.
Q10. Do you have any comments to make on Section 6 - Housing?	I wholeheartedly agree with ECNF with regard to housing..... 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
Q11. Do you have any comments to make on Section 7 - Design?	Please refer to my comment in section 10
Q12. Do you have any comments to make on Section 8 - Heritage Assets?	I agree with the Forums analysis of local Heritage Assets.
Q13. Do you have any comments to make on Section 9 - Transport and travel?	It is important that housing development should be to a scale that can be supported by the existing infrastructure. Developments should also not have a detrimental effect on the existing residents especially with regard to parking. It is vitally important that all residents in terraced properties on Market street should retain their existing on road parking.
Q14. Do you have any comments to make on Section 10 - Local Community Infrastructure facilities?	The existing facilities are not adequate for the present population and will certainly not support the numbers anticipated by the proposed developments currently under consideration ECNF would not contemplate allowing such a massive combined development ...in effect, doubling the size of the population.
Q15. Do you have any comments to make on Section 11 - Local Centre and Commerce?	I agree with the ECNF
Q16. Do you have any comments to make on Section 12 - Green Infrastructure?	Green infrastructure is of paramount importance. The Edenfield Plan would take this into account in a far more detailed way.
Q17. Do you have any comments to make on Section 13 - Natural Environment?	All development whether urban or rural has to take account of the natural environment. The Edenfield Plan would take account of all aspects of life in the village. ...and the relationship between people, buildings, transport, green spaces, views, air quality and so on....
Q18. Do you have any comments to make on Section 14 - Delivery, monitoring and review?	I agree with The ECNF's assessment
Q19. Do you have any comments to make on Section 15 - Appendices?	I am so grateful to the Edenfield Neighbourhood Community Forum for their research, their effort, and the

	immense amount of work that has gone into drawing up this Plan for our Village. I back them 100%
Q20. Do you have any other comments to make on the Neighbourhood Plan?	I am totally in favour of it.

Name	Christopher Hanson
Q5. Do you have any comments to make on Foreword / Section 1 - Introduction?	No
Q6. Do you have any comments to make on Section 2 - History, Local Characteristics and Heritage Assets?	No
Q7. Do you have any comments to make on Section 3 - Edenfield Today?	No
Q8. Do you have any comments to make on Section 4 - Edenfield Tomorrow?	No
Q9. Do you have any comments to make on Section 5 - Development Within and Beyond Settlement Limits?	No
Q10. Do you have any comments to make on Section 6 - Housing?	No
Q11. Do you have any comments to make on Section 7 - Design?	No
Q12. Do you have any comments to make on Section 8 - Heritage Assets?	-
Q13. Do you have any comments to make on Section 9 - Transport and travel?	-
Q14. Do you have any comments to make on Section 10 - Local Community Infrastructure facilities?	-
Q15. Do you have any comments to make on Section 11 - Local Centre and Commerce?	-
Q16. Do you have any comments to make on Section 12 - Green Infrastructure?	-
Q17. Do you have any comments to make on Section 13 - Natural Environment?	-
Q18. Do you have any comments to make on Section 14 - Delivery, monitoring and review?	-
Q19. Do you have any comments to make on Section 15 - Appendices?	-
Q20. Do you have any other comments to make on the Neighbourhood Plan?	-

Name	M J Coyne Dipl.Arc.(Dist.) RIBA
Q5. Do you have any comments to make on Foreword / Section 1 - Introduction?	<p>We fully support the Edenfield Neighbourhood Plan.</p> <p>The Edenfield Neighbourhood Plan is extremely well researched and comprehensive in nature. It presents a sensitive and sensible approach to achieving sympathetic and fitting future development within the neighbourhood.</p> <p>It is essential that the Plan be adopted and vital that it be afforded full cognisance in the event of any such planned developments. It precisely captures the need to preserve the rich built heritage of the village, and its environs, in the face of bland, soulless, destructive urbanity. It recognises that new developments should reinforce the local rural character, not seek to emulate small, ad hoc, contemporary developments which are in themselves out of keeping with the historic environment.</p>
Q6. Do you have any comments to make on Section 2 - History, Local Characteristics and Heritage Assets?	<p>An excellent analysis of the local community, environment and historic significance.</p> <p>Well researched and informative.</p>
Q7. Do you have any comments to make on Section 3 - Edenfield Today?	<p>Again a thorough analysis of the existing community, it's assets and connections.</p> <p>It clearly documents the rural nature of the village and the limitations of current infrastructure.</p>
Q8. Do you have any comments to make on Section 4 - Edenfield Tomorrow?	<p>This is the crux of the document setting out an holistic vision of how development SHOULD proceed.</p> <p>The use of sustainable, high quality, traditional materials is of paramount importance in maintaining and enhancing the character.</p> <p>Development MUST reflect the housing and infrastructure needs of the local community, e.g. affordable housing, and not produce a profit-driven commuter dormitory.</p>
Q9. Do you have any comments to make on Section 5 - Development Within and Beyond Settlement Limits?	<p>It is noted that in the adopted Rossendale Local Plan 2019-2036 the preamble to Strategic Policy transforms Edenfield, through a typographical sleight of hand, from a Rural Local Service Centre to an Urban Local Service Centre.(Section 5.5). As the report reminds us it remains a Rural Settlement.</p>
Q10. Do you have any comments to make on Section 6 - Housing?	<p>The housing needs in Rossendale are identified as primarily for affordable housing and a growing elderly population, not commuter belt executive housing.</p>
Q11. Do you have any comments to make on Section 7 - Design?	<p>National and local guidance stresses high quality design to strengthen and protect local context and heritage.</p> <p>It should concerve and enhance the built environment.</p> <p>The Neighbour Plan rightly stresses the need to preserve the rich built heritage of the village, and its environs, in the face of bland, soulless, destructive urbanity. It recognises that new developments should reinforce the local rural character, not seek to emulate small, ad hoc, contemporary developments which are in themselves out of keeping with the historic environment.</p>
Q12. Do you have any comments to make on Section 8 - Heritage Assets?	-
Q13. Do you have any comments to make on Section 9 - Transport and travel?	<p>The Plan rightly comments on the impact of car and motorised transport generally and its significance in relation to future developments. The opportunity to improve (in a meaningful manner) cycling and walking facilities is extremely important. Simple traffic assessments do nothing to allieviate the problems only highlight them (or ignore them!)</p>

Q14. Do you have any comments to make on Section 10 - Local Community Infrastructure facilities?	The loss of local amenities in recent years exacerbates increased pressure on local facilities which need to be addressed before any additional demand.
Q15. Do you have any comments to make on Section 11 - Local Centre and Commerce?	-
Q16. Do you have any comments to make on Section 12 - Green Infrastructure?	Given the loss of green belt which has occurred the green infrastructure becomes even more significant as the Plan acknowledges.
Q17. Do you have any comments to make on Section 13 - Natural Environment?	This is again a rural versus urban dichotomy and the Plan highlights the unique position of Edenfield and the importance of topography in visual connectivity to the surrounding countryside. It is vital that these links are valued and preserved.
Q18. Do you have any comments to make on Section 14 - Delivery, monitoring and review?	-
Q19. Do you have any comments to make on Section 15 - Appendices?	Appendix 3 is a 'Masterplan' in in how planning should be researched, analysed and developed.
Q20. Do you have any other comments to make on the Neighbourhood Plan?	-

Name	Peter Haworth
Q5. Do you have any comments to make on Foreword / Section 1 - Introduction?	<p>Comments: I strongly object to this proposed development on GREEN BELT LAND in Edenfield. Neither the Masterplan nor the Planning Application meet the requirements of your own Local Plan. You appear to have completely ignored the Design Code produced by Edenfield Community Neighbourhood Forum citing that the scale, density and character of the development is not in keeping with the village. Concerns on the ecology, drainage and flood risk are not adequately addressed and there is no detail on the provision of local services required to supplement the development. The issue of sufficient school places to support the development are not adequately addressed and the concerns regarding the environmental impact are not adequately addressed. In addition to the above concerns the issue of Parking within the village will be seriously impacted by the additional vehicles associated with such a large number of new homes. The safety of the highway through the village will be impacted by the access provided to the site. I have lived at 43 Market Street Edenfield since June 1990 and over that period the traffic through the village has steadily increased to the current level which is already a major concern. The addition of another 238 new homes proposed by Taylor Wimpey will render the situation unbearable. The noise, dust and fumes associated with the inevitable increase in traffic will cause health issues and safety issues for all village residents. The concreting over of such a large area of GREEN BELT LAND will obviously cause major drainage problems and significantly increase the flood risk to the A56 Edenfield Bypass and areas lower down the valley. Within the last two weeks the A56 has been brought to a near standstill by flood water. If this development is allowed expect the situation to get worse. The impact of such a large development on the character and appearance of the area will be devastating. What is now a pleasant village will effectively become a small town without the necessary amenities of a small town. Rossendale Borough Council have blamed Central Government for the need to go ahead with this development. The Local MP has pointed out that there is sufficient BROWN FIELD LAND within the borough boundary which could be used instead of destroying the Edenfield GREEN BELT LAND. The council appears to be hell bent on appeasing this large house building company while ignoring the concerns of the very people who elected them in the first place. Other councils in the Greater Manchester area are already reconsidering their stance on GREEN BELT development in the light of imminent changes in Government policy. Why is Rossendale not prepared to save the GREEN BELT</p>
Q6. Do you have any comments to make on Section 2 - History, Local Characteristics and Heritage Assets?	-
Q7. Do you have any comments to make on Section 3 - Edenfield Today?	-
Q8. Do you have any comments to make on Section 4 - Edenfield Tomorrow?	-

Q9. Do you have any comments to make on Section 5 - Development Within and Beyond Settlement Limits?	-
Q10. Do you have any comments to make on Section 6 - Housing?	-
Q11. Do you have any comments to make on Section 7 - Design?	-
Q12. Do you have any comments to make on Section 8 - Heritage Assets?	-
Q13. Do you have any comments to make on Section 9 - Transport and travel?	-
Q14. Do you have any comments to make on Section 10 - Local Community Infrastructure facilities?	-
Q15. Do you have any comments to make on Section 11 - Local Centre and Commerce?	-
Q16. Do you have any comments to make on Section 12 - Green Infrastructure?	-
Q17. Do you have any comments to make on Section 13 - Natural Environment?	-
Q18. Do you have any comments to make on Section 14 - Delivery, monitoring and review?	-
Q19. Do you have any comments to make on Section 15 - Appendices?	-
Q20. Do you have any other comments to make on the Neighbourhood Plan?	-



Name	Peter Farrell
Q5. Do you have any comments to make on Foreword / Section 1 - Introduction?	-
Q6. Do you have any comments to make on Section 2 - History, Local Characteristics and Heritage Assets?	-
Q7. Do you have any comments to make on Section 3 - Edenfield Today?	-
Q8. Do you have any comments to make on Section 4 - Edenfield Tomorrow?	Based upon previous planning submissions I am concerned that new dwellings will follow the guidance of "Using sustainable, high quality, traditional materials for new development to maintain and strengthen the character and heritage of Edenfield" - specifically the plans originally submitted for the H66 (400) development was not with keeping with the character of heritage of the village. The sheer numbers are unreasonable. Developments like H65 (9 dwellings) with proven local developers and smaller development are much more in keeping with the village.
Q9. Do you have any comments to make on Section 5 - Development Within and Beyond Settlement Limits?	H66 (400) destroys the village, and H67 (47) is on the edge of being reasonable. Fully support H65 (9) dwellings.
Q10. Do you have any comments to make on Section 6 - Housing?	-
Q11. Do you have any comments to make on Section 7 - Design?	-
Q12. Do you have any comments to make on Section 8 - Heritage Assets?	-
Q13. Do you have any comments to make on Section 9 - Transport and travel?	I don't feel this has been addressed fully, and the transportation issues will be compounded by 400 new homes will increase traffic, causing congestion and safety risks, particularly near our schools, with years of construction causing noise, dust, and disruption to daily life.  Today it's bad enough with local buses and transportation to MCR being limited, and Market Street being congested.
Q14. Do you have any comments to make on Section 10 - Local Community Infrastructure facilities?	-
Q15. Do you have any comments to make on Section 11 - Local Centre and Commerce?	Local business are regularly hit when Edenfield is subject to roadworks or other disruption. The plans to put 400+ houses will kill local businesses whilst construction is in flight for years.
Q16. Do you have any comments to make on Section 12 - Green Infrastructure?	-
Q17. Do you have any comments to make on Section 13 - Natural Environment?	We already have local green spaces and wildlife habitats - large scale developments threaten this considerably.
Q18. Do you have any comments to make on Section 14 - Delivery, monitoring and review?	-
Q19. Do you have any comments to make on Section 15 - Appendices?	-
Q20. Do you have any other comments to make on the Neighbourhood Plan?	-