

Edenfield Community Neighbourhood Forum

Representations about Masterplan Proposed by Taylor Wimpey H66 Land West of Market Street, Edenfield

1. Interpretation, Summary Reasons for Rejection and Background

1.1 Interpretation, abbreviations and definitions

in these representations, extracts of Policies and their Explanation in the Local Plan are coloured blue, and expressions and abbreviations have the following meanings -

'Above' or 'below' following a Section or paragraph number - a Section or paragraph of these representations

DAS - Design and Access Statement submitted with the planning application

ECNF - Edenfield Community Neighbourhood Forum

H66 - the site allocated for housing by the Local Plan under reference H66 Land West of Market Street, Edenfield

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

MDC - the Masterplan and Design Code presented by TW that is the subject of consultation and these representations

planning application - planning application reference 2022/0451 submitted to RBC by TW

Planning Statement - Planning Statement (Including Heads of Terms, Waste Management Strategy and Affordable Housing & Parking Provision Statements) submitted with the planning application

Policy - a Policy in the Local Plan.

RBC - Rossendale Borough Council

SCI - Statement of Community Involvement, dated July 2022 submitted with the planning application

SSP - the site-specific policy in the Local Plan for H66

TW - Taylor Wimpey

1.2 Summary Reasons to Reject the MDC

a) The MDC does not apply to the whole of site H66, as the SSP contemplates, as two of the site owners were not involved in its preparation and/or want their land to be removed from it (paragraphs 1.3.4 to 1.3.6, 3.2.1 and 3.2.2 below).

b) Such consultation as was conducted on behalf of TW in June/July 2022 is now misrepresented by TW as being for a masterplan for the whole of H66, when in reality it was only for the land of TW and one other owner (paragraph (paragraphs 3.4.1 and 3.4.2 and Section 6).

- c) TW misrepresented that Peel L&P were a party to the MDC (paragraphs 1.3.4 to 1.3.6).
- d) Contrary to the SSP, the MDC does not include an agreed programme of implementation and phasing (paragraphs 3.5.1 to 3.5.3 and 4.2).
- e) The comprehensive development of the entire site has not been demonstrated and in particular (paragraph 3.8 below) there is
 - no planned highway network for the whole site,
 - no clarity about drainage arrangements for the whole site,
 - no overall provision for landscaping and open space, and
 - no assessment of required developer contributions;
- f) MDC wrongly minimises view of H66 from east of Market Street (paragraph 4.1)
- g) There is no agreed design code in accordance with which development can be implemented, contrary to the SSP and Strategic Policy ENV1 (Section 5 below);
- h) The Design Code in the emerging Neighbourhood Plan should be the basis for the design and layout of H66 (paragraph 5.2.3 below);
- i) Landowners' disinclination to produce a comprehensive masterplan for the whole site and agreed Design Code need not frustrate development - RBC can lead on their production (paragraphs 3.7.1 to 3.7.3).
- j) RBC must insist on a comprehensive masterplan and design code for the whole site, as the opportunity for a masterplan was a reason for removing H66 from the Green Belt (paragraph 2.4)

1.3 Background

1.3.1 TW, apparently with the support of Anwyl, have submitted an MDC for H66, which was taken out of the Green Belt and allocated for housing in the Local Plan. TW own the central portion of the land. Anwyl represent the owners of the southern portion. The northern portion is in two separate ownerships: Peel L&P and Mr Richard Nuttall, neither of whom has been involved in preparing the MDC.

1.3.2 The central portion is the subject of a planning application for 238 dwellings. The documents supporting that application include Version V7 of the MDC, dated 3 October 2022.

1.3.3 RBC committed, rightly, to putting the MDC to consultation, to which these representations are a response. That consultation runs concurrently with a statutory consultation about the planning application, which, because of time constraints, RBC does not wish to delay.

1.3.4 Notably, Version V7 of the MDC states by whom, but not on whose behalf, it was prepared. Version V7 included the logo of Peel L & P on the first two pages, as well as those of TW and Anwyl, thereby dishonestly giving the impression that it was endorsed by Peel.

1.3.5 On the RBC website pages relating to the consultation about the MDC, but not on the RBC website pages relating to the planning application, Version V7 was replaced by Version V8 dated 30 November 2022 which omits the Peel L & P logo. Version V8 still does not state unequivocally on whose behalf it has been produced. RBC's website page introducing the MDC now states that the MDC has been amended to

- *Remove Peel Land and Property's logo from the cover/introduction;*
- *Make it clear that Peel Land and Property did not input into the document; and*
- *Correct a small number of typing errors.*

1.3.6 In Version V8 a paragraph has been added on the unnumbered page 8 in bold print:

Peel have not had input to this document as they were not in a position to engage when it was produced. This is confirmed in the Masterplan at Fig. 2.1.

Section 2 Need for Masterplan

2.1 H66 was removed from the Green Belt and allocated for housing despite considerable opposition. Part of RBC's justification was that allocating it for housing presented the opportunity to masterplan a large site. A key topic in the Spatial Strategy in the Local Plan (paragraph 30) is:

- **Strategic Green Belt releases** for housing are proposed in Edenfield. The development in Edenfield creates the opportunity to masterplan a substantial new addition to the village that would have a limited impact on the openness of the Green Belt.

In the Explanation of Strategic Policy SD2, paragraphs 50 and 51 of the Local Plan state:

- 50 At Edenfield the justification for Green Belt release particularly relates to the strong defensible boundary of the A56 and the opportunity to masterplan the site to produce a high quality planned housing development that minimises impact on openness. There is strong market demand in the area. . . .
- 51 Masterplanning or, for smaller sites, the development of a design framework, will be expected to demonstrate how the design of the scheme minimises impacts on openness such as through the location of development within the site; the scale of the buildings and appropriate landscaping

2.2 Accordingly, the Local Plan included a SSP, of which the parts directly relevant to this consultation stipulated:

Development [of H66] for approximately 400 houses would be supported provided that:

1. The comprehensive development of the entire site is demonstrated through a masterplan with an agreed programme of implementation and phasing;
2. The development is implemented in accordance with an agreed design code . . .

2.3 The SSP includes an Explanation for those provisos, at paragraphs 120, 121 and 126, as follows:

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

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

126 In light of the site's natural features and relationship to surrounding uses, development is likely to come forward in a number of distinct phases. The infrastructure associated with the overall

development and each individual phase will be subject to the production of a phasing and infrastructure delivery schedule to be contained in the Masterplan. Site access will be a key consideration.

2.4 It would be unconscionable for RBC, having set such store by the opportunity to masterplan a large site and used that as a reason for removing the site from the Green Belt, to abandon the SSP and the commitment in paragraph 121 and to approve a purported masterplan covering only a portion of H66.

Section 3 MDC does not Satisfy the Need for a Masterplan

3.1 The masterplan must demonstrate the **comprehensive** development of the **entire** site.

3.2.1 Presumably, when Peel L&P discovered their logo had been used without their consent (see paragraphs 1.3.4 to 1.3.6 above), TW was forced to submit a revised version of the MDC without the Peel logo. Where the MDC comments, as on pages 43, 47 and 65 to 67, about Peel's site north of Church Lane, it does so without the consent of the landowner.

3.2.2 The representations submitted by Mr Richard Nuttall about the planning application indicate that he too has not been involved in TW's MDC, which, he says, shows some of his land in Peel L&P ownership and which shows a play area on his land. Mr Nuttall goes straight to the point:

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

3.3 It is obvious that without the concurrence of all the relevant landowners the MDC does not and cannot demonstrate "the comprehensive development of the entire site".

3.4.1 Paragraph 6.9 of the Planning Statement doubles down on misrepresenting the scope of the MDC:

*Randall Thorp have prepared a Masterplan and Design Code **for the whole allocation H66**, which is submitted in support of this planning application . . . Prior to the submission of this planning application , a public consultation exercise was undertaken in relation to the H66 Masterplan - the full details of which can be found in the submitted Statement of Community Involvement (Lexington Communications),*

and paragraph 6.10 refers to **the site-wide Masterplan**.

3.4.2 As stated in Section 6 below in comments about the SCI, the masterplan consultation leaflet declared that the subject land was **the site promoted by Taylor Wimpey and Anwyl Land (our site)**, and the home page of the TW/Anwyl consultation website referred to the **land that is in Taylor Wimpey and Anwyl's control**. It is therefore simply untrue to claim that a site-wide masterplan had been the subject of public consultation before the MDC and planning application were submitted.

3.4.3 Page 19 of the MDC states under the heading 'Stakeholder Engagement':

The Design Code has been developed in consultation with the Local Planning Authority (LPA) and local stakeholders.

A public consultation exercise for the H66 Masterplan process was undertaken prior to the submission of a planning application for the Taylor Wimpey land. This public consultation exercise related to the whole H66 allocation, seeking to gain views on the overall Masterplan and agreeing high-level principles. The consultation provided the opportunity for local residents to provide feedback online and via post/phone. A webinar was also held for residents to ask questions of the Development Team. Local residents were informed about the consultation by a leaflet drop and a letter was also sent to local councillors.

3.4.4 There is a lot wrong with page 19 -

- It is not clear which, if any, local stakeholders were consulted, but no part of the MDC was developed in consultation with ECNF, which is obviously local and which, as a group concerned with town and country planning and established under statute, is obviously a stakeholder. RBC regard ECNF as a stakeholder - see paragraph 121 of the Local Plan, quoted at paragraph 2.3 above
- In turn that raises doubts about how much, if any, consultation actually took place with other stakeholders and RBC
- The TW consultation was about the TW and Anwyl sites only, not H66 as a whole - see paragraph 3.4.2 above
- There was no opportunity to respond by post - see paragraphs 6.1.8 and 6.1.9 below
- TW do not claim that any responses during the consultation period were fed into the MDC - certainly ECNF's response was not (see for example paragraph 5.2.1 below)

3.5.1 Paragraph 6.11 of the Planning Statement provides:

The submitted MDC also explains how the allocation will be delivered in 4 broad phases, with this planning application relating to Phase 1A. Notwithstanding this, it is important to reiterate that the H66 allocation easily lends itself to be delivered via stand-alone phases. Whilst the Masterplan has ensured connectivity across the whole allocation, each of the respective Landowners have the ability to bring forward their site through individual site access points. The ordering of development phases may therefore be varied and phases may/can be delivered simultaneously.

3.5.2 The Phasing Plan preceding Section 5.13 of the DAS and Section 5.13 itself are totally discredited, as there is reason to believe that two of the relevant landowners had no input to it (please refer to paragraphs 1.3.4 to 1.3.6 , 3.2.1 and 3.2.2 above). Section 5.13 reads:

LIFESPAN

PHASING

The Phasing Plan (presented opposite) sets out the proposed delivery and phasing of the full H66 allocation which has been set out within the Design Code. The proposed Phasing Strategy has been prepared which demonstrates that the delivery of development would proceed from multiple access points. This will enable development to proceed across different parts of the site concurrently.

Initially, development would proceed from Phase 1A, which this application details, creating the main site access from Market Street with additional phases coming on stream relatively quickly. The detailed phasing and delivery of the associated infrastructure, such as landscaping, play and access routes, is subject to discussion between the applicant and the Local Authority.

It is intended that the delivery of the site will be adjusted as the building process is refined. It is considered that a site of this scale (approx 400 dwellings) does not present the complications of phasing, that a larger and more complex site may command, and ensures that each parcel can be delivered independently without prejudice to others. Similarly, this means phases could be developed simultaneously if desired.

3.5.3 The extracts at paragraphs 3.5.1 and 3.5.2 above run completely counter to the SSP requirement for the Masterplan to be accompanied by an agreed programme of implementation and phasing. Please see also paragraph 4.2 below. That requirement is explained at paragraph 126 of the Local Plan, reproduced at paragraph 2.3 above. Not the least concern is the need to avoid a construction traffic free-for-all and pressure on site accesses.

3.6 The claim in paragraph 6.12 of the Planning Statement that

Taylor Wimpey's proposals will help deliver comprehensive development across the entire allocation in accordance with criteria 1 sic of policy H66 (ECNF emphasis)

is demonstrably false. Other landowners might have no intention to deliver development of the sort TW propose.

3.7.1 It has been suggested that the respective landowners are not minded to co-operate on producing a masterplan and that the RBC cannot force them to do so. That may be the case, but it does not dispense with the need for a masterplan.

3.7.2 If any of the respective landowners anticipated difficulty in preparing a site-wide masterplan, they should have flagged this up at the Examination of the Local Plan. None of them did so, the Inspectors approved the policy, and the Plan was duly adopted.

3.7.3 The landowners' disinclination to produce a comprehensive masterplan need not and should not frustrate development of H66. RBC itself can organise the production of a masterplan. As the site was promoted by RBC for housing development, it would not be inappropriate for RBC rather than the developers to take the lead on this, particularly in view of RBC's stated commitment at paragraph 121 of the Local Plan (see paragraph 2.3 above), to ensure that a masterplan is prepared.

3.8 The lack of a comprehensive masterplan for the whole of H66 has at least four consequences:

1. There is no planned highway network for the whole site. Piecemeal development risks creating ransom strips that could hold up development on the rest of H66.
2. It is not clear that there is an overall drainage system for the whole allocation.
3. There is no overall landscaping plan including open space provision.
4. There is no indication as to how the necessary developer contributions might be determined, apportioned and agreed.

3.9 In summary, the MDC does not satisfy the need for a site-wide Masterplan and should be rejected. It is not agreed by all landowners. Nor is there an agreed programme of phasing and implementation. A masterplan and an agreed programme of implementation and phasing are specific policy requirements. Without them there can be no guarantee as to how the totality of the housing allocation can function adequately or be of good design.

Section 4 Content of MDC

4.1 The unnumbered page 24 of the MDC is plainly wrong in stating:

There are limited views to the allocation site from rising land to the east of Edenfield due to topography and existing development within the village.

In fact H66 is clearly visible from much of the lengths of Footpaths 136, 137, 138, 140 and 143 and Restricted Byways 147 and 277, shown on the map at Appendix 2 hereto.

4.2 The unnumbered page 70 says about Phasing:

Development of the H66 allocation should be undertaken in a phased manner broadly as indicated in the adjacent table, however the independent nature of each developer's land holding ensures that each parcel can be delivered independently without prejudice to the others. On this basis the ordering of development phases may be varied or phases may be delivered simultaneously.

The comments at paragraph 3.5.3 above apply equally here.

Section 5 No agreed Design Code

5.1.1 The SSP states:

The development [of H66 for 400 houses] would be supported provided that . . . 2. the development is implemented in accordance with an agreed design code.

One of the Local Plan Objectives (page 12) is:

ensuring good design that reinforces Rossendale's local character.

Strategic Policy SS: Spatial Strategy includes:

Greenfield development will be required within and on the fringes of the urban boundary to meet housing and employment needs. The Council will require that the design of such development relates well in design and layout to existing buildings, green infrastructure and services.

Paragraph 234 of the Explanation of Strategic Policy ENV1 states:

Design briefs or design codes will be required for major development and other sites as appropriate to help deliver high quality proposals. The Council will work with developers to address the nature and scope of these documents. The Council will prepare a Design Guide SPD to provide specific advice to developers. An SPD addressing climate change will also be produced.

5.1.2 Peel certainly has not agreed any design code for H66, nor apparently has Mr Nuttall (please refer to paragraphs 3.2.1 and 3.2.2 above). In those circumstances it would be wrong for RBC to impose TW's concepts on the other owners' land. RBC's only proper course is to reject the MDC.

5.2.1 Paragraph 6.15 of the Planning Statement states:

We note that the Edenfield Neighbourhood Community Forum (ECNF) have prepared their own Draft Design Code for the wider village (produced by AECOM), which is intended to be published alongside the emerging Neighbourhood Plan. We were made aware of this document through engagement with the ECNF during early 2019; however, the document was only formally shared with us in late June 2022, and as such have had limited time to review and integrate it with our own work.

That paragraph demonstrates the superficiality of the so-called consultation (please refer also to Section 6 below) undertaken in the last week of June and first week of July 2022 on behalf of TW and Anwyl Land. The applicant acknowledges receipt during the consultation period of the ECNF Design Code, prepared by AECOM, an independent organisation of worldwide repute, but dismisses it as not coming in time to be reviewed and integrated with its work. Indeed, only three weeks after the end of the period, the applicant stated in a leaflet distributed to residents (but omitted from the SCI) that

Taylor Wimpey will submit a full planning application to Rossendale Borough Council in August 2022.

5.2.2 Paragraph 6.16 adds:

That said, we have taken account of this document where possible, albeit noting that it was drafted in 2019 before site H66 was allocated, and therefore it does not fully acknowledge this strategic site and is written largely in the context of the existing village and potential for incremental development. What's more, this document does not yet form part of a made Neighbourhood Plan nor has it been subject to any formal public consultation (Regulation 14 or other) and therefore can only be given very limited weight at this stage.

The AECOM document was compiled and completed in the full knowledge that the then emerging Local Plan proposed H66 as a housing site allocation. The applicant accepts that the AECOM Design Code has been largely ignored.

5.2.3 ECNF consider that the Design Code prepared by AECOM should be the basis for the design and layout of H66. It has previously been submitted to RBC's Forward Planning Team, who have indicated that it is broadly acceptable. On any objective view, the AECOM Design Code is preferable to the applicant's and should be applied to the development of H66.

5.3 Paragraph 6.18 of the Planning Statement says:

Notwithstanding the above, the submitted Design Code is submitted as a formal planning application document, therefore the local community/other stakeholders will also have the opportunity to comment on the Masterplan and Design Code through the standard 21-day notification process on this planning application.

TW has muddied the waters by submitting the MDC as part of the planning application. Consultees therefore have to contend with two concurrent consultations - one on the MDC and one on the planning application including the MDC. Further confusion arises from the deceit that has been exposed whereby the MDC was branded with the logo of Peel L&P, who had not engaged in the process (please refer to paragraphs 1.3.4 to 1.3.6 and 3.2.1 above). Whilst Peel's logo does not appear on the version now on RBC's website masterplan pages, it remains on the version supporting the planning application as shown on RBC's website.

5.4 Paragraph 6.19 claims:

A separate consultation process and consultation opportunities through this planning application will ensure that the two elements are formally linked and provide the mechanism to formally agree the Design Code.

Those statements make no sense. The formal linkage, which we take to mean the inclusion of the MDC in the planning application, just causes confusion. Those responding to the consultation may not appreciate which part of their responses should be directed to the MDC, to the planning application or both, with the danger that some comments may fail to be submitted or fully considered.

5.5 Paragraphs 3.25 and 6.54 of the Planning Statement note that -

the Design Code will likely evolve through discussions with the local planning authority as the document proceeds towards adoption . . .

TW clearly has no confidence that its Design Code as submitted will be acceptable. Even if that Design Code does evolve through discussions, it is unlikely, unless it engages all the landowners, to satisfy the SSP and paragraph 125 of the Local Plan, which speaks of *Implementation of development [of H66 for 400 houses to] be in accordance with an **agreed** Design Code/Masterplan **across the whole development***. Any agreed design code needs to include the principles of the AECOM Design Code (please refer to paragraphs 5.2.1 to 5.2.3 above). For these reasons, the applicant's submitted Design Code should be rejected.

Section 6. Statement of Community Involvement

6.1.1 As TW are misrepresenting the nature of their 2-week consultation in June/July 2022 (please see Section 3 above), we must comment about the misleading SCI.

6.1.2 Section 1.0 Overview states that its author, Lexington Communications, was commissioned by TW and Anwyl Land -

to carry out a public consultation programme in relation to the Masterplan process for the Land West of Market Street Edenfield site allocation (H66) and

to undertake a public consultation exercise in relation to the proposed Masterplan for the entire Edenfield allocation.

6.1.3 Their instructions might have been to consult in respect of H66 in its entirety but what actually emerged, as the leaflet at Appendix F to the SCI declares, was a purported masterplan that had scant detail about the parcels of H66 north of Church Lane, the ownerships of which were incorrectly delineated :

*Taylor Wimpey and Anwyl Land have formed a unique partnership to deliver an exciting new vision for Edenfield. The Masterplan is a document which explains our vision for **our site** to the west of Market Street. (ECNF emphasis)*

6.1.4 This is reinforced by the key to the plan in the leaflet (and among the virtual exhibition boards in the site promoters' website which are reproduced at Appendix C to the SCI) which marks the land north of Church Lane *landowner not in a position to engage at the current time.*

6.1.5 The home page of the website (Appendix B to the SCI) states:

*This community consultation is the first step and sets out the team's Vision Masterplan for Land West of Market Street, **that is in Taylor Wimpey and Anwyl's control.** (ECNF emphasis)*

6.1.6 One of the virtual exhibition boards, headed 'Our Vision' and with the Anwyl and Taylor Wimpey logos at the foot, states:

*A development with placemaking at its core **Our site** presents a great opportunity . . . (ECNF emphasis)*

6.1.7 Paragraphs 6.1.2 to 6.1.6 above demonstrate that it is dishonest to claim that the applicant's consultation in late June and early July 2022 related to the whole of H66.

6.1.8 The Overview misleads again by stating:

*A community information telephone line, email address **and postal address** were available throughout the consultation period for those wanting to correspond with a member of the project team. (ECNF emphasis)*

This is amplified at paragraph 3.3:

*A dedicated email address, marketstreetmasterplan@havingyoursay.co.uk, was established to receive feedback and answer enquiries from the public regarding the plans. **Alternatively, respondents were able to post their comments.** (ECNF emphasis) During the public consultation, 57 emails were received and zero letters. More information about this can be found in Section 9.0 'Feedback Received'.*

Paragraph 9.2 confirms:

*Correspondence Residents and stakeholders were invited to contact the development team via email **or post**, with a dedicated project email address, marketstreetmasterplan@havingyoursay.co.uk, established for the consultation. (ECNF emphasis)*

6.1.9 A postal address might have been available, but readers of the leaflet and website pages (and the letter to RBC and LCC councillors as reproduced at Appendix A to the SCI and the press release at Appendix H) could not have availed themselves of it, as it was not published in those places. It is therefore no surprise that zero letters were received.

6.1.10 People who did not have access to or who were not comfortable with using a telephone or electronic device were thereby excluded.

6.1.11 The SCI claims that a dedicated email address was established to answer enquiries, although it does not claim that enquiries by email were ever actually answered. ECNF is aware of cases where an email enquiry received no response.

6.2 The extracts at Section 2.2 Government Planning Policy all refer to *applicant/s* and *application [for planning permission]*, reinforcing the point that the purpose of Lexington's consultation was to tick a box in the lead-up to the current application rather than to develop a masterplan for the whole of H66.

6.3 The response of ECNF to that so-called consultation is reproduced at the Appendix 1 to these representations and gives further details about the deficiencies in the process.

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

6 Alderwood Grove BL0 0HQ

16th January 2023

APPENDIX 1

Response of ECNF to Taylor Wimpey / Anwyl Consultation – July 2022

Edenfield Community Neighbourhood Forum

Response to Taylor Wimpey/Anwyl Land Market Street Masterplan Consultation

Consultation process

The consultation process is totally unsatisfactory because:

the two-week consultation period is ridiculously short, particularly in the summer holiday season;

our information is that not all Edenfield households received the consultation leaflet, although at the webinar on 29th June 2022 it was claimed that about 1,000 leaflets had been delivered;

the leaflet gives limited information, with the result that anyone without internet access will be unaware of the detail and thereby be at a disadvantage in responding;

the leaflet says there will be “two webinars where you can join and ask questions of the team” but provides the time of only one, held at barely one week’s notice;

it was not until the webinar that it was confirmed no developer has yet been chosen for the area promoted by Anwyl Land (Chatterton Hey site); and

there are other omissions and errors in the consultation, as noted below.

Masterplan comments

Masterplan does not satisfy Local Plan

1. The consultation masterplan falls short of the requirements of the Rossendale Local Plan. The Local Plan requires a masterplan for the entire site reference H66 land west of Market Street, Edenfield which is estimated to yield 400 homes. The consultation masterplan lacks any detail about the land in H66 in other ownerships.-The Local Plan is quite specific that the masterplan must be for the entire site. Rossendale Borough Council have pledged that they will work in partnership with key landowners and key stakeholders, including Edenfield Community Neighbourhood Forum, to **ensure** that such a masterplan is prepared (Local Plan, page 56, paragraph 121).

Lack of information

2. The consultation says 235 homes will be built in the developers’ first phase but omits the crucial information about the number of homes in their second phase (Chatterton Hey site). It emerged from the webinar that the second phase would yield some 90 dwellings. At the very least, the masterplan should indicate how many dwellings will be built and where and when.

3. Without this information it is impossible to have a comprehensive Transport Assessment.

Traffic

4. A major concern is the impact on traffic of a 50% increase in housing in a village which already has significant traffic problems. This was recognised in the Local Plan which states that development will be supported provided that a Transport Assessment is provided demonstrating that the site can be safely accessed. It will need to address issues arising from the proposed accesses from Blackburn Road, Market Street and Exchange Street, including the consequent reduced availability of on-street parking, as well as the impact of the inevitable increase in local traffic on the Market Place roundabout and at the beginning and end of the school day in the vicinity of an enlarged Edenfield CE Primary School. There is no indication in this consultation about when this Assessment is going to be prepared and when the highway authority will be involved in the process, but it is crucial to any consideration of the masterplan.
5. At the webinar it was admitted that the new Market Street access would require a ghosted right-turn lane. The consultation leaflet and website are silent about this but should have disclosed the information.
6. Although the consultation documents show the highway access to the Chatterton Hey site from the foot of Exchange Street, the highway authority has stated that Exchange Street would be unsuitable for this purpose. The consultation ignores the highway authority's suggestion that vehicular access to this area should be through the estate to connect to the proposed access from Market Street, with only pedestrian and cycle links to Exchange Street - see Local Plan Examination Library document *EL8.014 Actions 14.1 to 14.4*, paragraph 9.1 Action 14.3 - www.rossendale.gov.uk/download/downloads/id/16396/el8014_actions_141_to_144_-_housing_site_allocations_-_edenfield_helmshore_irwell_vale_and_ewood_bridge_with_appendices.pdf
7. In the webinar it was claimed that access to the Chatterton Hey site from Exchange Street and Highfield Road would be all right as only 90 houses were involved. However, at the time of Lancashire County Council's comments the estimated yield from that area, according to the Strategic Housing Land Availability Assessment, was only 70.
8. It would clearly be undesirable for motor traffic resulting from the development to use the existing public footpaths (which are also private vehicular rights of way serving Mushroom House, Chatterton Hey and Alderbottom/Swallows Barn). The masterplan is not clear how estate traffic would be segregated from those footpaths.

Community involvement

9. Edenfield Community Neighbourhood Forum has been working over the years to bring forward a Neighbourhood Plan and has involved the community, stakeholders and the local planning authority in the process. The masterplan consultation claims that the scheme will be community-led, although this is hard to reconcile with the fact that local residents are overwhelmingly opposed. If the developers are serious in this claim, they must commit to ensuring that the development will be in accordance with the emerging Edenfield Neighbourhood Plan and its design codes. In the webinar it was stated that the Taylor Wimpey houses would be mainly two-storey but with a few at 2.5 storeys. We are concerned that any houses more than two storeys high would have a seriously detrimental effect on views across the site to the other side of the valley. Those views are part of the distinctive character of the village and are highly valued by the community.

Green spaces, sports provision, landscaping and biodiversity

10. The new green spaces to be opened up are all located on the western and northern periphery of the consultation site. Apart from these, the masterplan depicts a development that will be a mass

of, to use the wording of the leaflet, “just bricks and mortar.” There is no provision for green spaces or landscaping with hedgerows *within* the development.

11. Far from being ‘long-lasting’ as claimed, some of those green spaces will be short-lived if National Highways proceeds with a scheme to widen the A56.

12. It would benefit both existing and new residents if green spaces were provided on the eastern flank of the consultation site. A green buffer on this side would mitigate any clash between the styles of existing and new development.

13. The green space deficiency might be ameliorated to a small degree by keeping open the field between Market Street and Mushroom House. This area could be used for a parking area for the benefit of existing residents whose access to on-street parking is going to be diminished.

14. The consultation website refers to ‘Providing generous areas of public open space and outdoors sports provision’, but, even if the green spaces are included, the open space provision is far from generous and, discounting the locally equipped area of play (LEAP), the outdoor sports provision is non-existent.

15. In the Masterplan layout, the LEAP is poorly located, adjacent to the junction of busy B6527 Market Street and the main site access.

16. We note that the illustration on the website pages between the sections ‘Our Proposals’ and ‘Masterplan’ suggests that it will be houses, not a LEAP, in this position. That illustration shows also a path across a grassed area adjoining Market Street and the estate road, but that path is not marked on the masterplan. These inconsistencies immediately cast doubt on the reliability of any of the information provided.

17. In view of the prospective requirements in the Environment Act 2021, the masterplan should demonstrate how the biodiversity value attributable to the development will exceed the pre-development biodiversity value of the onsite habitat by 10%.

18. Cycle route provision is perfunctory. It is not clear what it connects with. It should be included as part of the green spaces and as part of a wider cycle scheme.

19. It is surprising that the sustainable drainage system (SUDS) features so prominently in the consultation, after National Highways has indicated that it is likely to be problematical. The Local Plan expects consideration to be paid to the suitability or not of sustainable drainage systems on the boundary adjoining the A56, but there is nothing in the consultation to show that this has been done.

Heritage

20. The paragraph about Heritage in the Virtual Exhibition misrepresents the listed status of Edenfield Parish Church. It is in fact Grade II* listed, not merely Grade II. We do not agree that it is not visible from the development site or that it is so well screened by existing tree cover that the development would have a negligible impact on its setting.

Green Belt

21. The consultation does not state what compensatory improvements will be made in the remaining Green Belt to compensate for the proposed development on former Green Belt land.

Topography and geology

22. The tipped earth on the site that forms a mound to the west of Mushroom House needs to be removed and carted away off-site, restoring the original contours. Otherwise, any dwellings built there would be on an unnaturally high level and over-dominant.

23. Because of the underlying laminated clay, it is probable that extensive piling will be required, to ensure the stability and protection of the A56 and the new homes. The consultation does not mention this or explain how the effect of this on residents will be mitigated.

Ian B. Lord, Chair, Edenfield Community Neighbourhood Forum

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ianblord@btinternet.com

