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This matter is being dealt with by Mr Mike
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Date: 18/05/2023

Dear Sir,

**Re: Site H66 Masterplan and Design Codes & Planning Application 2022/0451 –
Land West of Market Street, Edenfield.**

I refer to the above site and the development proposed.

Comments from statutory consultees, interested parties and residents have been received and I write to set out the measures needed to address concerns raised at this stage by the above. Officers reserve the right to request further amendments in the future, once any amended plans and documentation have been received and reviewed.

Highway matters:

Policy H66 of the Adopted Rossendale Local Plan (ARLP) stipulates that a Transport Assessment needs to be submitted which assesses and mitigates for the full allocation (400 Units). A Transport Assessment has been submitted as part of application 2022/0451 which focuses on the assessment of the impact of developing one phase of the allocation (238 residential units from Market Street), with only a light touch assessment on the full allocation of 400 units.

The Transport Assessment does include a sensitivity assessment for the additional allocations on Blackburn Road and Exchange Street, however this does not include a full assessment, including all access points and required mitigation measures in respect of capacity and sustainability as detailed above.

Therefore, a detailed Transport Assessment is required demonstrating that the full site (400 units) can be safely and suitably delivered. This needs to include as stated in policy H66:

- Full details of all access points to the full allocation.
- Suitable mitigation measures in respect of the capacity of Market Street and its junctions to accommodate additional traffic and to support sustainable travel. This should include:

Exchange Street

- From observations on site, on street parking occurs on the North side of Exchange Street for a large percentage of its length. With some parking on both sides of the road observed near the children's play area, impacting on the effective width. In previous discussions, the Applicant's Highway Consultant made reference to the potential to provide a parking area within the development to displace some existing on street parking. LCC would request that this is included in any future layout and is in a location which is visible and close to the site's access. The proposed parking area would need to be managed long term by the developer/management company and have no restrictions.
- A review needs to be undertaken of existing TRO's on Exchange Street. There is a need of Double Yellow Lines (DYL's) adjacent to the children's play area to control parking on both sides of the road and potential extension to existing DYL's at junction with Market Street.
- There is a lack of footway provision on Exchange Street. A continuous footway link needs to be provided. Any footway improvements also need to include upgraded drop crossings at all the existing junctions along Exchange Street.
- With the above works, Exchange Street is only suitable to serve the southern parcel of the allocation approximately 100 dwellings, therefore, the Local Highway Authority, is of the opinion, no open vehicle link should be provided to the wider allocation.

Market Street

- In respect of the existing zebra crossing adjacent to Exchange Street, the Local Highway Authority is of the opinion the current location has the least issues. However when taking into consideration the additional pedestrian and vehicle movements from the proposed site, the following improvements need to be included to support highway safety and pedestrian movements:
 - LED upgrade of zebra crossing to improve its visibility for all road users.
 - Review of TRO's and make necessary changes, amend existing highway markings and change some surface material at the pedestrian crossing and adjacent junctions to strengthen its presence to all users.
- As part of the access works, a 2m wide footway is requested on both sides of Market Street to ensure that all footway users have an appropriate width to pass. The need for the 2m footways is intensified by the permanent removal of kerbside parking on this section of Market Street to provide the running lanes and the right turn facility. All southbound traffic will run adjacent to the existing

1m footway and the front of the residential properties on the eastern side of Market Street, thus creating an unappealing route for all footway users. Any footway improvements should include upgraded drop crossings at the existing junctions along Market Street.

- A pedestrian refuge is required as part of the right turn facility to protect the right turn lane and provide a crossing point on Market Street.
- To protect the visibility splays and the right turn lane, waiting restrictions along the site frontage will be required. As part of this a review needs to be undertaken of all existing TRO's on Market Street.
- The bus stop located adjacent to the proposed new access on Market Street will need to be relocated away from the proposed junction. Lancashire County Council would also request that the stop serving the south bound services located adjacent to Elizabeth Street is upgraded, this stop may also need to be relocated as part of its upgrade.
- The level of parking within the development to offset the lost existing residential parking on Market Street due to the proposed junction works, should be increased, if possible. This opinion is based on Local Planning and Highway Authority observations and the limited Parking Survey contained within the submitted Transport Assessment. The survey was only undertaken on one weekday (Thursday 16th June 2022); an additional weekend survey would have assisted in providing a more robust picture.
- If it is feasible to increase the amount of layby parking adjacent to the main access road and in a convenient location for the existing residents on Market Street, this should be illustrated on the submitted plans. The proposed parking area would need to be managed long term by the developer/management company and have no restrictions.
- The alterations to the existing highway as part of the new works will require changes to the existing street lighting, road signage and road markings (TRO's) to be funded by the Developer.

In addition to the above, the submitted Masterplan and Design Code outlines a number of general principles regarding highway design and sustainability. The Local Highway Authority have highlighted the following concerns with the information provided within the submitted documentation:

1. Carriageway widths have been proposed of 4.8m, 4.1m for the internal adopted roads. To be considered for adoption Lancashire County Council require a carriageway width of at least 5.5m with 2m wide footways.

2. Bus stops have been identified on the existing network, however changes will need to be made to existing stops to accommodate and support the development. The scope of these changes should be outlined within the Masterplan.

3. No detail has been provided regarding existing bus services within the vicinity of the development. Bus Service X41 now operates in partnership between Lancashire County Council and Transdev, the service is not fully commercially viable with the county council providing a subsidy to maintain the service levels. A contribution from the site is required to assist in securing the long term viability of this service and to support sustainable travel from the development. The Masterplan should include a

commitment to this and to green travel which takes into account travel patterns of residents.

4. The documentation states 'The site benefits from excellent pedestrian connectivity into Edenfield and its wider setting via the established network of PROW routes'. The footway provision on Market Street and Exchange Street linking the site to local services needs to be enhanced, as outlined above under mitigation measures.

5. A number of example junction and road layouts have been included within the document, some of these include designs with trees located within grass verges between footways and roads. The Local Highway Authority would not adopt grass verges with trees, all trees should be located behind the adopted highway and not impact upon the required visibility splays.

Public Rights Of Way Issues:

The walking and cycling section of the Masterplan/Design Code (pg.51) should include a commitment to incorporate the recommendations of Lancashire County Council's (LCC's) Public Rights Of Way and Active Travel teams regarding public footpaths and cycle routes, including the creation of a dedicated active travel north – south route through the allocation. The opportunity needs to be taken to incorporate an off-street multi-user bridleway route (for pedestrians, cyclists and horse riders) through the area of open space on the western part of the site. The route should have a suitable durable surface and should be of a suitable width (all specifications, links to other Public Rights of Way and the final route should be agreed with LCC's Public Rights Of Way and Active Travel teams). The planning application documents should also be amended to incorporate the above once full details have been agreed with LCC.

The Masterplan should refer to the opportunities to enhance PROWs from this site. A list is provided in the Green Belt Compensation Paper too.

Flood Risk & Drainage Matters:

The following concerns have been raised and should be addressed to the satisfaction of the Local Planning Authority:

Suds in Green Spaces: The design of green spaces with Sustainable Urban Drainage Systems (Suds) should be included within the Masterplan,

Sustainable Drainage & Flood Risk In The Master-Planning Process: The Design Code should consider how flood risk from all sources, both now and in the future, will affect the design considerations, adopting an avoid–control–mitigate hierarchical approach to addressing flood risk.

Surface Water Flood Risks. The submitted Masterplan provides no assessment of existing and future flood risks and does not seek to direct development to areas at the lowest flood risk. In addition, it does not identify any opportunities to reduce the causes and impacts of flooding, contrary to the National Planning Policy Framework and Planning Practice Guidance. This has not previously been considered within Rossendale's Strategic Flood Risk Assessment (SFRA) prepared as part of the Local

Plan evidence base, as this pre-dates recent and significant updates to the National Planning Policy Framework and Planning Practice Guidance with regard to flood risk and sustainable drainage. All sources of flooding, including from ordinary watercourses, surface water and groundwater must be considered throughout the master planning process to ensure compliance with national and local policies.

Specifically, the sloping topography of the allocation results in the generation of multiple surface water flow paths, as shown on the Environment Agency's Long Term Flood Risk Map. The surface water flood risks resulting from these flow paths, both now and in the future taking into account climate change, must be considered in the masterplan as these could affect, or be affected by design considerations, so as not to increase flood risk on or off-site in line with paragraph 167 of the National Planning Policy Framework.

The masterplan fails to provide a clear Design Code demonstrating how existing and future flood risks have been and will be, considered throughout the allocation. There is no provision of routes to safely manage such flows within the allocation, contrary to paragraph 049 of the Planning Practice Guidance.

The Lead Local Flood Authority strongly advise that the masterplan is revised to include a section on 'water management', examining the natural flow paths, watercourses, flood risks and catchments, ensuring these are protected throughout the masterplan process to ensure no increase in flood risk and that multi-functional SuDS and opportunities to utilise Natural Flood Management techniques are maximised.

Watercourses:

The Masterplan and Design Codes should show how existing watercourses will be protected and, where appropriate, enhanced through the site layout, for example, naturalization, de-culverting, and the creation of riparian habitats. The culverting of any ordinary watercourses should be avoided.

Throughout the masterplan process, it is critical to consider the future ownership of and access to any on-site watercourses. The site layout must provide safe access to all on-site watercourses for maintenance purposes. Consequently, no development should occur within 8 metres from the bank top of any ordinary watercourse to achieve this. This includes the construction of structures such as walls and fences and any activity during the construction phases of development.

It will not be acceptable for watercourses to be subject to maintenance regimes associated with fragmented riparian ownership. Applicants must demonstrate that on-site watercourses are subject to a clear and coordinated management and maintenance regime after development is completed, with riparian owners clearly notified of their ordinary watercourse responsibilities. Opportunities should be taken throughout the Master Planning process to integrate ordinary watercourses into the urban design, creating multifunctional open spaces where riparian owners feel connected to the water environment.

Failure to provide appropriate access and maintenance arrangements for both riparian owners and future maintenance contractors for ordinary watercourses can increase flood risk over the lifetime of the development, contrary to the policies of the National Planning Policy Framework.

Surface Water Sustainable Drainage Systems

The submitted Masterplan fails to define clear design principles for the provision of SuDS. It does however, set out the provision of indicative SuDS basins/ponds along the western boundary of the site and the associated landscape design principle: "Create sustainable drainage pond/s at appropriate locations at the western edge of the site. Pond/attenuation areas should be naturalistic in character with appropriately varied bank profiles, providing opportunities for habitat creation".

These end-of-pipe solutions do not deliver source control or multifunctional benefits, and, while managing surface water quantity at a site scale, are not part of a wider, multifunctional SuDS and therefore, can be considered contrary to Policy ENV9. The SuDS must be integrated throughout the development, to promote biodiversity and wider environmental net gains, generating the wider multifunctional benefits required through Policy ENV9.

The Masterplan should set out clear design codes for the provision of high-quality, multifunctional sustainable drainage systems which integrate with the wider blue-green infrastructure of the allocation, in line with Policy ENV9 and the Planning Practice Guidance. For example, in line with Policy ENV9, maximising opportunities for infiltration of surface water through the replacement of impermeable surfaces with permeable surfaces and maximising opportunities for planting and vegetated areas, in preference to engineered surfaces, to increase evapotranspiration and provide improvements for biodiversity and wider natural capital benefits. Above-ground conveyance SuDS such as swales should also be used to convey surface water to the attenuation components while providing a treatment train to provide benefits for water quality in line with Policy ENV9. Reliance on underground piped solutions should be minimised to maximise these multifunctional benefits and reduce future maintenance costs. Chapter 8.4 of the SuDS Manual (C753) provides guidance on designing SuDS for steep sites. The Lead Local Flood Authority do not consider topography, or lack of space, as sufficient reasons for discounting the use of above-ground multifunctional SuDS components on sloping sites.

The Masterplan should set out a source control > site control > regional control approach to managing surface water, with clear design codes setting out the SuDS components, deemed acceptable for the allocation. This will also ensure the continuity of SuDS design and place-making across the different sites in the allocation. In addition, the 'surface materials' should promote permeable paving for all private driveways to deliver source control, in line with the Planning Practice Guidance and Policy ENV9.

Discharge Points:

The submitted Masterplan does not identify discharge points for surface water, and, therefore, it cannot be assumed that the SuDS ponds have been located appropriately. In addition, the location of such large volumes of water next to the highway presents

a significant residual risk that must be addressed through any associated planning application. While it is unlikely at this stage that the on-site ground conditions have been established for infiltration, the Masterplan should provide provision for this to ensure all development is in accordance with the above hierarchy.

Existing Hydrological Characteristics

The submitted Masterplan provides no assessment of the existing hydrological characteristics, including existing flood risks, catchments and flow paths. It is critical that these existing characteristics are identified and mapped so that they are protected throughout the Masterplan process, as per section 7.5.1 of the SuDS Manual (C753) and integrated with the SuDS and wider blue-green infrastructure of the site to provide multifunctional benefits and reduce the causes and impacts of flooding, in line with the National Planning Policy Framework and Policy ENV9. Opportunities should also be taken to utilise Natural Flood Management techniques wherever appropriate, in line with the Planning Practice Guidance.

As the allocation contains multiple catchments and flow paths from outside of the boundary, it is critical that these are protected. This will help ensure flood risk is not increased, in line with the National Planning Policy Framework.

Maintenance & Adoption

The submitted Masterplan fails to consider future maintenance and adoption of the proposed SuDS, contrary to the National Planning Policy Framework. It is critical that in perpetuity maintenance of the SuDS is considered from the outset, to ensure the SuDS are subject to a clear maintenance regime with appropriate easements and to ensure components are designed to the standards of adopting bodies, including those of the Water and Sewerage Company and Local Highway Authority. The Masterplan should include details of future management and maintenance regimes of SuDS.

Phasing:

The Masterplan contains no detail on the phasing of the proposed SuDS and, therefore, is not in accordance with Policy ENV9. The Masterplan should identify any coordination of SuDS that is required between parcels as part of a regional system and ensure the SuDS remains integrated with the wider blue-green infrastructure of the allocation. It is important that phasing is also considered for the construction phase, to ensure the construction of the development does not pose an undue surface water flood risk on-site or elsewhere.

The phasing arrangements should allow for an overall and integrated approach to SuDS across the separate parcels in the allocation.

Education:

The revised Masterplan should show the land for potential future school expansion to the rear of Edenfield Primary School in accordance with the allocation in the Local

Plan illustrated as, 'Potential School and Playing Field Extension.' Please note though, that this land to the rear of the school retains its Green Belt designation.

The County Council and the Local Planning Authority understand that the school has been approached about being provided with some additional land for car parking. It would be beneficial if this was also illustrated on the Masterplan as potential future provision.

The Local Education Authority may also request a financial contribution towards the expansion of school provision to mitigate the impact of the development – a final assessment would be undertaken by the relevant authority closer to the time of the planning application being determined.

Ecology:

The Masterplan is an ideal opportunity to demonstrate how a minimum of 10% Biodiversity Net Gain can be achieved. There is potential to demonstrate this on land under the control of the various parties who are seeking to develop sites as part of these proposals.

The Masterplan should also demonstrate examples of how and where potential Green Belt Compensation Measures can be delivered.

There is no mention of the potential of the development to benefit wildlife, specifically nesting birds. A number of declining colonial breeders such as House Sparrow, Starling, House Martin and swift, are capable of benefitting from residential developments, if the eaves are constructed in such a way that nesting is possible or suitable nest boxes provided. Any such strategy should be based around species still present in the locality to ensure colonisation is likely. The proposed new residential development is also an opportunity to provide sensitive roosting opportunities for bats, as well as foraging/commuting routes.

Therefore, how existing ecological corridors are going to be maintained and also the development of enhanced ecological routes through the allocation, should be illustrated on the Masterplan.

The proposed tree species list includes Field Maple. This is inappropriate to the locality if utilised in the native woodland planting as whilst native to the UK, it is not locally native. Also, Amelanchier has been listed but this is not native. Neither species is inappropriate as a street tree or within gardens. However, locally native species would be better. Both Silver Birch and Rowan are capable of providing well formed and attractive garden specimens.

For the native tree planting to maximised the biodiversity benefits, the Masterplan should include Oaks (either native species); Birches (either native species), Rowan, Holly, Hazel, Crab Apple, Hawthorn and Elder in the drier locations, with Willows (goat and grey); Alder, Guelder Rose and Bird cherry in damper locations. Alder Buckthorn is also suitable in wetter areas, though relatively rare in the locality. It is important that the tree species list is split in to those suitable for street trees and gardens and those for the native tree planting. The use of non-native urban trees will compromise the maximum condition within the biodiversity metric as one of the criteria is having the majority of trees native.

Design, Layout and Landscape Issues:

Following the comments raised by the Design Panel, the Council's Landscape Consultant and Council Officers, the Local Planning Authority, the following points should be addressed in the revised submission:

- There needs to be a masterplan / design code in place to set out the strategic vision, before a decision is made on the application scheme - and planning applications must take into account whether the scheme has reflected properly the guidance in the masterplan / design code.
- The masterplan / design code is too generic and not place-specific in its recommendations. The current principles behind the development are very generic.
- Strategic Principles are important and the absence of a key structuring plan is a major concern. A key plan should deal with issues of movement, landscape and Public Open Space.
- An Urban Design Framework Plan (with urban edges, green edges, landmarks and vistas) should be created.
- The masterplan and design codes are vague and many of the sketches and images are generic and not worth including.
- The scheme does not reflect the local area, nor does it recognise the rural character of the site and wider area.
- It should reflect only the positive characteristics of the area, not all of the characteristics of the area.
- Need to articulate what will create a specific sense of place here. The analysis needs to go further to create this.
- Need to create a place that feels distinctive.

- Character areas need to be more distinctive and the documents needs to more clearly articulate the vision for each area.
- Character areas need to be more expressive and ambitious.
- Visual objectives need to be included so not just another anywhere estate
- What type of place this is going to be should be explained.
- This is a monotonous development with the appearance of a standard volume house builder scheme.
- Standard house types are proposed with poor design quality, poor artificial materials, lacking distinction, the development could be anywhere
- The design of the dwellings require alteration and significant upgrade to reflect the character of the area.
- Should be making landmarks within the development such as a unique building at certain locations, not just 2 storey, monotonous buildings throughout the site
- Changes need to be made to the density - it is very uniform across the development area and doesn't create a sense of place, nor does it reflect the layout of the local area. Lower density areas could be created near the main entrance and around existing buildings, e.g. Mushroom House, with greater density in other areas.
- Needs to include proposed street scenes within the design code to articulate visually what is proposed.
- Orientation of houses and roofs needs to be more organic, less regimented.
- Need to be thinking in a 3 dimensional way to eliminate poor views and allow views of key vantage points.
- Need to look at incorporating key movements within the parcels of development and achieve greater permeability.
- Need to take the opportunity to provide the north / south, cycle / pedestrian links through the site.
- Landscaping and open space needs to be incorporated into and throughout the development area, not just restricted to the western boundary / buffer area
- Development should take into account the landscape typologies of the area.
- Needs to include more commitment to street tree planting. There should be a separate section in the design code dedicated to this,

- The importance of boundary treatments to create positive street scenes needs to be articulated.
- Boundary treatments needs to be high quality and distinct to enhance frontages and define streets; these are lacking and of low quality.
- The proposal does not take opportunities to optimise the interface between the development's southern edge and the surrounding land.
- The application scheme does not seem to take on board most of the guidance within its own masterplan / design code - it just looks like a standard volume house builder scheme on a flat site.
- Drystone walls should be retained and enhanced, and new drystone wall stone walls should be introduced at key points. The use of ornamental hedges should be considered where attractive more formal boundary treatments are required.
- Exemplary design in real stone is required on the site, and the Masterplan / Design Code needs to commit to this (with such a commitment subsequently reflected in full in the planning application documents and drawings). Poor quality materials are not an option. The proposed palette of budget and largely concrete-based materials is unacceptable.
- The proposed selection of surfacing materials is non aspirational and would not result in a high-quality scheme. The palette of materials outlined in the Masterplan / Design Code document is poor quality and does not reflect the best aspects of the local area.
- Higher quality surfacing materials which draw on the local vernacular could be used to highlight selected areas, such as entrances, key junctions and features within or abutting the site.
- Principles relating to bin store location aren't addressed anywhere, this is a detail which needs to be considered early to ensure access is taken account of and bins don't become an eyesore littering pavements.
- Designs should accommodate cycle storage and easy access to that storage.
- Other SuDS features besides the retention pond should be considered - small scale features such as water butts and rain garden planters, using retention structures as green walls, etc with the opportunity to improve biodiversity too.

Conclusion:

The proposed housing development on the H66 allocation will bring about a profound change to the village of Edenfield, and it is essential that the Masterplan and Design

Code responds to that and sets out how the highest quality of design will be achieved
- currently it does not do this.

There are considerable concerns with the current proposal as detailed above and the Masterplan and Design Codes need to be fundamentally revised to produce a comprehensive Masterplan/Design Code which encompasses the issues raised in this letter and covers the entire site allocation in full. The points to be addressed, should then translate into any revised or future planning application submissions.

Yours faithfully,

Mike Atherton

Mike Atherton

Head of Planning & Building Control