



Review of Master Plan and Design Code for Edenfield

For

Rossendale Borough Council



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1. Introduction

Penny Bennett Landscape Architects have been commissioned by Rossendale Borough Council to review the Masterplan and Design Code prepared for the H66 allocation, Land West of Market Street, Edenfield by Randall Thorpe for developers Anwyl and Taylor Wimpey.

The purpose of the review is to inform the Borough Council of how effectively the Masterplan and Design Code provides clear guidance for the future development of the H66 allocation.

The Masterplan and Design Code is based on the best practice guidance set out in the National Design Guide by the Ministry of Housing, Communities and Local Government.

The National Design Guide is divided into separate elements, and recommended guidance is set out for each of these. Where these recommendations are not followed the departure must be justified in future planning applications, and any divergence should only be considered if it meets the broad aims of the code and offers additional design benefits or design excellence. This means that the Masterplan and Design Code is potentially a powerful document for improving the quality of design and creating *beautiful and sustainable places*¹ as described the NPPF.

2. Presentation

- The document is clearly presented following the template set out in the National Design Guide, and includes good quality and relevant photographs, plans and diagrams which illustrate the text, though sometimes these are lacking keys or the graphics are not clear e.g. fig 1.1. no key, fig 1.23 where not all elements described are visible. At times the language used is impenetrable and jargonistic and could be made clearer.
- A bibliography of documents and reports referred to would be helpful.
- An irritating feature is the confusing page numbering which only includes pages with odd numbers.

3. Sources of Information

The report notes that local design guidance has been sought (page 9). It is not apparent that the design guidance set out for the sites making up the H66 allocation in the Lives and Landscapes report prepared for RBC in 2015 has been used. Volume 2 describes outline mitigation recommendations for the main section of H66, named Land east of motorway, and part of the northern section named Land at Pinfold. In Volume 1 of the Lives and Landscapes report the landscape character types (LCTs), set out in the Lancashire Landscape Strategy are reviewed, and it is recommended that Settled Landscape LCT is split into two landscape character areas, (LCAs) as the southern area around Edenfield is very different in character from the northern Irwell 8a LCA. This difference has not been recognised in this Masterplan and Design Code.

It is not known if the Edenfield Neighbourhood Plan by Aecom 2022 has been referred to.

¹ Para 125 NPPF July 2021

It is not clear whether the 'Local forces for Change and their Landscape Implications' in the Lancashire Landscapes Strategy for Settled Valleys has been referred to. This addresses the landscapes of Irwell 8a, and is less specific to the area around Edenfield, however it does make the point that:

*Pressure for expansion of urban areas onto the steep, highly visible valley sides may detract from the characteristic wooded, rural backdrop to the valley towns and their typical linear form. **There is also a risk that new built development will lead to the coalescence of adjacent valley settlements and the loss of their distinctive identity.***

4. Review of Masterplan and Design Code

This considers and comments on each of the chapters as set out in the Masterplan and Design Code.

4.1 Context

4.1.1 Planning Policy

- Fig 1.1 shows the Rossendale Local Plan Policies Map, however the key is not attached which makes a lot of the information shown unusable.
- The context should consider that the site lies within the South Pennines Park², while this is not a statutory designation, the recognition of the South Pennines landscape which is culturally unique should be acknowledged, and those elements that make it special, understood.
- An important issue is highlighted in section 9 of Policy H66 relating to the extension of the primary school, where it states that either Stubbins Primary school or Edenfield CE Primary school would need to be expanded to extend entry from a 1 form entry to a 1.5 form entry. The potential for Edenfield CE Primary School to be extended is noted in yellow on the policies map. This would have landscape implications which would need to be considered as any new development could extend into open country.

4.1.2 Best Practice in Urban Design

The first paragraph on page 18 states that the Masterplan has been prepared in the context of current best practice in relation to urban design place- making, street making.... design for climate change etc, this is a fast moving area and new advice is developing all the time, the RTP1's research paper Cracking the Code: How design codes can contribute to net zero and nature's recovery was published in March 2022, and this Masterplan and Design Code would benefit from referencing that if it has not done so.

4.1.3 Landscape

- Landscape character: this paragraph needs to be re-written, the description does not match with the landscape character of Edenfield, urban development is not clustered around transport corridors on the valley floor. The Landscape Strategy for Lancashire identifies Settled Valley LCT for most of the built up areas of Rossendale, and it is not subdivided into separate landscape character areas. When the Lives and Landscapes study was carried out in 2014 – 15 this was addressed and a second landscape character area was proposed, LCA 8b Irwell Valley South³.
- The context should also emphasise that the village of Edenfield is self-contained and has a rural setting, surrounded by open countryside, this is in marked contrast to most of the other settlement in Rossendale which tends to be ribbon development along the valley bottom, as described in LCA Irwell 8a.

² www.southpenninespark.org

³ Lives and Landscapes Volume 1 para 3.2

- The description states that the A56 is a dominant feature the landscape, this is true, but the surrounding characteristic flat topped hills are also dominant features, as is Peel Tower and the prominent Emmanuel Church at Holcombe to the south.

4.1.4 Visual context

The report identifies areas from where views towards the H66 allocation would be prominent.

- I am not sure what the phrase *full or partial direct interface* means with reference to views from Market Street to the surrounding hills but I assume that the importance of the area's South Pennine context is recognised here. The visual analysis falls short here though as it only considers what the views would be for vehicle users and ignores pedestrians, cyclists and horse riders, and residents from properties opposite who would mostly be able to see over the low walls which partially screen drivers from the site. Fig 1.5 demonstrates the long views to the west at the northern end of the site, it should also be noted that there are three benches located here to take advantage of the fine views westwards, see Fig 1.



Fig 1 Google street view: excerpt looking east from Blackburn Road at northern end of H66 at Fingerpost Triangle.

- Views eastwards from Helmshore Road are addressed, views below the road are considered to be limited by intervening vegetation and the topography. Views from higher ground further west are considered: *Urban development within the 'Settled Valley' is visually prominent on the lower slopes of the valley with the urban edge generally softened by tree planting*. The urban area described is the village of Edenfield, which is a village rather than an 'urban area'. From the hill tops above Helmshore Road, it is perceived as a self-contained community surrounded by open country. New development at H66 does increase the risk of the coalescence of adjacent valley communities which is identified in the Lancashire Landscape Strategy as one of the local forces for change as pressure for development increases.



Fig 2. View north from well used footpath from Peel Tower along the ridge of the hills opposite H66. Ribbon development along Burnley Road and Market street would be replaced by larger scale development, changing the perception of views eastward from these hilltops.

- Views from the site to Peel Tower and below it the Emmanuel Church at Holcombe are important local landmarks and should be referenced in the visual context.

4.1.5 Architectural Character

The description of the architectural character of the area divides Edenfield into three zones.

- The traditional building material of the area is described as ‘buff stone’. There is no such thing as buff stone as a natural stone, it is GRITstone.
- Gritstone is universally used for traditional buildings and walls in Rossendale and is an important part of the local character. It may manifest itself in different colours and tones depending on the source of the stone and whether it has been cleaned. It may be painted and if this a local feature this should be noted. Stone may be finished in different ways such as ashlar, square coursed rubble masonry etc and that noted also.
- A distinction between the different bricks used would be helpful, where the harder Accrington bricks are often used for walls and copings, and brown and red brick for housing as described in the south of Edenfield.
- It should also be noted that the traditional terraces tend to follow the contours in ribbon development along the main routes, generally occurring in short blocks of identical style.
- Boundary and retaining wall treatments are not addressed.

4.1.6 Street Hierarchy

The existing street hierarchy is clearly shown on fig 1.10. The term cobbles is used mistakenly when referring to gritstone ‘setts’ which are traditionally cut stone blocks. Cobbles are rounded river washed stones.

4.1.7 Non vehicular movement and open space

The network of local public rights of way and hierarchy of open space is well illustrated in Fig 1.14.

4.1.8 Heritage Assets

Local designated and non-designated heritage assets are correctly identified. No mention is made of Peel Tower nor Emmanuel Church at Holcombe which are both visually prominent from large parts of H66. These are both grade II listed, although lie over the border in Bury. Peel Tower is a widely visible landmark and a popular destination for walkers heading north into the hills.

4.1.9 Site constraints and opportunities

- Figure 1.23 illustrates constraints and opportunities, the key notes where open views to high land are present, but this does not feature on the plan. I assume this is a minor graphical error, as there are two significant locations on Market Street and Burnley Road where views west are prominent. It is very important that these areas are noted, and that the masterplan responds to these.
- Existing features including the two substantial stone walls running across the site should be shown. Similarly at the northern end of the site, the existing stone walls are not mentioned. These are landscape scale features.
- The new housing on Pilgrim Gardens is not identified as backing onto the site on Fig 1.23.
- The description of the vegetation within the site is confused, does this refer solely to woody vegetation, as grassland is not mentioned? Green infrastructure is not mentioned, and opportunities for new planting to reinforce this should be noted.
- The importance of the footpaths through the site and their importance to local connectivity is noted. The rural character of these paths should be retained as far as possible.
- Positive frontage noted around playing fields but is not shown anywhere else, although the intent to use a positive frontage is shown on the Masterplan Fig 2.1.
- Potential areas for sustainable drainage ponds have been identified, however the low permeability of soils here may limit application of some sustainable drainage features. It's recognised that new water features would be beneficial for enhancing biodiversity and providing visual amenity.
- Vistas through the site and potential views from the site outwards are not mentioned at all, and these would give useful references for designers developing an overall site layout.
- The final paragraph on page 34 needs to be strengthened, stating *Where the H66 allocation adjoins Market Street, development must not fully obscure views to high land to the west of Edenfield*. This is too weak and needs to be more specific. A number of measures could be put in place to ensure views and visual connectivity across the site is retained.
- At the northern end of the site at the Fingerpost Triangle there are views to the high ground to both the east and west, this is the only place in Edenfield where this is possible, reinforcing the need for open views to be retained across Edenfield North.

4.1.10 Summary of context chapter

Understanding the context of the H66 allocation is vital in being able to achieve a high-quality masterplan which responds to the particular qualities and characteristics of Edenfield and its immediate environs.

4.2 Masterplan

The introductory paragraph to this section states that the aspirations of the local community have been taken account of. There is no evidence in this Masterplan and Design Code of any input from the local community. This should be included.

- The masterplan takes no account of views from the site to potential focal points such as Peel Tower.
- The masterplan doesn't respond to the contours, the proposed street layout appears to superimpose a grid onto the sloping site with potentially many new properties stepping down the slopes as well as along the slopes, this could result in the need for costly, ugly and inappropriate retention features. Consideration should be given in the guidance on housing layout to properties being able to take advantage of long views by being aligned east west along the slope, and new homes being staggered to allow views through the development.
- A strong barrier of new vegetation will provide screening from the A56 to the south and central parts of the site, and link into the existing green infrastructure providing new wildlife corridors north and south. Properties at the most northerly part of the site haven't been screened, though this could be accommodated where the ground falls away this avoiding blocking long views. On Edenfield North, any screening needs to be carefully managed to provide an adequate buffer without blocking long views west.
- The masterplan could cross reference the detail given later in the report in the chapter on Movement etc.
- It is stated that the Masterplan will take its cue from the existing landscape features, yet there appears to be no mention in the text or on the Masterplan of the retention of the existing drystone walls two of which run across the site east to west and are strong features, and an important characteristic of FP 126, nor any note of the drystone walls bounding the northern sites in the allocation, see below:



Fig 3 Photos 1 & 2 Stone wall bounding FP 126, Photo 3 stone wall along the northern edge of the playing field

The masterplan does not indicate any clear principles relating to:

- street trees positioning and frequency within residential areas
- hedgerows
- boundaries to public rights of way and landscape treatment of those corridors
- potential height of buildings and other structures e.g. retaining walls

4.3 Identity

The overriding principle to create a high-quality development which draws upon local character is stated at the start of this chapter, and this is then supported by a number of general principles. The principal of buildings actively fronting onto open space is particularly important, and this could be linked to associated principles to retain the rural quality of the area by ensuring that public footpaths through the site are enclosed by hedges, and close boarded fences should only be used to separate gardens between properties, never as a boundary between proposed residential areas and public footpaths, nor at the edge of public realm or other landscape areas.

Drystone walls should be retained and enhanced, and new drystone wall stone walls should be introduced at key points.

The importance of incorporating tree cover within the development and not just to the periphery needs to be emphasised. This will buffer the effects of the new development from outside, as well as providing a better environment for those living within the development, moderating temperatures, providing shading and an immediate link with nature and seasonal change.

The four character areas within the proposals are briefly described.

- Clarification is needed in each of the character areas regarding boundary treatments where *'hedgerows / landscaping, masonry walls and use of stone where appropriate'* is recommended. What does the 'landscaping' refer to? Shrub planting or mounding or something else? Masonry walls are stone, so does this mean stone masonry walls? Is this real stone or reconstituted stone? The Masterplan and Design Code should be identifying the situations where different materials could be used.
- With reference to the Edenfield Core area and Edenfield North in the section of the table marked 'Height' the proposal for just 10% of buildings to be 2 storey building and 90% 2.5 storey building is unacceptable. It's noted that some parts of the site are on higher ground and development seeks to retain long views, but it doesn't explicitly state that development should be kept low where long views are to be retained. This is an important principle which is recognised earlier in the Masterplan and Design Code and should be reinforced. I would like to see further consideration to the use of single storey or 1.5 storey buildings where views are to be retained. This is most important in the vicinity of Mushroom House near the proposed road entrance where buildings to this frontage could be lower to allow views over. Similarly, on Edenfield North, the land is flat and is at the same level as Market Street / Burnley Road and any new development here will be prominent. Here single storey bungalows should be proposed throughout to allow views straight through.
- The National Model Design Code Part 2 Guidance recommends that the colour, quality of materials and detailing is taken from the surrounding context. Tables 3.1 – 3.4 details the use of reconstituted stone or stone effect, there is a great range of building products fulfilling this criteria, and in order to maintain a high quality more detailed parameters should be given, ensuring colour, block size, texture and finish fall within the desired range.

- Housing density on Edenfield Core is proposed at 34 – 36 homes per hectare, in areas closest to Market Street the density should be increased to maintain a tighter knit development.
- There is an opportunity to make the Edenfield North development more prestigious, this is the most conspicuous part of the proposed allocation. Table 3.4 recommends terracing as well as detached and semi-detached, will terraced housing would fit with the form of building on Market Street, it would block views westwards, conflicting with the principle to retain long views westward. At the beginning of this chapter the objective to create a high-quality development is stated, however reconstituted stone is not generally recognised as representing the highest quality, so in this location exemplary design in real stone should be considered, such that sitting on one of the benches at the Fingerpost Triangle would continue to be a pleasant experience with an attractive prospect. This principle could extend to the properties at the entrance to Edenfield Core, off Market Street.
- The temptation to create a very varied roofscape should be resisted. Roofscapes vary subtly in Settled Valley. The new development on Pilgrim Gardens east of the site is an example of a more radical roof shape that does not fit in to the local vernacular and is overbearing and out of character.
- Views to Peel Tower are not noted as a characteristic from Edenfield Core though the Tower is conspicuous on the southwestern horizon, views to Peel Tower should be protected.
- The brick colour is not noted in Edenfield Core.

4.4 Movement

4.4.1 Street Character, Junction Design and Built Form Response

The design of secondary and tertiary streets is well considered.

- Where high quality walls are noted fronting onto open space, it should be stated that these are stone.
- The design of potential retaining walls which would be a feature on this site to accommodate the changes of level should be addressed.
- The proposals for junction design and the incorporation of street trees are helpful. These need to be referenced back to the masterplan.

4.4.2 Surface materials

The proposed selection of surface materials is non aspirational and would not result in a high-quality scheme. It is accepted that high quality materials are expensive and there may be economic reasons why these cannot be used throughout the scheme, however the palette of materials offered in table 4.5 is dreary.

- Higher quality 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, for instance in the vicinity of Chatterton Hey.
- No consideration has been given to the use of permeable paving, and this should be standard on all private driveways and considered on other areas.

4.4.3 Access and Parking Typologies

- 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.

- The six types of frontage are useful and incorporate tree and shrub planting suggestions, these should be referenced back to the masterplan. The use of ornamental hedges should be considered where attractive more formal boundary treatments are required.

4.5 Nature

The section on nature is exceptionally brief for a landscape lead scheme at a moment when we have unprecedented loss of species and habitats.

Quoting from the foreword to Cracking the Code:

So, in a nature and climate emergency, the need has never been greater. This research shows how to build upon the foundations of the National Model Design Code to truly harness design codes and guides that drive the creation of new developments that rise to the urgent challenge of delivering net zero and nature recovery. It can be done – now is the time to do it. ⁴

4.5.1 Green Infrastructure

The landscape design principles are sound but need more detail to make these site specific principles for H66.

- Native species shall be used whenever possible and **always** at the interface between developed and rural areas/ informal open space/ PROW.
- The paragraph on tree planting within housing is inconsistent with the recommendations earlier in the report, e.g. page 52 (Detailed design of streets....) suggesting this *may* include trees. This should be amended to **shall** include trees.
- There is no mention of grass mixes and creation of new meadows and species rich verges, hedge edges etc;
- Other SUDS features besides the detention pond should be considered, small scale features such as water butts and rain garden planters, using retention structures as green walls etc;

Green infrastructure should refer to the Green Infrastructure Framework, and the 15 principles produced by Natural England 2023 and how land included within the H66 allocation can benefit from this. I note that this was introduced after this Masterplan and Design Code was first published, though its imminent introduction is flagged up in the National Model Design Code.

More detail is required to show how the proposals will link into existing green infrastructure, the benefits of new infrastructure and how this could be introduced:

- Opportunities for new species rich grassland
- Opportunities for new hedgerows, native and other and where these should be used
- Native tree, woodland and scrub planting
- Formal green spaces

4.5.2 Biodiversity

No mention is made of Biodiversity Net Gain, BNG and how this would be incorporated into this masterplan and design code. Since the requirement to provide 10% net gain becomes law in November 2023 this is a major omission. While a detailed BNG strategy would be produced by an ecologist, this needs to be fully integrated into the landscape proposals. The recognition of this and the likely impacts on new development should be a key part of this Masterplan and Design Code.

⁴ Cracking the Code How Design Codes can contribute to net-zero and nature's recovery RTPI March 2022

There are huge opportunities to incorporate new habitats within the H66 allocation which might include:

- Large scale habitat creation, associated with new woodland hedges and SUDS for instance;
- Small scale interventions such as hedgehog holes to all fences, bat and swift bricks to buildings, bird boxes, creative use of retaining structures for new invertebrate habitats, bird habitats within climbing plants on retaining structures etc.

4.5.3 Species Palette

- The species palette needs to be more detailed and give further guidance as to what trees could be used in what areas. A good selection of native trees is proposed, is the intention to use these within the residential area? Street tree cultivars which are more resistant to restricted rooting zones, have narrower canopies and so are less likely to be damaged by large vehicles may be more appropriate in some locations.
- I would question the use of lavender and box hedging, lavender is very low and unless its in a very sunny location doesn't thrive in Lancashire, box is subject to blight.
- The shrubs palette is very limited, there is no clear rationale, considering height, form, texture, seasonal change, value to wildlife, sensory interest (as suggested in fig 6.3) etc, the enclosure to be formed: private or semi-private. It would be better to give a few examples of good shrub species citing their key attributes and stating that these and similar species are recommended.

4.6 Public Spaces

It would be useful if the proposed play area provision was cross referenced to the relevant guidance from organisations such as Fields in Trust. Fig 6.1 usefully shows the proposed and existing public open space in and around Edenfield.

4.7 Phasing

The proposal to use footpath 126 through the site for emergency vehicle access is likely to wipe out any existing natural vegetation along this corridor, and the retention of the existing good quality drystone walls would be threatened, permanently damaging the rural character of this important well used path.

Phasing should be carefully considered to avoid adverse impacts on the existing landscape features.

5.0 Conclusions

The Masterplan and Design Code promises much: stating that an overriding principle is to create a high quality development but then failing to demonstrate that the views of local people or local design advice has been taken on board, recommending a palette of entirely budget and largely concrete based materials, and failing to give strong design commitments on some aspects, for example in the Nature chapter where it states planting in residential areas may include trees. The vision states that the existing landscape and heritage features should be respected yet important stone walls within the site are ignored and the opportunity to focus views to Peel Tower in the southwest has not been seized.

The scale and impact of this major development on Edenfield village, which is often referred to as an 'urban area' is underplayed, and the Edenfield's rural setting is not emphasised.

Guidance is often weak, leaving room for interpretation and dilution of the aims of the Masterplan, and there are important issues which are not considered at all, such as the treatment of retaining walls. Sustainability is mentioned, but there is no reference as to how designers should be making

their schemes more carbon neutral. Sustainable drainage is addressed by recommending a detention pond but other complementary features and materials and practices are not mentioned.

A serious omission is any consideration of biodiversity net gain and this must be addressed.

There is sometimes inconsistency between guidance in one part of the report and another so the overriding principles are lost, and a failure to use the diagrams to full effect: much more information could be shown on these to supplement the text. There is a resistance to providing specific detail and rather making broad generalisations where any sense of local distinctiveness is lost.

The proposed housing development on the H66 allocation will bring about a profound change to the village of Edenfield, and it is essential that this Masterplan and Design Code responds to that and really does set out how the highest quality of design can be achieved, at present it does not.