

## Forward Planning Policy Comment

### Edenfield Masterplan and Design Code

This response relates to the revised Masterplan and Design Code (submitted June 2023). It is not intended to refer specifically to Taylor Wimpey's related planning application.

To summarise we note that the applicant has provided a much clearer document with helpful maps and diagrams, although we consider that there is still much detail outstanding. In particular we would have expected measures to address Green Belt compensation and biodiversity net gain to have been shown, whether on or off site.

As with the earlier response, the revised proposed Masterplan and Design Code is assessed below against policies and guidance in the National Planning Policy Framework, the Design: process and tools Planning Practice Guidance, the National Design Guide and National Model Design Code, as well as the Local Plan policies and the draft Edenfield Community Neighbourhood Plan Design Code.

In order to provide a structure to the comments, the requirements of the site specific policy H66 in the Rossendale Local Plan for the Land West of Market Street in Edenfield will be used.

#### ***1. The comprehensive development of the entire site is demonstrated through a masterplan with an agreed programme of implementation and phasing;***

We welcome the changes to the boundary of the masterplan to exclude land north west of Church Crescent.

The additional detail for land owned by Peel Land and Property has also been provided, including their proposals for the land to the east of Market Street. However, it should be noted that we would expect the Masterplan and Design Code to provide guidance for the entire allocation and any related land (e.g. possible school extension, land owned by Richard Nuttall, and the land around Alderwood). We would suggest that these owners are invited to participate in the production of this document and would have the opportunity to make their views known through the consultation process.

We do note that the Masterplan and Design Code repeatedly refers to further details being provided in subsequent planning applications. Again, it is necessary to stress that we expect the Masterplan and Design Code to establish the overall framework for the development of this allocation.

There does not appear to be an agreed programme of implementation and phasing – with specified time periods - to support the delivery of the allocation. Although the table and map are useful (pp54-55), they lack this specific detail.

## **2. *The development is implemented in accordance with an agreed design code;***

We welcome that the design code proposed for the site allocation H66 is now assessed against all ten characteristics of the National Design Guide and National Model Design Code. These 10 characteristics are listed below:

- Context
- Identity
- Built form
- Movement
- Nature
- Public spaces
- Uses – mixed and integrated
- Homes and buildings – functional, healthy, sustainable
- Resources – efficient and resilient
- Lifespan – made to last

### Context

The Masterplan and Design Code provides a good level of information to set out the context of the site, and has expanded on the previous version to provide a much clearer presented and informative section, with maps, diagrams and photographs.

As reported in the revised Masterplan, Edenfield Community Neighbourhood Forum (ECNF) has prepared and undertaken a Regulation 14 consultation for the emerging Neighbourhood Plan, and this includes a draft Design Code for Edenfield Neighbourhood Area, prepared by their consultants Aecom, which is published on their website. We maintain that this provides some useful information in relation to the context of the site and to the other 9 characteristics of a design code. Although the updated Masterplan and Design Code now refers to this, it suggests the Design Code should only have limited weight. However, it should be remembered that ECNF's work benefits from participation by the local community in its preparation. Ideally it would be beneficial if the developers' masterplan could be assessed against the work published by ECNF, and the comments that were received during the consultation.

We note that information relating to green and blue infrastructure including ecological networks and waterways has been added.

A further landowner has submitted recently a planning application (2022/0577) in the vicinity of Alderwood, which is within the site allocation boundary. This area should be identified in the Masterplan as land with the potential for development.

### Identity/Character areas:

The Masterplan and Design Code identifies three character areas for the existing Edenfield settlement: north Edenfield, Market Street and South Edenfield. The identification of these character areas is slightly different from the ones proposed in

the draft Design Code of the Neighbourhood Plan where four character areas for the Neighbourhood Area have been identified. These are: the village cores, the traditional terraces, the piecemeal domestic development mainly in south Edenfield and the rural fringe. This is shown on the diagram below:

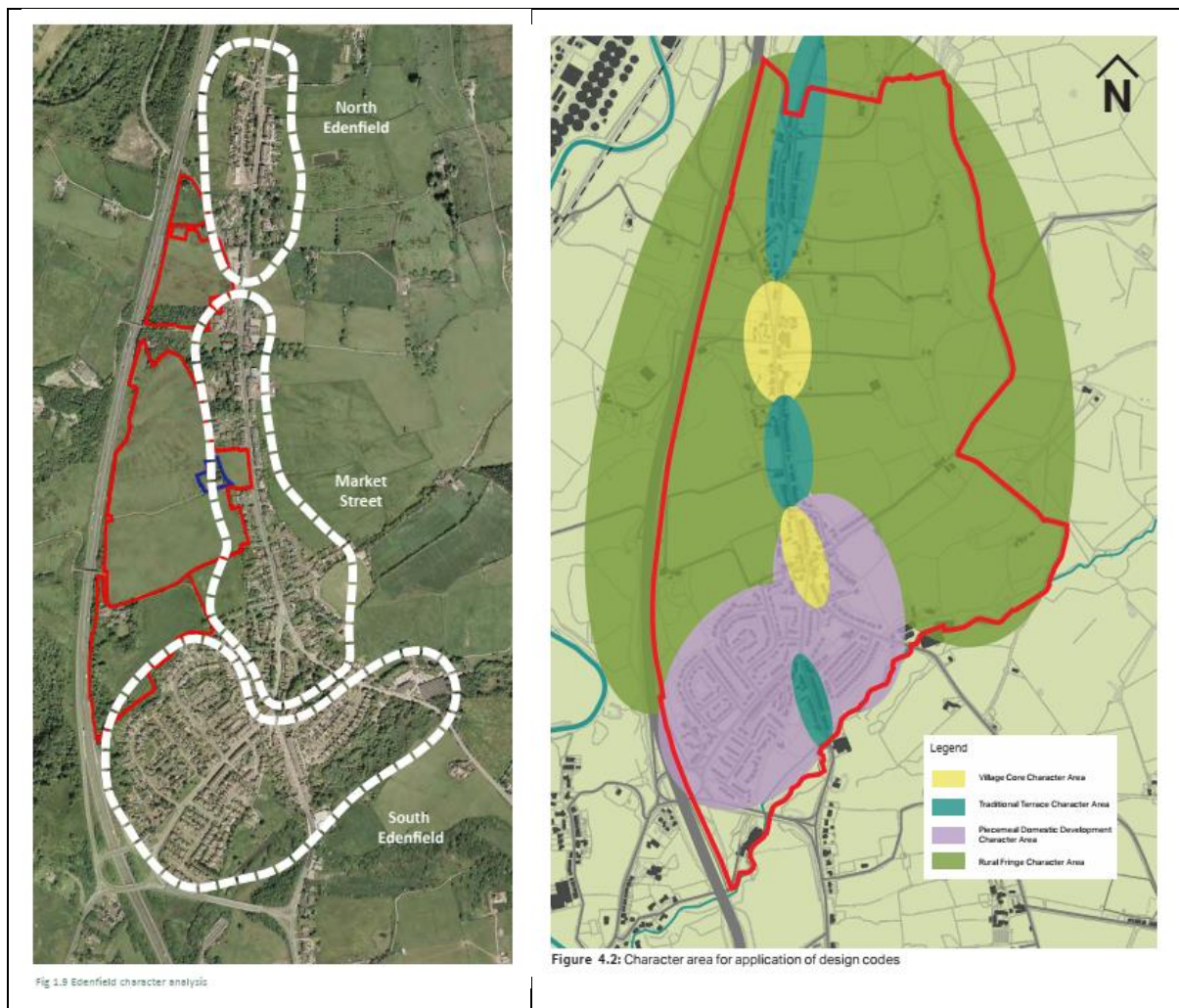


Figure 1- Proposed character areas by Randall Thorp for Taylor Wimpey (left) and draft character areas identified by AECOM for ECNF (right)

The Masterplan explains the differences between these in much more detail, justifying these Character Areas.

### Built form

- Layout

We note the internal road layout in the southern parcel near Chatterton Heys has a south-west to north-east axis which may help protect views to Peel Tower as set out in the Landscape Assessment Study and the allocated site specific assessment<sup>1</sup>. This key view needs to be highlighted in the key characteristics for this area.

<sup>1</sup> Lives and Landscapes Assessment – Volume 2: Site Assessments (2017)

[https://www.rossendale.gov.uk/downloads/file/14131/volume\\_2\\_site\\_assessments\\_-\\_version\\_2\\_-\\_partially\\_updated\\_july\\_2017](https://www.rossendale.gov.uk/downloads/file/14131/volume_2_site_assessments_-_version_2_-_partially_updated_july_2017)

- Building Heights:

The ECNF Design Code states that the height of new properties situated within Area A of the landscape assessment study (the central parcel of the site) where landscape impacts have been assessed as being significant, should be no more than 2 storeys to mitigate adverse impacts. We note the additional detail of building heights in the revised document and would only seek to stress that we would expect to see landmark buildings which don't obscure direct views of the surrounding countryside.

- Boundary treatments:

The use of dry stone walls and hedges should be used in the character areas along Market Street and Blackburn Road in keeping with the village cores and traditional terrace character areas of the Edenfield Neighbourhood Area Design Code.

- Setbacks:

Acceptable distances between properties and the road should be provided. The setback should be small for properties along Blackburn Road and Market Street to be in keeping with the local character of the village cores and traditional terraces. The setback should be more important in the central and rural edges of the development to include large front gardens.

### Movement

- Street typologies

We note the indicative hierarchy of streets such as secondary and tertiary and the presence of on-site trees.

- Active travel and public transport

In terms of pedestrian and cycle provision, a north to south walking and cycling route through the site will provide a safe, off-road connection through Edenfield, linking into the wider walking and cycling network branching to Rawtenstall, Haslingden & Irwell Vale.

We would like to see greater reference to the improvements to the footpath and bridleway networks as discussed in the Green Belt Compensation Paper and with regard to Taylor Wimpey's current planning application, as we highlighted previously.

The creation or enhancement of existing footpaths and cycle ways to Edenfield Primary School and to the Edenfield Neighbourhood Parade (as shown on Policies Map) and south to Stubbins and north to Rawtenstall are important to ensure good accessibility to local services from the development site. Improved routes between Edenfield and Stubbins would also be appropriate, as this would link the southern part of the allocation with Stubbins and the facilities there, including the Primary School. These should be appropriately lit, direct and overlooked by properties as much as possible.

## Parking

Car parking should include the provision of electric vehicle charging points in line with the Local Plan policy TR4, with one electric vehicle charging point to be provided for every new house’.

Three community car parking areas are now included in the Masterplan. All of these must also comply with Policy TR4, providing the appropriate amount of electric vehicle charging points for the number of spaces provided.

A discrepancy also exists between the “Market Street Corridor Improvement Plan” and the most recent site layout for Planning Application 2022/0451, specifically regarding the community car parking area along the main vehicular entrance into the central parcel of allocation H66. The Market St Corridor Improvement Plan shows a one-way system flowing West to East, whereas the site plan for application 2022/0451 shows a one-way system flowing the opposite direction from East to West. Clarification is sought on this discrepancy, with the preferred option being the one shown in the Market St Corridor Improvement Plan. However, it is considered important to note that the position of the car parking facility requires a right turn across an oncoming traffic flow, giving rise to potential tail backs onto Market St. Further information regarding this may be provided by Lancashire County Council.

## Waste collection

The Masterplan and Design Code does not set out how bin storage and collection is to be provided throughout the site. Guidance is available from the NHBC<sup>2</sup>.

## Nature

- Green Infrastructure

We note this section has been expanded, however, there is still no reference to any on-site water courses. We note that the proposed scheme still contains two ponds, which originally was not supported by the LLFA.

- Biodiversity

The woodland along Church Lane is shown as a Deciduous Woodland – Priority Habitat on the Magic Map website. As such, any proposals to destroy part of this woodland as shown to the north of Church Lane to accommodate housing will not be supported. It is however considered that the provision of a cycle way / pedestrian link from the central parcel of the allocated site to the northern parcel, via this woodland, could be acceptable providing that the minimum number of trees are felled and each tree is replaced to the ratio of 1 tree felled to 2 trees replanted.

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<sup>2</sup> <https://www.nhbcfoundation.org/wp-content/uploads/2016/05/NF60-Avoiding-rubbish-design.pdf>

It appears that the area of woodland between the central and northern parcels has been reduced. Can this be clarified?

The masterplan does not indicate where or how within the allocation will the measures to address biodiversity net gain be positioned. This would seem to be an unfortunate omission.

### Uses

The Masterplan should set out that 30% of the dwellings should be affordable in accordance with Policy HS3 of the Local Plan, and the tenure of these units.

Also at least 10% of the plots in the new development should be made available for custom or self-build for people wishing to build their own homes. Since our original responses, the number of people on the Rossendale Self-Build Register has increased to 47 (as of 10<sup>th</sup> August 2023). Amongst these, three people identified Edenfield as their first choice of settlement, seven as their second choice and 5 as their third choice. 1 other person identified Edenfield as one of their choices. As such a total of 16 people identified Edenfield as one of their preferred location to initiate a self-build project.

### Homes & buildings

The Masterplan and Design Code should set out that at least 20% of the dwellings should be built according to the standard M4(2) of the Building Regulations in order to be compliant with Policy HS5 of the Local Plan. We note that Taylor Wimpey's planning application exceeds this.

### Resources

The Masterplan should consider the orientation of properties to maximise the use of solar technologies whilst preserving key views to Peel Tower in the southern section and to the western tower of Edenfield Parish Church in the central part of the site. We note the insertion of R01 and R02 but consider these should be strengthened, and the schemes to go beyond the minimum Building Regulations standards.

It is expected that 10% of energy requirements from the new development will be met by on-site renewable energy provision such as through the use of solar panels and/or air source heat pump as set out on the Climate Change Supplementary Planning Document<sup>3</sup>. A full assessment will be required to accompany any planning applications to show how this proposal accords with the Climate Change SPD. It is

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<sup>3</sup> [https://www.rossendale.gov.uk/downloads/file/17881/climate\\_change\\_spd](https://www.rossendale.gov.uk/downloads/file/17881/climate_change_spd)

\*a habitable room is defined as a room in which a resident would normally expect to have reasonable levels of privacy for relaxation. This normally would be a living room, dining room, bedroom or kitchen. Studies, work rooms, utility rooms or bathrooms are not normally defined as habitable rooms.

the Council's hope that the development of this former Greenbelt land would be an exemplar scheme, not just for Rossendale but wider afield.

### Lifespan

We note that this has now been addressed.

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

We note that a full transport assessment is expected.

If the Community Car Parking Areas are proposed for existing residents of Edenfield who may have vehicles displaced due to proposed on-street parking restrictions on Market St, we would expect to see details on how these new parking spaces will be retained and secured for these existing residents.

- 4. *A Heritage Statement and Impact Assessment is provided and suitable mitigation measures are identified and secured to conserve, and where possible, enhance the setting of the Church, the non-designated heritage assets which include Chatterton Hey (Heaton House), Mushroom House, and the former Vicarage, and the other designated and non-designated heritage assets in the area;***

- i. Landscaping of an appropriate density and height is implemented throughout the site to 'soften' the overall impact of the development and provide a buffer to the new Green Belt boundary***

- ii. Materials and boundary treatments should reflect the local context***

We maintain that the use of natural stone and not just reconstituted stone or stone effect should feature within the material pallet in the design code especially for properties fronting Market Street and Blackburn Road.

Timber wall boundary treatments will not be acceptable alongside the principal elevation of dwellings. The use of boundaries which will enhance biodiversity should be encouraged, for example, permeable for wildlife to minimise the impact of the development on small mammals.

- 5. *An Ecological Impact Assessment is undertaken which identifies suitable mitigation measures for any adverse impacts particularly on the Woodland Network and stepping stone habitat located within the site.***

The woodland area to the south and north of Church Lane should be retained and strengthened.

- 6. *Compensatory improvements must be provided to the Green Belt land in proximity of the site in accordance with Policy SD4***

As cited previously the Masterplan should identify the locations of proposed Green Belt compensation measures and set out further information about the nature of these measures and a timescale for their implementation.

A schedule should be prepared for the whole allocation showing which measures are being provided, and by which developer(s) for green belt compensation where appropriate, and for biodiversity net gain. Specific measures which are required to mitigate impacts of the development should also be distinguished.

- 7. *Geotechnical investigations will be required to confirm land stability and protection of the A56, and consideration paid to the suitability or not of sustainable drainage systems on the boundary adjoining the A56***

As noted previously the Masterplan and Design Code are not accompanied by geotechnical investigations to confirm the suitability of sustainable drainage systems along the A56. This should be addressed.

- 8. *Provision will be required to expand either Edenfield CE Primary School or Stubbins Primary School from a 1 form entry to a 1.5 form entry primary school, and for a secondary school contribution subject to the Education Authority. Land to the rear of Edenfield CE Primary School which may be suitable is shown on the Policies Map as 'Potential School and Playing Field Extension'. Any proposals to extend the schools into the Green Belt would need to be justified under very special circumstances and the provisions of paragraph 144 of the NPPF***

It is our understanding that Edenfield is the preferred school for expansion by the Education Authority. Comments have been received from the Education Authority and further work is being requested from them to look specifically at the impacts on school provision in Edenfield from the entire H66 allocation. The masterplan needs to indicate how and when on-site expansion at Edenfield or Stubbins would be considered and delivered by the developers.

It should be noted that the developers will still need to apply for planning permission and justify special circumstances as to why this land which is within the Green Belt should be developed.



**9. *Noise and air quality impacts will need to be investigated and necessary mitigation measures secured***

We note that the acoustic barrier has been removed from the masterplan, without any explanation for this.

**10. *Consideration should be given to any potential future road widening on the amenity of any dwellings facing the A56.***

In addition to the noise buffer between the A56 and the proposed development, there should also be a buffer to consider potential future A56 widening on the amenity of the proposed dwellings alongside the A56 (such as gardens).

### **Additional Relevant Policy Considerations**

Strategic Policy SD2: Urban Boundary and Green Belt of the Local Plan (adopted 2021) includes H66 and notes “The Council will expect that the design of development on the above sites minimises the impact on the character of the area and addresses relevant criteria in policy ENV3. Development will also be expected to contribute to compensatory improvements to land elsewhere in the Green Belt, enhancing both its quality and public access.”

The explanation to Policy SD2 notes in paragraph 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”.

Para 120 of the Site Specific Policy for H66 refers to “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”

Para 121 is clear that “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”.

Para 125 states “Any proposed development must make a positive contribution to the local environment and consider the site’s form and character, reflecting the setting of features such as the Grade II\* Listed Edenfield Parish Church and incorporating appropriate mitigation. Development must be of a high quality design using construction methods and materials that make a positive contribution to design quality, character and appearance. The development must contribute towards the sustainable use of resources. Implementation of development must be in accordance with an agreed Design Code/Masterplan across the whole development. The layout should be designed to allow glimpsed views towards the Church to continue, for example, by

aligning the principle road(s) along a north-south or north east – south west axis, and building heights restricted”.

The importance of a phasing and implementation plan is noted in Para 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”.

In view of the scale of this allocation, its location in former Green Belt land, and its strategic importance to the Borough, a site specific policy has been prepared. However, other Local Plan policies are relevant too and in particular attention is drawn to Policy ENV3 on Landscape Character and Quality. In particular ENV3 notes:

In order to protect and enhance the character and quality of the landscape, development proposals should, where appropriate:

- Respond positively to the visual inter-relationship between the settlements and the surrounding hillsides and follow the contours of the site;
- Not have an unacceptable impact on skylines and roofscapes;
- Be built to a density which respects the character of the surrounding area with only low density development likely to be acceptable in areas abutting the Enclosed Upland or Moorland Fringe Landscape Character Areas;
- Retain existing watercourses, trees and green infrastructure features that make a positive contribution to the character of the area;
- Incorporate native screen planting as a buffer to soften the edge of the building line in valley side locations;
- Take into account views into and from the site and surrounding area, retaining and, where possible, enhancing key views; and
- Retain and restore dry stone walls, vaccary stone flag walls and other boundary treatments which are particularly characteristic of Rossendale.
- Development proposals should incorporate a high quality of landscape design, implementation and management as an integral part of the new development. Landscaping schemes should provide an appropriate landscape setting for the development and respect the character and distinctiveness of the local landscape.