

## URBAN DESIGN CONSULTATION RESPONSE

|                       |                                                                                                                      |
|-----------------------|----------------------------------------------------------------------------------------------------------------------|
| Design Officer        | Azhar Kapadi                                                                                                         |
| Date                  | 01.09.26                                                                                                             |
| Application Reference | PL/2026/0684                                                                                                         |
| Address               | DICKEN GREEN MILL, GREENFIELD LANE, ROCHDALE                                                                         |
| Proposal              | Residential development- 44 affordable dwellings including access, car parking, open space and other associated work |

### Introduction

### Reason(s) for Consultation

Architecture and Urban Design

### Scheme Image(s)



***This assessment has been made against:***

**National Guidance:**

- *The National Planning Policy Framework*
- *The ten characteristics of a well-designed place contained within the National Design Guide*
- *National Model Design Code*
- *Building for a Healthy Life design toolkit*

**Local Policy:**

- *Rochdale Core Strategy policies:*
  - *S03 – To improve design, image and quality of place*
  - *P1 – Improving Image*
  - *P2 – Protecting and enhancing character, landscape and heritage*
  - *P3 – Improving design of new development*
  - *DMI (General Development Requirements)*
- *Supplementary Planning Documents:*
  - *Oldham and Rochdale Urban Design Guide*
  - *Oldham and Rochdale Residential Design Guide*
  - *Milkstone, Deeplish and Newbold SPD*
  - *Rochdale Station Area SPD*

***The Unitary Development Plan (UDP)***

- *G/BE/1 - Design Quality*
- *BE/2 - Design Criteria for New Development*
  - Greater Manchester's Streets for All Design Guide*
  - Places for Everyone (PfE) joint development plan*

## **SUMMARY**

The scheme exhibits fundamental shortcomings in its layout, placemaking strategy, architectural response and landscape integration, resulting in a development that falls short of the standards expected by national and local design policy.

The amendments required to address these issues are so substantial that they extend beyond the scope of revisions to the current submission.

I am not supportive of this proposal.

## **APPLICATION CONTEXT**

### **Pre-App Process**

The applicant engaged with the LPA at the pre-application stage, during which significant assistance was provided through a written pre-application response, follow-up meeting(s), and subsequent email correspondence as amendments were explored.

Extensive advice was provided on design and layout matters. Although I was not involved at this stage, I have taken account of the guidance given by the case officer.

Key issues identified included:

- Contribution to local distinctiveness and character
- Absence of a robust design process
- Over-reliance on frontage parking
- Landscaping and street design
- Site permeability
- Scale and form

As per Milkstone, Deeplish and Newbold SPD, it was reaffirmed the principle of development on the site would be supported.

The LPA considered that the proposals required a fairly significant redesign, as the submitted layout was unlikely to be supported.

The LPA made clear that new development should contribute positively to local distinctiveness and character. Concerns were also raised that the proposals had not followed an appropriate design process that properly responded to the site's opportunities and the positive characteristics of the site and its surroundings.

### **Housing Delivery**

The sensitivities of the site are recognised, as are the pressures associated with meeting funding-dependent deadlines for housing delivery (where relevant). The quality of placemaking should not be compromised, even in the context of delivering much-needed housing. There is an opportunity to successfully achieve both.

## **DESIGN POLICY**

### **Rochdale Core Strategy (2016)**

C3 requires a high standard of development and layout that produces attractive places.

Policy DMI Requires all development proposals to demonstrate that they are of a high-quality design and take the opportunity to enhance the quality of the area.

Policy PI – Improving Image: Developments should improve the image of the area. Poor or unremarkable design that does not elevate the local image or contributes negatively to the streetscape could be rejected.

Policy P3 acknowledges that good design will improve the image and attractiveness of the borough as a place to live, work and visit. This policy requires all new developments to adhere to high quality design and enhance the borough's identity and sense of place, by respecting context where it is positive.

### **National Planning Policy Framework**

Policy DP3 requires development proposals to respond positively to their context and create well-designed places through high-quality architecture, built form, landscape and public realm design. Development should reinforce local character and identity whilst contributing positively to the overall quality of an area. Development proposals that are not well designed should be refused.

### **Rochdale Borough Unitary Development Plan BE/2:**

Development proposals will be required to demonstrate good design by:

- a) Ensuring that they are compatible with or improve their surroundings by virtue of their scale, density, height, massing, layout, materials, architectural style and detail and means of enclosure
- b) Creating visual interest in areas or buildings lacking character

### **Milkstone, Deeplish and Newbold SPD**

The site falls within the Canalside Character Area of the Rochdale Station Area SPD, which seeks development that enhances the canal setting, improves connectivity along the corridor, and delivers high-quality, sustainable, and adaptable design.

### **Urban Design Guide SPD (Oldham & Rochdale)**

- Emphasises contextual design, active frontages, and material quality
- Encourages early engagement and use of CGIs to communicate design intent

**Residential Development SPD (2016)**

- Sets expectations for layout, scale, massing, and boundary treatments
- Advocates for private entrances and garden spaces where appropriate

## DESIGN

Many of the concerns raised during the pre-application process remain unresolved. Fundamental issues persist with the proposed layout, and the architectural approach does not reflect high-quality design. Rather than establishing a positive benchmark for future residential development, the proposal risks setting a poor precedent for subsequent housing delivery within the area.

Many of the issues identified stem from a weak Design and Access Statement, which fails to adequately analyse the site and its wider context. As a result, the proposal does not respond meaningfully to its surroundings and misses key opportunities to optimise the site's development potential, resulting in a layout and design approach that falls short of expectations.

The BHL states, *'Taking a walk to really understand the place where a new development is proposed and understand how any distinctive characteristics can be incorporated as features.'* The submission gives the impression that the site has not been adequately visited or assessed; this is evident in the limited consideration given to the site's level changes, views, canal-side setting and relationship with neighbouring land.

### Site Layout

The Milkstone, Deeplish and Newbold SPD seeks to maximise the benefits of the canal corridor and improve connections between neighbouring sites. The proposed layout fails to respond positively to its wider context, particularly in relation to the adjacent public open space, the canal-side setting and the eastern parcel currently occupied in part by the Iceland foodstore. As currently presented, there is little evidence that the scheme has been informed by a comprehensive understanding of the site's constraints, opportunities and future relationship with neighbouring land.

### Sites west of Well i'th' Lane

The site sits at a significantly higher level than the eastern parcel, yet there is insufficient information to demonstrate how the development would integrate with or relate to any future redevelopment of that land. Key questions remain unanswered regarding future connectivity, visual relationships, boundary treatments and the potential for comprehensive placemaking across the wider area. There is no clear strategy illustrating whether future connections are anticipated or, if not, the justification for their omission.

### Canal Corridor

Despite pre-application advice highlighting that landscape and open space should be integral to the design, the proposed public open space (POS) appears secondary to the development rather than a key structuring element. Good design is where plans: *'identify the character of new spaces, such as 'parks', 'woodland', 'allotments', 'wildflower meadows' rather than 'P.O.S.'. Be more specific about the function and character of public open spaces.'*

The proposed POS lacks a clear design rationale or vision for how it will function, be used and contribute to the character of the development. There is little evidence of how residents would engage with the space, benefit from views towards the canal corridor, or make use of seating, recreation and informal gathering opportunities.

The absence of accurate cross-sections and visual representations of the embankment and wider setting makes it difficult to properly assess the quality and deliverability of this aspect of the scheme. As such, too many fundamental design matters remain unresolved and cannot reasonably be deferred to planning conditions.

### **Arrival**

The site entrance fails to create a positive sense of arrival. Instead, the principal view on entering the development is dominated by a substation, frontage parking and a notable absence of meaningful landscaping. These weaknesses continue further into the development, particularly around Plots 40-44, where there is an over-reliance on frontage parking that results in a car-dominated street scene and poor first impression.

*Approximately 70% of all parking provision is allocated to frontage parking. This is excluding areas circled in blue, which occupy the street scene and are likely to dominate the street scene with parked cars*



### ***Inner Site***

The layout appears unresolved within the interior of the site and fails to prioritise pedestrian movement or create a coherent network of connected spaces. There is a notable lack of permeability and poor edge-to-edge connectivity, resulting in a development that feels fragmented rather than integrated.

Given the site's topography, there may have been opportunities to utilise split-level house types or alternative building forms that could positively address this POS. Instead, this key area is bordered by too many side elevations and fencing, resulting in weak enclosure and limited natural surveillance, contrary to the aspirations of the SPD.

As a consequence, the scheme lacks cohesion in both its street hierarchy and building composition. The transition between the public open space and the residential development is abrupt, with little evidence of a clear interface or sequence of spaces.

### ***Landscape Provision***

Whilst additional tree planting has been introduced through the pre-application process, much of this is located within private curtilages and therefore cannot be relied upon to establish the intended character of the development over the long term. Fundamentally, the site layout prioritises front driveways and vehicle storage, with front garden areas and planting appearing as residual spaces rather than meaningful, integrated landscape features. As a result, the development remains dominated by hardstanding and parked vehicles, with landscape provision playing a largely secondary role.

### ***Scale and Form***

There is an opportunity to introduce greater variety in building scale, form, house types and tenure. Provided the scheme achieves the required residential density and makes efficient use of the site, the focus should not be on increasing dwelling numbers but on improving the quality of the layout and overall placemaking.

The proposal lacks a clear frontage hierarchy and fails to demonstrate how key corners, streets and public spaces are appropriately defined. Insufficient consideration has been given to how buildings turn corners, address the public realm and provide natural surveillance. Boundary treatments, particularly extensive lengths of fencing, are poorly integrated and inadequately screened. Corner plots should be dual-aspect and perform a clear townscape function; their current treatment represents a fundamental weakness in the design approach.

### ***Character and architectural design***

Although street scene elevations have been submitted, they are inaccurate. Trees are shown in varying sizes and maturity, whilst in some instances areas of parking appear to have been replaced with landscaping, creating a more favourable impression of the development than would be experienced in reality. Section A-A illustrates an unfavourable streetscape dominated by side

elevations, rear garden boundaries, parking and inactive frontages - this exercise should inform the designer to make improvements. Similarly, Section B-B does not appear to accurately convey the transition to the adjoining eastern parcel accurately. As such, the illustrations do not provide an accurate representation of the proposed character within the street scene.



Whilst the decision to assess the scheme against the Building for a Healthy Life (BHL) framework is welcomed, the conclusions reached are not agreed with. In particular, it is difficult to support the assessment outcomes for 'Distinctive Places' and 'Streets for All', both of which appear to significantly overstate the quality of the proposal. The scheme exhibits notable shortcomings in its layout, parking strategy, street hierarchy, landscape integration and architectural response, which would warrant a far more critical assessment.

Policy DP3 2g requests proposals to *'create visually attractive, distinctive and characterful development to establish or maintain a strong sense of place and pride, including through the use of a coherent palette of materials, design features and planting.'* Similarly, Policy DMI in Rochdale's Core Strategy calls for all new developments to respond positively to their context and enhance the area's identity. Where it is deemed the local context has a weak or negative character, new development must improve the quality of the area. It may do this by introducing new street patterns and building forms to create a distinctive new identity (Oldham and Rochdale Urban Design Guide).

The contextual analysis presented within the Design and Access Statement is unconvincing. The statement asserts that the majority of surrounding development comprises *'red brick facades with little to no architectural interest or detailing'*, yet little evidence is provided to support this conclusion. More fundamentally, good design should not rely on the existence of poor-quality development to justify further mediocre development. Whilst the surrounding area undoubtedly contains elements of varying architectural quality, including commercial and industrial buildings, it also contains a number of positive characteristics that could have informed a stronger and more locally responsive design approach.

## 6.19 Building For A Healthy Life Assessment

### Distinctive Places

#### Making the most of what's there

Understand the opportunities both within and beyond the red line and respond to them with care and imagination. Some of the most valuable opportunities are the hardest to spot – yet they often shape the character and success of a place for decades. Finding these and using them well will make designing your site easier.



**Response:** The layout directly responds to the existing treelines along boundaries with neighbouring properties, with trees retained where possible to provide immediate landscape buffers and retain successful natural habitats and the Canalside to the north where the layout has been designed to provide a public open space adjacent to it, with multiple access points through the layout connecting to it. Properties with active gables have been located at key points around the layout to ensure all areas of open space have natural surveillance and overlooking. Where the site backs on to existing contextual back gardens, an interlocking / back-to-back approach has been utilised which provides added security to neighbouring gardens and ensures appropriate use of the site and street typologies within the development.

#### A memorable character

Create places people remember. Shape places that feel distinctive and rooted. Draw on local architectural and landscape cues to create character that is authentic and memorable.



**Response:** The majority of the contextual dwellings are red brick facades with little to no architectural interest or detailing, although this in itself is typical of the age which the surrounding dwellings were constructed. The proposed dwellings within the scheme are to be constructed in buff facing bricks, with feature gables and details in a multi brown brick, which given the site cannot be read in comparison with its context, due to the isolated nature of the site, will give the scheme its own distinctive character. This will not only give occupants a sense of place it will aid in wayfinding for visitors of the public open space.



For example, the surrounding area includes distinctive gable-fronted dwellings in various arrangements and building orientations, generous bay windows, front gardens that contribute positively to the character of the street scene. Notable buildings at key corners and junctions, including those around Dicken Green and Digby Road, demonstrate how building form and orientation can successfully address the public realm. However, there is little evidence that these characteristics have informed the proposed development in any meaningful way.

Nevertheless, had the applicant genuinely concluded that the surrounding context lacked sufficient quality to inform the design process, there would be an expectation for a strong and clearly articulated alternative design vision capable of establishing a new and distinctive character for the site. This has not been achieved. Whilst the application claims to establish a new identity, the proposed house types are generic in nature and appear drawn from standard housebuilder products with limited architectural merit or site-specific response. The elevations are repetitive, the detailing is simplistic / non-existent and the proposed material palette appears arbitrary, with the introduction of buff brick and brown multi-facing brick lacking any robust contextual justification.

Features that are characteristic of the surrounding area, including prominent gable forms, sawtooth roofs and generous window proportions, have been reduced to superficial references that fail to capture the qualities that make them successful. The interpretation of these features lacks conviction and does not demonstrate a coherent architectural strategy. Consequently, the proposal

neither responds positively to local character nor establishes a compelling new identity, resulting in a development that falls significantly short of the standard of design quality expected for this site.

The proposal misses an opportunity to take inspiration from the area's industrial heritage, with the form and detailing of former mill building offering potential cues for a more distinctive and locally responsive architectural character, particularly through the use of terrace forms.



## **CONCLUSION**

The need to deliver housing, including affordable housing, should not be used to justify an outcome that falls short of established design expectations. This is a prominent regeneration site with the potential to make a positive contribution to the area, and there is no reason why these objectives cannot be achieved whilst delivering a high-quality scheme that responds appropriately to national and local design policy.

Policy DP3 is clear that development proposals should deliver well-designed places and that proposals which fail to achieve this should be refused. Whilst the pre-application process identified a number of significant urban design concerns and opportunities for improvement, many of these remain unresolved within the submitted scheme. In this instance, the scheme exhibits fundamental shortcomings in its site analysis, layout, placemaking strategy, architectural response, landscape integration and treatment of the public realm. Collectively, these issues result in a development that neither responds positively to its context nor establishes a distinctive and convincing sense of place.

The shortcomings identified are not matters of detail but fundamental design concerns that sit at the heart of the proposal. In my view, the amendments required to address these issues are so substantial that they extend beyond the scope of revisions to the current submission. Consequently, I would caution against attempting to incrementally improve or 'salvage' the scheme through negotiation, as this risks compromising the site's true potential. A fundamentally different design approach, underpinned by a more robust understanding of the site and its context, is required if a high-quality development outcome is to be achieved.