



ROCHDALE
BOROUGH COUNCIL

ECONOMY DIRECTORATE

PLANNING AND DEVELOPMENT

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BY EMAIL ONLY

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Dear Lewis,

Proposal:	Proposed redevelopment of Heywood Stores Site for potential industrial or residential uses
Location	Heywood Stores, Manchester Rd, Heywood

I write further to our meeting on the 15 September 2021 and your request for pre-application advice relating to the proposals described above at the Heywood Stores site.

This response is based upon the information presented at our meetings and the following information submitted with your request:

- Site Location Plan;
- Covering Letter
- Proposed Site Plan Option 2 (Industrial) (21031_SK02)
- Transport Scoping Note (19358-HYD-XX-XX-RP-TN-3001-P02)

Development Plan

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that applications are determined in accordance with the Development Plan unless material considerations indicate otherwise. The Development Plan for Rochdale consists of the Rochdale Core Strategy (CS) and saved Unitary Development Plan (UDP) policies.

Other material considerations include, amongst other things, Supplementary Planning Documents (SPDs), Development Plan Documents (DPDs), the Greater Manchester Joint Minerals Plan, the National Planning Policy Framework (NPPF), and the National Planning Practice Guidance (NPPG). The site also lies adjacent a key strategic potential allocation included within the now withdrawn draft Greater Manchester Spatial Framework (GMSF) which has been replaced by the Places for Everyone (PFE) plan for the Greater Manchester Boroughs less Stockport.

A list of policies relevant to the proposed development as submitted is appended to this letter.

Principle of Development

Prior to the introduction of the modern planning system, the site was originally built as a Royal Air Force maintenance facility comprising aircraft hangers and workshops. At present it is understood that the site has been in use as industrial archival storage for the DWP, a use which has been said to be continuous for a number of decades. Due to the site's history it does not currently have a formal record of being classified as falling within the B8 use class, however alongside this pre-application process the applicant has submitted an application (21/01298/CPE) for a certificate of lawfulness to regularise the site and confirm its use within the B8 use class. The council does not currently dispute this existing use and as such for the purposes of this assessment, the site has been treated as falling within B8 use class. Please note however that this assumption for the purpose of this response does not prejudice the outcome of the CLEUD application 21/01298/CPE.

The pre-application proposals seek to test the feasibility of two development options as follows:

- Redevelopment for new commercial B8 units totalling 36,591sqm
- Redevelopment for residential use in the region of 300 dwellings

The principle of each of these uses is assessed in turn below.

Industrial Use

Subject to confirmation of 21/01298/CPE the site is in an existing B8 employment use with the current arrangement allowing providing circa 31,900sqm of GIA floorspace including mezzanines (it is noted that the Transport Note has used a lower estimate of 26,100sqm). The proposals would therefore represent an increase of circa 4,650sqm or approximately 15%.

Given the site's existing long term use it is accepted in principle that the site could be appropriate for redevelopment to provide modern upgraded provision within this same use class. Core Strategy Policy E2 sets out at point 1.e that the council will promote the regeneration of major employment locations suitable for continued employment use. The uplift in floorspace could be considered appropriate in the context of making best use of brownfield land and maximising employment opportunities onsite in accordance with national policy however this would be subject to the acceptability of this intensification with regards to design and technical matters.

Residential Use

Subject to confirmation of 21/01298/CPE the redevelopment of the site for residential uses would in policy terms represent the loss of an employment site. Whilst the site is not currently designated within the Saved UDP Proposals Map given its scale the policy protections afforded through Core strategy Policy E2 would apply.

Policy E2 sets out a number of criteria (1.g) that should be met before allowing the loss of employment land including:

- i. there is a proven lack of demand for the site for a suitable employment use, it's not suited in land use terms to any employment use and there is a satisfactory employment land supply in the area; and
- ii. It would not impact on the ability of existing businesses to operate satisfactorily; and
- iii. it will enable high quality mixed use employment development on strategic corridors, close to centres or transport interchanges, or

- iv. it will help support the delivery of regeneration proposals in a priority regeneration area; or
- v. redevelopment of the site would enable reinvestment that will provide jobs in the borough; or
- vi. Development would remove a severe environmental problem.

The criteria above are worded in a way which means that i. and ii. must be met as well one of criteria iii. to vi.

Criterion i. includes three elements. The element of this criterion relating to the proven lack of demand for a suitable employment use would need to be specifically evidenced as part of any planning application. This should include evidence that the site has been marketed and that there was no demand for a suitable employment use. Given the scale and location of the site close to the Junction 19 of the M62 with direct access from Manchester Road to this junction currently being constructed then **it is likely that there would be demand for this site as an employment location.**

The other elements of Criterion i. include demonstrating the site is not suited in land use terms to any employment use and that there is satisfactory employment land supply in the area. With regards to the first of these the site will in future be surrounded on all sides by residential and school uses, both sensitive to noise and amenity uses and which would represent difficulty in intensifying the employment use on site. With respect to satisfactory employment land supply in the area, the site lies directly adjacent the South Heywood J19 masterplan area which has permission for 135,000sqm of commercial floorspace, the first phase of which has been approved in reserved matters for a unit of more than 80,000sqm which is expected to begin construction shortly having progressed the infrastructure works and discharged all pre-commencement conditions to enable the development. Beyond this immediate provision of new floorspace the site also lies in very close proximity to the wider proposed Northern Gateway allocation (Places for Everyone allocation 1.1). Whilst the PfE remains at a relatively early stage, this is progressing and currently contains an allocation for 1.2million sqm of commercial floorspace in the local area.

Given the current tenant has confirmed they are vacating the premises the redevelopment of the site would have no impact on existing businesses ability to operate and therefore complies with criterion 2.

Criterion iii states that non-employment uses may be appropriate where it will enable high quality mixed use employment development on strategic corridors, close to centres or transport interchanges. The site is relatively close to South Heywood employment area as identified on the Key Diagram and within policies E3 and C2 of the Core Strategy. Policy C2 'Focusing on regeneration areas and economic growth corridors / areas' states that we will also encourage new housing which is well related to the economic growth areas which includes South Heywood. This policy seeks to acknowledge the role that high-quality new housing can play in supporting economic growth. Therefore, it could be demonstrated that the **redevelopment of this site for housing would be appropriate within the context of delivering a wider, large-scale, mixed-use development to the south of Heywood.**

On the basis of the above **it is considered that the proposals could most likely comply with all criteria with the exception of the first leg of criterion i. to demonstrate a lack of demand.** As such any proposal for the redevelopment of the site for residential may on balance need to be assessed as a departure from the Local Plan. However, on the basis of the specific site context, it is considered that this may be an appropriate option for the site given the ability to

cohesively work with and improve upon the strategic level work being carried out in South Heywood.

Looking at the wider area strategically, within the context of the J19 masterplan and proposed PfE allocation, there is a clear transition of the areas with the eastern part of the South Heywood urban edge where this site lies being used to deliver high quality new homes, whilst the western part of the area will see the creation of significant new employment floorspace with new direct and dedicated accesses being designed on the new link road infrastructure currently being constructed.

In strategic and land use terms there is therefore considered to be a route for justification of the site being brought forward for residential development, subject to compliance with other parts of the development plan.

Layout, Design and Visual Appearance

Industrial

The current site sees a layout with internal roads around the perimeter of the site and all buildings effectively focusses in the internal central spine with some smaller buildings sitting outside these main perimeter access loop. This affords significant distance between existing residential properties, and heavily screened boundaries to most site edges because of mature trees and landscaping providing buffers.

The proposed commercial layout option provided with this pre-application request would see encroachment of a number of units towards these existing residential boundaries, reducing the distances of separation. Whilst not shown on any elevations or sections given this early stage, the council have concerns that this may potentially have a negative impact on residential outlook and amenity which could be significant. The proposals also appear to result in the loss of the attractive mature tree lined entrance access from Manchester Road.

The layout would also see units positioned much closer to the southern boundary where these would potentially impact future residential properties proposed through 16/01399/HYBR and would sit very prominently to the new M62 J19 link road. The surrounding land uses must be considered in any proposed redevelopment, including those committed through the live planning permissions.

Any new commercial development would be expected to achieve the high design standards expected of the wider J19 Masterplan development where the commercial development is being designed to provide contemporary high quality units with active frontages to key areas and a substantial landscape provision with formal and informal/naturalistic planting and structure (as demonstrated by the recently approved 20/01480/REM).

Whilst limited detail is provided currently, the council are concerned by the potential impacts on surrounding land uses. Should the intensification of the uses not be possible without unacceptable visual and amenity impacts then a smaller arrangement more similar to the existing layout may need to be considered.

Residential

No proposals have been presented for the residential option for the site. As such set out below are the standards by which the council would assess any proposals.

Design of new developments, particularly residential, is a key area of focus both nationally and locally at present. The council currently applies Core Strategy Policies such as P3 to assess design as well as other complementary policies in relation to accessibility, landscaping and image and Supplementary Planning Documents as listed at the appendix to this response. Additionally, the council is proactively applying the best practice guidance and policies as set out nationally through the new revised NPPF and other key design guidance including; the National Design Guide and National Model Design Code, Building for a Healthy Life and Streets for a Healthy life Toolkits. The council will also assess any residential developments against the Nationally Described Space Standards to ensure that new residents are provided adequate living space in high quality new homes.

Any residential developments brought forward would be expected to achieve the standards set out in the above policy and guidance documents and create high quality new homes for the local area.

Residential Amenity

Industrial

Residential amenity has already been addressed with respect to the industrial uses and their potential visual impacts on surrounding existing and proposed residential uses. In addition to visual impacts, any noise generated from the proposals would also need to be considered as part of any application.

Residential

Any new residential development would need to be designed so as to respect the current layout and outlooks of existing and future residential properties to ensure that there is no undue loss of outlook, privacy or visual amenity for local residents. This should be achieved through good design and the application of the separation distances set out within the council's residential standards SPD. These standards will also be expected to apply for residents of any newly proposed residential properties on this site with a need to consider the visual amenity from proposed properties. A noise impact assessment would also be a requirement for these proposals to ensure suitable amenity standards are achieved from new residents that could be impacted upon by the existing and under construction highways infrastructure.

Highways and Access

Rochdale BC Highways has been consulted as part of the pre-application consideration. Please find below RBC Highways general comments on the Transport Scoping Note prepared by Hydrock and provided with the application.

The document sets out a scoping note for a subsequent Transport Assessment (TA) that will support a potential planning submission for either a 36,500 sqm storage and distribution development or a 300 dwelling residential development. Any such TA must be drafted in line with Government and Local Policies.

The site has an established B8 use and the impact of any proposed development will be measured on additional traffic generation over and above what currently exists.

The scoping note sets out current highway descriptions and future changes to the network as a result of the South Heywood Link Road which must be fully considered in any subsequent TA.

The current access into the site is laid out to reflect the site's existing use and 40mph speed limit on Manchester Road. This layout appears to operate within its capacity however future increases in vehicles movements, through that junction, must be fully tested within the TA.

As the site is not within a sustainable area in terms of access to amenities and public transport we would expect parking provision to be in line with current Council Parking Standards. This should also be reflected in traffic generation figures and we would expect that TRICs data, particularly the selection of sites for comparison, reflect this.

We would expect some contribution towards bus service improvements in the area to a level which reflects the applied for use. We would also expect the application to fund improvements to cycling and walking links.

Any subsequent application should be supported by a Travel Plan.

All highways within the residential site will be subject to a s38 Agreement and be constructed to an adoptable standard in terms of construction and safe design. The approved highway layout must deliver safe management of the highway network and be practical in terms of future highway maintenance responsibilities for this Council. Appropriate access and turning facilities must be provided within the design especially for refuse collection.

All the access roads within any residential development must be designed to be a self-enforcing 20mph zone and have the benefit of a traffic regulation order enforcing that speed.

With regards to the Industrial Estate layout as shown on the submitted plan we do have some concerns regarding the main arterial road which has a 90 degree turn close to its entrance which may have road safety issues. Again further discussion will be required in the TA. We do not envisage the adoption of the Industrial Estate roads but they must be laid out and constructed to an approved standard to ensure accessibility.

All parking areas must be SUDS compliant.

Arboricultural & Ecological Impacts

A detailed Tree Survey and Arboricultural Impact Assessment would be required with the application to provide an understanding of the impacts of the development on existing green infrastructure. There is likely potential for trees to be retained within the layout for the site but any development which would lead to future pressure to remove trees with a high amenity value would be resisted.

Given the site characteristics, ecological surveys will be required to assess the existing potential for protected species to be present onsite and to input into the creation of a scheme for mitigation and enhancement of the site for important habitats. This scheme will need to be capable of achieving biodiversity net gain across the site as required by NPPF. Please note that upcoming legislative changes through a future Environment Bill will specify a 10% net gain required by law for any new developments, to be assessed using a standardised calculator.

Flood Risk and Drainage

Given the scale of the proposals detailed flood risk assessment and drainage proposals will be required.

Our minimum expectation on a brownfield site is a 50% reduction in the rate of discharge for the average annual storm i.e. Qbar 1 in 2.3 year storm. A flow control of 5 l/s is accepted as the minimum practical flow control value that can be applied using a vortex flow control such that the outlet diameter of the flow control does not block.

In accordance with the National Planning Policy Framework (NPPF) and the National Planning Practice Guidance (NPPG), the site should be drained in the most sustainable way. The drainage scheme for the development shall be in accordance with the National Planning Policy Framework (NPPG) hierarchy, in the following order of priority:

- into the ground (infiltration);
- to a surface water body;
- to a surface water sewer, highway drain, or another drainage system;
- to a combined sewer.

Energy Demand/Climate Change Adaptation

Core Strategy Policy G1 sets out measures to address climate change and emissions concerns, whilst Policy G2 requires that new development adhere to the energy hierarchy. These are supported by the councils Climate Change Adaptation SPD. The development should be designed in order to meet the requirements of these policies and an Energy Statement should be submitted with the application. Where possible for developments to achieve higher standards than required by building regulations and contribute actively towards targets for a net zero carbon future will be considered a strong positive in the planning balance of any such application.

Contamination/Land Stability

The application should be accompanied by at least a Phase I Site Investigation or Preliminary Risk Assessment to provide an initial assessment of potential land contamination within/adjacent to the site. If an initial assessment identifies a need for further intrusive investigations or remediation strategy to be required, these would be required as part of pre-commencement conditions on any permission unless provided as part of the main application. Core Strategy policy G9 is relevant in this regard.

Planning Obligations and Section 106 Requirements

The Core Strategy sets out at Policy DM2 infrastructure requirements that may necessitate developer contributions through Section 106 agreements. These contributions may include affordable housing, open space, formal sports, health and well-being, education/community facilities, or other site specific requirements to mitigate any impacts of the development as set out within Policy DM2.

In line with national planning policy the council will give consideration to the viability of delivering any proposed schemes with the necessary contributions.

Public and Stakeholder Consultation

The Council has an adopted Statement of Community Involvement that we would encourage developers to consider when preparing engagement plans. We encourage that developers seek to engage with local residents and, where appropriate, undertake consultation with ward councillors.

Conclusion

The site presents a strong opportunity for redevelopment. The redevelopment of the site for further commercial use could be appropriate and achieved subject to overcoming current design and technical concerns which may necessitate a reduction in the floorspace compared to what has been proposed in the pre-application documentation.

The redevelopment of the site for residential use may also be appropriate with suitable justification, given that there are strategic indicators of how the local area is changing and how residential uses could potentially contribute positively to the regenerative impact and compressive masterplanning of the local area.

Both redevelopment options would require a high quality design and demonstration of accordance with all technical requirements to facilitate the site's redevelopment in line with local and national policy.

Validation Requirements

The council's full validation checklist is provided on our website. This checklist contains details of thresholds and provides guidance on the preparation of the listed plans and documents, as well as providing links to a variety of useful sources. Based on the information provided at this pre-application stage, and following discussions on the matter, the following documents are considered necessary to accompany any planning application. There may be potential for some documents to be combined whilst others could be considered through planning condition requirements where appropriate and not central to initial determination of the application.

- Application form and ownership certificate
- Set of drawings
- Design and Access Statement
- Affordable Housing Statement*
- Air Quality Assessment
- Archaeology Assessment
- Bat and Bird Surveys
- Coal Mining Risk Assessment
- Statement of Community Involvement
- Contamination Report/Site Investigations
- Crime Impact Statement
- Ecological Appraisal
- Employment Land Supply Statement*
- Energy and Climate Change Adaptation Statement
- Flood Risk Assessment
- Health Impact Assessment *
- Lighting Assessment

- Noise Impact Assessment
- Planning Statement
- Section 106/Heads of Terms
- Structural Survey
- Sustainable Drainage Assessment
- Sustainable Urban Drainage Pro-Forma
- Transport Assessment
- Travel Plan (Framework)
- Tree Survey and Arboricultural Impact Assessment
- Viability Appraisal
- Waste management plan and servicing strategy

Please note that any advice provided above is an informal opinion of the author only and is made without prejudice to any formal determination which may be given in the event of an application being submitted. In particular, it does not constitute a formal decision of the Council with regard to any future planning applications, which will be subject to wider consultation and publicity, and provides no guarantee of a future decision.

Yours Sincerely,



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Appendix 1 - Relevant Policies

In addition to the requirements of the National Planning Policy Framework, any application for the proposed use of the site would be subject to an assessment against the following list of key policies contained within the Rochdale Core Strategy:

S02	Creating successful and healthy communities
SP2	The Spatial Strategy for the borough
E2	Increasing jobs and prosperity
C1	Delivering the right amount of housing in the right places
C3	Delivering the right type of housing
C4	Providing affordable homes
C6	Improving health and wellbeing
C7	Delivering education facilities
C8	Improving community, sport, leisure and cultural facilities
SO3	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
SO4	Promoting a greener environment
G1	Tackling and adapting to climate change
G2	Energy and new development
G6	Enhancing green infrastructure
G7	Increasing the value of biodiversity and geodiversity
G8	Managing water resources and flood risk
G9	Reducing the impact of pollution, contamination and land instability
SO5	Improving Accessibility and delivering sustainable transport
T2	Improving Accessibility
DM1	General development requirements
DM2	Delivering planning contributions and infrastructure
SD1	Delivering sustainable development

Additional Core Strategy and saved UDP policies may also be relevant depending upon the details of any submitted proposal.

There are also a number of SPDs which are of relevance to the proposals including the following:

- Affordable housing
- Provision of recreational open space in new housing
- Guidelines and standards for residential developments
- Climate change adaptation
- Residential design guide