GVA HOW Planning



Supporting Planning Statement

Employment Development Land at Royle Road, Rochdale

December 2018

GVA HOW Planning

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Prepared By: JS/RS
Status: Final Revision 1
Draft Date: December 2018

For and on behalf of GVA Grimley Limited

1. Introduction

1.1 This Supporting Planning Statement ("SPS") has been prepared by GVA HOW Planning ("HOW") in support of a planning application made by Stechrioco Ltd ("the Applicant"). It relates to an outline planning application submitted to Rochdale Council for an employment development on land at Royle Road, Rochdale.

1.2 This document provides a detailed description of the application site and development proposals, the relevant planning considerations, and in particular, the case for the redevelopment of the site. It considers the proposal in light of national and local planning policy, in addition to summarising the key benefits of the scheme.

1.3 This application is accompanied by a comprehensive suite of supporting technical reports. The scope of supporting information, which accompanies this application, has been agreed with Rochdale Council through pre-application discussions and where relevant technical reports have been prepared in line with an agreed methodology. These supporting documents are listed in **Appendix 1**.

1.4 Upon review of the technical assessments undertaken in support of the planning application, it is not considered the development will give rise to significant environmental effects such that an Environmental Impact Assessment (EIA) would be required to evaluate any potential effects of the proposal. Nonetheless, a Screening Opinion has been submitted to Rochdale Council to confirm this approach.

1.5 In accordance with the Development Plan and National Planning Policy Framework ("NPPF") the proposed will deliver a sustainable development that meets the local planning policy land allocation and other benefits mentioned throughout. It should therefore be approved without delay in accordance with paragraph 38 of the NPPF.

2. Site Location and Description

2.1 This section provides a description of the site and its context.

Site Location and Accessibility

2.2 The site is within the administrative area of Rochdale Borough Council, approximately 2.4km to the south west of Rochdale town and all the services and facilities contained therein, such as supermarkets, retail stores and restaurants.

2.3 The site has good access to public transport, with the nearest bus stops located to the west of the site on Manchester Road (A58). These stops are well served by bus routes 17, 471 and 818 providing frequent services to Manchester City Centre, Rochdale and Bolton.

2.4 Castleton Train Station (1.6km to the south) and Rochdale Train Station (1.9km to the north) are both accessible from the site by walking. The stations provide services to Southport, Wigan, Manchester, Leeds, Blackburn, Clitheroe and Rochdale. Overall the site is in a highly accessible and sustainable location.

Site Characteristics & Surroundings

2.5 The site comprises of 0.86ha of brownfield land which is currently vacant, as shown edged red on the Site Location Plan included within **Appendix 2**. The site is irregular in shape and is located off Royle Road, Rochdale.

2.6 The site is predominantly grassed land. Pedestrian and vehicular access is achieved onto the site via Royle Road which forms the western boundary of the site.

2.7 To the north of the site is Edinburgh Way, to the south and east of the site is further brownfield land which is proposed for residential development, and to the west is Royle Road and residential properties. The surrounding area comprises predominately residential uses with retail facilities however, there are some industrial uses located to the south and east beyond the railway line.

3. Proposed Development

3.1 This section describes the application proposals and their relationship and compatibility with the characteristics of the site. The Proposed Site Plan shows the configuration of the development proposals and is attached at **Appendix 3**.

Description of Development

3.2 The submitted planning application seeks permission for the following development:

> *Outline permission (with all matters reserved accept for access) for the redevelopment of the site for employment uses (Use Class B1/B2/B8) with associated ground works, landscaping and vehicular access from Royle Road.*

Use and Amount

3.3 The outline proposals seeks planning permission for up to 33,000sq.ft^2 of employment uses (Use Class B1/B2/B8). The end uses will be determined at reserved matters stage once a detailed scheme for the site emerges and end operators are known. As such, the outline application seeks permission for B1/B2/B8 uses to give flexibility in attracting future occupiers.

Layout, Scale and Appearance

3.4 The indicative layout shows how the site would be developed and arranged to provide a mixture of units ranging from 2,000sq.ft units to 20,000sq.ft. The business units are orientated to face towards the Edinburgh Highway and away from existing residential properties to the west and any proposed residential units to the south with direct access from Royle l Road. The orientation of the units facing the highway will aid promoting the businesses on site, and also ensure that there is sufficient separation between the employment units and existing and proposed residential properties.

3.5 The submitted Parametric Plan (Dwg. No. M4482-1.1.08_B) sets the parameters for the outline scheme, with a maximum height of 21metres (above FFL). The site sits lower than the land to the north (Edinburgh Way) and south, as such the proposed heights will not look out of character or context to the surrounding area.

3.6 Full regard has been given to the site's opportunities and considerations and the layout responds fully to the local context. A comprehensive approach has been taken to the scheme design to ensure that the requirements are recommendations of all the technical reports have been incorporated.

Landscaping

3.7 The Landscaping Strategy will be fully addressed as part of the subsequent reserved matters application for the site's redevelopment. However, as shown on the site layout plan (ref. M4482-1.1.05_Rev B) a landscape bund is located to the south of the site which will act as a buffer between the employment land and future residential dwellings to the south.

3.8 Due to the potential for development to the land adjacent to the south of the site, this employment scheme has been designed to ensure it will not hinder such future proposals. In this instance land to the rear of the proposed units will not be developed upon and will seek to retain and enhance the steeply sloped grassed boundary to the south of the site.

Access

3.9 Full details of the sites pedestrian and vehicular arrangements can be found within the accompanying planning application drawings and places, and Transport Statement. The proposed means of pedestrian and vehicular access is located on the western boundary, via Royle Road.

4. National Planning Policy

National Planning Policy Framework (NPPF) (July 2018)

4.1 The NPPF was originally published on 27th March 2012. The 2018 Framework was published in July 2018 and contains the Government's most up-to-date planning guidance. The NPPF sets out the Government's planning policies for England and how these are expected to be applied. The NPPF is a significant material consideration in the determination of this application. The overall emphasis of the NPPF is to reiterate the Government's key objectives of facilitating economic growth and securing sustainable development.

The Presumption in Favour of Sustainable Development

4.2 Central to the NPPF is the presumption in favour of sustainable development and the need for the planning system to support economic growth. Paragraph 11 of the 2018 Framework sets out the presumption in favour of sustainable development and the application of the policy for decision making states:

"Plans and decisions should apply a presumption in favour of sustainable development.

For decision taking this means:

c) approving development proposals that accord with an up to date development plan without delay; or

d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out of date, granting permission unless:

i. the application of policies in this Framework that protect areas of assets of particular importance provides a clear reason for refusing the development proposed; or

ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole".

4.3 Paragraph 7 of the 2018 Framework emphasises that the purpose of the planning system is to contribute to the achievement of sustainable development. Paragraph 8 defines "sustainable development" and highlights the three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways:

a) ***"an economic objective*** *- to help build strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;*

b) ***a social objective*** *– to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and*

c) ***an environmental objective*** *– to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy."*

Building a Strong, Competitive Economy

4.4 The 2018 Framework confirms that planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. In addition, paragraph 84 states that previously developed land (PDL) "*and sites that are physically well related to existing settlements, should be encouraged where suitable opportunities exist".*

Making Effective Use of Land

4.5 The 2018 Framework puts significant emphasis on the reuse of PDL. In particular, paragraph 117 states:

"Planning policies and decisions should promote an effective use of land in meeting the needs for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously developed or 'brownfield' land".

4.6 Paragraph 118 requires substantial weight to be given to the value of using suitable brownfield land and decisions should support the development of under-utilised land and buildings.

Achieving Well Design Places

4.7 Paragraph 124 sets out that good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. At paragraph 130, the NPPF states that:

"Permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and they way in functions, taking into account any local design standards or style guidance in plans or supplementary planning documents. Conversely, where the design of a development accords with clear expectations in

plan policies, design should not be used by the decision maker as a valid reason to object to development".

4.8 In determining applications, paragraph 131 assigns:

"great weight to outstanding or innovative designs which promote high levels of sustainability or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings".

Implementation of the NPPF

4.9 Paragraphs 212 – 217 of the NPPF set out how the NPPF should be implemented and the level of weight should be attributed to Development Plan policies.

4.10 Paragraph 213 states that existing policies should not be considered out of date simply because they were adopted or made prior to the publication of the Framework. However, due weight should be given to them, according to their degree of consistency with this Framework (i.e. the closer the policies in the plan to the policies of the Framework, the greater weight that may be given).

4.11 Rochdale's UDP was adopted in 2006 and is time expired, as such para 213 applies when considering the level of weight which should be attributed to these polices.

Planning Practice Guidance

4.12 On 6th March 2014, the Department for Communities and Local Government launched the online Planning Practice Guidance (PPG) as a web-based resource to further simplify and bring together planning practice guidance for England in an accessible and usable way. The PPG is intended to assist practitioners and provide further guidance on the interpretation of national planning policy within the NPPF. It is therefore a significant material consideration in the determination of the application.

5. Local Planning Policy

5.1 This section describes the relevant adopted planning policy and other material considerations that have underpinned the proposed development.

Development Plan

5.2 Section 38 (6) of the Planning and Compulsory Purchase Act 2004 states that decisions should be made in accordance with the Development Plan unless material considerations indicate otherwise.

5.3 The adopted Development Plan for Rochdale comprises:

- The saved Rochdale Unitary Development Plan (adopted June 2006); and
- The Rochdale Core Strategy (adopted October 2016).

The Saved Rochdale UDP

5.4 The Rochdale UDP was adopted in June 2006 and has been partially saved beyond its expiry date of 2016 following a formal direction issued from the Secretary of State. In accordance with paragraph 213 of the NPPF, the weight to be attributed to the 'saved' policies depends upon their degree of consistency with the NPPF. The only saved UDP policy relevant to this current application is Policy EC/2.

5.5 The application site is designated within an "Primary Employment Zone" under Policy EC/2. Policy EC/2 states:

"Within Primary Employment Zones development and change of use, for industrial, business and warehouse uses (Use Classes B1, B2 and B8) will be permitted where proposals:

(a) Are of an appropriate scale and character to the area;

(b) Will cause no unacceptable environmental or amenity problems in the employment area or adjoining areas; and

(c) Will cause no unacceptable traffic problems and have adequate on-site provision for parking, servicing and manoeuvring.

Other uses will not be permitted unless it can be shown that they are ancillary and complementary (both in terms of size and function) to the industrial and business nature of the employment area."

The Rochdale Core Strategy

5.6 The Rochdale Core Strategy was adopted in October in 2016 and provides a strategic framework for the Boroughs future development needs up to 2028. The key policies relevant to the current application are summarised below.

Employment Policies

5.7 Policy SP1 (Rochdale Borough's role in the city region) seeks to deliver sustainable development and investment that meets national and sub regional objectives for employment growth. Under part B of the policy it will focus employment development so that is supports the overall economic growth of the sub region.

5.8 Policy E2 (Increasing Jobs and Prosperity) seeks to ensure the supply of up to 210 hectares of highly accessible land for Use Class B1 – B8 development, focused in the south of the borough. The policy also notes that land will be released as and when appropriate subject to maintaining a 5-year land supply for manufacturing, warehousing and office development.

General Development Management

5.9 Policy P3 (Improving Design of New Development) seeks to ensure that all new development will achieve high standards of design. The principles will ensure that all new development respects scale, density, massing, height, layout of the surrounding area; contributes positively to the townscape; ensure development is permeable and will not have an adverse impact on the environment.

5.10 Policy DM1 (General Development Requirements) states that all development proposals will be expected to demonstrate that they are of high-quality design, are compatible with surrounding land uses, do not adversely affect the amenity of residents or users, provide satisfactory access, do not have an adverse impact on health, provide the service or community infrastructure necessary to meet local needs, minimise opportunity for crime, take account of ground conditions, incorporate high quality landscape schemes, assess potential impacts by ground instability and consider the availability of necessary water and wastewater infrastructure.

5.11 Policy DM2 (Delivering Planning Contributions and Infrastructure) outlines the Council's requirements for planning contributions.

Other Material Considerations

5.12 There are a series of other planning policy guidance documents at local and national level that are relevant to the determination of this application which include the:

- Emerging Rochdale Borough Allocations Plan; and

- Rochdale Employment Land Study (July 2008).

5.13 Each of these documents are summarised below.

Emerging Rochdale Borough Allocations Plan

5.14 Rochdale Council are in the process of preparing an Allocations Plan which, once adopted will supersede the UDP, and provide detailed planning policies, area designations and site allocations for specific types of developments, including new housing developments, up to 2028. Whilst it is noted that the emerging Allocation Plan is at an early stage and as such in accordance with paragraph 48 of the NPPF should be given limited weight, it is highlighted that the draft Allocations Plan (September 2018) does proposed to allocate the application site for residential development under Draft Policy AL/6.

Rochdale Employment Land Study (2008)

5.15 The Employment Land Study was published by DTZ in July 2008, it calculates the current and predicated employment land position for the borough. Although its summary states that there should be a reduction of 41ha of industrial land across the Borough, it still highlights the need for a variety of employment land to be maintained throughout the borough.

Summary

5.16 This Chapter has identified a series of Development Plan Documents and other material considerations to be taken into account in the determination of this application. The following section assesses the principle of development against the local and national planning policy framework in greater detail.

6. Assessment Against the Development Plan

6.1 This section appraises the principle of the proposed development against the Development Plan. Section 38 (6) of the Planning and Compulsory Purchase Act 2004 requires that applications for planning permission must be determined in accordance with the Development Plan unless material considerations indicate otherwise.

Principle of Development

6.2 The application site is designated within an "Primary Employment Zone" under saved UDP Policy EC/2. Policy EC/2 states:

> *"Within Primary Employment Zones development and change of use, for industrial, business and warehouse uses (Use Classes B1, B2 and B8) will be permitted where proposals:*
>
> *(d) Are of an appropriate scale and character to the area;*
>
> *(e) Will cause no unacceptable environmental or amenity problems in the employment area or adjoining areas; and*
>
> *(f) Will cause no unacceptable traffic problems and have adequate on-site provision for parking, servicing and manoeuvring.*

6.3 The proposed development would provide for B1/B2/B8 uses within an existing employment zone in accordance with Policy EC/2 of the UDP and Core Strategy Policy E2. Whilst the application is submitted in outline, the proposed parameters and indicative layout have been developed to ensure that the scheme is in keeping with the surrounding uses and character of the area.

6.4 The application site sits substantially lower than the proposed residential site to the south and the indicative layout and parameters plan has been designed to ensure that the industrial units will not dominate the street scene or result in any adverse amenity impacts to existing or proposed residents. Indeed, the proposed redevelopment of the currently vacant site, will enhance the physical appearance of the local area and contribute to environmental.

6.5 As set out in further detail below, the application is supported by a number of technical reports which have assessed the potential environmental, traffic and amenity impacts of the development. Theses reports have concluded, subject to the implementation of mitigation measures, where necessary, that the development will not result in any adverse impacts.

6.6 In addition, as set out in chapter 7, the proposed development will provide direct and indirect economic, social and environmental benefits, including job creation, increased spending in the

local economy and redevelopment of a brownfield site. These benefits amount to very significant and weighty material considerations in favour of the scheme.

6.7 In the context of the above it is clear that the principle of employment development at the site is acceptable.

Transport

6.8 The submitted Transport Statement, prepared by CBO Transport, demonstrates that there will be no material impact on the local highway network as a result of the proposed development.

6.9 The purpose of the assessment is to provide information on the possible transport implications the proposed development would have on the surrounding transport infrastructure. In compliance with Policy T2 of the Rochdale Core Strategy, the submitted Transport Assessment and Travel Plan confirm the site's suitability for sustainable residential development.

6.10 It is also noted that the site is accessible to a range of community facilities by walking, cycling and public transport in accordance with national and local transport policies. It is therefore evident that the proposed development in acceptable in highway, traffic and transportation terms.

Ecology and Trees

6.11 An Ecology Survey and Assessment has been prepared by ERAP (Consultant Ecologists) Ltd and submitted as part of this application. The survey found Japanese Knotweed, Indian Balsam and Rhododendron present at the site, these will be dealt with as part of wider site remediation by a suitably qualified person. Full details of the proposed methodology are contained within the submitted Knotweed Eradication Report produced by Knotweed Eradication. In accordance with Policy G7 of the Rochdale Core Strategy the assessment concludes by stating the proposed development would secure an opportunity to implement beneficial measures for habitat management and habitat creation which would provide a net gain in biodiversity in accordance with the principles of the NPPF.

In support of the Ecology Assessment submitted, an Arboricultural Impact Assessment has been prepared by Helmrig Ltd and submitted with this application. The survey has addressed the trees on site that are covered by a Tree Preservation Order (TPO) and considers that not all the trees identified should be worthy of inclusion. These particular trees are marked on the submitted Tree Constraints Plan as Category U.

Flood Risk and Drainage

6.12 A Flood Risk Assessment has been produced by ELLUC Projects and submitted as part of this application. The assessment confirms that the site is appropriate for residential development as it is

located within Flood Zone 1 according to Environmental Agency flood maps, it therefore passes the sequential test and also complies with Policy G8 of the Rochdale Core Strategy.

6.13 In addition to the FRA, the assessment includes a proposed drainage strategy. Full details of the drainage strategy are to be submitted and determined as part of a subsequent reserved matters application once the detailed design is known.

Land Contamination and Site Assessment

6.14 A Geo-Environmental Site Assessment has been produced by e3p and submitted as part of this application. The assessment included a thorough investigation into the site's historic land configuration which included historical plans, geology, hydrogeology, site sensitivity, flood-plain issues, mining record and other information gathered from the local planning authority. The assessment concludes by stating that there is no identified contamination or geo-technical issues that would prevent the proposed development on site.

Air Quality and Noise

6.15 An Air Quality Assessment has been prepared by Redmore Environmental and submitted as part of this application. The assessment considers both the effects of construction and occupation on air quality. The results of the assessment demonstrate that predicted pollution levels where below the relevant air quality standards at all sensitive locations across the development. As such, the site is considered suitable for emplyoment use from an air quality perspective.

6.16 An Environmental Noise Study has been prepared by Red Acoustics and submitted as part of this application. Whilst further modelling work will be required at the reserved matters application stage, the current assessment, based on the illustrative masterplan clearly demonstrates that the site can be developed without resulting in any adverse noise impacts, in accordance with National Planning Policy and the relevant Development Plan policies.

Summary

6.17 It has been demonstrated that the proposals accord with the relevant policies in the Development Plan, providing much needed housing on a currently vacant, brownfield site. As such the proposed should be approved without delay.

7. Sustainable Development

7.1 This Chapter provides an assessment of the key benefits of the scheme, particularly when measured against the three dimensions of sustainable development as established in the NPPF.

Sustainable Development

The overarching policy objective of the NPPF is the presumption in favour of sustainable development. The NPPF at Paragraph 7 indicates that there are three dimensions to sustainable development: economic, social and environmental. The proposed development will result in a number of economic, social and environmental benefits, as set out below:

- **Increased Spending in the Local Economy** – the additional businesses would generate new spending in the local area.
- **Job Creation** – the construction phase of the development will create a number of jobs in the construction sector over the built time of the development, as well as further direct job opportunities during occupation, which can provide benefits for the local labour market. The precise number of jobs created will be dependent on the end use class be it B1, B2 or B8, the predicted job creation for B8 use is circa 40 full time jobs.
- **High Quality Development** – the delivery of a high-quality employment scheme in Rochdale;
- **A Deliverable Site** – the site can be delivered immediately as it is suitable and available; and
- **Redevelopment of Brownfield Site** – regenerate an unsightly site, significantly enhancing the physical appearance of the local area;
- **A Sustainable Location** – a high quality, well designed, comprehensive development will be secured in a very sustainable location, surrounded by a number of uses and in close proximity to a range of services and public transport services in the local area;
- **Efficient Use of Land** – the application proposes an efficient use of land to maximise its development whilst taking into account key site opportunities and constraints, delivering a viable scheme;
- **Environmental enhancements** – the application site is of extremely limited ecological value, and will be enhanced through provision of areas of green open space; and
- **Compatibility with Surrounding Uses** – the proposed employment development will be fully compatible with the neighbouring uses.

Summary

7.2 In summary, the application proposals will generate a significant number of economic, social and environmental benefits of the types described in paragraph 7 of the Framework. These are significant material considerations in favour of granting planning permission for the proposed development.

8. Conclusion

8.1 This Supporting Planning Statement has been prepared by GVA HOW Planning on behalf of Stechrioco Ltd (the applicant), in support of a full planning application for the redevelopment of Land at Royle Road, Rochdale.

8.2 The application proposals represent a sustainable employment development in a highly accessible location. This planning application will improve the local area, benefit local people and the wider Borough.

8.3 As a sustainable development, this planning application benefits fully from the presumption in favour of sustainable development set out at paragraph 7 of the NPPF and therefore should be granted, as there are no material disadvantages to granting consent, which would be capable of outweighing the very substantial benefits flowing from the regeneration of this brownfield site.

8.4 In the context of the above and the very substantial regenerative benefits described, we respectfully request that the Council grants planning permission.

Appendix I

Schedule of Supporting Plans and Documents

GVA HOW Planning

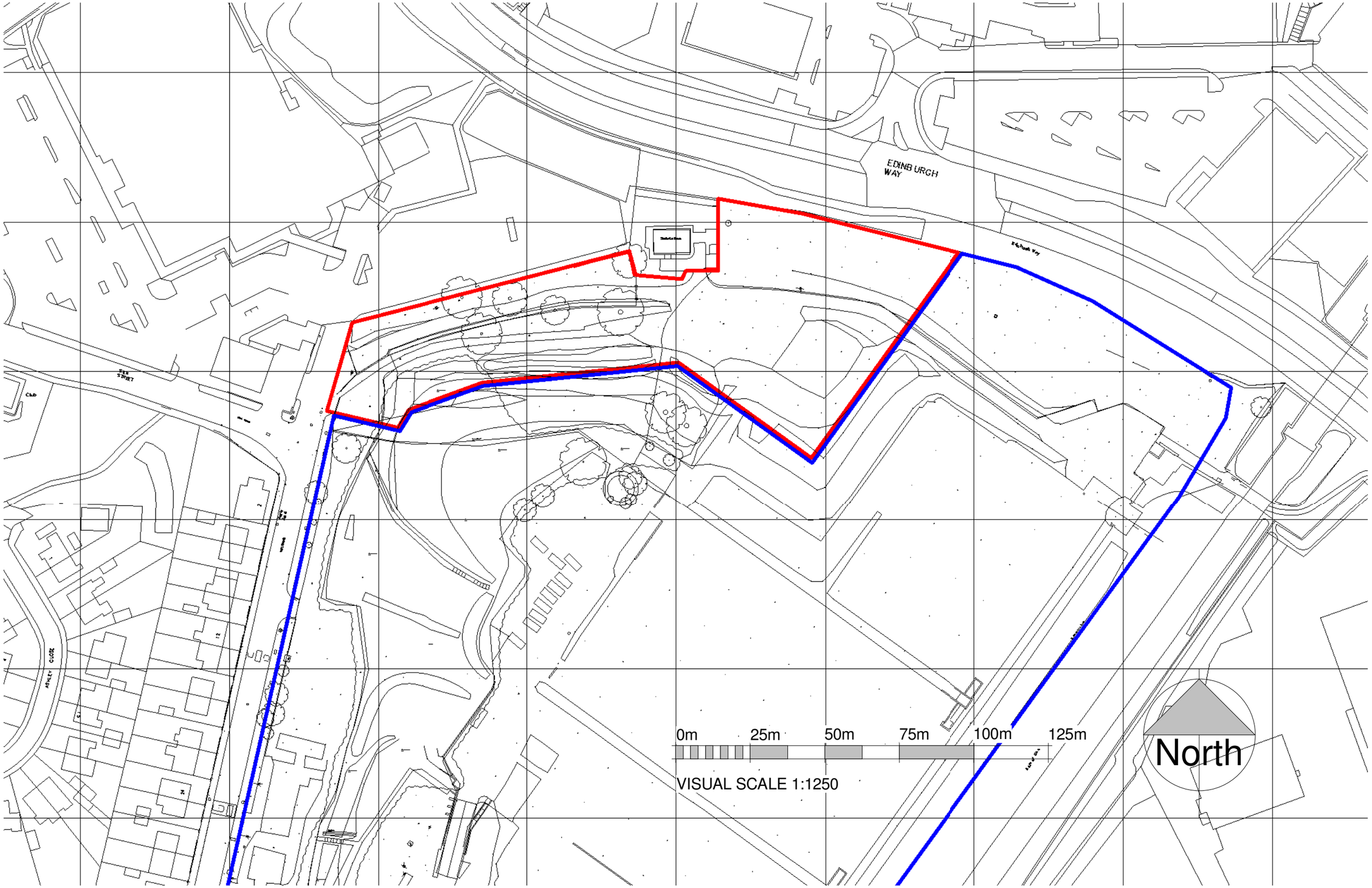
Submission Schedule

Document	Reference/Date	Author
Covering Letter	23/11/18	GVA HOW Planning
Application Fee	£4,158	Countryside Properties (UK) Ltd
Application Forms, Certificates & Notices	23/11/18	GVA HOW Planning
Plans and Drawings		
Location Plan	M4482 1.1.10 Rev A	Nicol Thomas
Existing Site Plan	M4482 1.1.04	Nicol Thomas
Parameters Plan	M4482 1.1.08 Rev B	Nicol Thomas
Proposed Site Plan	M4482 1.1.05 Rev B	Nicol Thomas
Elevations	M4482 1.1.06 Rev B	Nicol Thomas
Indicative Sections	M4482 1.1.07 Rev B	Nicol Thomas
Sketch Site Plan and 3D	M4482 1.1.01 Rev E	Nicol Thomas
Topographical Land Survey	S18-396	JLP Surveying
Documents / Technical Plans		
Supporting Planning Statement	November 2018	GVA HOW Planning
Design and Access Statement	November 2018	Nicol Thomas
Air Quality Assessment	November 2018	Redmore Environmental
Arboricultural Impact Assessment	November 2018	Helmrig Ltd
Crime Impact Statement	November 2018	Crime Prevention Design Consultant
Ecology Survey	October 2018	ERAP Consultant Ecologists
Flood Risk Assessment	November 2018	ELLUC Projects Ltd
Noise Assessment	November 2018	Red Acoustics
Phase I & II Residential Site Investigation	October 2018	E3P

Remediation & Enabling Works Strategy	October 2018	E3P
Transport Assessment	November 2018	CBO Transport

November 2018

Appendix II
Site Location Plan



nicol thomas

Rev	Date	Description
-	09-10-18	First Issue
A	22-10-18	Client Comments

nicol thomas
architects project managers construction cost consultants
Registered in England and Wales, Reg No. 2140639
Quality Assured to BS ENISO 9001:1994 Certificate Number GB 4723

Heyside House, Blackshaw Lane, Heyside, Royton, Oldham OL2 6NS
t: 01706 290088 f: 01707 290099 e: oldham@nicolthomas.com

Also at Birmingham (Registered office)

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Client	Stechrioco Ltd		
Job	Royle Road, Rochdale		
Drawing title	Location Plan		
Project number	M4482	1.1.10	Rev A
Scale	1 : 1250 @ A3		
Date	10/18/18		
Drawn by	AS	Checked by	GRF

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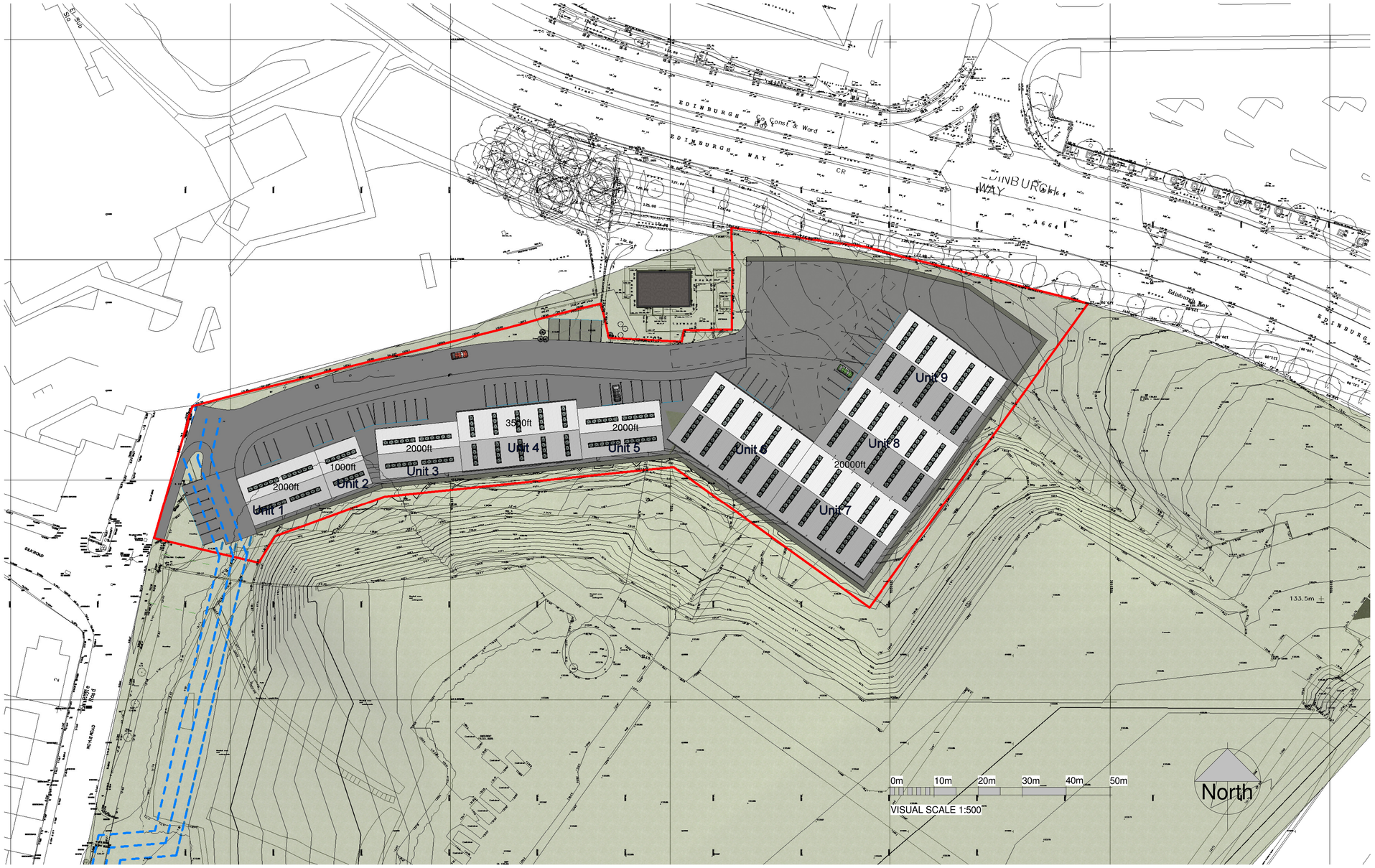
Appendix III
Proposed Site Plan



1 Proposed Business Site Plan

1 : 500

nicol thomas

Rev	Date	Description
-	09-10-18	First Issue
A	22-10-18	Client Comments
B	09-11-18	Unit Sizes Revised

nicol thomas
architects project managers construction cost consultants CDM co-ordinators
Registered in England and Wales. Reg No. 2140639
Quality Assured to BS ENISO 9001:1994 Certificate Number GB 4723

Heyside House, Blackshaw Lane, Heyside, Royton, Oldham OL2 6NS
Also at Birmingham (Registered office) tham@nicolthomas.com

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Client	Stechrioco Ltd			
Job	Royle Road, Rochdale			
Drawing title	Proposed Site Plan			
Project number	M4482	1.1.05	Rev	B
Scale	1 : 500 @ A1			
Date	10/17/18			
Drawn by	AS	Checked by	GRF	

09-11-18

Contact Details

Enquiries
Rhian Smith
0161 956 4081
Rhian.smith@howplanning.com

Visit us online
howplanning.com

GVA HOW Planning
Norfolk House, 7 Norfolk Street, Manchester M2 1DW
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