

Planning Statement

For Wain Homes (North West) Ltd | 24-641

Demolition of existing dwelling and erection of 43 dwellings with access and associated works - Land at Greenvale, Bamford, Rochdale

Project: 24-641
Site Address: Land at Greenvale, Bamford, Rochdale
Client: Wain Homes (North West) Ltd
Date: April 2025
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1. Introduction

- 1.1 This statement has been prepared in support of an application seeking full planning permission by Wain Homes North West for the erection of 43 dwellings on land off Greenvale, Bamford, Rochdale. The site extends to 2.7 hectares and forms part of Policy JP Allocation 17: Bamford / Norden in Places for Everyone.
- 1.2 Paragraph 11 of the Framework states that *“Plans and decisions should apply a presumption in favour of sustainable development”*. Paragraph 11(c) states that for decision taking this means *“approving development proposals that accord with an up-to-date development plan without delay”*.
- 1.3 The PfE allocation confirms that the principle of the proposed development is acceptable. The proposals have been the subject of pre-application discussions with the LPA and follow the framework of the wider allocation masterplan considered as part of PfE. The scheme is therefore acceptable in planning terms and accords with the development plan. On that basis we respectfully request that planning permission is granted without delay.



2. The Application

2.1 The application seeks full planning permission for up to 43 dwellings. Access for the purpose of this application is from Greenvale. A Layout Plan, prepared by MCK Associates and detailed house types have been submitted with this application, together with a Landscape Plan, and these plans show how the site would come forward for the quantum applied for. The key points are:

- Vehicular access, and the principal pedestrian access, would be via Greenvale with a new junction designed by Tetra Tech.
- Pedestrian/cycleway connection to Greenvale which would enable future connections to the wider allocation if required.
- Key elements are:
 - Prominent entrance with tree lined avenue into the development.
 - Dual aspect units facing onto public open space to create natural surveillance and attractive views.
 - A mix of housing tenures have been proposed to meet local housing requirements.
 - Pedestrian connectivity onto existing public right of way for ease of accessibility and navigation in and out of the development.
 - Change in road surface to identify junctions and slow vehicle movement to enhance safety. Dual aspects and focal units will frame this space.
 - Proposed units here will respect interface distances against existing properties at the north of the site.
 - A spine road connects the development throughout with units facing onto this road for natural surveillance. This road has no other connections creating a cul-de-sac.
 - Units along this area are set back behind a green landscape buffer and will face out to overlook the eastern countryside adjacent.
 - New landscaping/vegetation are proposed to enhance and soften the development. This will also create new habitats to wildlife and promote a greener development.
 - Retention of existing trees forms a mature and interesting landscape setting.

Environmental Impact Assessment

2.2 A Scoping Opinion in respect of a proposed scheme including 500 dwellings and a sports hub was submitted in October 2021 by Turley on behalf of Peel L&P Investments (North) Limited. The Scoping Opinion was issued on 25th July 2022. It states:



“The Council agrees that the following topics will be scoped in to the ES:

- *Climate Change;*
- *Socio-Economics and Human Health;*
- *Landscape and Visual;*
- *Biodiversity;*
- *Transport and Accessibility;*
- *Air Quality; and,*
- *Noise and Vibration.*

The following topics were considered and it is agreed that there is no requirement for them to be scoped in to the ES:

- *Ground Conditions and Contamination;*
- *Agricultural Land;*
- *Built Heritage;*
- *Flood Risk and Drainage;*
- *Archaeology;*
- *Obtrusive Lighting;*
- *Waste; and,*
- *Major Accidents and Disasters.”*

2.3 We are not aware of an ES being prepared, and no application has come forward on the wider site. Since the Scoping Opinion was issued, the site has been allocated in PfE and subject to a comprehensive SA process so whether an ES is required for the scale of development in light of the current policy context is not clear given the indicative screening thresholds of number of dwellings for Urban Development Projects is “(iii) the development would have significant urbanising effects in a previously non-urbanised area (e.g. a new development of more than 1,000 dwellings)”.

2.4 The applicant has sought to engage with the landowners of the wider land within the allocation but there has been no response on a co-ordinated approach so the relevant proposal for the purposes of the EIA Regulations is a residential development for 43 dwellings. It is agreed that whilst the current proposals will at some point in time link to the wider allocation as required by PfE and contribute financially to the wider infrastructure of the allocation (matters that can properly be controlled via planning conditions and a S106 Agreement) the application does not have a functional interdependence with other proposals – i.e. the current proposals could, and would, be likely to proceed in the absence of the wider proposals and are not dependent upon the infrastructure of the wider allocation so would not be a ‘single project’ for EIA



purposes. In *R(Wingfield) v Canterbury City Council and another* [2019] EWHC 1975 (Admin), [2020] JPL 154, (“Wingfield”) stated at [63] that:

“The question as to what constitutes the “project” is a matter of judgment for the competent planning authority, subject to challenge on grounds of Wednesbury rationality or other public law error.”

- 2.5 In that judgement there is a non-exhaustive list of potentially relevant criteria, which serves as a useful aide-memoire. These include whether the sites are owned or promoted by the same person, functional interdependence, and stand-alone projects. In relation to the last of the judge states:

“...where a development is justified on its own merits and would be pursued independently of another development, this may indicate that it constitutes a single individual project that is not an integral part of a more substantial scheme”.

- 2.6 It is relevant to note that our client does not control the wider allocation and, as such, is unable to provide any timeline for the delivery of the wider parcels of land or how they will be laid out. There is no “common ownership”, which was a factor in Wingfield. Similarly, there will not be any “simultaneous determination” of the current proposals with any part of the wider allocation.
- 2.7 The cumulative effects relating to the topics in the Scoping Opinion are addressed by the suite of documents in the current proposal so the LPA can determine each matter accordingly.

Statement of Community Involvement

- 2.8 The LPA’s SCI¹ encourages “*applicants/developers to consult with the local community before submitting their application. This enables the applicants to explain their proposals, receive feedback on which they might be able to act, create an atmosphere of genuine interest in the views of the local community and provide more certainty about any level of concern and the issues of concern*”. In this case the site has been subject to a comprehensive public consultation process through PFE where the principle of development and the range of issues were thoroughly assessed which cumulated in the site being found sound by the Inspector and then adopted.
- 2.9 A further recommendation in the SCI² encourages developers to engage in pre-application discussions with the Local Planning Authority. Pre-application discussions have been undertaken with officers of the Local Planning Authority (LPA), Local Highway Authority (LHA) and Transport for Greater Manchester (TfGM).

¹ Paragraph 5.10

² Paragraph 5.13



2.10 The pre-application (PREAPP/00115/24) submission was for a development of 65 dwellings. As a result of the pre-application advice significant changes were made to the proposal and the supporting documentation has been prepared in the context of the site being part of the wider allocation, for example the Transport Assessment and the landscape and design work. Given the site constraints there is minimal opportunities to alter the scheme so once the application is validated any public comments will be considered along with comments from statutory consultees.

2.11 Therefore, the application is submitted on this basis.



3. Planning Policy and History

3.1 The Development Plan for Rochdale comprises:

- Greater Manchester Places for Everyone (PfE) adopted in March 2024;
- Rochdale Core Strategy adopted in 2016;
- the saved policies of the Rochdale Unitary Development Plan (UDP) adopted in 2006; and,
- Greater Manchester Joint Minerals Plan (JMP) adopted in April 2013.

Greater Manchester Places for Everyone (PfE)

3.2 The relevant PfE policies are:

- Strategy
 - Policy JP-Strat6: Northern Areas
- Sustainable and Resilient Places
 - Policy JP-S1: Sustainable Development
 - Policy JP-S2: Carbon and Energy
 - Policy JP-S4: Flood Risk and the Water Environment
- Places for Homes
 - Policy JP-H1: Scale, Distribution and Phasing of New Housing Development
 - Policy JP-H2: Affordability of New Housing
 - Policy JP-H3: Type, Size and Design of New Housing
 - Policy JP-H4: Density of New Housing
- Greener Places
 - Policy JP-G1: Landscape Character
 - Policy JP-G2 Green Infrastructure Network
 - Policy JP-G3: River Valleys and Waterways
 - Policy JP-G6: Urban Green Spaces
 - Policy JP-G7: Trees and Woodland
 - Policy JP-G8: A Net Enhancement of Biodiversity and Geodiversity
- Places for People
 - Policy JP-P1 Sustainable Places



- Policy JP-P2: Heritage
- Policy JP-P6: Health
- Policy JP-P7: Sport and Recreation
- Connected Places
 - Policy JP-C1: An Integrated Network
 - Policy JP-C3: Public Transport
 - Policy JP-C5: Streets for All
 - Policy JP-C6: Walking and Cycling
 - Policy JP-C8: Transport Requirements of New Development
- Allocations
 - Policy JP Allocation 17: Bamford / Norden

Rochdale Core Strategy (CS)

3.3 The relevant CS policies are

- Policy P2 - Protecting and Enhancing Character, Landscape and Heritage
- Policy P3 – Improving Design of New Development
- Policy DM1 – General Development Requirements
- Policy T2 - Improving accessibility
- Policy G6 - Enhancing Green Infrastructure
- Policy G7 – Increasing the Value of Biodiversity and Geodiversity
- Policy G8 - Managing Water Resources & Flood Risk
- Policy G9 - Reducing the impact of pollution, contamination and land instability

Rochdale Unitary Development Plan (UDP)

3.4 The relevant UDP policies are:

- Saved UDP Policy EM/7 – Development & Flood Risk
- Saved UDP Policy EM/8 – Protection of Surface and Ground Water

3.5 The Proposals Map for the Rochdale UDP identifies the site as falling within the Defined Urban Area of the Borough just outside the Primary Employment Zone.



National planning policy and guidance

- 3.6 The National Planning Policy Framework (the Framework) was published in December 2024. At the heart of the Framework remains a presumption in favour of sustainable development. As set out in paragraph 11 of the Framework, all proposals should be considered in the context of sustainable development.
- 3.7 Chapter 2 of the Framework seeks to clarify what is meant by sustainable development. In doing so it states that the planning system has three overarching objectives which are interdependent and need to be pursued in mutually supportive ways. These are as follows:
- an economic role – contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation and improved productivity;
 - a social role – supporting strong, vibrant and healthy communities; and
 - an environmental role – including contributing to protecting and enhancing our natural, built and historic environment; including making effective use of land and improving biodiversity.

Other material considerations

- 3.8 The following SPDs are of relevance to the proposals:
- Oldham and Rochdale Urban Design Guide SPD
 - Design and Planning Process: A Guide to Good Practice
 - Residential Design Guide SPD
 - Public Realm Design Guide SPD
 - Guidelines and Standards for Residential Development SPD
 - Provision of Recreational Open Space in New Housing SPD
 - Biodiversity and Development SPD

Planning History

- 3.9 The only application on the main part of the site is 78/D06179 which was for 48 dwellings. With regard to 58 Greenvale, which is proposed to be demolished, there have been a number of applications made, these being:
- 11/D54358 - Change of Use of Existing Detached Garage into Ancillary Living Accommodation – Approved June 2011



- 11/D54159 - Application For A Lawful Development Certificate For A Proposed Use To Convert A Detached Outbuilding Presently Used As A Garage/Store Room Into Ancillary Living Accommodation - withdrawn
- 06/D46875 - Erection of Balcony to First Floor Rear Elevation of Dwelling (Partly Retrospective) - Approved April 2006
- 05/D44791 - Erection of One Detached Dwelling - Approved March 2005
- 04/D44547 - Erection of One Dwelling and One Stable Block – withdrawn
- 78/D07323 - One Detached Bungalow and Access Road to Land at the Rear of the Site.



- 4.3 Criterion 3 seeks to “achieve excellent design and sustainability through masterplanning and the use of design codes for the whole site to ensure comprehensive development. This will include the need for an infrastructure phasing and delivery strategy in accordance with policy JP-D1”.
- 4.4 We note that paragraph 445 of the Inspectors Report stated that “The site is being actively promoted and a planning application prepared”, which reflected the Hearing Statement (M20.4 of the PfE Examination Library) where the Examination was advised that “Peel is in the process of preparing a hybrid planning application for the site”. However, we are not aware of any such application and the applicant has sought to engage with the landowners of the other land within the application but there has been no response on a co-ordinated approach. Therefore this application has been progressed but in the context that it will form part of the wider allocation.
- 4.5 A Development Framework (Ref 10.06.01 of the PfE Examination Library) was prepared as part of the evidence base for Places for Everyone which is a material consideration. An extract is below.

Appendix 3: Indicative Masterplan



- 4.6 On the Development Framework, the application site is shown as residential development with open space on the western part due to the overhead electricity cables. Indeed, due to constraints such as overhead electricity cables, the location of the existing playing pitches and access points, there is very little scope

for change to the above Development Framework. The main change from the allocation is the separate access from Greenvale in order to deliver the 43 dwellings.

4.7 Policy JP-D1 (Infrastructure Implementation) sets out a range of criteria

4.8 The early delivery of the site is important for the Council being able to maintain its housing trajectory and achieve a 5 year housing land supply. The table below is from the PfE response to IN9: Matters, Issues and Questions [Matter 8 Places for Homes].

Table 2: Lead in times for allocations

District	Proposed strategic sites	Capacity (dwellings) (inc. capacity within existing supply)	First completions	Final completions
Bury	JPA1.1	200	2025/26	2030/31
	JPA1.2	1,350	2025/26	2036/37
	JPA7	1,900 within plan period 3,500 total	2025/26	Beyond 2050
	JPA8	140	2025/26	2028/29
	JPA9 ³	1,250	2025/26	2036/37
Oldham	JPA12	480	2025/26	2031/32
	JPA13	30	2025/26	2026/27
	JPA14	950 within plan period 1,450 total	2022/23 for existing supply of 77 units 2025/26 for remainder of allocation	2045/46
	JPA15	90	2026/27	2030/31
	JPA16	460	2023/24	2031/32
	JPA17	175	2028/29	2032/33
	JPA18	60	2025/26	2026/27
Rochdale	JPA1.1	1,000	2020/21	2034/35
	JPA1.2	200	2024/25	2028/29
	JPA2	1,680	2024/25	2035/36
	JPA19	450	2024/25	2031/32
	JPA20	125	2024/25	2027/28
	JPA21	250	2024/25	2030/31
	JPA22	300	2024/25	2029/30
	JPA23	250	2024/25	2028/29

4.9 As can be seen the PfE expected completions from the allocation in 2024/25 with final completions in 2031/32. The lack of any public progress of the wider allocation means that the application is the only opportunity to bring deliver forward on the site allocation so that the housing trajectory is not delayed even further.

4.10 Therefore, on the principle of development we consider that application site is a discreet parcel of the wider allocation which can come forward now without causing prejudice to the delivery of the wider site and can be integrated with the wider site when that land comes forward.



Highways and accessibility

- 4.11 Criterion 5 of JPA17 states access to the site would be from suitable points along Norden Road. This application would however take access from Greenvale which requires the demolition of the existing dwelling (58 Greenvale). The access via Greenvale would be appropriate for this level of development and any links to the wider site can be achieved to meet criterion 6 of JPA17 which seeks new and improved sustainable transport and highways infrastructure. Pedestrian and cycle links can be delivered between the site and the wider allocation and the link onto Greenvale will increase permeability for pedestrians and cyclists into the existing urban area.
- 4.12 The submitted Transport Assessment, prepared by Tetra Tech, has been prepared for the 43-dwelling proposal but it takes account of the wider allocation, notwithstanding that the application comprise a small portion (9.56%) of the 450 dwellings, which are allocated within JPA17.
- 4.13 The TA includes the proposed off-site sustainable transport measures for the full JPA17 allocation (450 dwelling), in accordance with PfE Appendix D: Indicative Transport Mitigation which sets out measures for each allocated site (extract below).

JPA17 Bamford and Norden	Necessary
	• Norden Road / War Office Road – modifications to traffic circulation and local junction improvements • Norden Road – new pedestrian crossing • Bus stop upgrades at the Norden Road / War Office Road junction • Active travel improvements including Furbarr Road improvements and North-South Greenway corridor through the site
	Supporting
	N/A

- 4.14 The applicant is willing to contribute to the proportionate costs associated with the delivery of those measures which are set out in 7.2 of the TA and included in the Heads of Terms.
- 4.15 At a site-specific level, the TA demonstrates that the proposed access onto Greenvale would be suitably designed in terms of highways safety and there would be an acceptable impact on the local road network in accordance with the guidelines and policies detailed in Section 2 of their report.

Design



4.16 Policy JP-P1 (Sustainable Places) sets out a range of criteria for new developments. Policy JP-H3 (Type, Size and Design of New Housing) states that development across the plan area should seek to incorporate a range of dwelling types and sizes. All dwellings must also comply with NDSS and Part M4(2). Policy JP-H4 expects new housing developments to be of an appropriate density for the location. The policy sets out a range of densities *“reflecting the relative accessibility of the site by walking, cycling and public transport and the need to achieve efficient use of land and high-quality design”*. A density of 35 dwellings per hectare are sought. However lower densities may be acceptable where they can be clearly justified by:

- 1. Local housing market issues, such as a demonstrable need for a particular type of housing that cannot be delivered at a higher density; or
- 2. Site-specific issues, such as the design context and any potential impact on the wider landscape or townscape including heritage assets and green infrastructure

4.17 Criterion 1 of JPA17 seeks to deliver *“around 450 new homes including significant provision of larger (4, 5 and 6 bedroom) houses in spacious plots, to reflect the grain and density of the surrounding residential areas, or similar types of larger homes as agreed with the Local Planning Authority and affordable housing in accordance with relevant local plan requirements”*. The layout shows a total of 43 dwellings on the site of which 7 would be affordable.

4.18 In the Core Strategy, policies P3 (Improving design of new development) and DM1 (General development requirements) set out criteria to achieve high standards of design.

4.19 With regard to density the proposed development would achieve 22 dwellings per hectare. As the LPA will be aware the pre-application scheme was for 65 dwellings. A key issue raised was that *“the delivery of dwellings situated within well-landscaped settings, with spacious plot sizes and large internal floor areas remains a key priority at this site”*. It then stated that *“What constitutes a larger 4,5 and 6-bedroom dwelling is not defined in policy and is to be agreed through the pre-application process, however it can be taken to set internal floor areas significantly above the national minimum as per the NDSS”*.

4.20 Table 1 of the NDSS sets out the minimum gross internal floor areas and storage and the table below sets out the house types proposed with their floorspace.

House type	No of Beds and Type	Floorspace (sqft)	NDSS Standard (sqft)
Parkland	3B 4P Semi	1012	904
Meadowvale	3B 4P Detached	1093	904
Highstone	4B 7P Detached	1396	1237



Peakridge	5B 8P Detached	1679	1379
Standish	5B 8P Detached	1907	1379
Capstone	5B-8P	2240	1379
Beckfold (A)	2B-3P	771	753

4.21 As can be seen each of the proposed house types are in excess of NDSS and in most cases significantly higher. This accords with the aspirations for this site in Policy JP-H4.

Affordable housing

4.22 Policy JP-H2 states that affordable homes should be delivered in line with local targets. The proposed scheme will provide a policy-compliant level of affordable housing in accordance with the Affordable Housing SPD at 15%. This equates to 7 no. affordable homes and they would be delivered on site.

Tress and Landscape and Visual Impact

4.23 Policy JP-G1 states that development should reflect and respond to the special qualities and sensitivities of the key landscape characteristics of its location, including having regard to:

- Topography, geology and drainage;
- Land use and field patterns;
- Semi-natural habitats and woodland cover;
- Archaeology and cultural heritage;
- Settlement, road pattern and rights of way; and
- Views and perceptual qualities.

4.24 The site is located on the edge of Bamford and comprises agricultural land on the urban fringe. The fact that the site is allocated means that the landscape and visual impact of the development was considered acceptable. Nevertheless, criterion 7 of JPA17 states:

“7. Reflect and respond to the special qualities and sensitivities of the key characteristics of the Pennine Foothills (West /South Pennines) landscape character type in accordance with policy JP-G1. This should take account of any visual impact from Ashworth Valley to the west given the high landscape and recreational value of that area.”



4.25 A Landscape and Visual Assessment by Barnes Walker demonstrates that the harm in relation to landscape and visual impact, which is an inevitable consequence of developing any greenfield site, would be localised and limited only. Following the pre-application response, the existing landscaping which provides strong screening to the parcel has been retained. This is set out in further detail in Section 4 of the LVA which describes sets out the landscape proposals (M3886-PA-01-V3) in greater detail.

4.26 Therefore, the proposed development for the purposes of policies JP-G1, JPA17, P2, P3, G6 and DM1.

Ecology

4.27 The submitted Phase 1 Ecology Report and Biodiversity Net Gain Assessment by Tyler Grange shows the following:

- Designated Sites: In terms of protected sites, no internationally or nationally designated sites are to be impacted as a result of the proposed development. Twelve non-statutory designated sites are present within 2km of the site, it is expected that a CEMP will suitably prevent any impacts to these sites during the constructional phase whilst no impacts are expected during the operational phase.
- Habitats: The site is dominated by neutral grassland which is of local importance due to being detailed within the LBAP. Bramble scrub is of local importance due to the suitability for supporting priority and/or protected species. Lines of trees, scattered trees and woodland are of local importance due to being detailed within the Policy JP-G7 of the PfE Joint Development Plan which requires all lost trees to be replaced on a two for one basis. Hardstanding, buildings and ruderal vegetation is also present within the site, all of which are of negligible ecological importance. Habitats of local importance proposed to be lost should be replaced on a like for like or better basis to ensure the biodiversity value of the site is not impacted.
- Badgers: A pre-commencement badger survey will be required if more than 6 months elapse from the date of the initial survey to re-confirm the presence or absence of this species
- Birds: A common assemblage of birds is considered to be utilising the site, with species of importance (including lapwing and skylark) likely to favour surrounding habitats. Nevertheless, Habitat removal should occur outside of the core nesting bird season if possible and if not under supervision by a SQE. Additional tree and hedgerow planting is expected to maintain/enhance the quality of habitats for bird species on site.
- Bats: Three nocturnal surveys (or aerial inspections) will be required to be conducted on Tree T3, given that it is scheduled for removal, to determine a likely presence or absence of roosting bats. Trees T1 and T2 are to be soft felled if removal is required. Retention of existing boundary features (lines of trees, woodland) is expected to avoid impacts to commuting/foraging bat species, and any impacts to this suitable habitat are expected to be controlled through the implementation of a sensitive lighting strategy.



- Hedgehogs: The sensitive working methodologies outlined in section 2 of this report should be adopted during the construction phase of the proposals.
- BNG: The proposals would result in a net loss of 4.39 habitat units (39.31%) and a net gain of 0.97 hedgerow units (51.12%). Given the net loss of habitat units arising from development, the development would need to make off-site contributions to a third-party unit provider, totalling 5.50 units, in order to obtain an overall gain of 10%. Off-site contributions should consist of the creation of grassland, woodland, and individual tree planting in order to satisfy the trading rules of the biodiversity metric. A LEMP to ensure the long-term management of the proposed habitat enhancements is expected to be secured via a suitable worded planning condition.

4.28 The proposed development is compliant with the development plan in terms of ecology and Policies JP-S1, JP-G7, JP-G8 and G7.

Heritage

4.29 Criterion 4 of JPA17 states:

“Define the archaeological potential of the development site through the completion of archaeological evaluation in the form of geophysics, field walking and trial trenching for areas specified in the Bamford/Norden Historic Environment Assessment 2020. The masterplan must detail where significant archaeology must be preserved in situ and demonstrate how the development has responded sympathetically to this.”

4.30 Criterion 9 states:

“Take appropriate account of relevant heritage assets, and their settings, including the listed Bamford United Reform Church, in accordance with Policy JP-P2”.

4.31 A Heritage Statement, prepared by HCUK, has been submitted with this planning application and it assesses the impact of the development on heritage assets. The proposed development is well removed from the identified heritage assets both visually and experientially. It is c.320m away from Hopwood Farm and c.790m away from the two listed buildings and is visually separated from these assets as a result of intervening features (including Jowkin Lane, field boundaries, sports pitches and tree cover) and built form (including Bamford Mews and other buildings within the wider allocation area).

Flood risk and drainage

4.32 A Flood Risk Assessment and Drainage Strategy, prepared by Betts Associates, has been submitted with this planning application. This confirms that the site lies solely within Flood Zone 1 and the Planning Practice Guidance confirms that ‘More Vulnerable’ development is appropriate within Flood Zone 1, providing there is no increase in flood risk elsewhere due to the proposals. Consultation with the



Environment Agency, United Utilities, and Rochdale Metropolitan Borough Council has not identified any historical flooding to the site or the wider area. The nearest Main River to the site is Naden Brook, which is located 480m west of the site. The fluvial flood risk to the site from Naden Brook is 'low' based on the surrounding topography.

- 4.33 The site is at predominantly 'very low' risk of surface water flooding. The areas indicated to be at higher risk onsite correspond with a naturally low-lying conveyance channel which routes through the site from the north to the south where ponding is likely to occur during extreme and prolonged rainfall events.
- 4.34 The report concludes that the proposals are at 'low' flood risk from the flood sources reviewed as part of this assessment. This assessment has been prepared in consultation with the relevant interested parties. The report is commensurate with the scale and nature of the development proposals, and appropriate in accordance with the Planning Practice Guidance.

Noise

- 4.35 The impact of noise from adjacent football pitches has been assessed for the proposed residential development at Greenvale in Bamford near Rochdale. The potential noise impact associated with use of the pitches on the proposed development has been assessed. The Hepworths Report states:

"4.3 As the predicted noise levels across the development are below the relevant advisory threshold of 50 dB LAeq,1hr, no specific noise mitigation measures—such as acoustic fencing—are considered necessary.

4.4 The layout, including the orientation of dwellings and set-back distances from the boundary, is sufficient to ensure that acceptable external amenity sound levels will be achieved without the need for additional screening."

Minerals

- 4.36 Part 11 of JPA17 states:

"Consider the extraction of any viable mineral resources within Mineral Safeguarding Areas, in accordance with Policy 8 of the Greater Manchester Joint Minerals Development Plan (or any relevant policies in subsequent minerals plans)."

- 4.37 The Greater Manchester Joint Minerals Plan was adopted in April 2013. Policy 8 Prior Extraction of Mineral Resources states:



Within Mineral Safeguarding Areas

All non-mineral development proposals within the Mineral Safeguarding Area (see maps 4, 5, 6 & 7) should extract any viable mineral resources present in advance of construction. Proposals for prior extraction of minerals will be permitted provided the proposal is in accordance with Policy 2 Key Planning and Environmental Criteria.

Proposals for non-mineral development within the Mineral Safeguarding Areas that do not allow for the prior extraction of minerals will only be permitted where:

1. The need for the development outweighs the need to extract the mineral; or
2. It can be clearly demonstrated that it is not environmentally acceptable or economically viable to extract the mineral prior to non-mineral development taking place; or;
3. It can be clearly demonstrated that the mineral is either not present or of no economic value or too deep to extract in relation to the proposed development; or;
4. The development is limited ⁽¹⁰⁾ or temporary and would not prevent minerals extraction taking place in the future.

4.38 The extract from Map 14 (below) shows that the application site is not within an area of search for gravel, sandstone or sand. Part of the western area of the wider allocation is shown to be in an area of search for sandstone.



4.39 The extract from Map 24 (below) shows that the application site is within a wider mineral safeguarding area for brick clay with the mineral safeguarding area for sandstone. Both these mineral safeguarding areas apply to the wider allocation.





4.40 Given that the site is part of allocation JPA17 would meet part (1) of the policy. In addition, the application site is small in relation to the wider safeguarded area and is adjacent to existing residential dwellings so we conclude there is no conflict with Policy 8 and criterion 11 is met.

Planning obligations

4.41 JPA17 sets out requirements for contributions as set out in the following criteria:

- 2. Retain and significantly enhance the existing recreational facilities as part of an integrated green and blue infrastructure network on the site. The residential development on the site will provide contributions towards the improvement of the facilities which will create a high quality recreational and sports 'hub' serving the local area and the borough as a whole. The development should incorporate existing public rights of way along with new routes for active travel into a high quality integrated green infrastructure network that links to existing public rights of way in the countryside to the west and north west of the site;
- 6. Make provision for new and improved sustainable transport and highways infrastructure having regard to the indicative transport interventions set out in Appendix D in accordance with policy JP-C8;
- 10. Make financial contributions for offsite additional primary and secondary school provision to meet needs generated by the development in accordance with policy JP-P5.

4.42 Appropriate planning obligations can be secured via Section 106 legal agreement and this will be discussed with the LPA through the planning application process (e.g. education, sports facilities, youth provision). However the following draft Heads of Terms are proposed:

- commuted sum payment towards off-site POS provision;
- A contribution towards formal sports provision and sports hub - The improvement of the facilities to create a high quality recreational and sports 'hub' serving the local area and the



borough forms part of the wider allocation. This land is in the control of the Council and are used as playing pitches used by Bridge Junior Football Club. The pitches closest to the proposed site consist of four full size pitches, two $\frac{3}{4}$ size pitches and three five-a-side size pitches. The overall improvement of the pitches will be determined by the LPA and the associated cost;

- Education contribution;
- Off Site Highways. Tetra Tech advises that the total costs of these for the allocation would be:
 - War Office Bus Stop Upgrade - £8,124
 - Norden Road Bus Stop Upgrade - £17,811
 - Puffin Crossing - £104,875
 - The proposed development is 43 dwellings from the allocated 450 dwellings which equates to 9.56%. 9.56% of the total cost of £130,810 equates to a £12,499.62 contribution from this application for the three schemes.



5. Planning Balance

- 5.1 Paragraph 11 of the Framework states that *“Plans and decisions should apply a presumption in favour of sustainable development”*. Paragraph 11(c) states that for decision taking this means *“approving development proposals that accord with an up-to-date development plan without delay”*.
- 5.2 The site is allocated in the PfE. The allocation was informed by a Green Belt assessment, a comprehensive site selection process and Sustainability Appraisal. The PfE was the subject of a rigorous examination process. The outcome of that process was that the Inspectors concluded that the allocation of the site was justified (the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence) and consistent with national policy. Furthermore, the Inspectors concluded that exceptional circumstances existed to justify removing the site from the Green Belt and allocating it for housing.
- 5.3 The early delivery of the site is important for the Council being able to maintain its housing trajectory and achieve a 5 year housing land supply as PfE expected completions from the allocation in 2024/25 with final completions in 2031/32. The lack of any public progress of the wider allocation means that the application is the only opportunity to bring deliver forward on the site allocation so that the housing trajectory is not delayed even further.
- 5.4 A range of environmental and technical studies are submitted with this application and demonstrate that the Site is suitable and deliverable, subject to appropriate mitigation considered necessary.
- 5.5 The application accords with the development plan as a whole. On that basis we respectfully request that planning permission is granted without delay.



