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Planning, Development & Heritage Consultants

Cassel & Fletcher

42-46 Drake Street, Rochdale, OL16 1NU

Planning Statement

05 March 2024

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1. Introduction

1.1 This Planning Statement has been prepared by Paul Butler Associates on behalf of Cassel & Fletcher. The statement has been provided in support of a full planning application for a residential-led development at 42-46 Drake Street, Rochdale, OL16 1NU. The application proposes the construction of a part 4, part 5 storey building with roof dormers, comprising 33no. apartments (C3 use) and a ground floor commercial unit (Class E).

1.2 To provide a clear understanding of the application proposal this statement includes:

- A description of the application site and surrounding area;
- A review of the planning history of the application site;
- A description of the proposed scheme;
- A review of national and local planning policies of relevance to the scheme;
- An appraisal of the scheme against relevant planning policies and an assessment of the scheme in relation to its immediate and surrounding context; and,
- A conclusion.

2. The Application Site and Surrounding Area

The Application Site

- 2.1 The application site relates to a vacant plot of land located within Rochdale Town Centre (see figure 2.1 below). The site occupies a corner plot location at the junction of Drake Street and Nelson Street, which bound the site to the east and south respectively. A two storey property occupied by 'La Strada' restaurant bounds the site to the north, whilst an unnamed access road and car dealership bound the site to the west. In addition to being located within the Town Centre boundary, the site also sits within the Rochdale Town Centre Conservation Area and the Drake Street Physical Regeneration Area.
- 2.2 The site is currently vacant and underutilised, but was formerly occupied by the Ivesons buildings, including the Trafalgar Buildings retail unit at 42 – 46 Drake Street and the adjoining Ivesons Bros. warehouse on Nelson Street. Ivesons was a local furnishings and carpet retailer with several stores around Rochdale that operated between 1818-1995. Following vacancy in 1998 the Ivesons stores fell into disrepair before ultimately being demolished in the early 21st century. The site's vacancy has a negative visual impact and interrupts the flow of the streetscape in this part of the Conservation Area.



Figure 2.1: Aerial view of the site (approximate boundary in red).

- 2.3 The topography of the site gently slopes downwards to the east and north site boundaries. The site is located in flood zone 1 (lowest risk). There are no trees located on the site. The former built development has been cleared and the site is now covered in rough grassland.



Figure 2.2: View of site from Drake Street looking west



Figure 2.3 View of site from Nelson Street looking east

The Surrounding Area

- 2.4 The surrounding area is predominantly mixed use / commercial development typically found in town centre locations including shops, cafes, drinking establishments, leisure uses and banks. Residential uses exist on the upper floors of some properties.
- 2.5 The site is located within a highly sustainable location in Rochdale's Town Centre and benefits from the array of shops, amenities, services, facilities, and employment opportunities that this brings. The site is also very accessible by public transport, being only 230m (3 minutes' walk) from the Rochdale Town Centre metrolink tram stop which provides frequent services to various stops, including those within Manchester City Centre. Adjacent to Rochdale Town Centre tram stop is Rochdale Interchange, which offers regular bus services to various destinations including Bury, Bolton, Milnrow, Manchester City Centre, Accrington, Ashton-under-Lyne and Littleborough. In addition the site is 1km (14 minutes' walk) from Rochdale train station which offers services to a range of destinations including Manchester City Centre, Blackburn, Clitheroe, Leeds, Wigan, Kirby and Chester.

Rochdale Town Centre Conservation Area

- 2.6 The application site is located within the Regency Drake Street character zone of the Rochdale Town Centre Conservation Area. Please refer to the supporting Heritage Statement for a description of the Conservation Area.

3. Planning History

- 3.1 In accordance with best practice a review of the site's planning history was undertaken on 29.01.2024. The applications identified are provided in the table below.

Application Ref and Address	Description of Development	Decision and Date
96/D32834 42-46 Drake Street Rochdale	Change Of Use Of First Floor From Retail To Restaurant	Grant subject to conditions 26 Mar 1996
96/D32833 42-46 Drake Street Rochdale	Change Of Use Of Second And Third Floor From Retail To Offices	Grant subject to conditions 26 Mar 1996
96/D32835 42-46 Drake Street Rochdale	Change Of Use Of Part Of Ground Floor From Retail To Cafe/Wine Bar	Grant subject to conditions 26 Mar 1996
97/D34494 42-46 Drake Street Rochdale	Change Of Use Of Part Of Ground Floor From Retail To Cafe/Wine Bar (Class A3)	Grant subject to conditions 23 Sep 1997
99/D36489 42-46, Drake Street, Rochdale	New Shop Front.	Grant subject to conditions 05 Jun 1999
02/A5174 Trafalgar Building, 42-46, Drake Street, Rochdale, Lancashire	8 Non-Illuminated Information Boards	Grant subject to conditions 30 Aug 2002
03/D42395 Former Ivesons Warehouse, Nelson Street, Rochdale, Lancashire	Change Of Use From Pottery Warehouse To A Hair And Beauty Salon On Ground And First Floor With Offices On 2ND And 3RD Floors	Grant subject to conditions 22 Nov 2003
05/D45481 Site Of 42-46 Drake Street And 9 Nelson Street, Rochdale	Demolition Of Existing Buildings And Erection Of New Building Comprising 23 Apartments, 2 Office Units And 1 Retail Unit And Associated Car Parking.	Withdrawn 29 Jul 2005
05/D46422 42-46, Drake Street, Rochdale	Demolition Of Existing Buildings And Erection Of New Building Comprising 21 Apartments, 2 Office Units And 1 Retail Unit With Associated Car Parking- Resubmission D45481.	Withdrawn 24 Jan 2006

- 3.2 The above applications relate to the former buildings on site which have since been demolished. The planning history does not have any significance for the proposals but has been included for completeness.

Pre-application Discussions

- 3.3 Paragraph 39 of the NPPF advises that early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties. Good quality preapplication discussion enables better coordination between public and private resources and improved outcomes for the community. Paragraphs 41-43 of the NPPF go on to emphasise the importance of statutory consultees and other consenting bodies participating in pre-application discussions to enable early consideration of all the fundamental issues.
- 3.4 The Planning Practice Guidance (PPG) provides additional advice for applicants prior to submitting an application. This reinforces the value of pre-application engagement by prospective applicants which can offer significant potential to improve both the efficiency and effectiveness of the planning application system and improve the quality of planning applications and their likelihood of success.
- 3.5 Rochdale Council have adopted a Statement of Community Involvement (August 2021) which sets out how the Council will consult and publicise planning applications. The SCI states that the Council has adopted guidance to encourage applicants/developers to consult with the local community before submitting their application.
- 3.6 The applicant's funding mechanism for the site has meant that there are major time implications for obtaining planning permission. This has meant that the applicant has not been able to accommodate formal pre-application engagement with the LPA or local community prior to submission, however the applicant will endeavour to discuss the proposals with neighbouring occupiers. It is also highlighted that whilst the applicant did not submit a pre-application enquiry, the existing landowner has provided a positive e-mail response from Rochdale Council dated 1st August 2022 which has been received in relation

to a scheme for 33 residential apartments and commercial floorspace. This has informed the latest proposals for the site.

4. The Proposed Scheme

- 4.1 The application proposals are for the construction of a residential-led development on a vacant site located at the junction of Drake Street and Nelson Street in Rochdale Town Centre. The description of the development is 'Construction of a part 4, part 5 storey building with roof dormers, comprising 33no. apartments (C3 use) and a ground floor commercial unit (Class E)'.
- 4.2 The four-storey element of the building will accommodate 143.3 square metres of commercial floorspace at ground floor, accessed by an entrance positioned at the chamfered corner of the proposed building where it addresses the junction of Drake Street and Nelson Street.
- 4.3 The ground floor level of the five-storey element of the building will accommodate two apartments, cycle storage for 22 bikes, bin storage, a plant room and the residential entrance lobby. The entrance to the residential element of the building is centrally located on the south (Nelson Street) elevation, whilst a further entrance for servicing to the bin store is located on the west (rear) elevation.
- 4.4 The upper floors will accommodate the remaining 31 apartments. All apartments within the development will provide one bedroom and will exceed the nationally described space standards. The residential units benefit from a decent level of outlook and natural lighting, with a number of them being dual aspect. A lift will provide level access to all apartments.
- 4.5 The proposed building will cover the site area in its entirety and has been designed to read as two separate buildings, reinstating the historic arrangement of the former Trafalgar Buildings and Iveson Bros. warehouse that previously occupied the site. Also in reference to the former Ivesons buildings, the proposals involve a chamfered corner which addresses the junction of Drake Street and Nelson Street. Sitting atop the chamfered corner is a pediment feature which creates visual interest and will allow this building to act as a landmark feature, much like the former Ivesons building did.

- 4.6 The elevational treatment involves vertically proportioned fenestration and a mansard roof design, with a traditional shopfront at ground floor level of the four-storey element of the building. The proposed materiality includes red brick slips, aluminium frame windows and an artificial slate roof covering. The five-storey element also includes buff brick and off-white banding in reconstituted stone or ceramic tiles to create additional interest and reference the art deco style of the former warehouse building. The applicant has been in discussions with a local manufacturer, T&F Terrix, who will be commissioned to undertake works on the façade and interiors. Details of the Terrix brick slips have been submitted as part of the application.
- 4.7 Please refer to the planning drawings prepared by BPM Architectural for a full description of the proposals.



Figure 4.1: Architect's sketch of the proposals.

5. Planning Policy Context

5.1 Planning policy guidance of relevance to the proposed scheme, and which provides the context for its assessment, is set out within the following:

- The National Planning Policy Framework (NPPF); and,
- The Development Plan for Rochdale

National Planning Policy Framework

5.2 The updated National Planning Policy Framework (NPPF) was most recently updated on 19th December 2023 and sets out the government's objectives for achieving sustainable development. At the heart of the NPPF is a presumption in favour of sustainable development which ensures that sustainable development is pursued in a positive way.

5.3 Development proposals that accord with an up-to-date Development Plan should be approved without delay. Where there are no relevant development plan policies, or the policies which are most important for determining the application are out of date, permission should be granted unless:

- i. The application of policies in the Framework that protect areas or assets of particular importance provides a clear reason for refusing the proposed development; or
- ii. Any adverse impact of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

5.4 Paragraph 8 confirms that there are three dimensions to sustainable development; economic, social and environmental. To achieve sustainable development, economic, social and environmental gains should be pursued in mutually supportive ways through the planning system.

Delivering Sustainable Development

- 5.5 The NPPF explains that the purpose of the planning system is to contribute to the achievement of sustainable development. Planning policies and decisions should play an active role in guiding development towards sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area. These sustainable objectives should be delivered through the preparation and implementation of plans and the application of the policies in the framework. The NPPF is split into 17 chapters, the chapters of relevance to this development are discussed below.
- 5.6 Delivering a sufficient supply of homes (Chapter 5) – paragraph 60 explains that in order to support the government’s commitment to significantly boosting the supply of homes, it is important that a sufficient amount and variety of land comes forward for development where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.
- 5.7 Local planning authorities are not required to identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years’ worth of housing for decision making purposes if the following criteria are met: a) their adopted plan is less than five years old; and b) that adopted plan identified at least a five year supply of specific, deliverable sites at the time that its examination concluded. In all other circumstances, local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide either a minimum of five years’ worth of housing, or a minimum of four years’ worth of housing if the provisions in paragraph 226 apply.
- 5.8 The NPPF is clear at paragraph 11 that housing applications should be considered in the context of the presumption in favour of sustainable development and that relevant policies for the supply of housing should not be considered up to date if the local planning authority cannot demonstrate a five year (or four year, if applicable) supply of deliverable housing sites or the Housing Delivery Test indicates that the delivery of housing was below the housing requirement over the previous three years.

- 5.9 Paragraph 70 highlights that small to medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly in comparison to larger sites. Paragraph d) emphasises the importance of windfall sites and states that local authorities should support their development through giving great weight to the benefits of using suitable sites within existing settlements for homes.
- 5.10 Building a strong and competitive economy (Chapter 6) - emphasises that the government is committed to ensuring that the planning system should help to support economic growth. It recognises that a poor environment and a lack of housing can act as a potential barrier to investment.
- 5.11 Ensuring the vitality of town centres (Chapter 7) - planning policies and decisions should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation. Paragraph 90(f) advises that planning policies should recognise that residential development often plays an important role in ensuring the vitality of centres and encourages residential development on appropriate sites.
- 5.12 Promoting healthy and safe communities (Chapter 8) - the planning system should aim to achieve healthy, inclusive and safe communities. Planning decisions should aim to achieve places which promote, amongst other things, safe and accessible developments, where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion.
- 5.13 Promoting sustainable transport (Chapter 9) - to protect and exploit opportunities for the use of sustainable transport modes, development should be located and designed to give priority to pedestrian and cycle movements and have access to high quality public transport facilities.

- 5.14 Paragraph 115 advises that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highways safety, or the residual cumulative impacts on the road network would be severe.
- 5.15 Making effective use of land (Chapter 11) – the NPPF recognises the need for the planning system to promote an effective use of land in meeting the need for homes and other uses. 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. Paragraph 124 (c) explains that the planning system should specifically give substantial weight to the value of using suitable brownfield land within settlements for new homes and other identified needs. Further, sub-section (d) of this paragraph explains that planning should also promote and support the development of under-utilised land and buildings especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively.
- 5.16 The chapter goes on to discuss how appropriate densities can be achieved. Paragraph 128 sets out that the planning system should support development that makes efficient use of land, taking into account the following:
- a) the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;
 - b) local market conditions and viability;
 - c) the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;
 - d) the desirability of maintaining an area’s prevailing character and setting or of promoting regeneration and change; and

- e) the importance of securing well-designed, and beautiful, attractive and healthy places.

5.17 Achieving well-designed places (Chapter 12) - this chapter sets out at paragraph 135 that planning policies and decisions should aim to ensure that developments:

- a) Will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development.
- b) Are visually attractive as a result of good architecture and appropriate landscaping.
- c) Are sympathetic to local character and history including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation.
- d) Establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit.
- e) Optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development and support local facilities and transport networks.
- f) Create places that are safe, inclusive and accessible and which promote health and well-being.

5.18 Meeting the challenge of climate change, flooding and coastal change (Chapter 14) - this chapter emphasises the importance of securing reductions in greenhouse gas emissions, minimising vulnerability and providing resilience to the impacts of climate change; and, in terms of flooding, development should be made safe without increasing flood risk elsewhere.

- 5.19 Conserving and enhancing the natural environment (Chapter 15) - the planning system should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes, recognising the wider benefits of ecosystem services and minimising impacts of biodiversity and providing net gains in biodiversity where possible.
- 5.20 Conserving and enhancing the historic environment (Chapter 16) – this section deals with conserving and enhancing the historic environment. Paragraph 200 advises that ‘In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting’.
- 5.21 Paragraph 201 of the NPPF advises that ‘Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this assessment into account when considering the impact of a proposal on a heritage asset, to avoid or minimise conflict between the heritage asset’s conservation and any aspect of the proposal’.
- 5.22 Paragraph 203 of the NPPF advises that ‘In determining applications, local planning authorities should take account of: a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation; b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and c) the desirability of new development making a positive contribution to local character and distinctiveness’.
- 5.23 Paragraph 205 of the NPPF advises that ‘When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance’.

- 5.24 Paragraph 206 advises that 'Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional; b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional'.
- 5.25 Paragraph 207 advises that 'Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:
- a) the nature of the heritage asset prevents all reasonable uses of the site; and
 - b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and
 - c) conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and
 - d) the harm or loss is outweighed by the benefit of bringing the site back into use'.
- 5.26 Paragraph 208 advises that 'Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use'.
- 5.27 Paragraph 209 advises that 'The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In

weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset’.

5.28 Decision making – guidance in paragraph 38 states that local planning authorities should approach decisions in a positive and creative way, making use of the full range of planning tools available, including brownfield registers and permission in principle, and work proactively with applicants. Decision-makers at all levels should seek to approve applications for sustainable development where possible.

5.29 The proposed development scheme has been designed in accordance with the policies and provisions of the NPPF.

The Development Plan for Rochdale

Rochdale Council Core Strategy

5.30 The Council submitted the Core Strategy for Examination in Public (EiP) in 2013. The EiP was suspended in order to allow the Council to provide additional information with respect to its objectively assessed housing need. In response the Council updated its Strategic Housing Market Assessment (SHMA) in 2015 and the EiP re-opened with a hearing session in June 2015. In February 2016, the Council consulted on modifications recommended by the Inspector in order to make the plan sound. The Core Strategy was formally adopted by the Council on the 19 October 2016.

5.31 Policies SO1 to SO5 in Chapter 4 of the Core Strategy set out the strategic objectives of the Council. These are centred on the themes of: economy; healthy and successful communities; design and quality place; greener environment; and accessibility and sustainable transport. The detailed policies for the Core Strategy are then grouped under these key themes.

- 5.32 In accordance with the guidance contained in the National Planning Policy Framework, Policy SD1 states that the Core Strategy is centred around delivering and supporting sustainable development. To this effect, the policy repeats the presumption in favour of sustainable development set out in paragraph 14 of the NPPF and what this means for decision-taking.
- 5.33 Chapter 6 presents the spatial strategy for the borough. Policy SP1 states that the borough will contribute to the success of the Manchester city region and the North West by playing its part in the delivery of sustainable development and investment that meets national and sub regional objectives for housing and employment growth.
- 5.34 The following detailed policies of the Core Strategy have been considered in the preparation of this planning application.
- 5.35 Policy C1 'Delivering the right amount of housing in the right places'. The policy states that the Council will identify sufficient land to deliver at least 460 net additional dwellings per year up to 2028. To do this the Council will:
- i. Ensure there is always a deliverable five year supply of land for new homes. This will include an additional buffer of 20% which would be reduced by 5% if delivery of the annual target is achieved;
 - ii. Maximise the potential of previously developed sites, including empty homes and buildings, within the urban area to achieve a target of 80% of new housing on previously developed land; and
 - iii. Ensure that sites are sustainable with good access to local services, facilities, green infrastructure, shops, jobs, schools and public transport.
- 5.36 The policy explains that: "New homes will be delivered through existing commitments and identified sites, mixed use developments and specific site allocations in the Allocations

Development Plan Document. The supply of housing land is set out in the Council's latest strategic housing land availability assessment (SHLAA). The application site is identified for future housing development (ref SH 0596) within Rochdale's SHLAA published in March 2023.

- 5.37 Policy C3 'Delivering the right type of housing'. The policy seeks housing which is designed and built to appropriate densities, recognising the need to make an efficient use of land and respond to local housing priorities.
- 5.38 Policy C4 'Providing affordable homes'. This policy advises that the Council will seek affordable housing on all developments of 15 dwellings or more. A contribution to affordable housing of 7.5% of the development sales value of the overall scheme will be sought.
- 5.39 Policy C6 'Improving health and well-being'. The policy supports the creation of an economic, social and physical environment which promotes and supports healthy lifestyles and outlines a number of policy objectives to achieve this.
- 5.40 Policy P1 'Improving image'. The policy requires design which is of a high standard in all developments, which is particularly important in various locations including town centres. The policy also promotes the development and re-use of under-used land and buildings, maximising the potential for heritage assets to provide a sense of place and image.
- 5.41 Policy P2 'Protecting and enhancing character, landscape and heritage'. The policy seeks to protect and enhance the borough's valued and distinctive landscape and heritage assets.
- 5.42 Policy P3 'Improving the design of new development'. All new development including landscaping should adhere to high standards of design. The policy therein sets out design principles which development should comply with.
- 5.43 Policy G1 'Tackling and adapting to climate change'. The policy aims to ensure that new development minimises its impact on climate change and also adapts to its impacts. This

involves locating growth in areas which are likely to minimise the need for travel and which are well served by public transport, services and infrastructure and encouraging the efficient re-use of buildings.

- 5.44 Policy G2 'Energy and new development'. In order to reduce carbon emissions, the policy details the energy hierarchy which all new development will be expected to demonstrate compliance with.
- 5.45 Policy G8 'Managing water resources and flood risk'. This policy sets out what the Council will require to ensure development (including flood risk mitigation measures) does not lead to any form of increased flooding locally or further downstream, does not impede natural water and flood risk management, is not detrimental to existing or potential flood storage areas, contributes where possible to alleviating existing flood risk, and is itself well protected from flood risk and ensures prudent use of water resources.
- 5.46 Policy G9 'Reducing the impact of Pollution'. The policy requires that new development does not lead to an increase in air, water, noise, light or other pollution. New development should also not be adversely affected by existing sources of pollution.
- 5.47 Policy T2 'Improving accessibility'. The policy states that the Council will improve accessibility by locating development where good access to public transport is available or can be provided, and will ensure that development is located to minimise the need to travel by car. Development proposals should also satisfy the accessibility hierarchy.
- 5.48 Policy DM1 'General development requirements'. The policy sets out a number of basic planning and design considerations which development proposals will be expected to demonstrate compliance with.

Rochdale Borough Council Unitary Development Plan (saved policies)

- 5.49 Upon adoption of the Core Strategy, the majority of policies within the Rochdale Unitary Development Plan were deleted, those policies which were saved will be replaced through the Site Allocations DPD or other DPD. The saved policies of relevance to this application are outlined below.
- 5.50 Policy G/D1 'Defined Urban Area'. This policy seeks to concentrate new development within the urban area in order to support urban regeneration and protect the countryside.
- 5.51 Policy S/5 'Development Elsewhere In Town Centres'. This policy advises that housing development in parts of the town centre that are not identified as Primary, Secondary or Central Shopping Areas will be permitted providing it will be appropriate in scale and character, compatible with neighbouring uses, and not harm the vitality or viability of the centre.
- 5.52 Policy R/3 'Drake Street Physical Regeneration Area, Rochdale'. Within the Drake Street Physical Regeneration Area, the Council will support, facilitate and implement, in partnership with other agencies and landowners proposals that: i. Assist comprehensive regeneration and restore commercial viability; ii. Introduce new businesses and leisure uses and create complementary day and night time activities; iii. Improve the environment, the quality of the public realm and create a safe and attractive pedestrian environment; iv. Maximise the opportunity that Metrolink provides to regenerate the area and improve environmental conditions; v. Strengthen links with the town centre shopping and commercial core and adjoining areas; and vi. falls within various use classes including commercial and residential.
- 5.53 Policy BE/15 'New Development Affecting The Setting Of A Listed Building'. This policy advises that new development affecting the setting of a listed building; development will not be permitted, where through its siting, scale, design or materials, would harm the setting of a listed building.

- 5.54 Policy BE/17 'New Development Affecting Conservation Areas'. This policy advises that development proposals will be permitted that preserve or enhance the character or appearance of a conservation area, and outlines various principles that will be considered in applying the policy.
- 5.55 Policy BE/19 'Protection Of Parks And Gardens Of Special Historic Interest'. This policy advises that development proposals which would result in the loss of, or cause harm to the historic character, structure or setting of any part of a designated historic park or garden will not be permitted.

Supplementary Planning Documents

- 5.56 The Council have also adopted a number of Supplementary Planning Documents (SPDs) which the scheme will have to be assessed against, these include the Guidelines and Standards for Residential Development SPD; Rochdale Town Centre East Area Framework SPD; Biodiversity and Development SPD; Climate Change Adaption SPD; and Energy and New Development SPD.

Guidelines and Standards for Residential Development SPD (2016)

- 5.57 This SPD was adopted in June 2016, and provides a set of standards to be considered in the design of new housing to ensure that the impact on neighbouring residents is limited and that the design and appearance of new homes makes a positive contribution to the local environment.

Biodiversity and Development SPD (2008)

- 5.58 Rochdale Borough Council adopted the Biodiversity and Development SPD in January 2008. The SPD explains the level of information that should be provided with a planning application and the principles that should be adhered to in the design and implementation phases of development.

Climate Change Adaption SPD (2012)

- 5.59 Adopted in June 2012, the Climate Change Adaption SPD outlines guidance for developments in order to assist climate change adaption. The SPD addresses eight broad categories: location, layout and orientation; materials / structure; environmental performance; green roofs and walls; rainwater harvesting; Sustainable Drainage Systems; and green and blue infrastructure.

Energy and New Development SPD (2008)

- 5.60 The Borough Council adopted this SPD in 2008, the document sets out the Council's requirement in terms of Code for Sustainable Homes and BREEAM standards.
- 5.61 The proposed redevelopment scheme has been designed in accordance with the policies of the UDP, and the above SPDs.

6. Planning Appraisal

6.1 Having regard to the relevant planning policy guidance in the previous section, the key material considerations against which the proposed scheme should be considered, and which are discussed in this section, include:

- Principle of Development
- Residential Amenity
- Design and Heritage Considerations
- Highways, Accessibility and Parking
- Environmental Considerations
- Crime and Security
- Waste Management
- Sustainable Development: Economic, Social and Environmental Benefits
- Planning Obligations and Viability

Principle of Development

6.2 The proposals for the development of the vacant plot in Rochdale Town Centre with a mixed use residential-led development are wholly appropriate. Historically, the site is known to have been developed from around the 1850s. The former Trafalgar building and Iveson Bros. warehouse that occupied the site are understood to have been demolished within the last 10 years.

6.3 Paragraph 124 of the NPPF states that planning should promote and support the development of under-utilised land, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively.

Paragraph 89 of the NPPF requires that local planning policies recognise that residential development often plays an important role in ensuring the vitality of town centres.

- 6.4 The application site is within the Defined Urban Area and as such, policy G/D/1 is relevant, which establishes that development should be located in the urban area so as to support urban regeneration and protect the countryside. Core Strategy Policy C1 states that the Council will identify sufficient land to deliver at least 460 net additional dwellings per year up to 2028. The policy seeks to maximise the potential of previously developed sites within the urban area to achieve a target of 80% of new housing on previously developed land to deliver housing. The scheme's provision of 33no. dwellings will make a meaningful contribution to meeting this need, and at the same time assist in the regeneration of this part of the Town Centre. The proposed dwelling mix is also considered acceptable given the Town Centre location of the site which warrants more dense development.
- 6.5 Policy C3 of the core strategy is also relevant and its aims are to ensure new development provides housing types that take account of local needs and aspirations and promote densities that make efficient use of land. The proposals constitute the redevelopment of previously developed land with much needed housing, thereby representing an efficient use of land and relieving pressure to build on more valuable and potentially less sustainable greenfield locations.
- 6.6 The proposed development directly responds to the aims of Saved Policy R/3 of the UDP which supports development proposals that assist in the regeneration and restoration of commercial viability of the Drake Street Regeneration Area; improve the environment; and strengthen links with the town centre shopping and commercial core. The policy confirms that commercial and residential uses are appropriate in this location.
- 6.7 Saved UDP Policy S/5 advises that housing development in parts of the town centre that are not identified as Primary, Secondary or Central Shopping Areas will be permitted providing it will be appropriate in scale and character, compatible with neighbouring uses, and not harm the vitality or viability of the centre. The proposed scale is acceptable since it reinstates built form similar to the former development on site, and the proposed residential use will be

compatible with neighbouring town centre uses, with increased footfall helping to boost custom and trade to local businesses.

6.8 In addition to the above, the proposed development will be associated with a range of planning benefits, including:

- Returning built form to this vacant plot in a prominent location, which is currently a blight to the Rochdale Town Centre Conservation Area;
- Delivering a high-quality designed scheme which is sensitive to its surrounding historic context and will improve the visual quality of the site and surroundings;
- Making a positive contribution to Rochdale's housing supply;
- Providing housing on brownfield land in a highly accessible and sustainable location;
- Increasing footfall in Rochdale Town Centre and thereby having a positive impact on custom of nearby commercial uses;
- Increasing surveillance helping to minimise risk of crime and fear of crime; and,
- Creating jobs in the construction and operational phase of the development.

6.9 Overall the principle of the proposed development is considered to be acceptable. The proposed development is in accordance with Core Strategy Policies C1, C3, DM1, and Saved UDP Policies G/D1, S/5 and S/3, and the provisions of the NPPF.

Residential Amenity

6.10 The Guidelines and Standards for the Residential Development SPD provides parameters regarding the development of housing. The design of the scheme has been based on the 'Technical housing standards – nationally described space standard' document. All flats meet or are in excess of the requirements for one bedroomed flats. The flats will also be designed and fitted to meet current requirements in terms of energy efficiency.

- 6.11 All of the residential units will have a decent level of outlook and natural lighting, with a number of properties benefitting from dual aspect by virtue of the corner plot position of the site. The proposed development is not overlooked by any nearby residential uses, and it is considered that sufficient separation distances between neighbouring built form is achieved. It is also worth highlighting that section 4 of the Guidelines and Standards for the Residential Development SPD states that exceptions to these minimum space standards may be acceptable in some circumstances and applications will be considered on their individual merits. For example, where the character and density of the surrounding area would be best preserved by reduced distances and this would not detract from the general levels of privacy and amenity typical in the area, then exceptions may be made. The application site is located within the Regency Drake Street character area of the Town Centre Conservation Area where there is a character of dense development and a tight urban grain. Denser development is also typical in town centres and encouraged by national planning policy.
- 6.12 The neighbouring uses comprise primarily retail uses, as well as cafes, take-aways and offices along Drake Street. A church is located adjacent to the site on Nelson Street, with a used car dealership to the rear of the site. The adjoining property to the north at 38 to 40 Drake Street, 'La Strada', is in use as a restaurant. It is not uncommon for residential uses located in town centre locations to be in proximity to commercial uses. A Noise Assessment prepared by AEC has been submitted in support of the application, which considers noise from the surrounding environment including road and tram noise, and the proposed plant and ground floor commercial use. The report makes recommendations for mitigation including acoustically enhanced glazing to elevations with a line of sight of Drake Street. The report confirms that noise is not a constraint to granting planning permission. It anticipated that any noise insulation can be dealt with by planning condition.
- 6.13 Overall, the scheme is acceptable in terms of impact to residential amenity of existing and future occupiers. The proposals are in accordance with the Guidelines and Standards for Residential Development SPD, and Core Strategy Policy DM1, and the relevant provisions of the NPPF.

Design and Heritage Considerations

- 6.14 The existing vacant plot has a harmful visual impact on the surrounding streetscene and this part of the Rochdale Town Centre Conservation Area. The gap site interferes with the urban grain and the flow of the streetscape along Drake Street. The site also suffers from littering and fly-tipping which has an unsightly appearance.
- 6.15 The proposed development responds to the surrounding context in terms of footprint and massing. The proposed height, whilst taller than the neighbouring development is considered appropriate. The dormer windows are set back from the elevations which minimises the visual impact. Furthermore, there are other taller buildings along Drake Street, such as Champney's Hall, meaning that the development would not be considered out of character. The proposed height, together with the pediment detail will enable the building to be read as a positive landmark in the streetscape.
- 6.16 In addition to the pediment feature which addresses the junction, the proposals make reference to the former Ivesons buildings by stepping up a further storey on Nelson Street and through the use of off-white banding, columns and corbelled features to this element of the building. The ground floor shopfront has a traditional design, and the overall design approach is considered sympathetic to the character of the conservation area.
- 6.17 The proposals are judged to be a positive addition to the streetscene. The Heritage Statement prepared by Paul Butler Associates assesses the impact of the development on heritage assets, whilst the Archaeological Desk Based Assessment prepared by Paul Butler Associates considers potential for below ground archaeology.
- 6.18 The proposals are wholly in accordance with Core Strategy Policies P1, P2, and P3, and Saved UDP Policies BE/17 and BE/18, and chapter 16 of the NPPF.

Highways, Accessibility and Parking

- 6.19 The site is located in an exceptionally sustainable and accessible location in Rochdale Town Centre. Future residents will have access to a range of shops, amenities, leisure facilities, services and job opportunities. The site benefits from good public transport links, being in

close proximity to Rochdale Town Centre metrolink tram stop and Rochdale Interchange, both offering regular services to a wide range of destinations. Rochdale train station is also within walking distance of the site.

- 6.20 The application proposals do not involve provision of car parking spaces. This is considered appropriate given the highly sustainable, town centre location of the site. Indeed, the car free scheme will also help to support a reduction in reliance upon the private car and help to encourage use of more environmentally friendly and sustainable modes of transport amongst future residents. The development will accommodate 22 secure cycle parking spaces inside the building, which will also help to encourage sustainable, healthy transport modes.
- 6.21 Given the development is car free and will provide 33x one-bedroom dwellings in a highly sustainable location, with 22 cycle parking spaces, it is not considered that the proposals would result in significant transport implications. Car parking in the vicinity of the site is generally pay and display in short stay surface car parks or on-street parking bays, and TROs are in place restricting on-street car parking. Nonetheless, the applicant has confirmed that the building management will issue a welcome pack to residents including details of sustainable transport options and journey planning advice to encourage sustainable transport habits.
- 6.22 It has been demonstrated that the scheme accords with the transport requirements of the NPPF; and Core Strategy Policy T2.

Environmental Considerations

Land Contamination

- 6.23 The application is supported by a Phase 2 Geo-Environmental Investigation and Assessment. Intrusive investigations have been undertaken to verify the preliminary site conceptual model and confirm the anticipated relatively low environmental risk. The report concludes that where the site is to be covered by hard surfacing & buildings, there will be no

mechanism for a direct contact pollutant linkage. Therefore, the risk to end-users of the site will be negligible since the site is to be developed in its entirety with built form.

Flood risk and Drainage

- 6.24 A Drainage Strategy report has been prepared by Brennan Consult. This report confirms that the site is in flood zone 1, which is the lowest level of risk. The report sets out the proposed drainage strategy against the surface water drainage hierarchy, and appraises the various methods of SuDS. A geo-cellular attenuation tank is proposed as a suitable SuDS method, and a new private drainage network is proposed beneath the building and outfall to the surface water culvert in Nelson Street. The report also confirms the allowance for climate change and proposed discharge rate in accordance with local planning policies.
- 6.25 For the above reasons the scheme complies with Core Strategy Policies G1, G8 and G9, as well as relevant provisions of the NPPF.

Crime and Security

- 6.26 A Crime Impact Statement has been prepared by Greater Manchester Police. This report highlights a number of positive aspects of the proposals which will make a positive contribution to the prevention of crime and fear of crime. These include the positioning of the development on a prominent corner plot location which has high levels of natural surveillance, the positioning of the building entrances in visible locations, provision cycle parking internally within the building, and defensible space the front of the ground floor residential apartments. The report also makes various recommendations to enhance the security credentials of the development, these will be considered as the design progresses once planning approval has been granted.
- 6.27 It is considered that the development has been designed to minimise opportunities for crime against people or property in accordance with Core Strategy DM1 and the NPPF.

Waste Management

- 6.28 Bin storage is proposed internally within the building at ground floor level. Servicing will take place via Nelson Street. Bins can be presented on the street by the building management company. Provision of separate bins will allow for the segregation of refuse and recyclable waste.

Sustainable Development: Economic, Social and Environmental Benefits

- 6.29 Economic: It is well documented that a shortage of housing can result in economic barriers. The provision of 33 apartments will make a meaningful contribution to Rochdale's housing delivery targets. The provision of 1 bed accommodation will also help to free up larger properties which are under single person occupancy. Nearby shops and businesses will also benefit as a result of the proposals increasing the customer base. The commercial floorspace at ground floor will reinstate the row of shopfronts along Drake Street and bring this prominent corner site back into viable use, helping to protect the vitality and viability of Rochdale Town Centre. The development will create jobs during the construction and operational phase, a local manufacturer (F&T Terrix) is to be commissioned to undertake works on the façade and interiors.
- 6.30 Social: The proposals will provide much needed housing in a town centre location which is in proximity to a range of amenities, employment opportunities and well served by public transport. The proposed development will deliver good quality housing and contribute to the creation of a mixed and sustainable community.
- 6.31 Environmental: The proposals will provide 33 residential apartments on a brownfield site, in a sustainable urban location. The scheme will provide much needed accommodation, which will help to ease pressure on greenfield and Green Belt sites. Future residents will benefit from the highly sustainable and accessible nature of the development, thereby reducing the need to travel by car and helping to reduce carbon emissions and air quality impact. The visual environment will be greatly enhanced by the proposals, which in turn will have a

positive impact on heritage assets. The application is supported by an Environmental Standards Statement prepared by WECE. The report confirms that the U-values, design air permeability and ventilation targets all aspire to Passive House design standards along with the consideration and application of low zero carbon renewable technologies. The suitable technologies include PV array to the flat roof and ASHPs to each dwelling, which would result in a total carbon reduction to 92.7%.

- 6.32 On the basis of the above it is demonstrated that the proposals will deliver economic, social and environmental benefits and thereby constitute sustainable development, in accordance with chapter 2 of the NPPF.

Planning Obligations and Viability

- 6.33 Policy C4 of the Core Strategy advises that the Council will seek a contribution of 7.5% of the development sales value of the overall scheme towards affordable housing on developments of 15 dwellings or more. The policy advises that the Council will take various factors into account when negotiating the level of affordable housing and how it is to be provided, including the need to deliver other planning objectives with a higher priority; and the economic viability of the development. A Financial Viability Appraisal has been prepared by S106 Management. This report confirms that in all circumstances tested the achieved return is below the targeted 17.5%, and therefore any contribution remains unviable.

7. Conclusion

7.1 This Planning Statement has been prepared by Paul Butler Associates on behalf of Cassel & Fletcher. The application is for the development of a gap site in Rochdale Town Centre with a residential-led mixed use development. The proposals will deliver 33 apartments, a commercial unit and associated ancillary facilities including a refuse/recycling store and bike store.

7.2 This Statement has demonstrated that the proposals accord with national and local planning policy guidance. The scheme will also deliver a series of planning benefits including:

- Returning built form to this vacant plot in a prominent location, which is currently a blight to the Rochdale Town Centre Conservation Area;
- Delivering a high-quality designed scheme which is sensitive to its surrounding historic context and will improve the visual quality of the site and surroundings;
- Making a positive contribution to Rochdale's housing supply;
- Providing housing on brownfield land in a highly accessible and sustainable location;
- Increasing footfall in Rochdale Town Centre and thereby having a positive impact on custom of nearby commercial uses;
- Increasing surveillance helping to minimise risk of crime and fear of crime; and,
- Creating jobs in the construction and operational phase of the development.

7.3 As evidenced in this statement, the site has been shown to be a suitable and sustainable location for residential development with no known adverse impact arising from the development that would significantly and demonstrably outweigh its benefits. Indeed it is our view that no material planning considerations exist that would justify refusal of planning permission.

- 7.4 On this basis Paul Butler Associates are pleased to submit this planning application and look forward to working with the council on progressing it through to a positive determination.