

Proposed 6 storey extension
Rochdale Sixth Form College, College Road

Planning Statement

Including:

Flood Risk Sequential Test

November 2022

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1 Introduction

- 1.1 This Planning Statement has been prepared by Smith & Love Planning Consultants on behalf of Rochdale Sixth Form College (RSFC) in support of its full planning application for the erection of a 6 no. storey extension to its existing facility at College Road, Rochdale.
- 1.2 RSFC was named Sixth Form College of the Year in 2012 in the Times Educational Supplement Awards. RSFC occupies a 6 storey building on the edge of Rochdale town centre and is now at capacity due to rising student numbers. The proposed 6 storey extension to the north of the existing college building will provide 19 teaching spaces, learning support space and staff accommodation. The proposal will create capacity for approximately 360 students and is likely to create additional teaching posts.
- 1.3 It sets out the background and context of the application, providing a description of the site and surroundings, the proposed development scheme and a summary of the relevant policies of the statutory development plan. It assesses the merit of the proposals against the identified policies, national policy in the National Planning Policy Framework and all other material considerations.
- 1.4 It demonstrates that the proposed development is in accordance with the general technical and development management policies of the Development Plan for Rochdale when viewed as a whole, and Government policy aimed widening educational choice.
- 1.5 Consequently, having regard to the development plan and all material considerations, there is a compelling case for planning permission to be granted without delay, in accordance with the presumption in favour of sustainable development at Paragraph 11(c) of the National Planning Policy Framework.

Supporting information

- 1.6 This Planning Statement should be read together with the following list of plans and supporting documents submitted with this application;

a) Application drawings:

- 3940-A-1000P Location Plan
- 3940-A-1001P Existing Site Plan
- 3940-A-1002P Proposed Site Plan
- 3940-A-1003P Landscape Plan
- 3940-A-1800P Existing GA Plans
- 3940-A-1801P Existing GA Elevations
- 3940-A-2000P Proposed GA basement Plan
- 3940-A-2001P Proposed GA Ground Floor Plan
- 3940-A-2002P Proposed GA Typical Upper Floor Plan
- 3940-A-2003P Proposed GA Fifth Floor Plan
- 3940-A-2004P Proposed GA Roof Plan
- 3940-A-2700P Proposed GA Sections AA and BB
- 3940-A-2701P Proposed GA Sections CC

- 3940-A-2800P Proposed GA Elevations 1 of 2
- 3940-A-2801P Proposed GA Elevations 2 of 2
- 3940-A-2810P Proposed Site Elevations
- 3940-SK-0001P Proposed 3D Aerial Views

b) Application documents:

- Energy Statement
- Air Quality Assessment
- Crime Impact Statement
- Design & Access Statement (inc. Heritage Statement)
- Transport Assessment
- Travel Plan
- Coal Mining Risk Assessment
- Preliminary Environmental Risk Assessment
- Ecological Survey and Assessment
- Flood Risk Assessment (including drainage)

2. Site and surroundings

- 2.1 Rochdale Sixth Form College ('the College') is located at College Road to the west of Rochdale Town Centre. The site extends to 0.76ha and is relatively flat.
- 2.2 The site is accessed from College Road to the north of the site with car parking provided to the north of the site adjacent to the River Roch.
- 2.3 The existing college building is 5-6 storeys and is located to the west of St Mary's Gate/Manchester Road, with an Asda superstore located to the west. To the east is the River Roch beyond which lies St Mary's Gate; a dual carriageway.
- 2.4 The site is a densely populated urban area with existing development on all sides. The proposed development site is currently used as a car park.
- 2.5 The application site is well located in respect of public transport provision adjacent to the A58 and is in close proximity to the town centre bus station and metrolink stops.

Relevant planning history

- 2.6 Planning permission was granted for the erection of a new sixth form college with associated landscaping and temporary bridge for construction access (08/D51561) and the College opened in 2011. Planning permission was granted more recently for a proposed extension to the main entrance of the college to provide additional internal space, increased lobby and relocation of the security barriers (17/01323/FUL).
- 2.7 Additional car parking spaces were approved to be added to the site under application reference 16/00824/FUL.
- 2.8 Radio and telecommunications equipment to support the College was approved under application reference 21/01401/TELE.

3. Proposed development

- 3.1 The development comprises the erection of a 6 storey extension at RSFC.
- 3.2 RSFC was built in 2011 and currently has a 1480 student capacity. The proposal would create capacity for an additional 360 students. It is rated 'Outstanding' by Ofsted and was named as the Sixth Form College of the Year in 2021 in the Times Educational Supplement Awards. RSFC aims to be the sixth form college of choice for the young people of Rochdale and aims to develop confident and articulate students, respectful and respected, capable of independent and critical thought and appropriately prepared for higher-level achievement.
- 3.3 RSFC intends to expand its existing facility by approximately 1,822sqm in order to meet local growth in technology-based companies and small start-up businesses in the area. Additional accommodation is crucial to ensure that continual growth can be accommodated and quality expectations can be met.
- 3.4 Occupying the land to be built on is currently 5 no. visitor car parking spaces. Given the site's accessible location parking provision can easily be found either in the town centre or staff, students and visitors will be able to continue to use the excellent public transport facilities close to the College. Car parking provision will comprise 72 spaces including 2 mobility spaces and 39 cycle parking spaces.
- 3.5 The extension comprises 1,822sqm of floorspace across 6 floors with a void at the 'ground floor', referred to as the lower ground floor, as the building is erected using a cantilever as a result of the building lying within Flood Zone 3. The building is designed to allow flood water to rise under the building if required.
- 3.6 The extension cantilevers over the eastern side of the building which defines the frontage of the building and provides a covered external route to the entrance, aligning with the eastern edge of the existing building footprint.
- 3.7 The extension will comprise metal rain screen cladding to expand the existing palette of materials with the use of orange to tie in with the existing building. Extensive curtain wall glazing will be used to complement the existing building.
- 3.8 A roof garden is proposed as existing external space is limited at the College. A tall glazed screen will secure the roof garden. Existing landscaping will be expanded where possible.
- 3.9 Users will access the extension from within the existing College building via a new ramp.

Pre - application response

- 3.10 A request for pre-application advice was submitted to the LPA this Summer and a response was issued on 20th September. A proposed site layout plan was issued comprising a separate College building adjacent to the River Roch. At the time of the submission of the pre-application request the proposals were in their infancy. In consultation with the design team and statutory

bodies the proposal was amended from a standalone building to an extension to the College. This was primarily due to the need to move the building further from the River part of the site lies within a functional flood plain.

- 3.11 The LPA has confirmed that the proposal is acceptable in principle as the site comprises previously developed land in the urban area. Policies C7 and C8 also aim to improve education by providing facilities in appropriate and accessible locations.
- 3.12 Other advice provided relates to good design, car parking, highway safety, heritage (proximity to a Grade II listed building and Conservation Area), ecology, flood risk and drainage,

4. Planning policy

- 4.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 refers to the development plan as a whole, and states that 'if regard is to be had to the development plan for the purposes of any determination to be made under the Planning Acts, the determination must be made in accordance with the plan unless material considerations indicate otherwise'. Section 39 of the Act also requires decision makers to exercise their functions with the objective of contributing to the achievement of sustainable development.

Development Plan

- 4.2 For the purposes of determining the application, the Development Plan for Rochdale consists of the Rochdale Core Strategy (CS), adopted 2016, and saved Unitary Development Plan (UDP) policies.

Rochdale Unitary Development Plan

- 4.3 The 'saved' policies of the Rochdale UDP are relevant to the determination of the application. The accompanying Proposals Map shows that the College comprises undefined white land.
- 4.4 The following saved policies are relevant:
- G/D/1 Defined urban area
 - EM/7 Development and flood risk
 - EM/8 Protection off surface and ground water

Rochdale Core Strategy

- 4.5 The Rochdale Core Strategy was adopted in 2016. The proposals should be considered within the context of the following policies and are discussed in the following section.
- SO2 To create successful and healthy communities ·
 - SO3 To improve design, image and quality of place ·
 - SO4 To promote a greener environment ·
 - SO5 To improve accessibility and deliver sustainable transport ·
 - SD1 Delivering sustainable development ·
 - P2 Protecting and enhancing character, landscape and heritage
 - P3 Improving design of new development
 - C6 Improving health and well being
 - C7 Delivering education facilities
 - G7 Increasing the value of bio-diversity and geo-diversity ·
 - G8 Managing water resources and flood risk
 - G10 Managing Mineral Resources·
 - P1 Improving image ·
 - P2 Protecting and enhancing character, landscape and heritage ·
 - P3 Improving the design of new development ·
 - T2 Improving accessibility ·

- DM1 General development requirements ·

National Planning Policy Framework 2021

- 4.6 This sets out the Government's planning policies for England and how they should be applied. It requires local planning authorities to apply a presumption in favour of sustainable development which means, as paragraph 11c explains, that development which accords with an up-to-date development plan should be approved without delay. Relevant sections of the NPPF include;

- Paragraph 7 The purpose of the planning system is to contribute to the achievement of sustainable development;
- Paragraph 11 The presumption in favour of sustainable development lies at the heart of the Framework. For decision-taking this means approving development where it accords with an up-to-date development plan, or where there are no relevant development plan policies or where the policies which are most important for determining the application are out-of-date, granting permission unless adverse impacts would significantly and demonstrably outweigh the benefits, or policies in the Framework indicate development should be restricted.
- Paragraph 95 It is important that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. They should: a) give great weight to the need to create, expand or alter schools through the preparation of plans and decisions on applications; and b) work with school promoters, delivery partners and statutory bodies to identify and resolve key planning issues before applications are submitted.
- Paragraph 104 Transport issues should be considered from the earliest stages of development so the potential impacts of development on transport networks can be addressed and to encourage opportunities to promote walking, cycling and public transport use.
- Paragraph 111 Development should only be prevented on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe;
- Paragraph 124 Development should make efficient use of land taking into account the need for different types of housing and other development and the availability of suitable land; market conditions and viability; availability and capacity of infrastructure; the scope to promote sustainable travel; the desirability to maintain the character and setting of an area or promote regeneration; and the importance of creating well-designed, attractive, healthy and safe places;

Paragraph 126 Development should achieve good design and create high quality buildings and places;

Paragraph 161 All plans should apply a sequential, risk-based approach to the location of development – taking into account all sources of flood risk and the current and future impacts of climate change – so as to avoid, where possible, flood risk to people and property. They should do this, and manage any residual risk, by applying the sequential test and then, if necessary, the exception test, amongst other criteria.

Paragraph 169 Major developments should incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate;

Paragraph 180 When determining planning applications, local planning authorities should apply the following principles: a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;

Paragraph 183 Development sites should be suitable for proposed use/s taking account of ground conditions and any risks arising from land instability and contamination.

Paragraph 195 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 into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.

5. Planning assessment

5.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 refers to the development plan as a whole, and states that 'if regard is to be had to the development plan for the purposes of any determination to be made under the Planning Acts, the determination must be made in accordance with the plan unless material considerations indicate otherwise'. Section 39 of the Act also requires decision makers to exercise their functions with the objective of contributing to the achievement of sustainable development. These requirements are embodied in the 2021 NPPF which is a principal material consideration and should be given substantial weight.

5.2 The following key issues are to be considered in determining the planning application are therefore;

- the principle of development;
- design and layout;
heritage impact;
- environmental and technical considerations;
 - Flood risk (including sequential test)
 - Drainage
 - Highways and accessibility
 - Biodiversity
 - Coal mining risk
 - Air Quality
 - Land Contamination
 - Sustainability

5.3 Each of these matters is considered below and the overall planning balance is drawn.

Principle of development

5.4 The proposed application site is located within the Defined Urban Area as defined by the Proposals Map of the Unitary Development Plan (UDP). New development, wherever possible and appropriate, should be concentrated within the urban area in order to support urban regeneration and to protect the countryside.

5.5 Paragraph 96 of the NPPF states that it is important that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. They should: a) give great weight to the need to create, expand or alter schools through the preparation of plans and decisions on applications; and b) work with school promoters, delivery partners and statutory bodies to identify and resolve key planning issues before applications are submitted.

5.6 Policy C7 and C8 of the Core Strategy emphasises the Council's aim to improve education by providing facilities in appropriate and accessible locations, which serve the needs of

communities. In particular, Core Strategy Policy C7 seeks to improve education, skills and training in the borough and raise educational achievement. The policy seeks to promote growth and expansion of the colleges at St Mary's Gate. As the site is located within a high-density area surrounded by a mix of uses and will enhance the RSFC educational offer, it is considered the proposal meets the aims of paragraph 96 of the NPPF and CS Policies C7 and C8, ensuring provision of further education facilities, and in particular those in town centre locations. Therefore, in principle, the proposed College extension is in accordance with the development plan and national planning policy.

Design and layout

- 5.7 The proposal comprises a contemporary 6 storey extension to RSFC. The site is located in the heart of Rochdale in a dense urban setting adjacent to the town centre and River Roch. In close proximity are tall buildings for example Hopwood Hall College to the east is a 6 storey building. The 'Seven Sisters' residential tower blocks are also in close proximity to the site. The site and surroundings therefore lend themselves to the creation of a building of scale. At 6 storeys the proposed building is in keeping with the density of the surrounding area.
- 5.8 The NPPF and Core Strategy Policy P3 promote good design. The existing College building was erected approximately 10 years ago and as such is contemporary in its form, appearance and use of materials comprising vertical cladding, curtain wall glazing and bold use of colour for visual interest. The proposed extension seeks to complement this through the application of further colour by using orange rain screen cladding to reinforce the College's brand identity.
- 5.9 The extension would take an interesting form with the use of a cantilever, providing a void at the lower ground floor. A small roof garden is also provided creating a stimulating social space for students.
- 5.10 The design approach is high quality creating a contemporary addition to the town and a stimulating environment for students and staff. As such the proposal accords with Core Strategy Policy P3 and national planning policy contained in the NPPF.

Heritage Impact

- 5.11 The Design & Access Statement contains a Heritage Statement which is commensurate to the relationship between the College building and nearby heritage assets comprising the town centre Conservation Area and Touchstones Museum.
- 5.12 To the north west of the application site is a Grade II listed building known as Touchstones Museum - a library, museum and art gallery. Touchstones Museum dates back to 1884 when in part it functioned as a library. It was extended in 1903 and again in 1913.
- 5.13 The heritage significance of the Museum lies in its architect W.H. Crossland and its appearance built of Yorkshire stone, with a slate roof and stained glass windows. Of particular significance are the figures carved into the front elevation.

- 5.14 The modern tall buildings on the edge of the town centre add little to the heritage significance of the Museum. Indeed, the setting of the asset could be tightly drawn around the building and its landscaped grounds.
- 5.15 To the east of the A58 is also a designated Conservation Area which centres upon the town's civic buildings and gardens. At St Alban's Street in the Conservation Area is a Grade II listed asset known as Broadfield Park. It contains the statue of John Bright MP, Victorian bandstand, bowling green and children's play area. There is no visual or physical relationship between the listed park and the application site due to intervening tall buildings on the periphery of the town centre.
- 5.16 Whilst the Conservation Area extends to the Museum, the dual carriageway and Police Station, with its surface car park, serves to sever any physical or visual relationship between the application site and the Conservation Area. As such the proposal would not result in any harm to this heritage asset.
- 5.17 In conclusion, the proposed extension would not impact on the significance of the heritage assets or result in any harm to them. As a consequence, the proposal accords with Development Plan and heritage policies contained within the NPPF.

Environmental and technical considerations

- 5.18 When considering the suitability and sustainability of the application site for proposed development, the following environmental and technical matters have been considered;
- Flood risk (including sequential test)
 - Drainage
 - Highways and accessibility
 - Biodiversity
 - Coal mining risk
 - Air Quality
 - Land contamination
 - Sustainability
- 5.19 Surveys and impact assessments have been commissioned in connection with these matters and accompany the application. A summary of the recommendations and conclusions of the reports is outlined below.
- a) Flood risk**
- 5.20 The application site lies within Flood Zone 3, an area with a high probability of flooding. As such the applicant is required to undertake a flood risk sequential test and exceptions test. This Planning Statement considers the sequential test and the Flood risk Assessment (FRA) prepared by Watermans contains the exceptions test.
- 5.21 Before summarising the findings of the FRA this Statement provides a flood risk sequential test.

Sequential test

- 5.22 Paragraph 159 of the NPPF states that ‘inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere’. The sequential test is designed to investigate alternative sites which have a lower risk of flooding, are reasonably available and suitable in terms of purpose of the proposed development.

Scope of search

- 5.23 A new standalone building was initially explored closer to the Rover Roch. However, an alternative proposal is now proposed comprising an extension to the existing building, further away from the river and thus maintaining clear access to the River for the Environment Agency. As an extension is proposed the sequential test will need to explore alternative sites that could accommodate a new campus. The application site extends to 0.76ha but the site is constrained to some degree with limited space for car parking and open space. If a new campus was provided it is realistic to assume that any alternative site would need to be at least 1ha to accommodate an entirely new campus.
- 5.24 Core Strategy Policy C7 seeks to improve education, skills and training in the borough and raise educational achievement. The policy seeks to promote growth and expansion of the colleges at St Mary’s Gate. Elsewhere education facilities will be provided in appropriate and accessible. Co-location is referred to as being of importance in Policy C7 to ensure that education facilities are well related to existing business and enterprise to maximise learning. This is considered to be of particular importance for Colleges within the borough. Furthermore, the policy seeks to ensure that educational facilities are sustainable and provide good access to communities.
- 5.25 Taking into consideration the policy requirements of Policy C7 the proposed area of search is reasonably restricted to Rochdale town centre given its accessibility credentials. The College is currently a c. 10 minute walk from Rochdale Interchange and c. 17 minute walk from the train station. For students arriving by public transport good accessibility is essential. For this reason, the area of search is restricted to alternative sites to the east of Manchester Road (A58 within the town centre.
- 5.26 It should be noted that much of the town centre lies within either Flood Zone 2 or 3 as a result of the River Roch running through the centre of the town.

Alternative sites

- 5.27 Within the town centre there is a vacant site identified within the adopted Core Strategy as an Opportunity Area (Policy R/4 (e) Riverside Area of Opportunity). The area comprises vacant land; extending to 3ha and lies adjacent to Central Retail Park. In August 2022 a planning application was submitted for the site’s development for the erection of 81 dwellings and a 5/6 storey building containing 142 apartments, new park, internal estate roads, revised means of vehicular access off Oldham Road, associated parking, infrastructure, landscaping, ancillary

works and amended car parking layout to retained Central Retail Park (Ref. 22/01119/FUL). As such the site is not available for development.

- 5.28 Other potential alternative sites, outside of Flood Zone 3, are limited in the town centre predominantly due to their size. A small vacant and underused site lies at Drake Street/ St Alban's Road but it only extends to c. 0.3ha.
- 5.29 Similarly, there is underused land bound by Crook Street, George Street and High Street which is also too small to relocate RSFC, at just 0.2ha.
- 5.30 No other potential alternative sites are identified and as such the sequential test is passed and the application site is therefore deemed to be suitable for development.

Exceptions test

- 5.31 There are two parts to the policy test for flood risk; the second part relates to the exceptions test.
- 5.32 The NPPF states that to pass the exception test it should be demonstrated that: a) the development would provide wider sustainability benefits to the community that outweigh the flood risk; and b) the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.
- 5.33 In terms of the assessment of wider sustainability benefits the NPPG states that LPAs need to set their own criteria for this assessment. In this case the development plan for Rochdale clearly seeks to encourage the growth and expansion of the colleges at St Mary's Gate, including RSFC. This is for the benefit of young people in the town and also local businesses that serve to benefit from educational investment in young people. As such there is a compelling case, supported by the Development Plan, for expansion and longer-term sustainability benefits for the local community.
- 5.34 Turning now to the second part of the exceptions test which requires that the development must be safe for its end users and not increase flood risk elsewhere. The FRA sets out how the exceptions test is met in this regard.
- 5.35 The site is primarily designated as Flood Zone 3, land defined as having greater than 1% (1 in 100) annual exceedance probability (AEP) of flooding in any given year, classified as a high probability of fluvial flooding. Part of the site is defined as functional floodplain, in particular the area at the top of the slipway and the eastern end of the car park.
- 5.36 The River Roch is designated as a Main River and is therefore managed by the EA. The EA has confirmed the riverbank is defined as the top of the river wall, rather than the top of the grass slope. The EA would usually require a minimum maintenance offset of 8m from the top of the riverbank. However, maintenance access has been allowed for within the design as discussed with the EA and LLFA, who agree in principle with the proposals (FRA Appendix D). Safe access/egress is provided through the existing building and the southern end of the Asda carpark which sits outside of the design flood extent and provides ramped access to Dane

Street (A6060). Dane Street sits at a level of approximately 125m AOD, which is well above the design flood level of 119.32m AOD. A Flood Warning and Evacuation Plan will need to be prepared to protect site users in the event of a flood and this will be secured via a condition.

5.37 In summary, the risk of fluvial flooding is mitigated through the following measures:

- Finished floor levels of the proposed extension are set at 120.15m AOD, providing >1m freeboard above the design flood level for the Site (119.02m AOD).
- Safe access/egress is provided through the existing building and the southern end of the Asda carpark which sits outside the design flood extent and provides ramped access to Dane Street (A6060). Dane Street sits at a level of approximately 125m AOD, which is well above the design flood level of 119.02m AOD.
- Floodplain storage will be maintained by retaining existing ground levels and the use of stilts to maintain the existing flood storage beneath the proposed extension.

5.38 The proposed mitigation measures ensure that the proposed development will be safe over its lifetime and will not increase flood risk elsewhere. The risk of flooding from pluvial, groundwater and artificial sources has been assessed and found to be low. As such the exceptions test is passed. The proposal also complies with UDP Policy EM/7.

b) Drainage

5.39 The FRA states that the operation and maintenance drawing held by the College indicates that the existing surface water drainage discharges directly to the River Roch via a private outfall. Flows from the site are restricted to 72 l/s via a hydrobrake upstream of the outfall. Surface water runoff is stored and attenuated within a 50m³ tank.

5.40 In line with the drainage hierarchy, surface water runoff will discharge to the River Roch to the east of the site via the existing onsite drainage network. Source control, through the use of SuDS, is proposed to provide multiple benefits, including a reduction in the existing runoff rates from the site.

5.41 The total roof area of the proposed extension (0.036 ha.) will drain through blue and green roofs before discharging to the existing surface water sewer that runs adjacent to the building. Storage and attenuation will be provided via a blue roof at the roof level. It is not feasible to achieve greenfield runoff rates from the blue roof as the low flow rate may lead to blockage of the system. Instead, discharge will be restricted to 1 l/s. Attenuation will be provided via a green roof on the terrace.

5.42 Foul drainage discharge will connect to the College's existing system.

5.43 In summary, the approach to drainage satisfies the requires of the UDP Policies EM/7 and EM/8 and national planning policy.

c) Highways and accessibility

5.44 The application is accompanied by a Transport Assessment and Travel Plan (TP) prepared by Waterman.

Transport Statement

- 5.45 The proposed development includes construction of a new six-storey extension (1,822sqm) to the existing RSFC building providing an additional 19 teaching spaces. This will provide capacity to accommodate up to 360 students as part of the established growth of the College.
- 5.46 The existing RSFC currently has a total of 168 staff and the proposal will likely generate a requirement for additional teaching staff.
- 5.47 Pedestrian access to the site will continue to be provided as per the existing arrangements. The proposed extension will be accessed through the existing entrance to the college building via a reinstated ramp from the south of the RSFC building.
- 5.48 Cycle access to the site will be continue to be provided through the existing vehicle access. Cycle access will also be improved as part of the proposal. A cycle lane will be provided along the site access to the south of the car park towards the bridge.
- 5.49 Based upon the parking standards within the Core Strategy a minimum of 36 cycle parking spaces are required for the projected student capacity of the scheme (360 students). The existing RSFC is served by a total of 39 cycle parking spaces, comprising 23 cycle lockers located below the undercroft to the rear of the main RSFC building, and 16 spaces in the form of Sheffield stands on the river frontage.
- 5.50 Vehicle access to the site will continue to be provided via the existing access for the RSFC, via College Road, through the main Hopwood Hall College Campus access and across the bridge over the River Roch to the existing car park.
- 5.51 The existing RSFC currently provides 77 car parking spaces, including 2 disabled car parking spaces and 5 visitor car parking spaces on-site. The construction of the new block will involve removing 5 existing visitor car parking spaces located to the immediate north of the existing RSFC building. These visitor spaces will not be directly re-provided elsewhere within the site.
- 5.52 The RSFC site will provide a total of 72 vehicle parking spaces (with the loss of the five visitor bays), including retention of the 2 existing spaces (circa 3% of total capacity) for use by disabled drivers.
- 5.53 Currently no on-site car parking provision is made for students. Student parking is accommodated within surrounding town centre public car parks where necessary although it is known that the majority of students travel on foot, by cycle or us public transport.
- 5.54 Based upon the parking standards within the Core Strategy, a maximum of 84 car parking spaces could be provided for the staff parking requirement of RSFC. In addition, a total of 6% of total bays, equivalent to 5 accessible bays for Blue Badge holders could be expected.
- 5.55 In order to provide additional car parking RSFC has agreed to lease 30 car parking spaces in Rochdale Exchange Shopping Centre. However, this is not considered to be an essential component of the proposal given the site's accessibility credentials.

- 5.56 Given the potential to use the available car parks within the Rochdale town centre and the site's excellent accessibility to alternative modes of travel (on foot, by bicycle and public transport), the proposed provision is deemed to be acceptable.
- 5.57 Servicing, refuse collection and access to the proposed extension for deliveries and emergencies will continue to be undertaken as per the existing arrangement via the main RFSC access. Servicing vehicles will continue to utilise the south-eastern service yard area of the college site as a turning area. The movement of refuse and deliveries between the vehicle and the college buildings will be managed by the college.

Travel Plan

- 5.58 The overriding objective of TP's is to reduce the level of car use, particularly single mode and encourage the use of sustainable transport modes. A wide range of potential benefits can accrue from the implementation of a TP, including improved health and well-being for individuals who can change their mode of travel, and reduced environmental effects in terms of air quality, noise and congestion near the site.
- 5.59 The site is well served by a number of sustainable access opportunities, which include good quality pedestrian facilities that provide links to existing transport facilities and the nearby residential areas. In addition, the presence of local cycle routes will assist and encourage cycle trips to and from the Site, which would most likely be student related. 2.27. At present there is a good level of bus services serving the Site, providing connections throughout the area and wider destinations, such as; Bury, Wallbank, Norden and Heywood. Rochdale Railway Station provides an alternative to bus travel for longer distance journeys.
- 5.60 The TP contains a variety of initiatives to encourage and promote travel other than by car including the appointment of a TP co-ordinator with a focus on promoting walking and cycling, in conjunction with use of public transport.
- 5.61 In conclusion, based on the evidence and analysis within the supporting Transport Assessment, there should be no highways or transport planning reasons that would prevent this planning application from being approved. Taking the above into account, the proposed development is in accordance with Policy T2 of the Core Strategy.

d) Biodiversity

- 5.62 The application is supported by an Ecological Survey and Assessment undertaken by ERAP in May 2022.
- 5.63 The report confirms that the eastern site boundary is demarcated by the concrete lined bank of the River Roch. The south-eastern boundary meets the bridge that carries St. Mary's Gate road over the river. The western site boundary meets a mown grassed verge.
- 5.64 The proposals will have no adverse direct or indirect effect on statutory or non-statutory designated sites for nature conservation.

- 5.65 None of the habitats within the proposed development site are representative of semi-natural habitat or are Priority Habitat. The site contains only common and widespread plant species; although the presence of the Southern Marsh-orchid spikes is of interest at the site / campus geographic scale.
- 5.66 The off-site grassland verge at the western site margin and the mown grassland verge within the site that support Marsh-orchid spikes will not be directly affected by the construction activities. Protection of these verges will be achieved by the project.
- 5.67 In summary, the assessment demonstrates that the proposals can be achieved whilst securing the appropriate treatment and disposal of Japanese Knotweed and Montbretia to avoid spread in the wild.
- 5.68 The building extension covers existing hard standing so no trees are removed as a result of the proposal. No structures or planting is proposed along the Rover corridor. It is recommended that any proposed lighting be sensitive to wildlife such as foraging bats and commuting otter. It is also recommended that the protective measures outlined in the report are incorporated into a Construction Environment Management Plan which would be secured via a condition.
- 5.69 Proposals for Ecological Enhancement include the provision of bird boxes on the walls of the plant room on the roof.
- 5.70 In conclusion, the development proposals at Rochdale Sixth Form College can be achieved with no adverse effect on designated sites for nature conservation, ecologically valuable habitats, protected species and Priority Species.
- 5.71 The development therefore raises no wider issues and is compliant with Policy G7 of the Core Strategy.

e) Coal mining risk

- 5.72 A Coal Mining Risk Assessment (CMRA) has been prepared by Waterman Infrastructure & Environment.
- 5.73 The CMRA concludes that whilst the site is not within a Coal Authority High Risk Development Area, one is located immediately to the north-east of the Site. The Coal Authority Consultants Coal Mining Report notes the site is not located in an area with probable unrecorded mine workings and with a combination of BGS mapping, historical borehole data and on-site ground investigation records it is considered unlikely that the Site is underlain by any coal seams at depths that have the potential to impact the proposed development.
- 5.74 Considering all information reviewed in undertaking the study, the risk to the development associated with potential shallow mine workings is currently assessed as very low, and it is considered that further works are not required to explore the potential for coal seams underlying the site. The proposed development therefore accords with Policy CS G10.

f) Air Quality

- 5.75 Waterman Infrastructure & Environment has prepared an Air Quality Assessment (AQA) to support the application. The main likely effects on local air quality during construction relate to the generation of dust and particles. Contained within a Construction Management Plan would be measures to minimise and prevent dust and particles. This would be secured via a condition.
- 5.76 Based on the low trip generation and absence of a centralised combustion plant the development is not expected to give rise to air quality impacts. As such the likely effect of the operational development on local air quality would not be significant.
- 5.77 A review of the local monitoring data and Defra's modelled background maps, indicates that future air pollutant concentrations for users of the development would not be significant.
- 5.78 In conclusion, the assessment is that there would be no significant air quality impacts from the construction or operation of the building, nor would future users of the building be exposed to significant levels of air pollutants.

g) Land contamination

- 5.79 Waterman Infrastructure & Environment has prepared a Preliminary Environmental Risk Assessment for ground contamination.
- 5.80 The historical mapping indicates most of the site was in use until the 1960s as Sunny Bank Mills (Cotton and Woollen), at which point the former buildings were cleared. The site has been used for car parking since at least 1999. Between mapping from 1890 to 1930 the northern most corner of the site was occupied by a Town Mill Dye Works.
- 5.81 The Preliminary Conceptual Site Model indicates that the highest risk estimated for potential pollutant linkages was Medium. This rating was given to six of nine potential pollutant linkages. It is considered that the overall risk rating for the proposed development is medium. As such, Section 7 of the report contains a list of recommendations to mitigate the risk of contamination, taking into account the end use. Once successfully implemented the risks are anticipated to be low. Therefore, the NPPF requirement, that on completion the site can no longer be captured under the Part IIA regime, is expected to be met.

h) Sustainability

- 5.82 An Energy Statement has been prepared by Rosiben to accompany the application. The statement evaluates the technical and economic feasibility of using both passive and low and zero carbon technologies and assesses the practical levels of CO₂ and energy reduction possible for the development to comply with the Rochdale Core Strategy.
- 5.83 The approach for the Rochdale Sixth Form College extension is to embed sustainability into the heart of the development through a range of design measures based on the 'Be Lean, Be Clean, Be Green' design hierarchy. Measures will include:

- 1) Enhanced building fabric and air tightness to meet Building Regulations ADL2 (2021)
- 2) Heating and cooling will be provided to occupied areas by an air-to-air heat pump system
- 3) Hot water will be provided by local electric point of use heaters
- 4) Ventilation will be provided by mechanical ventilation with heat recovery (MVHR)
- 5) Lighting will be provided to all areas by high-efficacy LED-type fittings
- 6) Rooftop 100m2 photovoltaic panel array

5.84 Using this method, the results show a 2% carbon emissions improvement and a 3% primary energy improvement over the Building Regulations Part L2 (2021) baseline.

5.85 As a consequence, the proposal complies with Policies G1 and G2 of the Rochdale Core Strategy.

The planning balance

5.86 Material considerations support this assessment and do not point to a contrary view, whereby;

- the proposed development is in full accordance with the relevant policies and objectives of the 2021 National Planning Policy Framework aimed at widening the choice in education giving 'great weight' to the need to expand or alter schools;
- the development will help RSFC to support the local business community ensuring that young people achieve academic excellence and are ready for the workplace;
- notably the proposal will help to strengthen and promote Rochdale town centre as a location for higher education together with Hopwood Hall College;
- the development will make effective and beneficial use of previously developed land;
- technical matters including, flood risk and drainage, ecology, highway safety have been thoroughly investigated and the accompanying reports demonstrate that there are no valid technical reasons to preclude development of the application site; and,
- the proposed development will deliver a range of social and economic benefits to which substantial weight must be attached including short term jobs in construction and a longer term need for additional staff. Providing the opportunity to enhance the academic attainment of young people in the Borough is regarded as a social and economic benefit which turn benefits local businesses supporting economic growth in the Borough.

5.87 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires the planning application to be determined in accordance with the adopted development plan unless material considerations indicate otherwise, which they do not in this case.

- 5.88 On that basis and in accordance with the presumption in favour of sustainable development at paragraph 11(c) of the Framework, it is clear that planning permission should therefore be granted without delay.

6. Summary and conclusion

- 6.1 This Planning Statement has been prepared by Smith & Love Planning Consultants in support of a planning application for the extension of Rochdale Sixth Form College on the edge of Rochdale Town Centre. The extension extends to 1,822sqm over 6 floors and comprises 19 teaching spaces, social space and staff rooms.
- 6.2 It assesses the merits of the application against the policies of the development plan, the NPPF and all other relevant material considerations, and it demonstrates that the proposed development will create a high quality, well-designed development which will deliver important social and economic benefits for the Borough and local area.
- 6.3 The proposed 6 storey extension is contemporary in its appearance so as to complement the existing College building which is approximately 10 years old.
- 6.4 The site lies in a flood zone adjacent to the River Roch. It has been demonstrated that the sequential test and exceptions test have been passed in accordance with national planning policy. Care has been taken when designing the building to allow the lower ground to flood, if required in a flood event, by erecting the building on stilts using a cantilever. Thus, ensuring that flood risk potential is not increased elsewhere.
- 6.5 No other technical issues have been identified that would prevent development.
- 6.6 The Statement concludes that the proposed development is in full accordance with relevant policies of the adopted development for Rochdale and Government policy aimed at widening educational choice. CS Policy C7 notably promotes the growth and expansion of the Colleges at St Mary's Gate including RSFC.
- 6.7 Consequently, and having regard to all relevant material considerations, there is a compelling case for planning permission to be granted without delay, in accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004 and the presumption in favour of sustainable development at paragraph 11c of the Framework.

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