



Paul Butler Associates
Planning, Development & Heritage Consultants

Tang and Associates Ltd

Proposed residential apartment building
on land bounded by Earl St, Taylor St and
Bethel St, Heywood, Rochdale, OL10 1HT

Planning & Affordable Housing Statement

04 May 2021

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Professional Planning, Development & Heritage Advisors since 1992.

Our professional staff are Members of the Royal Town Planning Institute (RTPI) or the Chartered Institute for Archaeologists (CIfA)

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1. Introduction

1.1 This Planning and Affordable Housing Statement has been prepared by Paul Butler Associates on behalf of Tang and Associates Ltd. The statement has been provided in support of an outline planning application for the redevelopment of land bound by Earl Street, Taylor Street and Bethel Street, Heywood, Rochdale, OL10 1HT. The application proposal is for the development of a new residential apartment building comprising of 23 apartments (15 no x 1 bedroom and 8 no x 2 bedroom) with associated cycle parking and bin store. The development will provide one and two bedroomed flats with a high standard of accommodation. The application site is 426 sqm in size.

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 relevant planning history;
- 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;
- An affordable housing statement; and,
- A conclusion.

2. The Application Site and Surrounding Area

The Application Site

- 2.1 The application site is located to the north of Earl Street and to the south of the rear of a terrace of commercial properties which front onto Market Street in Heywood (refer to figure 1 below). To the west of the site is Bethel Street which links Market Street to the north with Fox Street to the south. Adjoining the eastern boundary of the application site is Taylor Street which links Market Street to the north with Taylor Street to the south. The site which is bounded by Bethel Street, Earl Street and Taylor Street and the rears of commercial properties at 1-11 Market Street is presently vacant, the previous use being car parking. The site is in poor condition with the majority being tarmacked hardstanding. Timber hoardings have been erected to prevent fly tipping and a container has been sited on the land, close to the boundary with Taylor Street.

The Surrounding Area

- 2.2 The site lies within a grid iron street pattern. To the north of the site at 1-11 are the rear facings and rear yards of commercial properties fronting Market Street. Uses within this block include from west to east: Tayler James Hairdressing, Age UK Charity Shop, Shepherds Cycles, The Old Music Shop, Spring Hill Hospice Shop and on the corner turning into Taylor Street is Just Cuts Hairdressing. Fronting Taylor Street and neighbouring Just Cuts Hairdressing is JD Nails and Beauty.
- 2.3 To the south of the application site is the Trinity Methodist Church which is sited adjacent to Fox Street. Separation between the Church building and the application site is provided by the dedicated Church car park which lies to the north of the church building. To the east of the site on the opposite side of Taylor Street is a car park serving commercial properties on Market Place. To the western side of the site are further commercial properties including Jack Fulton frozen foods at 2-4 Bethel Street.



Figure 1: Aerial view identifying the approximate location of the application site in red.



Figure 2: The application site viewed from Bethel Street looking north towards the rears of commercial properties at 1-11 Market Street.



Figure 3: The application site viewed from Earl Street looking east towards 2-4 Bethel Street.



Figure 4: The application site viewed from Earl Street looking east towards Bethel Street.



Figure 5: The application site viewed from Market Street looking south down Taylor Street towards the Trinity Methodist Church.



Figure 6: Looking east from the application site across Taylor Street to the surface car park beyond.

- 2.4 The immediate surroundings are largely commercial buildings, community uses and car parking. A block away to the south of the site on Fox Street is low rise residential housing development.
- 2.5 Taylor Street and Beth Street form part of a one-way system. Car parking is not restricted on Earl Street. Pedestrian footways are present to each side of all three roads surrounding the application site and pedestrian facilities are generally good.
- 2.6 The site benefits from high levels of accessibility by foot and is within 5 minutes' walk of all the main facilities and services offered within the centre of Heywood. There are a variety of food stores nearby, all within easy walking distance including a Morrison's on Times Retail Park to the north.

3. Planning History

- 3.1 Prior to the submission of this application and in accordance with best practice a review of the site's planning history was undertaken. This identified several applications relating to the subject site which is listed below.

Application Site History (Earliest first)

Application Reference: 99/D36780

Application Validated: Mon 02 Aug 1999.

Address: Car Park at Junction of Bethel St/Taylor St, Heywood, Lancs.

Proposal: Erection of Private Hire Taxi Booking Office and use of Land for Ancillary Parking.

Status: Refuse, Wed 27 Oct 1999.

No further information was accessible online regarding this application.

Application Reference: 02/D39978

Application Validated: Wed 27 Mar 2002.

Address: Land opposite Trinity Methodist Church, between Bethel Street and Taylor St, Heywood, Lancashire.

Proposal: Erection of two storey modular Building for use as Offices for New Deal for Communities and long term Community Use.

Status: Refuse, Thu 06 Jun 2002.

No further information was accessible online regarding this application.

Application Reference: 06/D48197

Application Validated: Tue 31 Oct 2006.

Address: Land at Junction of Earl Street and Bethel Street, Heywood.

Proposal: Erection of 4 Storey Building comprising B1 Office Space at Ground Floor and 14 Apartments at 2nd, 3rd and 4th Floor Levels.

Status: Grant subject to conditions, Wed 24 Jan 2007.

No further information was accessible online regarding this application.

Application Reference: 09/D51839

Application Validated: Wed 13 Mar 2009.

Address: Junction of Earl Street/Bethel Street, Heywood.

Proposal: Mixed use Development - Ground Floor Office Units with 17 apartments above.

Status: Grant subject to conditions, Thu 11 Jun 2009.

No further information was accessible online regarding this application.

Application Reference: 12/D55542

Application Validated: Wed 23 May 2012.

Address: Land at Earl Street/Bethel Street, Heywood.

Proposal: Application for a new planning permission to replace extant planning permission D51839 for a five storey building comprising ground floor office units with 17 apartments above.

Status: Withdrawn, Fri 26 Jun 2015.

Applicant: Mr Argon Elezi.

Agent: Mr Karl Seddon of Howard and Seddon.

Application Reference: 15/01480/FUL

Application Validated: Wed 30 Mar 2016.

Address: Land Bounded By Bethel Street, Earl Street & Taylor Street Heywood.

Proposal: Erection of a 3 storey building containing 14 apartments.

Status: Grant subject to conditions, Wed 28 Sep 2016.

Applicant: Mr Argon Elezi.

Agent: Mr Barry Tang, Tang and Associates.

Approved Drawings: Location Plan Drawing No. 8435/001A; Existing and Proposed Site Plan Drawing No. 8435/002C; Proposed Floor Plans Drawing No. 8435/101F; Proposed Elevations Drawing No. 8435/110F; and Street Scenes Drawing No. 8435/121B.

This application is understood to have lapsed.

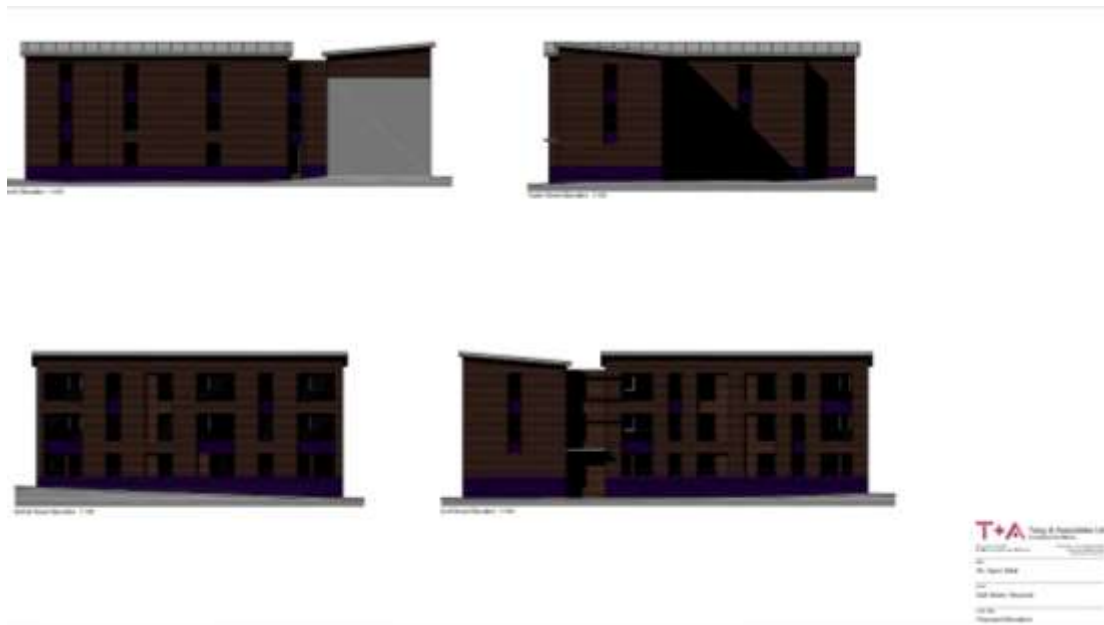


Figure 7: Application Reference: 15/01480/FUL: Approved Drawing Proposed Elevations Drawing No. 8435/110F.

Relevant Planning History on Adjacent Sites

Application Reference: 19/00211/FU

Application Validated: Wed 03 Apr 2019.

Address: Freemasons Arms 17 Market Place Heywood OL10 1LA

Proposal: Change of use and conversion including external alterations of former Freemasons Arms Hotel into a mixed use development, comprising 6 no. 1 bedroom apartments and 2 no. studio apartments including mezzanine (Use Class C3(a)) at ground, first and second floors and the creation of 1 no. commercial unit (Use Class A1/A2/B1(a)) at lower ground and ground floors.

Status: Grant subject to conditions, Wed 14 Aug 2019.

4. The Proposed Scheme

- 4.1 The application description of development is for development of a new residential apartment building comprising of comprising 23 apartments (15 no x 1 bedroom and 8 no x 2 bedroom) with associated cycle parking and bin store.
- 4.2 The four storey brick faced development has been carefully designed in a contemporary manner with a flat roof, brick elevations and inset terraces. The proposed fenestration and elevational detailing is vertically proportioned having regard to the general proportions of the row of older terraced properties to the north.
- 4.3 The apartments are entered by a communal entrance lobby which is accessed from Bethel Street by a personnel door located to the back of pavement. This leads to an internal lobby with access to the separate communal bike store and separate communal bin store. The main lobby is also accessible from a further personnel access door located on Taylor Street. From the ground floor lobby, access is provided directly to each of the five ground floor apartments whilst stairs and a lift give residents access to the 6 flats on the first floor, the 6 flats on the second floor and the 6 flats on the third floor.
- 4.4 The town centre location is sustainable and ideally located for access to public transport and therefore dedicated car parking is not necessary. At ground floor, accommodation includes an internal bin store and cycle store which are communal facilities which will be available to all residents of the development. The bin store will be serviced from Taylor Street.
- 4.5 The materials proposed are traditional and include facing brickwork walls. Added interest to the elevation brickwork is provided by brickwork motifs.
- 4.6 The scheme will be designed and furnished to a high standard and will be attractive to local singles and couples including key workers, young professionals and older people who may be seeking to downsize. The prospective occupiers will value the accessibility of the

site's location. Each apartment is generously provisioned in terms of facilities. The development will provide occupants with a high standard of accommodation.

- 4.7 Like many apartment buildings located in or close to town centre locations, external space is not feasible and therefore each apartment benefits from an inset terrace.



Figure 8: Proposed Elevations

5. Planning Policy Context

Introduction

- 5.1 This section of the statement sets out the local and national planning policy context of relevance to the determination of this planning application.

The Development Plan

- 5.2 Section 38(6) of the Town and Country Planning Act 2004 states that applications for development should be determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 5.3 The Development Plan for Rochdale of relevance to the scheme comprises the following documents:
- Rochdale Core Strategy (RCS): The Core Strategy for Rochdale borough was adopted on 19 October 2016 and is the lead document of the Rochdale Borough Local Plan. It provides an overview of the Council's objectives for the whole of the borough. All other plans and policies must align with the policies laid out in the Core Strategy;
 - The Rochdale Unitary Development Plan (RUDP); The Unitary Development Plan adopted in 2006 from the 1996-2016 Local Plan will remain in place until the Allocations Development Plan which is currently in preparation is adopted;
 - Supplementary Planning Documents (SPDs).

National Planning Policy Framework

- 5.4 The revised National Planning Policy Framework (NPPF) was published in July 2018 (and updated June 2019), and sets out the government's planning policies and how these are expected to be applied. It replaces the Framework published in March 2012, however a presumption in favour of sustainable development continues to be at the heart of the NPPF which ensures that development is pursued in a positive way.

5.5 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:

- 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
- 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.

5.6 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

5.7 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.

Delivering a sufficient supply of homes (Chapter 5) – paragraph 59 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.

Local Planning Authorities should identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirement set out in adopted strategic policies or against their local housing need where strategic policies are more than five years old. The five year supply should include an appropriate buffer. Where the local authority chooses to demonstrate a five year supply of deliverable sites through an annual position statement or recently adopted plan the buffer should be 10% to account for any fluctuations in the market during that year. In the event that there has been significant under delivery when measured against the Housing Delivery Test (November 2018 onwards) then a 20% buffer should be applied.

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 supply of deliverable housing sites or the Housing Delivery Test indicates that the delivery of housing was substantially below the housing requirement over the previous three years.

Paragraph 68 highlights that smaller sites, such as the application site can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly. Paragraph c) of the same paragraph 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.

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.

Ensuring the vitality of town centres (Chapter 7) – advises that 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. It advises that planning policies should recognise that residential development often plays an important role in ensuring the vitality of centres and encourage residential development on appropriate sites.

Promoting healthy and safe communities (Chapter 8) - the planning system should aim to achieve healthy, inclusive and safe places. 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.

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. Importantly Paragraph 109 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’*.

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 118 (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. Developing surplus car parking land for beneficial reuse as housing land is cited as an example of the type of site which may be redeveloped to help deliver the Government's policy objective of making more effective use of urban land.

Paragraph 121 states that local planning authorities should take a positive approach to applications for alternative uses of land which is currently developed but not allocated for a specific purpose in plans, where this would help to meet identified development needs and would be compatible with other policies in this Framework.

The chapter goes on to discuss how appropriate densities can be achieved. Paragraph 122 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, attractive and healthy places.

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.

The Development Plan for Rochdale

5.8 The Development Plan for Rochdale of relevance to the scheme comprises the following documents:

- Rochdale Core Strategy (RCS) adopted on 19 October 2016;
- The Rochdale Unitary Development Plan (RUDP) adopted in 2006; and
- Supplementary Planning Documents (SPDs).

The Rochdale Core Strategy (RCS) adopted on 19 October 2016

5.9 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.

5.10 In accordance with the guidance contained in the National Planning Policy Framework, Policy SD1 'Delivering Sustainable Development' (Chapter 5) states that the Core Strategy is centred around delivering and supporting sustainable development. To this effect, the policy seeks to replicate the 'presumption in favour of sustainable development' of the NPPF.

5.11 Chapter 6 of the Core Strategy presents the spatial strategy for the borough.

5.12 Policy SP1 'Rochdale borough's role in the city region' 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. This includes promoting the borough as an attractive location in terms of jobs, housing, shopping, the environment, image, tourism and quality of life; and providing improved housing quality and choice by working with private and public sector partners.

5.13 Policy SP2 'The Spatial Strategy for the borough' sets out that most new housing will be focused within the urban areas within the south of the borough. Investment, development and improvements will be focussed on: Rochdale, Heywood and Middleton town centres; Economic growth corridors/ areas; Regeneration Areas; and Key corridors and gateways. Paragraph 6.3 of the supporting policy text states that "our spatial strategy sets out broadly 'how much and what sort' of development we want and 'where we want it to go' in the borough. The spatial strategy is based on the borough needing to build around 460 additional homes a year.

5.14 Policy SP3 'The Spatial Strategy for the townships': develops the spatial strategy further identifying that the spatial strategy is based on the strategic objective and the visions for each of the townships. The four townships are Heywood, Middleton, Pennines and Rochdale. Heywood Town Centre is located in the Heywood township area and is the focal point of the area for retail and services. Policy SP3/H sets out the specific priorities for Heywood which differ from the other townships reflecting the needs of the area. Policy SP3/H establishes a priority policy objective is to 'Transform Inner Heywood by:

- Delivering new homes in and around the town centre to widen housing choice (Policies C1,C2);
- Redeveloping unsuitable employment sites for better uses (Policy C2);
- Improving the quality of open space; and
- Increasing opportunities for healthier lifestyles through improving access to the new leisure village, Queens Park and the Roch and Ashworth valleys).

5.15 The following detailed policies of the Core Strategy are also of relevance to the application.

5.16 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:

- 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.
- 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
- Ensure that sites are sustainable with good access to local services, facilities, green infrastructure, shops, jobs, schools and public transport.

5.17 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).

5.18 Policy C2 'Focusing on regeneration areas and economic growth corridors / areas': This policy seeks to focusing housing development in regeneration areas and in and around economic growth corridors / areas in order to create sustainable patterns of development, help tackle social and economic deprivation and improve quality of life. Policy C2 seeks therefore to focus regeneration and the delivery of new homes in priority areas. Central Heywood (including the town centre) is identified to be a priority area where Policy C2 seeks to:

- a) Deliver additional dwellings for sale and rent to widen housing choice in the area; and;
- b) Redevelop vacant sites and incompatible employment uses, particularly in Back o'th' Moss and south of the town centre.

5.19 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. In the south of the Borough where the application site is located, the focus will be on widening housing choice and delivering housing that better suits the needs of existing and future residents. To do this the Council will direct particular types of housing development to particular areas:

'a) In the East Central Rochdale, Milkstone & Deeplish & Newbold and Falinge, Spotland and Sparth regeneration areas place an emphasis on larger, family housing, including affordable housing, to widen housing choice in areas currently dominated by smaller terraced properties and flats;

b). In central Heywood, Kirkholt, Langley and east Middleton regeneration areas deliver a mixture of housing with an emphasis on good quality family housing;

c) Support lower density housing elsewhere in Heywood, Middleton and Rochdale where it delivers higher value dwellings of a type and size that is currently in short supply across the borough; and

d). Focus higher density development in and around Rochdale, Middleton and Heywood town centres, along major transport corridors, the Canal corridor, and in key district and local centres'.

5.20 Policy C4 – 'Providing affordable homes' This advises that the Council will seek affordable housing on all developments of 15 dwellings or more. The policy seeks a contribution to affordable housing of 7.5% of the development sales value of the overall scheme. Policy C4 seeks Affordable housing to be:

a. Provided on-site using this contribution to deliver homes of a type, size and tenure agreed by the developer and the local authority based on local evidence and, where appropriate, delivered in partnership with a Registered Provider; or

b. Provided via an off-site financial contribution in exceptional circumstances, for example, where: i. The local authority considers that the site is not an appropriate location for affordable housing e.g. poor access to local services and public transport; or ii. The type of housing on the site makes it difficult to provide an element of affordable housing; or iii. It is not practical to properly manage an element of affordable housing on the site e.g. on-site provision would only deliver a very small number of homes.

- 5.21 When negotiating the level of affordable housing and how it is to be provided the Council will take the following factors into account: i. The type of affordable housing required in the area; ii. The availability of Social Housing Grant or equivalent; iii. The need to deliver other planning objectives with a higher priority; and iv. The economic viability of the development.
- 5.22 Policy P1 'Improving Image'. The policy requires design which is of a high standard in all developments. The policy also promotes the development and re-use of under-used land and buildings.
- 5.23 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, including the distinctiveness of its town centres and by enhancing townscape character.
- 5.24 Policy P3 'Improving the design of new development'. All new development should adhere to high standards of design. The policy therein sets out design principles which development should comply with:
- Enhance the borough's identity and sense of place, by respecting context where it is positive and having regard to the scale, density, massing, height, layout, landscape, materials and access of surrounding buildings and areas in general;

- Ensure that buildings contribute positively to the townscape, and are well proportioned;
- Incorporating design measures that design out crime and ensure developments are safe to use and access;
- Provide an appropriate mix of uses and consider the needs of all sections of society;
- Ensure a development is easy to move through and get around, especially for pedestrians, cyclists and disabled people;
- Ensure that the intended functions of buildings are easily understood, and their entrances appropriately located and visible;
- Ensure buildings can be easily adapted to meet future/alternative needs of occupants;
- Minimise impact upon the environment, and help adapt to the impacts of climate change, and utilising sustainable drainage (Policies G1 and G2); and
- Design buildings so that quality and appearance can be maintained over time.

5.25 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 previously developed land.

5.26 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.

5.27 Policy G7 'Increasing the value of biodiversity and geodiversity'. The policy seeks the protection and enhancement of the borough's wildlife habitats, species and key natural resources and features. In urban areas the policy seeks to protect and enhance existing urban biodiversity and to support opportunities for new urban biodiversity features including sustainable urban drainage schemes and green roofs.

- 5.28 Policy G8 'Managing water resources and flood risk'. The policy seeks to ensure that new development does not lead to any increased form of flooding locally or downstream, does not impede natural water or flood risk management, is not detrimental to existing or potential flood storage areas, contributes where possible to alleviating flood risk, is itself protected from flood risk and ensures prudent use of flood resources.
- 5.29 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.
- 5.30 Policy T1 'Delivering Sustainable Transport'. The policy states that the Council will secure a programme of sustainable transport proposals to ensure accessibility for all users and reduce pollution and climate change emissions. It is further stated that the Council will reduce the need to travel, make best use of the existing transport infrastructure and ensure the transport network continues to become safer and more secure for all users.
- 5.31 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 seek to satisfy the accessibility hierarchy which seeks in the first instance to prioritise the needs of pedestrians, cyclists and public transport users. The maximum car parking provision permissible within a town centre location (Table 10 Schedule of parking standards, p172) is 1.25 spaces per flat.
- 5.32 Policy DM1 'General Development Requirements'. The policy sets out a range of basic planning and design considerations which development proposals will be expected to demonstrate compliance with the following criteria:
- a. Are of high quality design and take the opportunity to enhance the quality of the area;

- b. Are compatible with surrounding land uses, both in terms of its impact upon those uses and the impact of the surrounding land uses upon the amenities of future residents / users;
- c. Do not adversely affect the amenity of residents or users through visual intrusion, overbearing impact, overshadowing or loss of privacy;
- d. Mitigate against any impacts due to noise, air, dust, light and odour pollution, traffic generation or inadequate access, where such mitigation is identified as being necessary;
- e. Provide satisfactory vehicular access with adequate parking, manoeuvring, and servicing arrangements taking into account of the proposed use and location;
- f. Do not have an adverse impact on health, through its impact or the effect of existing problems e.g. land contamination, or poor air quality;
- g. Provide, or demonstrate the availability of, the service and community infrastructure necessary to meet local needs e.g. local shops, community, leisure and sport facilities and provision of open space;
- h. Minimise opportunities for crime against people or property;
- i. Take account of ground conditions including unstable or contaminated land - where a potential risk exists, a survey should be carried out and any necessary remedial measures identified and carried out;
- j. Incorporate, where appropriate, high quality landscape schemes;
- k. Have assessed whether the development may be affected by ground instability;
- l. Have considered the availability of water and wastewater infrastructure, and any need for additional capacity; and
- m. Do not lead to impacts detrimental to the conservation interests of European Protected Sites.

5.33 Policy DM2 'Delivering planning contributions and infrastructure'. The policy explains that the Council will seek contributions for affordable housing; open space provision and maintenance; health and well-being; education facilities and/ or community facilities.

The Rochdale Unitary Development Plan (RUDP) adopted in 2006

- 5.34 The saved policies of the Unitary Development Plan (Adopted June 2006), which will remain in place until the adoption of the Allocations Development Plan. The Greater Manchester Spatial Framework will also form part of the Local Plan once this is adopted. The saved policies of relevance to this application are outlined below:
- 5.35 Policy G/D1 'Defined Urban Area'. This saved policy seeks to concentrate new development within the urban area in order to support urban regeneration and protect the countryside.
- 5.36 Policy G/S/1 'Hierarchy and Role of Centres'. This policy identifies the site to be located within Heywood Town Centre.

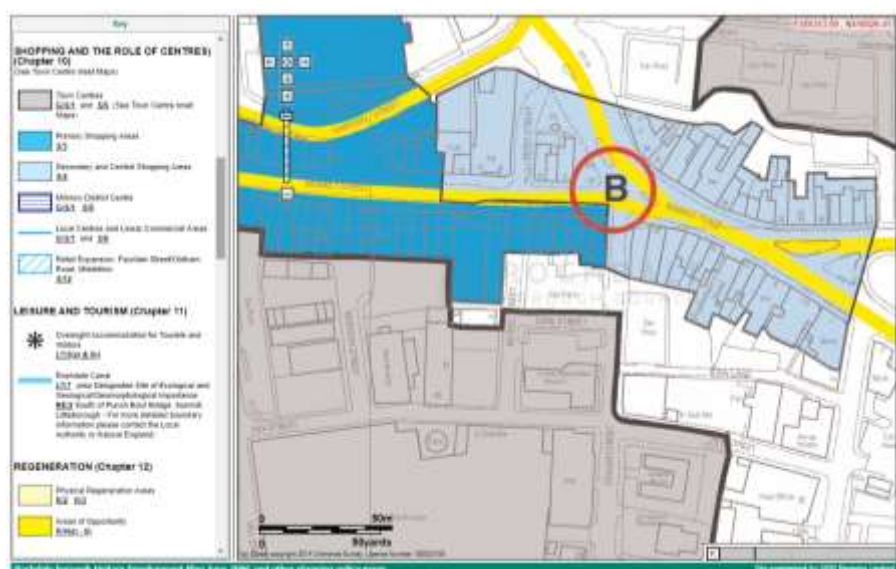


Figure 9: The Rochdale Unitary Development Plan (RUDP) adopted in 2006.

Draft Site Allocations Development Plan Document

- 5.37 The Council are currently in the process of producing the Site Allocations DPD which will propose areas or sites around the borough to be developed in order to meet development needs up to 2028. The draft Allocations Plan includes the application site as

a proposed housing site (reference AL/HOU/12 – Land bounded by Bethel Street, Earl Street and Taylor Street).



Rochdale Borough Council Draft Allocations Plan

AL/HOU/12 – Land bounded by Bethel Street, Earl Street and Taylor Street, Heywood



Figure 10: Render showing the proposed building.

Draft Greater Manchester Spatial Framework

- 5.38 The Greater Manchester Spatial Framework (GMSF) is currently under production with the last stage of production underway. The GMSF focuses on making the most of Greater Manchester's brownfield sites, prioritising redevelopment of town centres and other sustainable locations.

Supplementary Planning Documents (SPDs)

5.39 In addition to adopted national and local planning policy, a number of other Supplementary Planning Documents have also been considered during the design of the proposed scheme. Adopted SPDs include:

- 'Affordable Housing' (March 2008);
- 'Provision of Recreational Open Space in New Housing' (March 2008);
- 'Guidelines and Standards for Residential Developments' (June 2016);
- 'Biodiversity and Development' (January 2008);
- 'Climate Change Adaption' (June 2012);
- 'Residential Design Guide' (September 2007); and
- Urban Design Guide (September 2007).

5.40 The proposed redevelopment scheme has been designed in accordance with the policies of the Development Plan documents and other relevant policy documents set out within this section.

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;
- Housing Type;
- Design;
- Residential Amenity;
- Sustainable Development: Economic, Social and Environmental Benefits;
- Highways, Accessibility and Parking;
- Crime and Security Issues;
- Flood Risk/SUDS;
- Contamination;
- Trees, Ecology and Biodiversity; and
- Air Quality.

Principle of Development

6.2 The proposals involve redevelopment of vacant brownfield land for a new apartment development providing residential accommodation. A total of 23 new apartments will be provided comprising of 15 no x 1 bedroom and 8 no x 2 bedroom with associated cycle parking and bin store.

6.3 Policy SP1 of the Rochdale Core Strategy 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. The spatial strategy is based on the borough needing to build around 460 additional homes a year. Policy SP2 'The Spatial Strategy for the borough' sets out that most new housing will be focused within the urban areas within the south of the borough within priority locations one of which is noted to be

Heywood town centre. This policy aims to ensure that the use of existing infrastructure and resources are maximised and allows homes, jobs and other facilities to be located close to each other and be accessible by public transport. The proposed development of 23 apartments in Heywood Town Centre will contribute to meeting the local need to provide 460 additional homes per year up to 2028 whilst also contributing to help address the national housing shortage.

- 6.4 The proposal will deliver 23 homes on a previously developed site which lies within an existing urban area on a site well related to Heywood Town Centre which can be regarded as a location which is sustainable with good access to local services, facilities, shops, jobs, schools and public transport. Policy C1 aims 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 and the proposal will contribute 23 dwellings (100% brownfield) toward delivering this policy objective. Furthermore the location of the proposed development lies within an area specifically targeted by Core Strategy Policy C2 and Policy SP3/H as a priority area for new housing development over the lifetime of the plan. The proposal is in accordance with Core Strategy Policies C1 and C2.
- 6.5 The proposal makes best use of a vacant site to deliver new housing and the density of development proposed may be regarded as appropriate when the site location and the objectives of Policy C3 'Delivering the right type of housing' are considered. Specifically Policy C3 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. To do this the Council states that it will direct particular types of housing development to particular areas including seeking to 'd). *Focus higher density development in and around Rochdale, Middleton and Heywood town centres, along major transport corridors, the Canal corridor, and in key district and local centres*'. In complying with objective d) the application proposal can be regarded to be fully compliant with Policy C3 and clearly represents the right type of housing for the locational context by focusing higher density development in Heywood town centre.

- 6.6 With regard to the saved policies of the Unitary Development Plan (Adopted June 2006), the application site lies within the 'Defined Urban Area' within which Policy G/D1 seeks to concentrate new development in order to support urban regeneration and protect the countryside. The site also lies within the area defined as 'Heywood Town Centre' which Policy G/S/1 identifies as an appropriate location for residential development which will complement and support the retail role of the Town Centre. The proposal complies the relevant saved policies of the UDP including Policy G/D1 and Policy G/S/1.
- 6.7 It is noted that the proposal also accords with the emerging Site Allocations DPD which will propose areas or sites around the borough to be developed in order to meet housing development needs up to 2028. The draft Allocations Plan includes the application site as a proposed housing site (reference AL/HOU/12).
- 6.8 The principle of a higher density residential development on the application site is consistent with local planning policy and the redevelopment of previously developed land within the Town Centre will help to reduce development pressure to build on less sustainable land including greenfield and Green Belt land elsewhere in the Borough. The development of the subject site would clearly contribute towards the delivery of stated policy objectives allowing redevelopment of a vacant brownfield site for residential accommodation which will contribute to housing supply within the borough.
- 6.9 It is important to highlight that the proposed scheme is also deliverable on the site for the following reasons:
- It is Available – The applicant is in a position to develop the land once permission is secured.
 - It is Suitable – The suitability of the site for housing development is confirmed throughout this report, by reason of its sustainable accessible location, close local shopping facilities, services, amenities and employment opportunities.
 - It is Achievable – There are no known policy restrictions or development constraints that would impact on the scheme's deliverability.

- It is Viable – The scheme submitted for planning approval is deliverable in the short-term although without delivering affordable housing or planning gain.

6.10 For the reasons given above the principle of the proposed residential development is wholly in accordance with national and local planning policy.

Housing Type

- 6.11 Policy SP3 'The Spatial Strategy for the townships' Part H sets out the specific priorities for Heywood which differ from the other townships reflecting the needs of the area. Policy SP3/H establishes that a priority policy objective is to 'Transform Inner Heywood by: Delivering new homes in and around the town centre to widen housing choice (Policies C1,C2)'. The provision of apartments on the application site will widen housing choice by providing greater housing choice locally with the development proposing 23 apartments (15 no x 1 bedroom and 8 no x 2 bedroom). The provision of smaller family homes of two bedrooms will provide opportunities for new households to get on the housing ladder, and for older households to downsize thereby supporting the local community.
- 6.12 One and two bedroom apartments in an accessible location close to shops, services and employment opportunities would respond local housing needs. Potential occupants for the completed property may include singles/couples/one parent families and would appeal to first time buyers, renters, key workers and younger people alike. Given the provision of level access and a lift the flats will also appeal to older people wishing to downsize. The proposal is seen to meet local housing need by being able to accommodate the needs of a broad-based section of people and will complement the family housing being developed on other sites in the Borough.
- 6.13 The development is also ideally located for people choosing not to own a car and the benefits of providing residential accommodation in Town Centres is recognised by planning policies at a local and national level, with Paragraph 85(f) of the NPPF confirming the important role accommodation plays in increasing local demand thereby ensuring the vitality of centres. The provision of residential accommodation in this location will increase

footfall around the site and in centre throughout the daytime and evening, and boost spending in nearby shops and businesses. Furthermore the site is highly accessible on foot, bike and by public transport to the range of facilities and amenities provided within Heywood, reducing the need to travel by less sustainable modes of travel. In summary, the apartments proposed will clearly be attractive to a diverse group of potential occupiers and will therefore contribute to sustaining a mixed and sustainable community.

Design

- 6.14 The design of the new building is an appropriate design response to the site and urban context. The application land is located within an historic nineteenth century grid iron street pattern and examination of the 1851 plan of the area (Figure 11) shows that the site previously accommodated buildings fronting all three surrounding streets. These buildings were sited to the back of pavement building line, providing enclosure to these streets and were arranged around a courtyard partly formed by properties to the north on Market Street. The new building siting design adopts this traditional back of pavement siting and proposes a new building which reinstates the 'missing street wall' enclosure to Earl Street, Taylor Street and Bethel Street. Importantly reinstating this building siting combined with the new massing will help reduce the prominence of the rear outriggers to the commercial properties on Market Street to the north which were never intended to be prominent and have only been exposed to public view after the demolition of the former properties on the application site.
- 6.15 The building is four storey and is designed with a flat roof allowing it to sit easily within the context whilst reading as a modern addition to the area. Appearance is identified to be a reserved matter as noted by the submitted Design and Access Statement. The scheme drawings submitted suggest materials proposed will be traditional and include facing brickwork walls which the plans show are arranged to create a textured façade. Inset balcony areas are shown which incorporate a brick motif providing architectural detail and will add depth to the façade, creating shadow lines and interest. Added interest to the elevations is suggested to be provided by vertical brickwork expressed using a repeated motif design. Whilst traditional facing brick is used throughout each of the

elevations, the design approach is clean, contemporary and the resultant building is pleasing.

- 6.16 Vertically proportion fenestration respects the façade proportions of nearby Victorian buildings ensuring that the proportions of the various windows and doorways of the new apartments will fit easily into the architectural rhythm of the surrounding area.
- 6.17 The proposed approach to emissions reduction for the new building will be through a fabric led energy strategy, in accordance with the principles of the energy hierarchy. The energy efficiency of the proposed dwellings will be ensured through the incorporation of highly insulated walls / roofs / floors and good air tightness.
- 6.18 The proposed scheme has been designed in response to Core Strategy policies DM1 'General Development Requirements', P1 – 'Improving Image', P2 – 'Protecting and Enhancing Character, Landscape and Heritage', P3 – 'Improving Design of New Development', Policy G2 'Energy and New Development' along with paragraphs 124 and 128 of the NPPF.

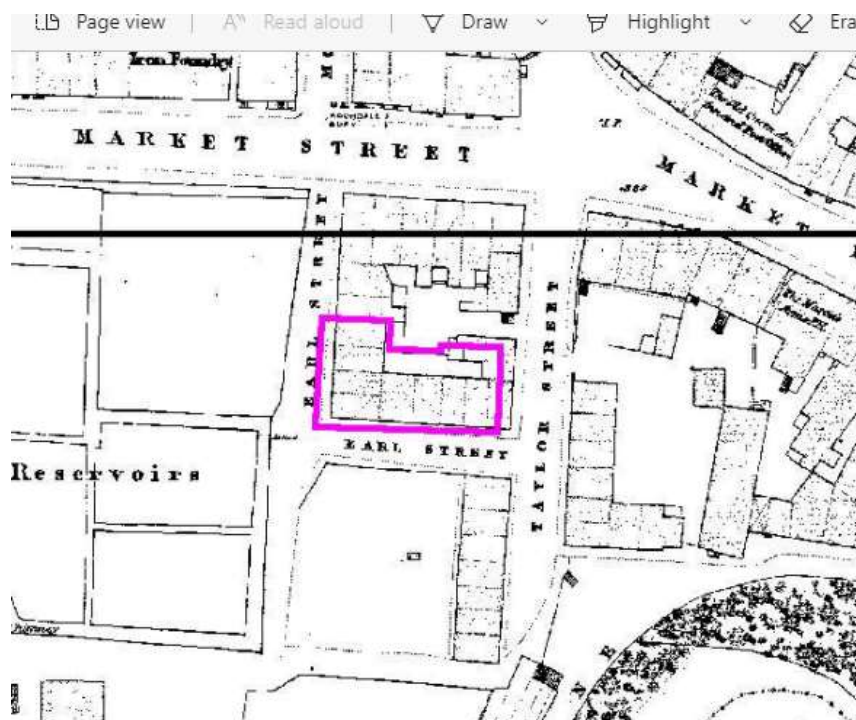


Figure 11: Extract from 1851 OS Plan

Residential Amenity

- 6.19 The proposed scheme will deliver residential development in Heywood Town Centre which is supported by various policies at national and local level as noted previously. In considering whether the new residential accommodation proposed will be associated with any potential amenity impacts there are two key issues requiring consideration; firstly, whether the development will safeguard the amenity of existing surrounding properties; and secondly, whether future residents will have sufficient amenity. These matters are considered below:

Amenity Matters of Surrounding Properties

- 6.20 Neighbouring properties include commercial buildings to the east and north of the application site, the Trinity Methodist Church to the south and a surface car park to the west. The closest properties are those located to the north. The new building is sited sufficiently distant from these to ensure that appropriate separation is achieved with the rear elevations which generally comprise either blank facades or stair core closest to the application property. The proposed new residential building is sited appropriately on the application land and can be regarded as enjoying an appropriate relationship with the neighbouring buildings.

Amenity of Proposed Dwellings

- 6.21 The proposed residential properties will provide future residents with a good standard of living accommodation to meet local demand. Each apartment will have outlook and good levels of natural light. No apartments will be overlooked either by one another or by neighbouring accommodation ensuring that residents will have the benefit of privacy.
- 6.22 The apartments will be built in line with current building regulations which will ensure high levels of insulation and energy efficient measures are incorporated. An acoustic report submitted with the application recommends additional sound proofing to bedroom windows. Otherwise amenity will be ensured by sound proofing in line with building regulations, alongside natural lighting and ventilation.

- 6.23 Due to the limited site size, it is not realistic to provide external amenity space, however this is not uncommon for town centre apartments and there are various apartment buildings in central locations that are not associated with private gardens. Future residents will have access to nearby public open spaces and other sports/recreation facilities such as Queens Park and Heywood Sports Village.
- 6.24 In summary, the proposed scheme will be of a high standard of design in terms of living accommodation. Whilst the site is surrounded by existing urban uses and development as is common for a brownfield site, no significant impact on neighbouring uses has been identified which may have an adverse amenity impacts on surrounding properties, whilst future residents of the scheme will enjoy a good level of amenity.
- 6.25 The proposed development will not have a detrimental impact on the amenity of existing residents or future occupants of the scheme, and as such accords with relevant provisions of the NPPF and Policy DM 1 'General Development Requirements' which seeks to ensure that all proposals for new development are compatible with surrounding land uses, both in terms of its impact upon those uses and the impact of the surrounding land uses upon the amenities of future residents.

Sustainable Development: Economic, Social and Environmental Benefits

- 6.26 The proposal will have high sustainability credentials as a result of the economic, social and environmental benefits that it will bring.

Economic Benefits

- 6.27 The proposed development will bring a number of economic benefits during and post construction. A shortage of housing opportunities can act as a barrier to people accessing job opportunities, thus preventing the Borough from achieving its economic potential. The proposed accommodation will help meet the needs of local people and those moving to the Borough, thereby contributing to Rochdale's economy. Ministerial statements refer to the pressing need of ensuring that the planning system does everything

it can to help sustain economic growth, urging planning authorities to make every effort to identify and meet the housing needs of their areas. It is accepted that house building is a driver of the local economy. Together with creating job opportunities during and after the construction phase, the proposed accommodation will contribute to Council tax revenue, whilst existing and future retailers/businesses in the local shopping centre will benefit from increased footfall and spending in the local community.

Social Benefits

- 6.28 The application site is in Heywood Town Centre and has access to the amenities and services which the centre has to offer, as well as being in close proximity to open space and recreation facilities, schools and places of worship, which will provide for the needs of future occupants of the scheme. As shown by the Transport Statement prepared by SCP, the site is accessible on foot and by cycle and has ready access to public transport services. The proposed development will deliver high quality housing and contribute to the creation of a sustainable community.

Environmental Benefits

- 6.29 The proposal will provide 23 new homes. It will have significant environmental benefits since it reuses a vacant brownfield site, thereby reducing development pressure to develop greenfield sites. As noted previously the site benefits from a sustainable and accessible location with good access to public transport and local shops, services and amenities due to being readily accessible on foot and by bike, reducing reliance on the private car.
- 6.30 For the above reasons the proposal constitutes sustainable development in accordance with the NPPF; and Core Strategy Policies SD1 'Delivering Sustainable Development', Policy SP2 'The Spatial Strategy for the borough', Policy SP3 'The Spatial Strategy for the townships' and Policy T2 'Improving Accessibility'.

Highways, Accessibility and Parking

- 6.31 The application does not propose any significant changes to the local highway network. The site is located within Heywood Town Centre and residents will have excellent accessibility to the shops, services, amenities and employment opportunities that this provides. The site is well connected by high frequency bus services. The Technical note prepared by SCP as part of the application provides full details.
- 6.32 Due to the highly sustainable and accessible location of the site it is not considered necessary for future residents to own a car. To further promote sustainable travel the scheme will provide safe cycle parking provision located on the ground floor of the building.
- 6.33 In terms of servicing, a bin store for the proposed accommodation is also incorporated into the ground floor of the building with future residents responsible for transferring their waste into the bins in the store. The bin store room provides internal space for the storage of wheeled bins to enable the segregation of refuse and recyclable waste. Waste collections will take place from Taylor Street.
- 6.34 For the reasons noted above the application proposal is considered to be in accordance with relevant provisions of the NPPF relating to transport and highways safety. At a local level the scheme is in accordance with relevant provisions of Core Strategy Policy T1 'Delivering Sustainable Transport' and Policy T2 'Improving Accessibility'.

Crime and Security Issues

- 6.35 A Crime Impact Statement has been commissioned by GMP and is submitted in support of the application. This makes a series of recommendations with regard to the physical construction. Overall the application proposal will bring a vacant site back into use. It will increase passive surveillance along Bethel Street, Earl Street and Taylor Street helping to minimise the potential for crime and anti-social behaviour. The application is therefore consistent with requirements of the NPPF relating to improved safety and reduction of

crime with Secure by Design features able to be secured by an appropriately worded planning condition.

Flood Risk/SUDS

- 6.36 The Environment Agency mapping for Heywood Town Centre shows the site to be located in flood risk zone 1 which is land assessed as having the lowest probability of flooding (1 in 1000 annual change). The scheme will not be at risk of flooding. Furthermore the site is at present a hardsurfaced area with brownfield run off characteristics. The new development will improve runoff characteristics over the existing position by incorporating SUDs measures. The application therefore complies with section 14 of the NPPF and Core Strategy Policy G8 'Managing water resources and flood risk' which seeks to ensure that new development does not lead to any increased form of flooding locally or downstream.



Figure 12: Environment Agency Flood Mapping. Extract: <https://flood-map-for-planning.service.gov.uk/>

Contamination

- 6.37 LK Consult Ltd were commissioned to carry out a Phase 1 Preliminary Risk Assessment (PRA) for the application site. Shallow Made ground is likely present below some or all parts of the site although this was not expected to be a significant source of landfill gas given the anticipated depth and likely nature of the made ground. The report concludes that there is sufficient information on the potential contaminative status of the site to allow conditional approval of a planning application, based on the proposed nature of the scheme submitted.
- 6.38 With regards to next steps the report makes recommendations for a Phase 2 intrusive investigation to be carried out in line with current guidance including BS10175, BS5930 CIRIA C665, RB17 and BS8485. This would be combined with exploratory or detailed investigation to be agreed with the local authority as part of condition discharge. The application therefore complies with the requirements of Core Strategy Policy G9 'Reducing the impact of Pollution' which seeks to ensure that new development should also not be adversely affected by existing sources of pollution.

Trees, Ecology and Biodiversity

- 6.39 During our site visit no floral or fauna species of conservation importance were noted anywhere within the site boundary. There are no trees, hedges or permanent buildings on the site and no opportunity for use by either nesting birds or roosting bats. The site is tarmacked hardstanding and is devoid of habitat and wildlife and may be considered to be entirely without nature conservation value.
- 6.40 The proposal redevelops the site and due to the form of development proposed, there are no external areas and no landscaped areas. The new building might achieve a net-gain in biodiversity by incorporating one or two bat boxes behind to the rear of the parapet wall at roof level. Conditioning these measures would ensure the application can be regarded as enhancing biodiversity in compliance with NPPF guidance and Core Strategy Policy G7 'Increasing the value of biodiversity and geodiversity'.

Air Quality

- 6.41 The development will operate without resident car parking and therefore will not have the potential to cause significant air quality impacts as a result of road traffic exhaust emissions associated with vehicles travelling to and from the site during operation. Potential construction phase air quality impacts may arise from fugitive dust emissions but could be controlled using best practice control measures during construction works. Air quality factors are not considered a constraint to planning consent for the development with any construction mitigation measures easily incorporated into a standard Construction Management Plan.

7. Affordable Housing Statement

Purpose of this Statement

- 7.1 This Affordable Housing Statement has been prepared by Paul Butler Associates Ltd on behalf of the applicant. The statement is submitted in support of a planning application on land at Earl Street (hereafter referred to as the site or the application site).
- 7.2 The application proposes redevelopment of the site described in the Planning Statement with 23 new residential units within a new apartment building. The purpose of this statement is to consider the planning policies pertaining to affordable housing in the context of the proposed scheme, and to assess the ability of this development to support such contributions in addition to the significant social, economic and environmental benefits already known to be associated with the proposed development.
- 7.3 The applicant's Project Team have carefully considered the deliverability of the project and implication of providing affordable housing contributions either on site or as part of a commuted sum payment.

- 7.4 It is evident within planning policy guidance that there are exceptions to the provision of affordable housing as part of a redevelopment scheme. This statement examines the local and national requirements for affordable housing contributions in the context of this proposed development.

Structure of Statement

- 7.5 This Statement is structured as follows:

- An examination of the national and local planning policy context relating to affordable housing.
- An assessment of the potential requirement for affordable housing in the context of the significant benefits associated with the scheme and relevant viability considerations.
- A summary and conclusions of the key considerations and the social, economic and environmental benefits associated with the scheme.

Planning Policy Context

- 7.6 The local and national policy context relating to the delivery of affordable housing is set out in the following documents:

- The Rochdale Core Strategy (RCS) adopted on 19 October 2016;
- Saved Policies of the Rochdale Unitary Development Plan (RUDP) adopted in 2006;
- Supplementary Planning Document: SPD 'Affordable Housing' (March 2008);
- National Planning Policy Framework (February 2019); and
- National Planning Practice Guidance.

Rochdale Core Strategy (RCS) adopted on 19 October 2016

7.7 Policy C4 – ‘Providing affordable homes’: This advises that the Council will seek affordable housing on all developments of 15 dwellings or more. The proposal at 23 dwellings just exceeds this threshold. The policy seeks a contribution to affordable housing of 7.5% of the development sales value of the overall scheme. Policy C4 seeks Affordable housing to be:

a) Provided on-site using this contribution to deliver homes of a type, size and tenure agreed by the developer and the local authority based on local evidence and, where appropriate, delivered in partnership with a Registered Provider; or

b) Provided via an off-site financial contribution in exceptional circumstances, for example, where: i. The local authority considers that the site is not an appropriate location for affordable housing e.g. poor access to local services and public transport; or ii. The type of housing on the site makes it difficult to provide an element of affordable housing; or iii. It is not practical to properly manage an element of affordable housing on the site e.g. on-site provision would only deliver a very small number of homes.

7.8 When negotiating the level of affordable housing and how it is to be provided the Council will take the following factors into account: i. The type of affordable housing required in the area; ii. The availability of Social Housing Grant or equivalent; iii. The need to deliver other planning objectives with a higher priority; and iv. The economic viability of the development.

Saved Policies of the Rochdale Unitary Development Plan (RUDP) adopted in 2006

7.9 Policy H/7 ‘Affordable Housing’ of the UDP was deleted and replaced by Core Strategy Policy C4 in October 2016.

Supplementary Planning Guidance

7.10 In 2008 the Council adopted an Affordable Housing Supplementary Planning Document. Elements of the guidance are superseded by Core Strategy policy and National Policy however the document remains a guide for developers.

- 7.11 This Supplementary Planning Document sets out more detail regarding the provision of affordable housing. It also sets out the calculation for the contribution within the policy which is based on an assumption of 15% of the homes being affordable with an average discount of 50% of the open market value. The level of off-site contribution will be calculated in the same way as on-site provision (i.e. 7.5% of the total development sales value).
- 7.12 The Note also provides guidance on viability. This notes that Applicants who cite non-viability due to particular development costs as the reason for not complying with UDP policy H/7 must support their case with financial evidence, and evidence that these matters were not ascertainable, which they should submit with the planning application. Where necessary this information will be audited by external experts but confidentiality of commercially sensitive information will be ensured.

Strategic Housing Market Assessment for Rochdale borough of 2015

- 7.13 The Strategic Housing Market Assessment for Rochdale borough of 2015 shows an estimated annual requirement, using the recommended Communities and Local Government methodology, of 204 additional affordable homes per year. Table 6.3 of the SHMA shows Heywood at 29% to have the highest proportion of affordable social rented and intermediate housing of all the Rochdale townships: Middleton 25%, Pennines 19%, Rochdale 24%. This suggests that the greatest need for affordable provision is in the areas outside Heywood (Figure 13).
- 7.14 Within Heywood the vast majority of properties are terraced houses (45%). Heywood is noted to have a lower percentage of one bedroom flats (8.4%) than the township of Middleton (11.9%). Heywood also has a lower percentage of two bedroom flats (4.9%) than Rochdale (6%). The Strategic Housing Market Assessment for Rochdale borough of 2015 goes on to note that *'Rochdale has a relatively youthful population, with 52.3% of residents aged under 40. However, over the period 2012 to 2028 the number of residents under 40 and between 40 and 64 is expected to reduce (by 4,100). The only cohort of the*

population expected to increase is the 65+ age group which is expected to increase by 11,700. By 2028, 20% of the population is expected to be aged 65 or over compared with 15.2% in 2012'. This suggests an aging population will be a driver of housing need and suitable accommodation will need to be provided in the Borough.

Township	Tenure			Total (%)	Base
	Owner Occupied (%)	Private Rented (%)	Affordable/Social Rented and Intermediate (%)		
Heywood	57.2	14.3	28.5	100.0	14405
Middleton	63.3	12.1	24.6	100.0	18404
Pennines	66.4	14.9	18.7	100.0	17365
Rochdale	60.8	15.9	23.3	100.0	37378
Total	61.8	14.6	23.5	100.0	87552

Source: 2010 Household Survey; rebased to 2011 households

Figure 13: Extract from Rochdale SHMA 2015 Update – Final Report, p53

Dwelling type and no. beds	Township (%)				
	Heywood	Middleton	Pennines	Rochdale	Total
Bungalow 1-2 Bed	7.2	7.2	6.3	5.1	6.1
Bungalow 3+ Bed	0.3	3.0	3.5	1.7	2.1
Flat 1 Bed	8.4	11.9	6.1	7.9	8.5
Flat 2 Bed	4.9	4.7	4.0	6.0	5.2
Flat 3+ Bed	0.7	0.3	0.4	1.5	0.9
Terraced House 1-2 Bed	26.2	11.9	18.2	19.2	18.6
Terraced House 3 Beds	17.4	17.3	16.2	10.9	14.3
Terraced House 4+ Beds	1.4	0.4	0.7	2.4	1.5
Semi-detached House 1-2 Bed	7.7	6.7	6.7	6.1	6.6
Semi-detached House 3 Bed	16.0	22.2	19.0	19.2	19.3
Semi-detached House 4+ Bed	2.4	3.1	4.2	1.9	2.7
Detached 1-3 Bed	1.6	5.1	3.9	6.1	4.7
Detached 4+ Bed	4.8	4.8	9.3	11.6	8.6
Other	0.9	1.2	1.5	0.4	0.9
Total	100.0	100.0	100.0	100.0	100.0
<i>Base (Valid responses)</i>	<i>13555</i>	<i>17803</i>	<i>16914</i>	<i>36601</i>	<i>84873</i>

Source: 2010 Household Survey; rebased to 2011 households

Figure 14: Extract from Rochdale SHMA 2015 Update – Final Report, p53

National Planning Policy Framework

- 7.15 Chapter 5 of the NPPF 'Delivering a sufficient supply of homes' sets out that planning policies should specify the type of affordable housing required, and expect it to be met on-site unless: off-site provision or an appropriate financial contribution in lieu can be

robustly justified; and the agreed approach contributes to the objective of creating mixed and balanced communities (paragraph 62).

- 7.16 Paragraph 63 of the NPPF states that affordable housing should only be sought on major developments and goes on to introduce the vacant building credit with the intention of encouraging the re-use of brownfield land. The policy states ‘where vacant buildings are being reused or redeveloped, any affordable housing contribution due should be reduced by a proportionate amount’. This reduction is the equivalent to the existing gross floorspace of the existing buildings.
- 7.17 In respect of planning obligations the national planning policy framework (NPPF) identifies that local planning authorities should consider whether otherwise unacceptable development could be made acceptable through the use of planning conditions or planning obligations. It highlights that planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition (paragraph 54). The NPPF also restates the three statutory tests for planning obligations which are defined in the CIL Regulations (paragraph 56).
- 7.18 The NPPF sets out that where up-to-date policies have set out the contributions expected from development, planning applications that comply with them should be assumed to be viable. It is up to the applicant to demonstrate whether particular circumstances justify the need for a viability assessment as part of the application. The weight to be given to a viability assessment is a matter for the decision maker, having regard to all the circumstances in the case (paragraph 57).

National Planning Practice Guidance (NPPG)

- 7.19 The NPPG sets out that the role for viability assessment is primarily at the plan making stage. Viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan.

- 7.20 The NPPG goes on to advise that it is the responsibility of plan makers in collaboration with the local community, developers and other stakeholders, to create realistic, deliverable policies. It is the responsibility of site promoters to engage in plan making, take into account any costs including their own profit expectations and risks, and ensure that proposals for development are policy compliant. (Paragraph: 002 Reference ID: 10-002-20190509).
- 7.21 The NPPG is clear that it is up to the applicant to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage.
- 7.22 Such circumstances could include for example, where development is proposed on unallocated sites of a wholly different type to those used in viability assessment that informed the plan; where further information on infrastructure or site costs is required; where particular types of development are proposed which may significantly vary from standard models of development for sale (for example build to rent or housing for older people); or where a recession or similar significant economic changes have occurred since the plan was brought into force (Paragraph: 007 Reference ID: 10-007-20190509).
- 7.23 The NPPG also provides specific guidance on the application of the vacant building credit which is intended to incentivise brownfield development, including the reuse or redevelopment of empty and redundant buildings Paragraph: 028 Reference ID: 23b-028-20190315.

Assessment

- 7.24 It is a requirement of section 38(6) of the Town and Country Planning Act 2004 that where a development plan contains policies relevant to an application, the decision must be made in accordance with the development plan, unless material considerations indicate otherwise.
- 7.25 The statutory development plan therefore relating to the application site consists of the Rochdale Core Strategy (2016) read in conjunction with the Strategic Housing Market Assessment for Rochdale borough of 2015. Material considerations relating to this

application include the National Planning Policy Framework, Planning Practice Guidance and now dated Supplementary Planning Guidance of 2008 prepared by Rochdale Council.

- 7.26 No vacant building credit is applicable to the site. Twenty three dwellings are proposed. Policy C4 advises that when negotiating the level of affordable housing and how it is to be provided the Council will take into account the type of affordable housing required in the area. Based on evidence in the SHMA, the Heywood Township has the highest proportion of affordable flats and housing in the Borough at 28% with affordable provision exceeding that in other townships of the Borough such as Middleton (18%). Owner occupied provision at 57% is lower than the local and national average. The SHMA estimates of need are largely based on survey work completed in 2010 and furthermore confirm that there is no shortage of 2 bedroom affordable units within Heywood. There appears to be no significant confirmed need to seek a small number of affordable 1 bedroom flats in this locality, rather a more pressing need to increase market opportunities for flats for owner occupation and rental which are planning objectives with a higher priority.

- 7.27 Paragraph 006 of the NPPG Guidance on Viability states:

“Where up-to-date policies have set out the contributions expected from development, planning applications that fully comply with them should be assumed to be viable. It is up to the applicant to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage...”

Such circumstances could include for, for example where development is proposed on unallocated sites of a wholly different type to those used in viability assessment that informed the plan; where further information on infrastructure or site costs is required; where particular types of development are proposed which may significantly vary from standard models of development for sale (for example building to rent or housing for older people); or where a recession or similar significant economic changes have occurred since the plan was brought into force...”

- 7.28 The adopted Local Plan currently comprises the Core Strategy 2016. The evidence base supporting affordable housing policy which informed Core Strategy policy is from 2015, six years old. This cannot be considered up to date and as such viability is a matter which needs to be considered on a case by case basis at the decision-making stage.
- 7.29 A previous planning application for a smaller number of units (14) has lapsed. Additional units will increase returns although even with 23 units we understand the profit associated with the scheme is unlikely to exceed approximately 10% due to the limited value of apartments in this location. This represents a relatively low level of profit and demonstrates 'delicate' viability associated with the scheme which is unable to support any affordable housing or other contributions.

Benefits of the Scheme

- 7.30 The delivery of 23 units on site will provide a number of benefits to the locality. The Planning Statement above has reviewed scheme and found there to be no significant negative impacts associated with the scheme. The proposals amount to the delivery of a well-designed attractive and successfully planned development. The benefits associated with the scheme are identified as follows:
- The redevelopment of a previously developed brownfield site with a scheme of high design quality.
 - The provision of 1 and 2 bedroom flats which are an under represented housing type within Heywood Township.
 - The delivery of a mix of high quality housing that will meet local needs by providing housing opportunities for older residents and contribute to a mixed and sustainable community.

- Securing direct investment into the local community through the provision of jobs during the construction period and spending by future residents within the Heywood Town Centre area.
- Ensuring no adverse impact on the amenity of existing neighbouring residents, whilst the design will enable a good standard of living for future occupants.

7.31 The economic, social and environmental planning benefits associated with the proposed scheme are set out in full in the supporting Planning Statement.

Summary and Conclusions

7.32 This statement has considered national and local planning policy guidance on the provision of affordable housing as part of the proposed scheme.

7.33 It is evident within the guidance that there are various exceptions for a non / reduced provision of affordable housing and planning obligations, not least the impact that they can have on the viability and deliverability of a scheme.

7.34 In accordance with national policy, it is necessary to consider the viability constraints associated with the site and we understand the scheme is considered unlikely to exceed a profit of greater than 10%. This represents a relatively low level of profit and demonstrates the delicate viability associated with the scheme. On this basis it is not considered that the scheme can support the provision of planning contributions such as affordable housing and remain viable.

7.35 In considering the acceptability of the scheme there are a number of identified planning benefits which weigh heavily in favour of supporting the scheme. It is considered that the scheme constitutes 'sustainable development' and should therefore be approved without delay.

8. Conclusion

- 8.1 The proposed scheme involves the redevelopment of underused brownfield land with a new apartment building. The site is located in a highly accessible and sustainable location within Heywood Town Centre. It will provide housing on previously developed land which will contribute to meeting housing need in the Borough and the Council's policy objective of providing new housing in Heywood on brownfield land. It will also provide a boost to local shops and business including through increased footfall and spending by future residents. The development will also provide a series of positive economic, social and environmental benefits and constitutes sustainable development.
- 8.2 The application scheme is considered to be in full compliance with the adopted policies of the adopted Development Plan, relevant provisions of the NPPF, and other relevant national and local guidance documents.
- 8.3 As evidenced in this statement the site has been shown to be a suitable and sustainable location for new development with no known adverse impacts arising from the development that would significantly and demonstrably outweigh its benefits. There are no material planning considerations existing that would justify a refusal of planning permission. Consequently the proposals are considered to constitute sustainable development as defined by the NPPF and the presumption in favour of sustainable development should apply in the determination of this application.
- 8.4 For the reasons given within this statement the proposal is consistent with national and local planning policy guidance. On this basis Paul Butler Associates Ltd are pleased to support this planning application and recommend it be positively determined.