GVA HOW Planning



Supporting Planning Statement

Proposed Residential Development Land at Royle Road, Rochdale

January 2019

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For and on behalf of GVA HOW Planning

1. Introduction

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

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

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

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

1.5 This SPS assesses the development proposals against relevant planning considerations including national and local planning policy and other material considerations. It summarises the planning justification for why the proposals represent policy compliant sustainable development and should be approved in accordance with paragraph 38 of the NPPF.

2. Site Location and Description

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

Site Location and Accessibility

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

2.3 The site is also well provided for by local services and facilities to meet day to day needs along Manchester Road, including a pharmacy, post office, several supermarkets, a cinema, hotel, gym, public house, places of worship, medical centres and dentists. Brimrod Community Primary School, Ashfield Valley Primary School, Marland Hill Community Primary School, Beech House School and Matthew Moss High School are all located within a 2km walking catchment.

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

2.5 Castleton Train Station is located within walking distance of the site to the south. Rochdale Train Station is located 1.9 km to the north, within the town centre. The stations provide services to Southport, Wigan, Manchester, Leeds, Blackburn, Clitheroe and Rochdale. Overall the site is in a highly accessible and sustainable location.

Site Characteristics and Surroundings

2.6 The site comprises of 7.93 ha of brownfield land which is currently vacant, as shown edged red on the Site Location Plan included within **Appendix 2.**

2.7 A large portion of the site comprises hardstanding, following the demolition of the former Dunlop Mill and there is an area of mature trees on the western portion of the site. Existing pedestrian and vehicular access is achieved onto the site via Royle Road which forms the western boundary of the site.

2.8 To the north of the site is Edinburgh Way and to the south of the site is existing light industrial units off Lynroyle Way. To the east of the site is the existing railway line beyond which is Gorrels Way Industrial Estate. To the west is Royle Road surrounding which are existing terrace and semi-detached residential properties and a Tesco Superstore.

2.9 The whole of the site lies within Flood Zone 1 which is defined as having a less than 1 in 1000 annual probability of flooding, which indicates a low probability of flooding and is therefore suitable to accommodate residential development from a flood risk perspective.

2.10 The site is not within a Conservation Area nor are there any listed buildings on site or within the surrounding area. The mature trees located on the western portion of the site are subject to a Tree Preservation Order (TPO).

Planning History

2.11 A desk-based search was conducted to find the site's relevant planning history.

2.12 The site area is predominantly hard standing brownfield land following demolition of previous structures. Details of these applications are outlined in Table 1 below:

Application Ref	Development Description	Status	Date
85/D18717	Use of premises for warehousing and distribution	Approved	January 1986
03/D41983	Change of Use from coach repair business to haulage business	Approved	September 2003
06/D47663	Use of unit as Dance School/ Offices	Approved	September 2006
07/D49936	Change of Use from industrial to 5-a-side football facility (temporary for three years)	Refused	November 2007
08/D50788	Change of Use from industrial to 5-a-side football facility – resubmission of D49936 (retrospective)	Refused	July 2008
09/D51805	Change of Use of first floor of unit A to allow B8 and A1 use for a temporary period of two years	Approved	May 2009
10/D53505	Change of Use of part of car park to create a car wash/ valeting business (Class B2 Use)	Approved	September 2010
12/D55247	Application for prior notification of demolition of premises	Approved	March2012
12/56276/DEM	Application for prior notification of demolition of Unit A and Tower	Approved	December 2012
12/56349/DEM	Application for prior notification for the demolition of units G-J at Royle Works	Approved	January 2013

Pre-Application Consultation

2.13 Pre-application discussions have taken place with the Local Planning Authority (LPA) to discuss the principle of development at the site and submission requirements (ref: PREAPP/00090/18). In addition to these formal pre-application discussions with the LPA a consultation leaflet has been distributed to nearby businesses and residential properties to inform them of the proposals for the site and submission of the planning application. A copy of the leaflet is provided at **Appendix IV**.

3. Proposed Development

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

Description of Development

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

"Demolition of all on-site structures and the redevelopment of the site for residential dwellings (Use Class C3) with associated ground works, landscaping and vehicular access from Royle Road".

3.3 In line with the 'Town and Country Planning (Development Management Procedure) (England) (Amendments) Order 2013 – Guidance Note for Design and Access Statement', the following subsection details the proposed site layout, the development amount, scale and appearance, and the proposed landscaping. Additional details can be found in the submitted Design and Access Statement prepared by Countryside.

Use and Amount

3.4 The site will be developed to provide 238 dwellings. In addition, the proposals include provision for access arrangements, internal roads and servicing areas, pedestrian connections, new and retained landscaping, off-street parking and gardens areas which are shown on the Site Layout Plan.

3.5 The Site Layout Plan shows a range and mix of house types as set out in the table below:

Proposed House Type	No of Bedrooms	Size of Units (sq ft)	No. of Units
2 bed apartment	2	613	24
Irwell	2	662	14
CP Colne	2	734	18
GP Weaver	3	899	22
Weaver	3	850	21
New Weaver	3	865	19
Weaver Up	3	964	3

Ellesmere	3	855	34
Ellesmere Up	3	952	1
Longford	3	893	10
New Stamford	3	1005	14
Ashbourne	3	991	11
GP Granthan	3	899	6
Grantham	3	850	3
GP Lyn	4	1046	12
Dee	4	1062	6
Avon	4	1129	2
Avon SA	4	1129	3
Coniston	4	1183	4
Dunham	4	1184	11

3.6 The residential dwellings are orientated to have direct access onto the road and create active frontages to give natural surveillance to the public realm. Proposed housing has been designed to ensure that corners will be addressed by using frontage/windows on both elevations of the street, avoiding blank and featureless gables. Each dwelling is set back from the road and includes front gardens areas / driveways to accommodate cars and reduce on-street parking.

3.7 The 24 two bed apartments are located in the southeast corner of the site so not to appear dominant over the proposed residential houses. The apartment buildings are four storeys in height and have been designed to be compliment the residential houses, further details of the design development are found in the submitted drawings and Design and Access Statement (DAS).

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

3.9 It is anticipated that the proposed residential development will not only address the significant local housing need, but also the complementary nature of housing in this location compared to its former

industrial usage is considered to largely benefit the character of the local area in terms of improving local amenity, bringing a vacant site back into active use and reducing industrial traffic.

Scale and Appearance

3.10 The residential development proposes a range of dwellings across the site ranging from two and two and a half storeys dwellings to a four storeys apartment block. The majority of the houses proposed are two storeys in height, some with habitable roof space. The proposed scale reflects the surrounding area and in particular the existing residential properties along Royle Road.

3.11 The appearance details of the proposed dwellings can be found in the submitted DAS. The proposed materials have been selected to ensure consistency with the local vernacular of predominantly red brick, render and roof tiles. The architectural palette will consist of light red brick, red multi brick and buff multi brick with selected plots being partially rendered (White) to provide further variety within the street scene.

Landscaping

3.12 The Landscaping Strategy is an integral part of the proposed development and a Landscape Strategy document and associated plans has been prepared by Urban Green and is included within the suite of planning application documentation submitted with this application. The proposals include 3 distinct landscape character areas across the site, including; public open space, formal play provision and landscape buffer area. The proposed formal play area covers 180m^2 of the site and includes a range of play equipment aimed at younger children. In addition, the proposed open space area includes a play trail, which is aimed at older children and extends the opportunities for imaginative and social play.

3.13 Alongside the play trail, the public open space seeks to secured enhancements in terms of amenity and ecological value, through the planting of new trees, shrubs and meadow planting, which improves the quality and usability of this space. The landscape buffer area has been designed to reduce the visual impact of the proposed development from Edinburgh Way, proving a Greenscreen Acoustic barrier and new tree planting along the site boundary.

Access

3.14 Full details of the sites pedestrian and vehicular arrangements can be found within the accompanying planning application drawings and plans, and within the DAS and Transport Assessment. The proposed means of pedestrian and vehicular access is located on the western boundary, via Royle Road. Within the development, all roadways and footpaths are shown to be safe by having good natural surveillance during daylight and being well illuminated during the hours of darkness. There are no through routes for vehicles. Footpaths from car parking areas lead directly to the dwellings they are provided for.

3.15 The level of parking provision is at the maximum permissible with local planning policy. The layout includes a maximum of two external spaces per dwellings for houses, and one space per residential apartment. Precise details of the paring provision can be found with the submitted Transport Assessment prepared by CBO Transport.

4. National Planning Policy

National Planning Policy Framework (NPPF) (July 2018)

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

The Presumption in Favour of Sustainable Development

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

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

For decision taking this means:

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

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

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

ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole"[1].

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

[1] National Planning Policy Framework, July 2018, Page 6, Paragraph 11

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

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

*c) **an environmental objective** – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy."*[2]

Delivering a Sufficient Supply of Homes

4.4 Paragraph 64 of the Framework states that for major development including housing, it should be expected that at least 10% of the homes are available for affordable home ownership[3], unless this would exceed the level of affordable housing required in the area, or significantly prejudice the ability to meet the identified affordable housing needs of specific groups.

4.5 The 2018 Framework addresses the supply and delivery of housing at Paragraph 73 and states:

"Strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period, and all plans should consider whether it is appropriate to set out the anticipated rate of development for specific sites. Local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old. The supply of specific deliverable sites should in addition include a buffer (moved forward from later in the plan period) of:

a) 5% to ensure choice and competition in the market for land; or

b) 10% where the local planning authority wishes to demonstrate a five-year supply of deliverable sites through an annual position statement or recently adopted plan, to account for any fluctuations in the market during that year; or

[2] Ibid, Page 5, Paragraph 8
[3] Footnote 29 of the NPPF states: "*As part of the overall affordable housing contribution from the site.*"

c) 20% where there has been significant under delivery of housing over the previous three years, to improve the prospect of achieving the planned supply".

4.6 The 2018 Framework introduces the Housing Delivery Test and paragraph 75 states:

"To maintain the supply of housing, local planning authorities should monitor progress in building out sites which have permission. Where the Housing Delivery Test indicates that delivery has fallen below 95% of the local planning authority's housing requirement over the previous three years, the authority should prepare an action plan in line with national planning guidance, to assess the causes of under delivery and identify actions to increase delivery in future years".

4.7 The 2018 Framework also seeks the timely implementation of proposals for housing development and paragraph 76 states:

"To help ensure that proposals for housing development are implemented in a timely manner, local planning authorities should consider imposing a planning condition providing that development must begin within a timescale shorter than the relevant default period, where this would expedite the development without threatening its deliverability or viability. For major development involving the provision of housing, local planning authorities should also assess why any earlier grant of planning permission for a similar development on the same site did not start."[4]

Building a Strong, Competitive Economy

4.8 The 2018 Framework confirms that planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. In addition, paragraph 84 states that previously developed land (PDL) "*and sites that are physically well related to existing settlements, should be encouraged where suitable opportunities exist"*[5].

Promoting Sustainable Transport

4.9 The 2018 Framework promotes sustainable transport choices and seeks to support sustainable patterns of development. In particular, paragraph 110 of the 2018 Framework states that applications for development should:

"a) give priority first to pedestrians and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services and appropriate facilities that encourage public transport use;

[4] Ibid, Page 20 -21, Paragraphs 73, 75 and 76
[5] Ibid, Page 24, Paragraph 84

b) address the needs of people of people with disabilities and reduce mobility in relation to all modes of transport;

c) create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;

d) allow for the efficient delivery of goods, and access by service and emergency vehicles; and

e) be designed to enable charging of plug in and other ultra-low emission vehicles in safe, accessible and convenient locations[6]*".*

4.10 Paragraph 111 states:

"All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impact of the proposals can be assessed"[7].

Making Effective Use of Land

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

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

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

4.13 Paragraph 120 states that planning policies and decisions need to reflect changes in the demand for land. Specifically, this paragraph states that where the local planning authority considers there to be no reasonable prospect of an application coming forward for the use allocated in a plan:

a) "They should as, part of plan updates, reallocate the land for a more deliverable use that can help to address identified needs (or, if appropriate, deallocate a site which is undeveloped); and

[6] Ibid, Page 32, Paragraph 110
[7] Ibid, Page 32, Paragraph 111

b) In the interim, prior to updating the plan, applications for alternative uses on the land should be supported, where the proposed use would contribute to meeting an unmet need for development in the area".

Achieving Well Design Places

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

"Permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and they way in functions, taking into account any local design standards or style guidance in plans or supplementary planning documents. Conversely, where the design of a development accords with clear expectations in plan policies, design should not be used by the decision maker as a valid reason to object to development".

4.15 In determining applications, paragraph 131 assigns:

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

Implementation of the NPPF

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

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

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

Planning Practice Guidance

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

within the NPPF. It is therefore a significant material consideration in the determination of the application.

5. Local Planning Policy

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

Development Plan

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

5.3 The adopted Development Plan for Rochdale comprises:

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

The Saved Rochdale UDP

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

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

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

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

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

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

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

5.6 The above policy does not allow for the change of use of existing/ allocated employment uses and as such is clearly not consistent with paragraph 120 of the NPPF, which stated that alternatives uses on land should be supported where the proposed use would contribute to meeting an unmet need

and there are no reasonable prospect of an application coming forward for the allocated use. In light of this and in accordance with paragraph 213 of the NPPF no weight should be afforded to Policy EC/2 in the determination of this application.

The Rochdale Core Strategy

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

Housing Policies

5.8 Policy C1 (Delivering the Right Amount of Housing in the Right Places) states that Rochdale will deliver at least 460 net additional dwellings per year up to 2028. The policy sates 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.

5.9 Policy C3 (Delivering the Right Type of Housing) states the Council will deliver the right types of homes, well designed and built to appropriate densities, to meet the overall needs and aspirations of the borough.

5.10 Policy C4 (Providing Affordable Homes) states that the Council will seek affordable housing on all developments of 15 dwellings or more. It will seek a contribution to affordable housing of 7.5% of the development sale value of the overall scheme.

Employment Policies

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

5.12 Specifically, this policy also notes that non-employment uses, including housing, in employment zones will be acceptable where:

i) "There is a proven lack of demand for the site for a suitable employment use, it's not suited in land use terms to any employment use and there is a satisfactory employment land supply in the area; and

ii) It would not impact on the ability of existing businesses to operate satisfactorily; and

iii) it will enable high-quality mixed-use employment development on strategic corridors, close to centres or transport interchanges, or

iv) it will help support the delivery of regeneration proposals in a priority regeneration area; or

v) redevelopment of the site would enable reinvestment that will provide jobs in the borough; or

vi) *development would remove a severe environmental problem."*

Transport Policies

5.13 Policy T2 (Improving Accessibility) states that the Council will improve accessibility by locating development where good access to public transport is available or can be provided, backed by measures to reduce the need for travel and effective provision for cyclists, pedestrians and people with impaired mobility. The policy also states that development will be appropriately located to minimise the need to travel by car and the number and length of car trips made to access local amenities.

General Development Management

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

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

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

Other Material Considerations

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

- Evidence base for Greater Manchester Strategic Framework (January 2016)
- Emerging Rochdale Borough Allocations Plan;

- Rochdale Employment Land Study (July 2008);
- Supplementary Planning Documents and Guidance;
- Strategic Housing Land Availability Assessment (April 2018); and
- Greater Manchester Strategic Framework (evidence base) (2016).

5.18 Each of these documents are summarised below.

Emerging Rochdale Borough Allocations Plan

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

Rochdale Employment Land Study (2008)

5.20 The Employment Land Study was published by DTZ in July 2008, it calculates the current and predicated employment land position for the borough. In its summary it states that there should be a reduction of 41ha of industrial land across the Borough.

5.21 The document states that proposals for redevelopment for or change of use to non-employment uses will only be permitted where:

- The proposal does not result in a net loss of employment capacity (in terms of land area, floorspace or jobs); and
- The primary function of the PEZ for employment uses is not undermined; and
- The proposal is in accordance with other LDF policies.

5.22 Evidence has been submitted with this planning application to demonstrate compliance with the employment policies and the Employment Land Study. The compliance of the proposals with these requirements is assessed in detail in Chapter 6 of the Supporting Planning Statement.

Supplementary Planning Documents and Guidance

5.23 Rochdale have prepared and adopted several supplementary planning documents and guidance that provide further non-statutory planning guidance on the interpretation and implementation of adopted local policy. The relevant SPD's that have fed into the scheme's evolution are:

- Guidelines and Standards for Residential Developments SPD (adopted June 2016);
- Affordable Housing SPD (adopted March 2008);
- Provision for Recreational Open Space in New Housing SPD (adopted March 2008); and
- Residential Design Guide SPD (adopted September 2007).

Strategic Housing Land Availability Assessment (2018)

5.24 The latest Strategic Housing Land Availability Assessment was published in July 2018 but assesses the housing supply position as of 1st April 2018. Based on this assessment the council claims it has a 6.1 years deliverable housing land supply. However, this calculation is based on the Council's Core Strategy need to provide 460 additional homes per year, it does not consider the proposed increase for housing need as set out in the emerging Greater Manchester Spatial Framework. This is set out in paragraph 5.27 of this statement.

5.25 The site is featured in the SHLAA (Ref. SH 2239) for having a capacity to deliver 200 units; 150 units within the next 6 – 10 years and 50 units within the next 11 – 15 years.

The site also features on the Council's Brownfield Register (Ref. SH 2238) as a result of being identified as being suitable for residential development within the Council's Strategic Housing Land Availability Assessment.

Emerging Greater Manchester Spatial Framework

5.26 Work is currently underway on the Greater Manchester Spatial Framework (GMSF), a new strategic plan being developed by the Greater Manchester Combined Authority which will be the overarching development plan for Greater Manchester's ten local planning authorities. Consultation on the draft vision, strategic objectives and strategic options for the GMSF along with the evidence base took place between November 2015 and early January 2016.

5.27 According to policy GM5 of the draft GMSF Rochdale would be required to provide 775 dwellings per annum. This is a significant increase to Rochdale's latest requirement of 460 additional homes per year based on the Council's Core Strategy. In accordance with appeal decision APP/N4205/W/15/3136446 and based on the NPPF and Planning Practice Guidance (PPG) consideration should be given to the latest most up to date housing requirements which in this instance is the draft GMSF.

Summary

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

6. Assessment Against the Development Plan

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

Principle of Development

Need for Residential Development

6.2 Policy C1 of the Core Strategy seeks to deliver at least 460 net additional dwellings per year up to 2028 to ensure that current housing needs are met. This policy also seeks to maximise the potential of previously developed sites, setting a target of 80% of new housing in urban areas to be on previously development land.

6.3 There is a requirement for more new homes in Rochdale to meet local needs. To support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed. The Core Strategy housing target of 460dpa is a minimum. The Council should seek to meet and exceed this target wherever possible through sustainable development.

6.4 Policy C3 also seeks to ensure that the right types of homes are built to meet the overall needs and aspirations of the borough. In accordance with this policy, the Proposed Site Plan shows a mix of house types which have been incorporated to respond to local needs. In addition, the scheme will provide 30% of affordable housing split between 38 dwellings for shared ownership and 34 dwellings for social rent.

6.5 The proposed development seeks to provide a range of dwellings as shown in paragraph 3.5 of this statement, with further detail provided in the DAS and submitted drawings. The range of dwellings responds to the latest Strategic Housing Market Assessment (SHMA, 2015) by providing a mixture of dwelling types and sizes including 2, 3 and 4 bed properties which are reflective of the surrounding house types and market area. The overall size of 2, 3 and 4 bed properties also vary across the site to meet varying needs. Additionally, there is a mixture of open market housing and affordable housing in response to local need and planning policy.

6.6 In summary, the proposals will result in the redevelopment of currently vacant brownfield site, providing new housing on a highly sustainable site that is highlighted as being suitable for residential development in the Council SHLAA and Brownfield Register and has been identified for housing in the emerging local plan. The development will provide much needed housing to help meet the Council housing requirement and as such clearly accords with Core Strategy Policies C1 and C3.

Loss of Employment

6.7 Whilst it is noted that the Council's own evidence base supports the loss of employment at the site, through the SHLAA and emerging Site Allocation Plan, consideration of the proposed development against its current employment allocation is provided below for robustness.

6.8 The application site is situated in an "Primary Employment Zone" as designated under the Rochdale UDP (2006). The key policy in determining the principle of loss of employment is saved Policy E2 of the Rochdale Core Strategy (2016). Policy E2 states non-employment uses, including housing, in employment zone will be acceptable where:

i) "There is a proven lack of demand for the site for a suitable employment use, it's not suited in land use terms to any employment use and there is a satisfactory employment land supply in the area; and

ii) It would not impact on the ability of existing businesses to operate satisfactorily; and

iii) it will enable high-quality mixed-use employment development on strategic corridors, close to centres or transport interchanges, or

iv) it will help support the delivery of regeneration proposals in a priority regeneration area; or

v) redevelopment of the site would enable reinvestment that will provide jobs in the borough; or

vi) *development would remove a severe environmental problem."*

6.9 It is noted that the policy does not require applications for alternative uses to meet all of the criteria listed above. Instead it requires application to meet point i) and ii) and at least one of points iii) to vi). Consideration of the proposed development against the most relevant factors set out above is given below.

Lack of Demand, Site Suitability & Land Supply

6.10 The Employment Land Review prepared by Avison Young and submitted alongside the application details the employment market demand within the area. The report concludes by stating there are alternative sites within the Borough such as Crown Business Park and Kingsway which are better suited for large scale employment use. Furthermore, it states Rochdale does not have a shortage of employment land and there is no reasonable prospect of the site coming forward for employment uses.

6.11 Furthermore, a recent planning decision to approve the provision of 33 acres of employment land (plan ref. 16/01399/HYBR) has resulted in the Council having achieved their target provision of 210 hectares for employment land over the plan period as set within the Core Strategy, policy SP2.

6.12 In addition, it is noted that the Council are in the process of preparing an Allocations Plan which, once adopted will supersede the UDP and provide site allocations for specific types of developments, including housing developments. As stated above, the application site is proposed to be allocated for residential development and highlights that the Council's own evidence indicates that the site should be release for residential development.

Impact on Existing Businesses

6.13 The site is located in close proximity to existing residential dwellings to the west and north, a Tesco superstore to the northwest corner, and existing employment uses to the east and south. In relation to the site's eastern boundary a railway line divides the site from the existing employment site. A proposed residential development having no adverse impact on the businesses located here which include car showrooms, and manufacturing and warehousing units.

6.14 For the Tesco superstore located to the northwest of the site, the proposed development is expected to have a positive impact on the business operations of this store by increasing the potential footfall of local resident's keen to shop here.

6.15 The closest existing businesses to the site are located adjacent to the southern boundary which include a storage warehouse, offices and trampoline centre. In order to reduce any potential on these existing businesses from the residential development and vice-versa it is considered that sufficient mitigation including boundary landscaping treatment and distance between the two uses has been provided to ensure that the two uses can coexist.

6.16 It is also noted that there is a large presence of residential uses within the area, particularly to the west and north of the site, which currently co-exist with similar separation distances, and therefore the proposed development would not have any further impact on the existing businesses operations.

Regeneration and Job Creation

6.17 The site is currently vacant brownfield land which is poorly maintained and detracts from the surrounding area. The proposed development will bring the site back into use, enhance the physical appearance of the local area and contribute to environmental improvements, through good design and associated green space and public realm.

6.18 Not only will the proposed development improve the environmental conditions of the site, it will also provide direct and indirect economic, social and environmental benefits. These benefits include a mix of new housing, increased spending in the local economy, redevelopment of a brownfield site

and many more which are set out in detail in Section 7 of this report and amount to very significant and weighty material considerations in favour of the scheme.

Design

6.19 The DAS demonstrates how the design of the proposed development has evolved and developed as a result of analysis of the site context, characteristics and opportunities. Policy P3 and DM1 of the Core Strategy seeks to ensure that development will achieve a high standard of design and will respond to the surrounding context. The scheme has been designed to be fully in accordance with this policy to ensure that the development will make a positive contribution to the existing local character of the area, including being compatible with all surrounding land uses, and will provide satisfactory access.

6.20 The detailed layout and design has been considered in light of relevant Supplementary Planning Documents (SPD), including the Guidelines and Standards for Residential Developments SPD (June 2016), to ensure that the proposals make a positive contribution to the form and quality of the surrounding areas by meeting the necessary standards and protecting residential amenity for existing and future residents.

Transport

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

6.22 The purpose of the assessment is to provide information on the possible transport implications the proposed development would have on the surrounding transport infrastructure. In compliance with Policy T2 of the Rochdale Core Strategy, the submitted Transport Assessment and Travel Plan confirm the site's suitability for sustainable residential development as its impact is not considered significant so as to warrant refusal.

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

Ecology and Trees

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

management and habitat creation which would provide a net gain in biodiversity in accordance with the principles of the NPPF.

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

Flood Risk and Drainage

6.26 A Flood Risk Assessment has been produced by ELLUC Projects and submitted as part of this application. The assessment confirms that the site is appropriate for residential development as it is located within Flood Zone 1 according to Environmental Agency flood maps, it therefore passes the sequential test and also complies with Policy G8 of the Rochdale Core Strategy.

6.27 In addition to the FRA, the assessment includes a proposed drainage strategy. Full details of the drainage strategy can be found within this assessment but to conclude the consultants recommend that Sustainable Drainage Systems (SuDS) should be implemented in order to ensure that post-development run-off volumes and peak flow rates discharging from the site do not exceed current levels or become unsatisfactory with statutory bodies.

Land Contamination and Site Assessment

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

Air Quality and Noise

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

6.30 An Environmental Noise Study has been prepared by Red Acoustics and submitted as part of this application. The results of the study found that future residents would be adequately protected from noise subject to the proposed mitigation and as such the proposed development complies

fully with National Planning Policy and there should be no constraint to development in relation to noise.

Viability Assessment

6.31 In accordance with the NPPF a Viability Assessment it currently being prepared and will be submitted to support the application. The assessment demonstrates that the site has many constraints typically related to redevelopment of brownfield land (e.g. ground conditions) which impacts the overall viability of the scheme. These matters will be considered during the course of the application's determination period with Council Officers.

Summary

6.32 In the context of the above it is clear that the principle of residential development at the site is acceptable. The loss of employment land is justified by the aforementioned site specific circumstances and the redevelopment for residential purposes clearly accords with the relevant housing policies and will provide new housing to meet the Borough's housing requirement.

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

7. Sustainable Development

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

Sustainable Development

7.2 The overarching policy objective of the NPPF is the presumption in favour of sustainable development. The NPPF at Paragraph 7 indicates that there are three dimensions to sustainable development: economic, social and environmental. An assessment of the proposal against the three dimensions of sustainable development as defined in the NPPF is provided below:

Economic

7.3 The proposed development will contribute to building a strong, responsive and competitive economy. In particular, the economic benefits that arise from the proposed development are:

- **Increased Spending in the Local Economy** – the additional households would generate new spending in the local area from increased footfall. The proposals will also generate additional Council Tax contributions for RBC;
- **New Construction Jobs** – the construction phase of the development will create a number of jobs in the construction sector over the built time of the development, as well as further indirect job opportunities, which can provide benefits for the local labour market.
- **New Homes Bonus** – the council will benefit from the Government's New Homes Bonus Scheme and additional annual Council Tax. It has been calculated that assuming the dwellings fall within Tax Band D, the Council would receive circa £100,000 over four years which they can spend to benefit the local community.

Social

7.4 The proposed development will support the creation of a strong, vibrant and healthy community. In particular, the social benefits are:

- **High Quality Housing Development** – the delivery of a high-quality residential scheme in Rochdale;
- **A Deliverable Site** – housing at the site can be delivered immediately as it is suitable and available; and
- **A Mix of Housing** – the scheme will deliver a mix of housing types, adding to the limited supply and diversifying the range of choice of housing.

- **Affordable Housing –** the scheme will provide circa 70 affordable houses in line with current local policy.

Environmental

7.5 The proposed development will not result in significant harm to the natural environment as well as using natural resources prudently and address climate change through the design of the proposed dwellings. In particular, the proposed development will:

- **Redevelopment of Brownfield Site** - regenerate an unsightly site, significantly enhancing the physical appearance of the local area;
- **A Sustainable Location** – a high quality, well designed, comprehensive housing development will be secured in a very sustainable location, surrounded by other residential uses and in close proximity to a range of services and public transport services in the local area;
- **Efficient Use of Land** – the application proposes an efficient use of land to maximise its development whilst taking into account key site opportunities and constraints, delivering a viable scheme;
- **Environmental enhancements** – the application site is of extremely limited ecological value, and will be enhanced through provision of areas of formal open space, amenity open space and dedicated garden areas to each residential unit; and
- **Compatibility with Surrounding Uses** – the proposed residential development will be fully compatible with the neighbouring uses.

Summary

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

8. Conclusion

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

8.2 The site has been identified for residential development by the Council as part of its emerging Local Plan.

8.3 Evidence submitted with this planning application demonstrates that the change of use of the site to residential from employment would have no material consequence in regard to the Council's ability to maintain an adequate supply of employment land, as confirmed in the Employment Land Assessment prepared by Avison Young.

8.4 The application proposals represent a sustainable development in a highly accessible location. This planning application will improve the local area, benefit local people and the wider Borough. It represents the type of residential development which the Government is encouraging and will help to improve peoples' lives and economic prosperity in the Borough.

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

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

Appendix I
Schedule of Supporting Plans and Documents

Appendix II
Site Location Plan

Appendix III

Proposed Site Plan

Appendix IV

Appendix IV

Consultation Leaflet

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