



Kellen Homes Ltd

CASTLETON SIDINGS

Planning Statement Addendum



Kellen Homes Ltd

CASTLETON SIDINGS

Planning Statement Addendum

TYPE OF DOCUMENT (VERSION) PUBLIC

PROJECT NO. 70105603

OUR REF. NO. 70105603.002

DATE: OCTOBER 2023

WSP

8 First Street

Manchester

M15 4RP

Phone: +44 161 200 5000

WSP.com

QUALITY CONTROL

Issue/revision	First issue	Revision 1	Revision 2	Revision 3
Date	18/12/2023			
Prepared by	VW			
Signature				
Checked by	DH			
Signature				
Authorised by	DH			
Signature				
Project number	70105603			
Report number	Rpt.003			
File reference	70105603.PS.03			

CONTENTS

1	INTRODUCTION	1
2	PROPOSED SCHEME AMENDMENTS	3
	Heywood Road Vehicular Access	3
	Design	3
	Hard and Soft Landscaping	3
3	CONSULTATION RESPONSES	5
3.2	RESPONSES TO CONSULTEE COMMENTS	5
	DEVELOPMENT MANAGEMENT (DESIGN)	5
	CANAL AND RIVERS TRUST	7
	EDUCATION	7
	ENVIRONMENTAL HEALTH (AIR QUALITY)	7
	FIRE SERVICE (GREATER MANCHESTER)	7
	GREATER MANCHESTER ECOLOGY UNIT	8
	NATURAL ENGLAND	8
	LOCAL HIGHWAYS	8
	NATIONAL HIGHWAYS	8
	TRANSPORT FOR GREATER MANCHESTER (TFGM)	8
	LOCAL LEAD FLOOD AUTHORITY	9
	UNITED UTILITIES	9
3.3	CONSULTEES WITH NO TECHNICAL QUERIES OUTSTANDING	9
	ACTIVE TRAVEL ENGLAND	9
	ARCHAEOLOGY (GMAAS)	9
	COAL AUTHORITY	9
	ENVIRONMENT AGENCY	9

ENVIRONMENTAL HEALTH (CONTAMINATION)	9
ENVIRONMENTAL HEALTH (NOISE AND ODOURS)	9
FORMAL SPORT AND OPEN SPACE	9
GREATER MANCHESTER POLICE - DESIGN FOR SECURITY	9
LIGHTING	9
NHS HEYWOOD AND MIDDLETON CCG	10
NETWORK RAIL	10
STRATEGIC HOUSING	10
SPORT ENGLAND	10
4 PLANNING POLICY CONTEXT	11
4.1 BACKGROUND CONTEXT	11
4.2 WEIGHT TO PLACES FOR EVERYONE	11
PREMATURITY IN RESPECT OF PFE	12
5 THE CASE FOR DEVELOPMENT	13
THE PRINCIPLE OF DEVELOPMENT	13
IDENTIFIED HARM	13
VERY SPECIAL CIRCUMSTANCES	13
6 PLANNING ASSESSMENT	17
7 DRAFT ALLOCATION JPA20	19
SUMMARY	21
8 CONCLUSIONS	22

1 INTRODUCTION

- 1.1.1. Application reference 23/00431/HYBR seeks hybrid planning permission (part outline and part full) for:
- “Outline application (all matters reserved) for operational works to facilitate the East Lancashire Railway (ELR) extension;*
- Full application for Residential development for 191 dwellings including access, landscaping, open space together with erection of sub-station and foul water pump station”.*
- 1.1.2. This Planning Addendum has been prepared to assist Rochdale Borough Council as Local Planning Authority (LPA) in the consideration of a hybrid planning application at Castleton Sidings (“the site”). This addendum sets out the key changes that have been made to the scheme during the determination period, following feedback and discussion with consultees and the LPA.
- 1.1.3. This addendum should be read alongside the WSP Planning Statement dated May 2023 that formed part of the original planning submission.
- 1.1.4. This addendum includes an assessment against key PfE policies (Sections 5-6), a summary of the consultation responses received and the further details provided where additional information has been requested (Section 3).
- 1.1.5. The following documents have been updated and are submitted alongside this addendum:
- Plans:
 - Colour and black/white site layout (ref: KH003-A-100)
 - Materials (ref: KH003-A-200)
 - Boundary Treatments Plan (KH003-A-300)
 - Housetypes
 - Pumping Station
 - Waste plan (KH003-A-700)
 - Storey heights plan (KH003-A-102)
 - Design and Access Statement (ref: 22/016/001/Rev E/DAS&CODE).
 - Landscaping scheme (ref: P.1733.22.09A)
 - Landscape Layout (ref: P.1733.22.03I)
 - Landscape Visual Impact Assessment
 - Transport Addendum
 - Biodiversity Net Gain (ref: P.1733.22G)
 - Ecological note
 - Habitat Regulations Assessment (ref: P.1733.22C)
 - Air Quality Assessment (ref: 6299r5)
 - Historic Environment Desk Based Assessment (ref: 1002.R01a)
 - Crime Impact Statement (ref: 2023/0028/CIS/01 Rev B)
 - Flood Risk Assessment and Drainage Strategy
 - Construction Management Plan
 - Noise and Vibration Assessment (ref: 50-285-R1-6)
 - Energy Statement



- Phase I and II
- Mineral Safeguard Assessment (14-768-R2-2)
- Environment Impact Assessment

2 PROPOSED SCHEME AMENDMENTS

- 2.1.1. In response to feedback received during the determination of the application, the proposed scheme has evolved. The changes are summarised below.

Heywood Road Vehicular Access

- 2.1.2. The original submission provided a cycle and pedestrian route through the site towards Heywood Road/Manchester Road to improve accessibility to the facilities and services in Castleton, and public transport connections such as Castleton Railway Station and bus stops. Vehicular access was taken from the Fairways only which has been tested through the emerging PfE.
- 2.1.3. Following public consultation, an additional vehicular access taken from Heywood Road was considered. As such this third access has been explored, modelled, and now incorporated into the scheme.
- 2.1.4. A site specific Transport Assessment has been prepared which demonstrates that the original scheme, with Fairways only access would result in no significant impacts in highways terms. However, following the consultation exercise, the originally proposed cycle route to Heywood Road has been upgraded to a one way vehicular access, permitting traffic to enter the site from Heywood Road in addition to the two way Fairways accesses. As set out within the updated Transport Statement, the additional vehicular access would reduce the traffic impact on the existing residential streets to the north as well as providing a pedestrian and cycle link. However, for the avoidance of doubt the Fairways only access has been assessed as acceptable and not having a severe impact in the highway.

Design

- 2.1.5. The scheme has been revised to incorporate the new Heywood Road access within the design, creating a new gateway at the site, and in response to the design feedback received. E*Scape has prepared an updated Design and Access Statement which responds fully to the comments received.
- 2.1.6. There is a new arrival point when approaching from the east via the new Heywood Road access. This area has been redesigned to create a formal crescent at the gateway.
- 2.1.7. There are several character areas within the design, and this has been articulated more clearly within the design and access resubmission. The scheme has been designed to work with the new and old accesses.
- 2.1.8. The design comments are considered fully within Section 3 of this addendum.

Hard and Soft Landscaping

- 2.1.9. The Green and Blue Infrastructure Coding (Section 6) within the Design and Access Statement has been developed further to provide additional detail on the re-wilded landscape concept. Illustrations have been prepared within the DAS to help visualise how the palimpsest and rewilding character will manifest within the site.
- 2.1.10. The proposed landscaping scheme has been updated in accordance with the revised layout. Landscaping is proposed along the new access road to create a tree-lined, visually interesting route, that will introduce screening between the new access, the residential properties to the north and the ELR land to the south.

- 2.1.11. The new access road will require additional tree removal. An updated arboricultural assessment and biodiversity net gain (BNG) assessment has been prepared to assess the impacts of development. The scheme will deliver above a 10% net gain in biodiversity units, and the number of trees lost (110) will be replaced by:
- 147 no Native Trees,
 - 42 no Ornamental Trees,
 - 3086 transplants of native scrub,
 - 720 transplants of native woodland with understorey scrub,
 - 524 lin.m of mixed native hedgerow, and
 - 1468 lin.m of formal hedging.
- 2.1.12. The pumping station and electric substation have been repositioned, so they are set slightly further back off the road with a path connecting to each.

3 CONSULTATION RESPONSES

- 3.1.1. This section sets out the latest position with regards to technical work and consultees.

3.2 RESPONSES TO CONSULTEE COMMENTS

DEVELOPMENT MANAGEMENT (DESIGN)

- 3.2.1. The Design and Access Statement has been updated to fully address the feedback received. The key feedback is summarised below.

Response to Railway Heritage

- 3.2.2. It was requested that additional narrative is provided within the DAS to better explain how the railway heritage has informed the scheme. It was also requested that historic built form associated with the railway was considered, and potentially buildings on a wider scale.
- 3.2.3. The railway theme is around the re-wilding of the railway and not the railway vernacular per se. This is set out in the DAS within the Vision Page 6 which states: *“A key theme underpinning the proposals is the concept of rewilding a former brownfield site and referencing its former use as railway sidings”*. The Vision has been expanded upon at Page 6, and an updated *“Building on the Site’s History – Exploring the Railway Rewilding Theme”* is included within Section 4, pages 24-25, of the DAS.

Contextual Appraisal

- 3.2.4. Further analysis of the existing built context is presented on Pages 14-15 of the DAS. The Local Vernacular section has been updated including a new “responding to context” section to provide further analysis.
- 3.2.5. It was suggested that in analysing built form, additional matters should be considered, including Area types, uses, block structure, street types, densities, urban grain, age, neighbourhoods, and at a granular level - plot and building line ratios, set-backs, parking arrangements, separation distances, building heights etc. This context analysis is provided on pages 12-13.
- 3.2.6. In carrying out a review of the existing built context E*Scape has attempted to identify the prevalent character of the local area with a view to ensuring that the proposed development will be complementary in terms of its design, whilst still ensuring a high-quality development with a unique character and identify that provides housing choice locally. We believe this has been achieved. It was not intended to simply replicate what exists currently which in many cases does not represent best practice in terms of urban design.
- 3.2.7. With regards to building analysis, the following items as identified by RMBC are considered within Pages 14-15 and the accompanying photos: entrances/porch articulation, fenestration, materiality and detailing, parking and threshold boundaries. This has translated into the Architectural Identity section (Pages 28-29).

Landscape character

- 3.2.8. More information and justification was requested to support the landscaping strategy.
- 3.2.9. Additional detail has been provided within the Green and Blue Infrastructure Section (Pages 31-36), including illustrations to better articulate the landscape features. E*Scape explains:

- 3.2.10. *We have chosen the theme of re-wilding and created a naturalistic palette for the planting which flows through the site. This approach is very topical and the idea of bringing nature to the doorstep and creating habitats for people and nature is the approach that has been adopted. Formal public realm is proposed in the form of the squares but juxtaposing this with natural planting continues the re-wilding theme of nature taking over the spaces within all spaces within the layout.*

Role, Purpose and Structure of the Design Code

- 3.2.11. e*SCAPE Urbanists have a long track record of developing design guidance and design codes. The coding is developed around the National Model Design Code which follows on from the National Design Guide, but importantly that that guidance offers flexibility as to how coding is developed and applied. The 10 characteristics of good design are fully explored in the DAS, as cross referenced here; Context (Chapter 2), Identity (Chapter 2 and Chapter 4), Built Form (Chapter 8), Movement (Chapter 7), Nature (Chapter 6), Public Spaces (Chapter 7), Uses (Chapter 5), Homes & Buildings (Chapter 8) with Resources & Lifespan covered in Chapter 8. The 10 characteristics are therefore all included in the DAS.
- 3.2.12. Terminology and code structure varies depending on the nature and size of the site and this contextually responsive approach has been utilised in producing the coding. A BHL assessment has been undertaken which fully covers the 10 characteristics of good design within the 12 questions/prompts.
- 3.2.13. The document structure and the creation of a combined document was proposed by the previous RMBC planning officer in meetings and via e-mails and that she fully agreed with this approach. The contents of each chapter was also agreed. Each chapter is either entitled as part of the Design and Access Statement or part of the Coding so it is clear as to what the each chapter covers.

Character Areas

- 3.2.14. RMBC asked whether character areas had been considered. A new Character Area Plan is provided at Fig 4.1 in the DAS, with corresponding descriptions of six character areas.

Movement

- 3.2.15. Chapter 7 and Figures 7.1-7.2 illustrates the proposed movement hierarchy including proposed connectivity to the wider movement network, with active travel links to the Bee Network, Castleton Centre, Railway Station and footpaths within the golf course. The street hierarchy is coded including Streets, Lanes, Shared Drives, Garden Squares and residential squares. Please refer also to the descriptive text in the BHL assessment which sets out how active travel will be promoted.
- 3.2.16. The shared squares were supported at pre-application stage with the previous RMBC Planning Officer. The design has regard to the highways requirements for adoption. If there is an opportunity for greater flexibility, alternative detailing and surfaces could be conditioned.

Open Space and Green Infrastructure

- 3.2.17. The central green space (village green) is at the heart of the neighbourhood and creates a focal space of a good size which is enclosed by the surrounding built form offering surveillance. Naturalistic green spaces are located to the south west with a smaller gateway pocket park to the boundary with the ELR land to the north east. These spaces offer a green counterpoint to the more urban streets and thus add to the site's legibility and permeability, connecting as they do, out to the

surrounding neighbourhoods and countryside. They do therefore create an incremental experience and legible layout to the users.

- 3.2.18. In accordance with NPPF Paragraph 131, trees are incorporated within the layout to create tree-lined streets. Tree planting follows the new Heywood Road access through the site towards the Eco Park to the west. The species have been carefully selected, with ornamental trees in gardens and native species in the public open space.

Built Form

- 3.2.19. The Design Code includes a detailed section on built form which addresses the themes raised in RMBCs comments. Please refer to Figure 3.1 for location of focal buildings and Figure 8.3 and associated text for a description of how massing will be used. Figures 8.2, 8.5 and 8.8 provide information on grain, separation distances, plot ratio, block form etc.

Life Span

- 3.2.20. Please refer to Pages 57-60 of the Design Code for details on the intended approach to net zero, energy efficiency, life carbon targets, natural ventilation, Part M.2/3/4 compliance, space standards compliance (or exceedance), secured by design, maintenance etc.

CANAL AND RIVERS TRUST

- 3.2.21. No objection to the application, general comments were provided.
- 3.2.22. An updated Habitat Regulation Assessment (HRA) has been prepared to fully addresses the comments received.

EDUCATION

- 3.2.23. Contributions have been requested, and discussions are ongoing between the Council's Education Officer and Alfredson York education consultants for the applicant.
- 3.2.24. The area of disagreement relates to which schools are relevant to include in the assessment of local capacity. The Council is focussing on the planning area in which the site falls, whereas we consider that other planning areas should be considered that are readily accessible from the development.

ENVIRONMENTAL HEALTH (AIR QUALITY)

- 3.2.25. The air quality consultee requested that the air quality assessment (AQA) should consider the A664 Manchester Road which is located within the Air Quality Management Area (AQMA). The locations considered within the AQA (rev 3) include worst-case receptors located within the AQMA along the A664 Manchester Road. For completeness, additional clarification has been provided with the AQA (rev 5) at 4.5.8 and Figure 4.
- 3.2.26. The submitted Energy Statement (prepared by AES Sustainability Consultants) considers sustainable building methods and solar panels.
- 3.2.27. Comments received recommend a Dust Management Plan is provided along with provision of Electric Vehicle (EV) charging, this could be dealt with by a suitably worded condition.

FIRE SERVICE (GREATER MANCHESTER)

- 3.2.28. No objection, comments request the location of fire hydrants to be provided.

GREATER MANCHESTER ECOLOGY UNIT

- 3.2.29. GMEU has requested further ecological survey work for reptiles, amphibians, plant and habitat surveys along with an update to the HRA.
- 3.2.30. This work has been undertaken and is submitted for re-consultation. Please see the Habitat Regulation Assessment and Ecological Response Note prepared by Ascerta.

NATURAL ENGLAND

- 3.2.31. Natural England requested updates to the HRA and production of a Construction Management Plan.
- 3.2.32. An updated Habitat Regulation Assessment (HRA) has been prepared to fully addresses the comments received. An Environmental Air Quality Assessment has been prepared by Redmore which is appended to the HRA.
- 3.2.33. An updated CEMP is also submitted.

LOCAL HIGHWAYS

- 3.2.34. The original submission provided two Fairways accesses into the site and a separate cycle/pedestrian route from Heywood Road. An alternative additional access has been prepared which was submitting informally for comment on 6 September 2023. A meeting between the applicant and the Local Highways Authority (LHA) took place on 23 November 2023 for the LHA to provide feedback on the proposal.
- 3.2.35. During the meeting the LHA confirmed that an in-only access from Heywood Road could be acceptable (subject to further detail being provided).
- 3.2.36. Eddisons has since prepared two drawings to show the proposed mitigation scheme and details of the in-only Heywood Road access. This information was submitted on 8 December 2023, and the LHA has provided feedback on 13 December 2023. Work is ongoing to respond to the comments received and further updates will follow.

NATIONAL HIGHWAYS

- 3.2.37. National Highways had recommended planning not be granted until 15 December 2023 to enable the applicant to respond to the queries raised by National Highways.
- 3.2.38. Clarifications were provided in a response note prepared by Eddisons, which was issued to the LPA on 7 November 2023. Formal feedback from National Highways is awaited however the holding objection expired on 15 December and at the time of writing has not been extended.

TRANSPORT FOR GREATER MANCHESTER (TfGM)

- 3.2.39. In their consultation response TfGM raised queries relating to road safety, trip distribution, junction assessment, construction management plan, active travel and a travel plan.
- 3.2.40. Clarifications were provided in a response note prepared by Eddisons, which was issued to the LPA on 20 October 2023. TfGM has since responded confirming that the LHA will ultimately agree the methodology, but would wish to see any revised distribution. As set out above within the LHA section, work is ongoing.
- 3.2.41. Further to the Eddison's response, a Construction Management Plan has been prepared and is submitted for comment.

LOCAL LEAD FLOOD AUTHORITY

- 3.2.42. The LLFA has provided comments on the application, requesting further detail is provided. The LLFA met with Kellen Homes Head of Engineering on Monday 11th December 2023. Work is ongoing to address the comments received and a separate update will follow.

UNITED UTILITIES

- 3.2.43. United Utilities' response requires details to be provided to the LLFA's comments above. A response has now been provided as set out above.

3.3 CONSULTEEES WITH NO TECHNICAL QUERIES OUTSTANDING

- 3.3.1. The following responses have no outstanding matters that require a response, other than agreeing suitable condition wording or contributions where this is requested.
- 3.3.2. It should be noted that a review of the Financial Viability Assessment (FVA) information provided with the original application is ongoing.

ACTIVE TRAVEL ENGLAND

- 3.3.3. No objection. Standing advice note was provided.

ARCHAEOLOGY (GMAAS)

- 3.3.4. No objection. Confirmed no archaeological requirements or implications.

COAL AUTHORITY

- 3.3.5. No objection, the comments confirm the site is safe and stable to accommodate the proposed development.

ENVIRONMENT AGENCY

- 3.3.6. No objection to the application, conditions are proposed.

ENVIRONMENTAL HEALTH (CONTAMINATION)

- 3.3.7. No objection, conditions are proposed seeking a detailed remediation scheme.

ENVIRONMENTAL HEALTH (NOISE AND ODOURS)

- 3.3.8. No objection, conditions are proposed.

FORMAL SPORT AND OPEN SPACE

- 3.3.9. No objection to the proposal. A financial contribution is sought.

GREATER MANCHESTER POLICE - DESIGN FOR SECURITY

- 3.3.10. No comments have been provided to date, a crime impact statement has been prepared and it is anticipated that an informative or compliance condition would be appropriate. An updated CIS is submitted alongside this addendum that has considered the revised layout.

LIGHTING

- 3.3.11. Comments set out the lighting requirements for external lighting other than that shall be adopted by the Local Authority. Details could be secured by a suitably worded condition.



NHS HEYWOOD AND MIDDLETON CCG

3.3.12. To date, no comments have been received.

NETWORK RAIL

3.3.13. A Basic Asset Protection Agreement (BAPA) has been signed. Network Rail has confirmed no objection to the application.

STRATEGIC HOUSING

3.3.14. No objections. The proposed quantum, mix and tenure of affordable units is welcomed.

SPORT ENGLAND

3.3.15. Confirmed that the application does not fall within their statutory remit. General advice is provided.

4 PLANNING POLICY CONTEXT

4.1 BACKGROUND CONTEXT

- 4.1.1. The easternmost part of the site lies within the settlement boundary of Castleton, the remainder of the site is allocated as Green Belt in the adopted Development Plan. Residential development in the Green Belt is considered inappropriate development within the NPPF, unless very special circumstances (VSC) can be demonstrated. VSC exist and this is set out in full within the Planning Statement.
- 4.1.2. The site is identified as a strategic development allocation (JPA 20) in the emerging Places for Everyone (PfE) joint plan. Part of the site is proposed for Green Belt release to deliver new homes, with a new Green Belt boundary established. PfE is an emerging plan and therefore full weight cannot be attached. Notwithstanding, the proposed development closely follows the draft policy, and reflects the proposed Green Belt boundary.
- 4.1.3. An assessment against the most recent PfE policy wording is set out within Sections 5-6 within this addendum.

4.2 WEIGHT TO PLACES FOR EVERYONE

- 4.2.1. PfE is well advanced. The Greater Manchester Combined Authority (GMCA) submitted PfE for examination on 14 February 2022, and examination hearings were held between 1 November 2022 and 5 July 2023. Since the examinations concluded GMCA has produced the Main Modifications which were consulted on up until 6 December 2023. Prior to the consultation commencing, the Inspectors published the following note:

'We are satisfied at this stage of the examination that all of the proposed main modifications in PMM6/GMCA12.3.3 are necessary to make the Plan sound and/or legally compliant, and would be effective in that regard (subject to any grammatical or other minor changes that we may decide are necessary). That is, however, without prejudice to our final conclusions that we will reach following consideration of responses to the public consultation to be carried out on the main modifications (see below). Reasons for the main modifications that we do ultimately decide are necessary will be set out in our final report.'

- 4.2.2. PfE cannot be given full weight in planning decisions, as it does not yet form part of the adopted plan for Rochdale, but given its stage of adoption it must be attributed some weight.
- 4.2.3. In the February 2023 decision of the World of Pets appeal, ref: APP/Q4245/W/22/3306715, the inspector concluded that PfE allocations set a direction of travel, but carried only limited weight as there were several unresolved objections (including the principle of Green Belt release for housing). This was before the Main Modifications, and therefore the plan has progressed further since then.
- 4.2.4. In the recent Crimble Mill committee report (ref: 22/00588/FUL) RMBC attached greater weight, now that the plan is further progressed. Under Emerging Planning Policy (Page 10) of the committee report states:

'Given the advanced stage of examination and the nature of the Inspectors responses received to date, the emerging policy is afforded moderate-substantial weight in the assessment set out within this report. However, this is limited with consideration to the fact that inspectors have not yet issued their full report in response to the Public Examination.'

- 4.2.5. The plan is now further progressed and so it would be reasonable to attach greater weight as RMBC has concluded in the Crimble Mill committee report.

PREMATURITY IN RESPECT OF PFE

- 4.2.6. NPPF Paragraph 49 states that prematurity is unlikely to justify a reason for refusal unless **both** of the following apply:
- a) the development proposed is so substantial, or its cumulative effect would be so significant, that to grant permission would undermine the plan-making process by predetermining decisions about the scale, location or phasing of new development that are central to an emerging plan; and*
- b) the emerging plan is at an advanced stage but is not yet formally part of the development plan for the area.*
- 4.2.7. Where an LPA refuses an application on grounds of prematurity, the LPA must clearly indicate how granting permission would prejudice the outcome of the plan making process (NPPF Paragraph 50).
- 4.2.8. With regards guidance, Part b) applies in this instance as PfE is at an advanced stage albeit it is not yet formally part of the development plan for the area.
- 4.2.9. With regards to part a), the PfE inspectors have given clear direction on the continued inclusion of JPA20, subject to proposed modifications. The main modifications do not relate to the removal of the allocation.
- 4.2.10. Therefore, as set out within this addendum, this hybrid planning application accords with the draft JPA20 and therefore granting planning permission would not undermine the emerging PfE. As such it is not premature ahead of the Plan.

5 THE CASE FOR DEVELOPMENT

THE PRINCIPLE OF DEVELOPMENT

- 5.1.1. The site has been long promoted as a PfE site allocation by RMBC as a sustainable location for new homes, the ELR, and tram-train expansion.
- 5.1.2. The principle of development in this location is supported by RMBC and demonstrated through the evidence base for PfE. The detail of the scheme is assessed through the determination of this planning application.

IDENTIFIED HARM

- 5.1.3. Two forms of harm resulting from the proposed development are identified, as summarised within the Planning Statement. The harm relates to: inappropriate development and openness.

Inappropriate Development

- 5.1.4. As set out in Section 4 of this addendum, until such a time that PfE is adopted and the site is released from the Green Belt, residential development within the Green Belt is considered inappropriate development. Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances (NPPF Paragraph 147).

Harm to Openness

- 5.1.5. An assessment of the proposal's impact on the Green Belt is set out within the Landscape and Visual Impact Appraisal prepared by Ascerta. Ascerta's assessment broadly accords with the conclusions of the PfE evidence base.
- 5.1.6. Appendix 2 of the Green Belt Topic Paper (2023) summarised the harm of JPA20 as:
- 5.1.7. **Harm impact from allocation on Green Belt purposes:**
 - *"The GM GB Harm assessment identifies that the Allocation make a moderate contribution to checking the sprawl of Greater Manchester (Purpose 1) and preventing the merging of Castleton and Heywood (Purpose 2), and a relatively limited contribution to preventing encroachment on the countryside (Purpose 3)".*
- 5.1.8. **Harm impact to the Green Belt from release of allocation:**
 - *"Release of the Allocation would constitute moderate harm to Green Belt purposes, would increase the containment by inset development of retained Green Belt land to the north but would only have a minor impact on adjacent Green Belt.*
 - *"In terms of cumulative harm on Strategic Green Belt Area 15, given the small size of the allocation there is no specific reference to it in the cumulative harm assessment report".*

VERY SPECIAL CIRCUMSTANCES

- 5.1.9. Very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations (NPPF Paragraph 148).
- 5.1.10. A full VSC case is set out within Section 7 of the Planning Statement. A summary of the key circumstances is included here for ease.

- 5.1.11. The harm identified is clearly outweighed by the significant benefits the scheme will provide. Exceptional circumstances have been set out within the PfE evidence base, to justify the removal of allocation from the Green Belt.

Making best use of land

- 5.1.12. The site is previously developed, vacant, derelict and contaminated. It is inaccessible to the public.
- 5.1.13. The proposal will make effective use of previously developed land, in a highly sustainable location that is adjacent to the centre of Castleton, Castleton Railway Station and high frequency bus corridor. Part of the site falls within the existing urban area. The site will be remediated and made available to the public.

The need for housing

- 5.1.14. There is a requirement for new homes in Castleton. 10,472 new homes are required in Rochdale over the PfE joint plan period (2022-2039), in accordance with the following trajectory at Table 7.2 of PfE:
- 2022-2025 (annual): 568
 - 2025-2030 (annual): 616
 - 2030-2039 (annual): 632
- 5.1.15. The proposed development will make a meaningful contribution towards Rochdale's housing requirement, providing 191 homes.

The need for affordable housing

- 5.1.16. PfE identifies over 70,000 households on the local authority registers, of which almost 27,000 being in reasonable preference for housing. The RMBC Strategic Housing Officer has confirmed that there are over 21,000 individuals on the council's Housing Register for social and affordable housing.
- 5.1.17. There is clearly a critical need for affordable homes and so providing policy compliant affordable homes (29 no.) should be given substantial weight. RMBC Strategic Housing is supportive of the property size/mix and tenure, as set out within their consultation response of 28 June 2023.

The need for specialist housing

- 5.1.18. Within the PfE Housing Topic Paper (June 2021), it is identified that within Greater Manchester there is a growing older population, and by 2035 almost one in three GM residents aged 65 or over will have a long term illness, and there should be sufficient offer so that older people can remain within their neighbourhoods.
- 5.1.19. In accordance with Policy JP-H3, the proposal will provide homes which are built to the 'accessible and adaptable' standard.

Diversifying the housing mix

- 5.1.20. There is local recognition that there is a need to diversify the housing stock in Castleton, by providing larger homes, that will bring vitality and vibrancy. This is described within PfE draft Policy 'JP-Strat6: Northern Areas', which seeks to "*boost economic opportunities and diversify housing provision*" in areas such as Castleton.

- 5.1.21. RMBC Planning Officer's has expanded on this, stating *"Core Strategy Policy C3 seeks to ensure that new development provides housing types that take account of local needs and aspirations and ensure that the supply of larger and higher value housing in the borough is improved"*.
- 5.1.22. PfE Main Modifications proposes to replace "higher value homes" with "four, five and six bedroom" homes within the Castleton Sidings JPA-20 allocation. We are not aware that there is evidenced need for five and six bedroom properties in Castleton. As such, the proposed mix provides two, three and four bedroom properties. The proposed mix will diversify the housing provision in Castleton as intended in JP-Strat6, JPA-20 and Policy C3 but without risk of very large homes for which there is no demand.

PfE Plan process

- 5.1.23. As set out within the evidence base that underpins PfE, there is an established requirement for Green Belt release in Rochdale to meet housing need across the plan period and to tackle the spatial context challenges identified.
- 5.1.24. JP-Strat6 seeks to diversify the housing stock and complement the strategic employment locations, which this development proposal will achieve. In accordance with 'JP-Strat7: North-East Growth Corridor' the proposal includes outline consent for the ELR land, which would facilitate the tram-train connection between Castleton and Bury, as seen within PfE Picture 4.2.
- 5.1.25. JPA-20 has been included as a draft allocation as a well-performing site that will deliver the strategic objectives.
- 5.1.26. Through its involvement in PfE, it is established that RMBC:
- Is supportive of the proposed allocation;
 - Considers exceptional circumstances exist to justify the part removal of the site from the Green Belt;
 - Considers the principle of residential development to be appropriate and necessary to meet local housing need over the plan period; and
 - Supports the ELR and tram-train expansion within this site.
- 5.1.27. As set out within the next Section, the proposal accords with the emerging Plan allocation and wider policies. The scheme will therefore help deliver the joint strategic plan for Greater Manchester.
- 5.1.28. The weight to attribute to PfE is considered in Section 4.

Alternative Scenario

- 5.1.29. Should this development not come forward the site would remain previously developed, contaminated, inaccessible to the public and vacant. Another alternative site would need to be identified in order for RMBC to meet its housing need within the plan period.

Socio-Economic benefits

- 5.1.30. The development will deliver a range of economic benefits that is set out in full within the Socio-Economic Benefits Statement and Planning Statement.

Recreation and Green Space

- 5.1.31. The scheme will deliver a significant new area of public open space (circa 3.29ha) in the form of EcoPark. The green infrastructure proposed will deliver biodiversity and ecological enhancements,



provide residents better access to nature and improved health and wellbeing, and create new footpaths and cycleways to the existing footpath connections.

ELR

- 5.1.32. The proposal will facilitate the ELR and extension through the gifting of land in the north east of the allocation to assist the delivery of a strategic allocation. The Castleton Sidings site is fundamental to facilitate the extension of the ELR from Heywood to Castleton and has been identified as one of the catalysts for securing the wider regeneration of Castleton itself.
- 5.1.33. The site will also facilitate the future tram/train trial with the intention for the Metrolink to be extended through Castleton to Heywood and Bury.

6 PLANNING ASSESSMENT AGAINST EMERGING PFE POLICIES

- 6.1.1. The Planning Statement provides an assessment against the adopted development plan and emerging policies. During the determination period, RMBC Planning Officers have requested further clarity as to how the proposal accords with the emerging PFE policies. This is discussed within this section.
- 6.1.2. Strategic Policies:
- **JP-Strat6: Northern Areas** – in accordance with the policy, the proposal will diversify housing provision, and will create connections and accessibility by public transport, cycling and walking via new connections to PRoWs to the west, Heywood Road to the east and Fairways to the north. The application will deliver economic investment which will help meet the strategic objective of economic growth and reduced deprivation.
 - **JP-Strat7: North-East Growth Corridor** – the proposal includes outline consent for the ELR land, which would facilitate the tram-train connection between Castleton and Bury, as seen within Picture 4.2 of the draft PFE.
- 6.1.3. Sustainable Development Policies
- **JP-S1: Sustainable Development**
 - In accordance with the draft policy's preference for making as much use as possible of suitable previously-developed (brownfield) land, this proposal for 191 dwellings demonstrates that the draft allocation JPA20 can accommodate more development than assumed within PFE. Importantly, PFE draft policy JPA20 does not set a ceiling limit on development. As such, the more effective use of a brownfield site, which has no significant adverse impacts, represents sustainable development.
 - JP-S1, Table 5.1 sets targets for reducing energy demand and on-site renewable energy generation within residential development. An Energy Statement has been prepared that considers low carbon and renewable energy.
 - Electric vehicle charging is proposed in accordance with policy and guidance.
- 6.1.4. Housing Policies:
- **JP-H1: Scale, Distribution and Phasing of New Housing Development** – This proposal will make a meaningful contribution to the delivery of new homes over the joint plan period.
 - **JPH2: Affordable Homes** – 29 new affordable homes are proposed in accordance with Local Plan Core Strategy Policies C4 and DM2 and the Council's Affordable Housing SPD. The mix has been prepared in discussion with the Strategic Lead for Housing at Rochdale Council and a Registered Provider. Full details are set out within Section 8 of the Planning Statement.
 - **JP-H3: Type, Size and Design of New Housing** – in accordance with the draft policy, an appropriate mix of dwelling types and sizes is proposed reflecting local plan policies, having regard to local context, policy guidance and local need.
 - In accordance with the draft policy, all dwellings will be built to nationally described space standards (NDSS) and 'accessible and adaptable' standard in Part M4(2) of the building regulations.

■ **JP-H4: Housing Density –**

- As shown in Figure 6.1 below, the site is within 800m of the railway station where the draft policy sets a minimum net density of 50dph. The easternmost corner of the site is within 400m which sets a higher density of 70dph.
- The net density of the scheme is 37dph. Whilst this is lower than the minimum proposed within draft policy JP-H4, the density proposed is the best use of the site, which balances the density requirements of JP-H4, design codes and local context, technical highways work and all other material considerations.

Figure 6.1 showing 400m and 800m radius from Castleton Station. The site is shown in blue.



7 DRAFT ALLOCATION JPA20

- 7.1.1. A summary of how the scheme responds to the draft policy allocation (March 2023) is included within the Planning Statement. This section reflects the updates proposed within the October 2023 Main Modifications that is currently undergoing consultation.

1. Deliver around 125 homes including provision of larger (4, 5 and 6 bedroom) houses, and affordable housing in accordance with relevant local plan requirements.

- 7.1.2. This application provides 191 homes which has been prepared following an analysis of site opportunities and constraints, and is supported by a full suite of technical work that demonstrates there are no technical concerns with the scheme. The policy states 'around 125' homes. Importantly the policy is "not seeking to set any form of ceiling"¹. As clarified within the PfE hearing session in February 2023, the policy should be interpreted to provide sufficient flexibility for a higher number of homes to come forward. As demonstrated through the technical and detailed design work prepared to support this application, the site can indeed accommodate a higher number of homes than 125. There is, therefore, no conflict with the draft wording.

- 7.1.3. The proposed mix comprises two, three and four bedroom homes, including larger detached and semi-detached properties. The scheme will provide a range of house types, and the mix has been prepared to meet local need and market demand, whilst also aligning with the Council's desire for larger and high value housing. It is our view that Criterion 1 as worded is not sound as whilst the aspiration to widen housing mix is acknowledged, the housing mix delivered on the site should meet local housing need based on up to date evidence available. We are not aware that there is evidence of market need for five and six bedroom houses in Castleton, across the joint plan period. Lesser weight should be applied to this policy whilst there are outstanding objections to the main modifications.

- 7.1.4. Affordable housing is proposed in accordance with the development plan. This is achieved through delivering 191 units, a scheme of fewer units would depress the public benefits that can be unlocked, including affordable housing.

2. Create an area of accessible open space on the part of the site to be retained as Green Belt as part of a multi-functional green and blue infrastructure network. This will include defining a new Green Belt boundary to the west of the residential development that will comprise physical features that are readily recognisable and likely to be permanent and mitigation of the visual and noise impacts of the nearby railway.

- 7.1.5. This application conforms by providing a park and ecological enhancements to the retained Green Belt area, the areas of hard standing will be removed and replaced with native species planting. Pathways will be created to introduce public access for the existing and future residents to enjoy and appreciate the space.

¹ JPA 20 PfE Hearing 8 February 2023 (YouTube, 4:19:00 – 5:23:39), spoken by Christopher Katkowski KC, representing GMCA.

3. Make land available within the site to facilitate the extension of the East Lancashire Railway (ELR) from Heywood to Castleton, and provision of tram-train infrastructure.

- 7.1.6. This application conforms by reserving the eastern part of the site for ELR purposes and seeking consent in outline to facilitate this, establishing the acceptability of this use within the urban area.
- 7.1.7. The applicant has met with TfGM to discuss the requirements in respect of tram-train trial infrastructure. The residential layout accommodates the safety offset distances provided by TfGM, which is necessary for the tram-train line to come forward in the future. It is our understanding that TfGM are supportive of the layout.

4. Achieve excellent design and sustainability through masterplanning and the use of design codes for the whole site to ensure comprehensive development.

- 7.1.8. This application is accompanied by a bespoke design code for the site. The approach taken is high quality and informed by local context analysis and pre-application feedback from the LPA and Places Matter. The proposal will deliver an excellent and sustainable development that is appropriate in its context.
- 7.1.9. As set out within this addendum, the Design and Access Statement has been updated to respond to the design comments received during the course of the application.

7. Make provision for new and improved sustainable transport and highways infrastructure having regard to the indicative transport interventions set out in Appendix D in accordance with policy JP-C7. This should include the provision of good quality pedestrian and cycling routes through the site to Heywood Road/Manchester Road to the north east of the site, and to the existing footpaths on the adjoining golf course in order to facilitate safe and convenient access to the centre of Castleton, Castleton station, bus stops and employment locations around Heywood.

- 7.1.10. A new 3m wide walking and cycling route will be provided through the site to Heywood Road/Manchester Road to the north east, providing convenient access to the centre of Castleton, the railway station and bus stops. The retained Green Belt will introduce walking routes, including a connection to existing footpaths on the adjoining golf course. As drafted in the policy, the proposal provides new, good quality pedestrian links through the site which integrate with existing walking and cycling infrastructure.
- 7.1.11. For JPA20, appendix D identifies the following works are necessary:
- A664 Manchester Road / Queensway – localised junction improvements
 - Active travel improvements including links to key routes beyond the allocation boundary
- 7.1.12. As set out within our response to PfE, JPC-7 allows final transport mitigation to be determined through site specific transport assessments, and therefore necessary works should be discussed and agreed at application stage. As set out above, discussions are ongoing with the LHA regarding mitigation.

10. Carry out a project specific Habitats Regulation Assessment in relation to the Rochdale Canal for planning applications of 50 dwellings or more.

- 7.1.13. This application conforms as a HRA has been carried out.

11. Make provision for compensatory improvements to the environmental quality and accessibility of remaining Green Belt within and/or in the vicinity of the site in accordance with policy JP-G2.

- 7.1.14. This application provides a high-quality landscaping scheme throughout the site, with substantial areas of public open space that include green and blue infrastructure. Walking routes are provided through the site which improve accessibility to the Green Belt.
- 7.1.15. The application is supported by a noise impact assessment that sets out recommendations for the scheme. The design incorporates the acoustic attenuation recommended, which includes an acoustic fence along the southern boundary of the site to control noise levels in rear gardens, and whole dwelling ventilation for some plots.

12. Make financial contributions for offsite additional primary and secondary school provision to meet needs generated by the development in accordance with policy JP-P5.

- 7.1.16. Financial contributions should be on a needs basis. However, to meet the NPPF Paragraph 57 tests, financial contributions will only be required where existing schools cannot accommodate the needs generated by the development. An Education Capacity Statement prepared by Alfredson York was submitted with the original application, which demonstrates that in January 2022 there was a surplus of both primary and secondary schools. Where schools can meet the needs generated by the development, a financial contribution would not be appropriate as it would not meet the NPPF tests. Discussion is ongoing between Alfredson York and RMBC.

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

- 7.1.17. The site is located within a much larger Mineral Safeguarding Area (MSA) for Brick Clay in the Greater Manchester Joint Minerals Plan. A Mineral Safeguarding Assessment report has been prepared and submitted with the application. The report concludes that there is an overriding need for the housing development, and mineral extraction is constrained in this site as it cannot be achieved in an environmentally acceptable or economically viable manner. On this basis, the development of the site is acceptable in terms of mineral safeguarding policies.

SUMMARY

- 7.1.18. As set out within this section, the proposal accords with the draft policy allocation.

8 CONCLUSIONS

- 8.1.1. Castleton Sidings is proposed to be allocated within PfE as a sustainable site that will enable housing need to be met within the joint plan period. Through its involvement in PfE, it is established that RMBC:
- Is supportive of the proposed allocation;
 - Considers exceptional circumstances exist to justify the part removal of the site from the Green Belt;
 - Considers the principle of residential development to be appropriate and necessary to meet local housing need over the plan period; and
 - Supports the ELR and tram-train expansion within this site.
- 8.1.2. The proposed development comprises residential development of 191 new family homes, a substantial area of public open space and land that will be used to facilitate the ELR heritage line expansion. The Planning Statement and this Planning Addendum, along with the supporting reports, demonstrate that the proposal accords with the main policies of the Development Plan and emerging PfE, and there are no material considerations that would prevent the grant of consent.
- 8.1.3. Where feedback has been received from consultees additional information and clarification has been provided to enable the application to move forward to a positive determination.
- 8.1.4. The proposal will unlock significant social, economic and environmental benefits that are far reaching and will have a significant impact for the local area and further afield. This is set out within the Planning Statement.
- 8.1.5. We look forward to receiving further updates as the re-consultation progresses.





8 First Street
Manchester
M15 4RP

wsp.com