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Outline Planning Application on Land to the North of Greenbooth Road, Norden Planning Statement

**Incorporating Statement of Community Involvement,
Open Space Assessment, Green Belt Assessment and
Heads of Terms**

Empire House Piccadilly Limited, Stonebond Properties
(Manchester) Limited and Great Places Housing Group

22 June 2023

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Appendix 1 Public Consultation Leaflet

1.0 Introduction and Background

The Purpose of the Report

- 1.1 This updated Planning Statement has been prepared by Nathaniel Lichfield & Partners [Lichfields] on behalf of Empire House Piccadilly Limited, Stonebond Properties (Manchester) Limited [Stonebond] and Great Places Housing Group [Great Places] [the Applicants], to support the current application (ref. 20/01170/OUT) which seeks outline planning permission for a residential development on land to the north of Greenbooth Lane, Rochdale [the Site].
- 1.2 The application for outline planning permission was validated by Rochdale Borough Council [the Council] on 25 January 2021 [the 2021 Application]. Following submission of the 2021 application, further consultation with the Council has taken place and the proposed development has been updated to reflect these discussions. It has been agreed to submit a new package of plans, technical reports and planning documents to support the proposed amendments to the 2021 Application.
- 1.3 The 2021 Application sought permission for:
- “Outline application for 56 dwellings with all matters reserved.”*
- 1.4 In order to address the concerns previously raised by officers, the suggested revised description of development is as follows:
- “Outline application (including details of access, appearance, layout and scale) for 49 dwellings with only details of landscaping reserved.”*
- 1.5 This statement considers the proposed development’s conformity with the Development Plan, having regard to Section 70(2) of the Town and Country Planning Act 1990 and Section 38(6) of the Planning and Compulsory Purchase Act 2004, as well as other relevant material considerations including national and local policy and guidance.
- 1.6 A full list of the plans, drawings and documents hereby submitted is included in the accompanying covering letter.

2.0 **Site Description and Background**

Site Location & Context

- 2.1 The Site is located in the settlement of Norden in Rochdale, circa 100m west of St. Paul's Church on Edenfield Road. The urban settlement of Norden lies in the north west part of the wider urban area of Rochdale. The Site is within the administrative boundary of the Council and is situated approximately 4km north-west of Rochdale town centre.
- 2.2 Rochdale town centre is the main employment site for the area. Heywood Business Park and Bury town centre are located circa 5.2km and 6.2km south and south-west of the Site, respectively and also offer large employment sites. The Site is approximately 4.4km east of the M56.
- 2.3 The Site is located on land north of Edenfield Road (A680) which links into Rochdale town centre. Edenfield Road benefits from bus stops in both directions. The nearest bus stop is located circa 55m to the west of the Site access which offers services to Rochdale, Bury and Bamford among others.
- 2.4 The Site is located in close proximity to a number of local community services and facilities including St. Paul's Parish Hall, a community allotment, two primary schools, a village high street including a range shops and services including a convenience store, pharmacy and an optician's and a number of restaurants and public houses. The nearest primary school, Whittaker Moss Primary School, is located approximately 340m south-east of the Site.
- 2.5 The Site is also located within 500m of a number of public open spaces, including Norden Jubilee Park, Hutchinson Road playground and Greenbooth Reservoir. Springfield Park and Rochdale Golf Club are located within 1.5km of the Site.
- 2.6 The nearest train station, Rochdale Train Station, is situated approximately 4.61km south-east of the Site and provides connections into Manchester and Leeds.
- 2.7 A site Location Plan (ref. SBM-001-LP01) accompanies this application which identifies the exact location and extent of the Site.
- 2.8 The Site is bound:
- To the west and south by the Naden Brook, which delineates the southern and western boundaries of the Site. Naden Brook has a winding trajectory, which creates the irregular 'kinked' plan form of the Site. On the opposite side of the Naden Brook, is Greenbooth Road with terrace housing and employment uses and further woodland. The residential uses present to the west and south predominantly comprise semi-detached homes, with some bungalows and other typologies also present.
 - To the east by a residential estate of (predominantly detached) housing.
 - To the north by an upward sloping woodland, and beyond this, open agricultural land with agricultural buildings present.

Site Description

- 2.9 The Site comprises an irregularly shaped parcel of land, which is long, narrow and winding in its form. The Site extends to 2.7 hectares [ha]. The Site comprises previously developed land, having been previously occupied by the Tack Lea Works industrial buildings. These have been substantially demolished although the slabs and associated hardstanding remain, as do some remnant structures and buildings. There are currently 5 main vacant remnant buildings on the Site. The Site contains areas of tree cover, particularly on the steeply sloping areas of the eastern part of the Site.
- 2.10 Woodhouse Lane Brook cuts through the eastern woodland area, connecting to the more substantial Norden Brook beyond the southern Site boundary. The topography of the previously developed part of the Site gradually slopes upwards towards the north-west.
- 2.11 The Site has two existing vehicular access points from Edenfield Road, directly opposite Blackpits Road and via Greenbooth Road.
- 2.12 The boundaries of the Site are defined largely by existing tree coverage to the north, east and south adjacent to the Site access.

Figure 2.1: Satellite Image Demonstrating the Site Extent



Site Constraints

- 2.13 The Site is not located within or adjacent to a Conservation Area.
- 2.14 The Church of Saint Paul is located circa 75m east of the Site access and is Grade II listed. The Woodhouse Farm cottage and foldyard buildings, and numbers 22 and 24 Lower Tenterfield are also Grade II listed and are located within 200m of the Site.

- 2.15 The majority of the Site is within Flood Zone 1 and is at low probability of flooding from rivers and the sea. The land adjacent to the brook is within Flood Zone 3. EA mapping shows that there is risk of flooding from reservoirs across the entire site, and a medium to high risk of surface flooding in small pockets of the site (shown in the PfE mapping extracts in the subsequent pages of this letter).
- 2.16 The majority of the trees within the Site and adjacent to it are protected by Tree Protection Orders. These are area orders and the extent of them is illustrated in Figure 2.2 below.

Figure 2.2: Map Detailing Areas Covered with a Tree Protection Order (green hatched areas)



Source: Rochdale Council

- 2.17 There is a public right of way [PROW] located adjacent to the south-eastern entrance to the Site (ref. RocAFp1). This PROW extends the length of Heap Road. There are no other PROWs in or adjacent to the Site.
- 2.18 There are no nature conservations designations on the Site or immediately adjoining it. The Site is not within an Air Quality Management Area [AQMA].

Planning History

- 2.19 Table 2.1 below details the most relevant parts of the Site's planning history.

Table 2.1 Planning History of Land at Greenbooth Lane

Application Reference	Proposal	Decision	Decision Date
20/01170/OUT	Outline application for 56 dwellings with all matters reserved	Invalid	13.05.2022
10/D53056	Application for a New Planning Permission to Replace Extant Planning Permission D48213 for Residential Development (Resubmission of D44077)	Approve	18.05.2010
06/D48213	Residential Development (resubmission of D44077)	Approve	27.03.2007
04/D44077	Residential Development	Refuse	25.11.2005

2.20

There are numerous other planning applications available on public access in relation to the Site's former industrial use. However, none of these applications are considered to be relevant to this planning application, other than illustrating the historic industrial use of the Site.

3.0 The Proposed Development

Proposed Development

- 3.1 The amended application seeks outline planning permission for 49 homes across the Site with details of access, layout, scale and appearance included, with only details of landscaping reserved for later determination via a subsequent reserved matters application. The provision of additional detail at outline stage follows discussions with the Council, which expressed a preference and requirement for more detailed information to be provided up front given the complexities and constraints of the site.
- 3.2 The remnant industrial buildings in varying states of disrepair are proposed to be demolished as part of the application. All slabs will be grubbed up and the Site will be remediated to be suitable for a residential use.
- 3.3 The proposed residential development will comprise a mix of two, three and four bedroom properties in detached, semi-detached and terrace style homes. The range of dwellings provides a choice of dwelling sizes suitable for smaller and larger families. All homes are proposed as affordable housing, the tenure for each will be shared ownership. Table 3.1 provides a breakdown of the housing proposed:

Table 3.1 Proposed Housing Mix

	Affordable
2 Bedroom	17 (34.7%)
3 Bedroom	22 (44.9%)
4 Bedroom	10 (20.4%)
Total	49

- 3.4 All homes include private gardens and one or two parking spaces. No garages are proposed as part of the development.
- 3.5 One primary access point is proposed from the existing site access via Edenfield Road located in the south-eastern corner of the Site. The access connects to a single spine road which is proposed throughout the Site. A secondary emergency vehicle and pedestrian access is proposed from the existing access bridge over the Naden Brook to the Site via Greenbooth Road. The internal road will be designed to adoptable standards with a 5.5 metre carriageway and two 2 metre footways located either side, where possible.
- 3.6 The homes have been designed to reflect the local architectural style with three storey homes located at the entrance to the Site, designed to pay homage to the former mill buildings of the Site and in the wider area. Travelling west through the Site, the homes are proposed to be two storeys in height. The homes become larger in size the further into the Site one travels with the homes located in the northern most corner of the Site proposed to be larger detached and semi-detached homes.
- 3.7 The homes have been orientated to front onto the internal road network. Triple aspect dwellings are proposed on corner plots. Soft landscaping is proposed throughout the Site, creating a sympathetic street scene.

Engagement

- 3.8 The Applicants have participated in a programme of detailed engagement with the Council and other statutory and stakeholders relevant to the proposed development.
- 3.9 This provided an important opportunity to engage with the Council and key stakeholders to ensure that the amended proposals were consistent with local planning policy and to obtain feedback on technical matters. This process enabled issues and concerns to be addressed prior to the submission of the amended outline planning application, where reasonably possible.
- 3.10 A formal request for detailed advice in relation to the amended proposals was submitted to the Council in September 2022. The submission included a Planning Covering Letter, Site Location and Boundary Plan, Proposed Site Access Plan, Development Zoning Diagram and a Sketch Layout.
- 3.11 The Council provided written feedback in response to the submitted material on 9 February 2023. The Council's response covered a range of topics including the principle of development; impacts on the Green Belt; character, design and appearance; layout; density; landscaping, public realm and pedestrian connectivity; highways; arboriculture and ecological impacts; flood risk and drainage; ground contamination; energy demand; planning obligations; and validation requirements.
- 3.12 The detailed advice note from the Council concluded that there were a number of matters which the Council considered would need to be addressed in order for the proposed development to accord with local planning policy. These included how the proposed development would fit with the character and setting of the wider area; the design of the scheme when compared with the surrounding built environment; and the proposed target demographic of the scheme compared with the Council's aspirations for the area.
- 3.13 The design of the development has been adapted considerably to take into account the Council's comments, and further refined through follow-up discussions and feedback. Some of the core changes include the reconfiguration of the internal road network to avoid the previously proposed cul-de-sac in the western end of the Site, reconfiguration of the eastern end of the Site and introduction of three-storey townhouses with industrial typology front gable roof profiles. In turn these changes have led to a reduction in units. It is our understanding that the layout hereby submitted is supported by the Council in principle.
- 3.14 The application is accompanied by a series of technical documents which demonstrate that the proposals are acceptable in relation to noise, highways, ecology, crime, air quality, flood risk.

Statement of Consultation

- 3.15 Community consultation is an important part of the planning process for new developments. The Applicants have committed to engaging with and consulting the local community and other relevant stakeholders, wherever possible.
- 3.16 Planning guidance states that consultations with the local community, the local planning authorities and key stakeholders can bring a number of benefits to the planning application process. Against this background, the Applicants have undertaken a stakeholder

engagement exercise, in order to identify any issues and improve the effectiveness of the planning process for all parties. The consultation undertaken is in accordance with the requirements of Rochdale's Statement of Community Involvement [SCI], as well as the guidance set out in the Framework and PPG.

- 3.17 The Applicants have engaged with the public via a residents leaflet which was distributed to local residents and businesses. The leaflet encouraged residents to provide their thoughts via a dedicated email address created for the application. A copy of the leaflet and a covering letter were also submitted to the Ward Councillors of Norden. A copy of the leaflet is attached at Appendix 1. See figure 3.1 for the catchment area. The leaflet was posted to residents / businesses located on Greenbooth Road, Edenfield Road, Heap Road and Tenterhill Lane.

Figure 3.1 Public Consultation Leaflet Area



Source: Google My Maps with Lichfields Edit

4.0 Planning Policy Context

Introduction

- 4.1 Section 70(2) of the Town and Country Planning Act 1990 and Section 38(6) of the Planning and Compulsory Purchase Act 2004 state that planning applications should be determined in accordance with the Development Plan unless material considerations indicate otherwise.

Development Plan

- 4.2 The Development Plan comprises the Rochdale Core Strategy (adopted October 2016), Rochdale Borough Unitary Development Plan (adopted June 2006), the Greater Manchester [GM] Waste Plan adopted April 2012 and the GM Minerals Plan adopted April 2013. There are no relevant policies within the GM Waste Plan of the GM Minerals Plan as these relate primarily to waste installations and mineral which this site is not concerned with.

Rochdale Core Strategy

- 4.3 The Rochdale Core Strategy [RCS] was adopted by the Council in October 2016. The document sets out the long-term spatial strategy for future development within the Borough. The key policies of relevance to the outline application are:
- **C1 (Delivering the Right Amount of Housing in the Right Places)** sets out that the Council will provide sufficient land to deliver the homes necessary and that the Borough will ensure there is always a deliverable five-year housing land supply.
 - **C3 (Delivering the Right Type of Housing)** sets out that the Council will deliver the right types of homes to meet the overall needs and aspirations of the Borough.
 - **C4 (Providing Affordable Homes)** states that the Council will seek affordable housing on all developments of 15 or more dwellings.
 - **P1 (Improving Image)** sets out that the Council requires high-quality design in all new developments.
 - **G4 (Protecting Green Belt)** states that the Council will continue to protect the Green Belt boundaries within the Borough from development.
 - **G5 (Managing Protected Open Land)** states that the Council will continue to protect the open land outside of the urban area which is not in the Green Belt from development unless it is development which would be considered to be acceptable in the Green Belt.
- 4.4 Other policies which are considered to be of relevance to this outline application are:
- P2 (Protecting and Enhancing Character, Landscape and Heritage);
 - P3 (Improving Design of New Development);
 - G1 (Tackling and Adapting to Climate Change);
 - G2 (Energy and New Development);

- G6 (Enhancing Green Infrastructure);
- G7 (Increasing the Value of Biodiversity and Geodiversity);
- G8 (Managing Water Resources and Flood Risk);
- G9 (Reducing the Impact of Pollution, Contamination and Land Instability);
- T2 (Improving Accessibility);
- DM1 (General Development Requirements); and,
- DM2 (Delivering Planning Contributions and Infrastructure).

Rochdale Unitary Development Plan

- 4.5 The Rochdale Unitary Development Plan [the UDP] was adopted by the Council in June 2006. The document sets out the Council's objectives for development within the Borough over the period from 1996 to 2016. The UDP remains part of the Development Plan until the Council has adopted the emerging Allocations Plan. However, many of the policies contained within the UDP have been replaced by the RCS.
- 4.6 The policies that are considered to be of relevance to the outline application are:
- G/D/2 (Green Belt);
 - G/8 (Greenspace Corridors);
 - RE/6 (Recreational Rights of Way); and,
 - EM/8 (Protection of Surface and Ground Water).

National Planning Policy

- 4.7 The most recent version of the Framework was published in July 2021 by the then Ministry of Housing, Communities and Local Government [MHCLG]. The policies in the Framework are material considerations to the consideration of applications [§218], with Policies in existing Local Plans to be given due weight depending upon their degree of consistency with the Framework.
- 4.8 The overarching aim of the Framework is to proactively deliver sustainable development to support the Government's economic growth objectives. The Framework [§8] identifies three dimensions to sustainable development, economic, social and environmental. The Framework indicates that to achieve sustainable development, economic, social and environmental gains should be sought jointly and simultaneously through the planning system.
- 4.9 Paragraph 10 states:
- “So that sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development (paragraph 11).”*
- 4.10 Paragraph 11 advises that 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.”*

4.11 Footnote 8 provides clarity on when policies might be out of date advising that:

“This includes, for applications involving the provision of housing, situations where the local planning authority cannot demonstrate a five-year supply of deliverable housing sites (with the appropriate buffer, as set out in paragraph 74); or where the Housing Delivery Test indicates that the delivery of housing was substantially below (less than 75% of) the housing requirement over the previous three years. Transitional arrangements for the Housing Delivery Test are set out in Annex 1.”

4.12 Footnote 7 identifies the protected areas or assets to which (d)(i) applies none of which are relevant to this site or the proposed development.

4.13 Section 3 of the Framework sets out the plan-led approach [§15] and the role of Local Plans. It goes on to advise that strategic policies should set out an overall strategy for the pattern, scale and quality of development. It advises that they should also make sufficient provision for *“...housing (including affordable housing), employment, retail, leisure and other commercial development.”* Paragraph 33 advises that policies in Local Plans and spatial development strategies should be reviewed to assess whether they need updating to take into account changing circumstances affecting the area, or any relevant changes in national policy, at least once every five years, and should then be updated as necessary.

4.14 Section 5 of the Framework relates to housing, and of particular note is paragraph 60 which identifies a need to boost significantly the supply of housing. It states that planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability [§68]. 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 [§74].

4.15 The Framework seeks to encourage a wide range of housing to meet local need, including the provision of affordable housing [§62 and §63]. Paragraph 64 relates to affordable housing and brownfield land. The paragraph states *“to support the re-use of brownfield land, where vacant buildings are being reused or redeveloped, any affordable housing contribution due should be reduced by a proportionate amount.”*

4.16 Section 11 of the Framework discusses making effective uses of land. Of note is paragraph 120(c) which states planning policies and decisions should *“give substantial weight to the value of using suitable brownfield land within settlements for homes”*.

4.17 The Framework [§138] states that there are two essential characteristics of the Green Belt, namely ‘permanence’ and ‘openness’. In addition, the Framework sets out five purposes of land within the Green Belt, these are to:

- check the unrestricted sprawl of large built-up areas;
- prevent neighbouring towns from merging into one another;
- assist in safeguarding the countryside from encroachment;
- preserve the setting and special character of historic towns; and,
- assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

4.18 The Framework indicates [§216] that applications must be determined in accordance with the development plan (summarised above) unless material considerations indicate otherwise and further states [§222] that due weight should be given to relevant policies in existing plans according to their degree of consistency with the Framework.

Housing Delivery Test

4.19 The Housing Delivery Test [HDT] was introduced as a requirement in a revision to the Framework published in July 2018 and is carried forward in the current iteration. This is referred to in Footnote 7 of paragraph 11 summarised above. The HDT is a percentage measurement of the number of net homes delivered against the number of homes required, over a rolling three-year period.

4.20 The planning policy consequences of not meeting the HDT are set out in the Framework and can be summarised as follows:

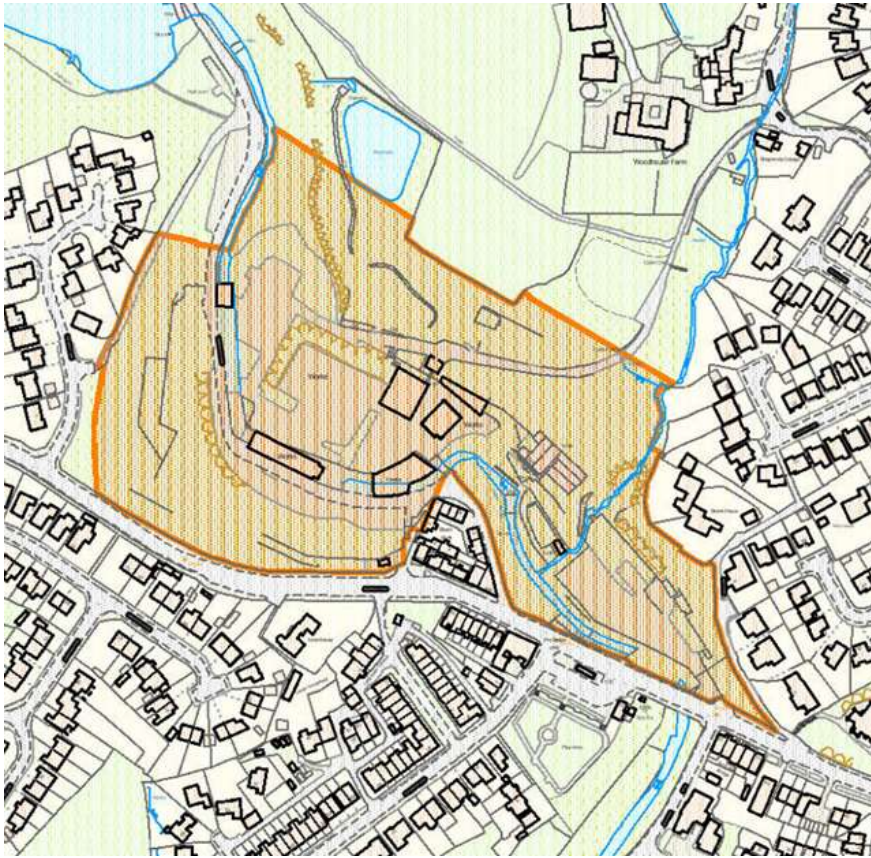
- The publication of an Action Plan if housing delivery falls below 95%;
- A 20% buffer on a local planning authority’s 5-year land supply if housing delivery falls below 85%; and,
- The presumption in favour of sustainable development of housing delivery falls below 75%, once transitional arrangements have ended (45% for the 2019 HDT rising to 75% for the 2020 HDT).

Emerging Plans & Policy

Rochdale Allocations Plan

4.21 The Rochdale Allocations Plan [the Allocations Plan] proposes areas and sites around the borough to build or develop up to 2028. The Council held a public consultation on the allocations plan in 2018 and is currently reviewing feedback. Due to the requirement of a further consultation on the draft allocations plan, only limited weight can be given to its draft allocations. An extract from the proposals map is shown at Figure 4.1.

Figure 4.1 Land at Greenbooth Road, Rochdale Draft Allocation



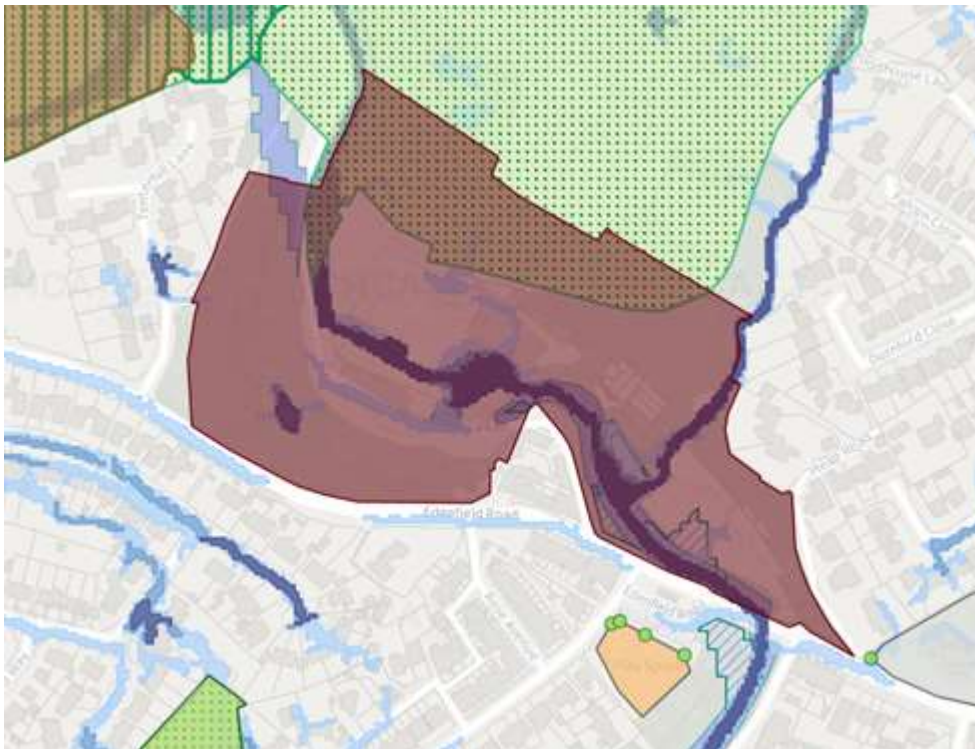
Source: Rochdale Borough Council

- 4.22 The Allocations Plan proposes to allocate the Site (as well as additional land to the south) for residential use. The site reference is AL/HOU/54, and is identified to accommodate 60 homes.
- 4.23 This emerging allocation is helpful in illustrating the long-term aspirations of the Council for the Site.

Places for Everyone

- 4.24 Nine of the ten Greater Manchester boroughs, including Rochdale Borough Council, submitted a joint development plan [PfE] document to the Secretary of State for examination in February 2022. An independent inspector released the schedule of proposed main modifications in July 2022. Hearings took place from 1 November 2022 and are continuing through to July 2023. Due to the stage of examination, limited weight can be given to the draft PfE document.
- 4.25 PfE does not allocate this site, instead only allocating strategic sites, providing a distribution of overall development requirements between the respective Boroughs and makes strategic amendments to the Green Belt Boundary. It does not undertake a localised review of the totality of the Green Belt and nor does it make non-strategic allocations.

Figure 4.2 Emerging Policies Proposals Map Extract for Land at Greenbooth Road



Source: Greater Manchester Combined Authority

- 4.26 The plan above reflects the proposed housing allocation set out within the emerging Allocations Plan (ref. AL/HOU/54) and the Green Belt boundary that is expected to be endorsed in PfE, but will no doubt be further reviewed as part of a subsequent new Local Plan for Rochdale.

Planning Practice Guidance

- 4.27 On 29 November 2016, the Government published the PPG. The PPG is updated regularly.
- 4.28 The PPG includes sections relevant to the consideration of planning applications (Section 21b), the use of planning conditions (Section 21a), and planning obligations (Section 23b). It also includes advice on specific topic areas including the natural environment (Section 8), design (Section 26), noise (Section 30), air quality (Section 32), contamination (Section 33), open space (Section 37), travel plans and transport assessments (Section 42), viability (Section 10), flood risk (Section 7) and water quality (Section 34) among other matters.
- 4.29 Those section are not repeated here but are referred to below as appropriate in the consideration of the proposed development.

Other Material Considerations

Supplementary Planning Documents

- 4.30 The Council has adopted the following Supplementary Planning Documents [SPD's] which are particularly relevant to the consideration of the current application pursuant to policies within the current development plan:

- Affordable Housing SPD;
- Design and Planning Process SPD;
- Guidelines and Standards for Residential Development SPD;
- Provision of Recreational open Space in New Housing SPD;
- Public Realm Design Guide SPD;
- Residential Design Guide SPD; and,
- Urban Design Guide SPD.

4.31 These documents are not part of the Development Plan but provide guidance on policies within the RCS. They are material considerations.

Evidence Base and Other Documents

Strategic Housing Land Availability Assessment (2023)

4.32 In March 2023, an update to the Strategic Housing Land Availability Assessment [SHLAA] was published. The assessment notes that the Council has a target for 80% of all residential development to take place on previously developed land. The SHLAA identifies that since 2015/2016, the Council has continuously missed this target. For the year 2021/2022, only 64.6% of homes delivered in the Borough were built on previously developed land.

Greater Manchester Strategic Housing Market Assessment (2019)

4.33 The Greater Manchester [GM] Combined Authority published a regional wide SHMA in January 2019. The GM SHMA identified that over the time period 2011-2012 to 2017-2018, the Council did not hit its affordable housing target of 204 homes per year once. Over the time period, the GM SHMA notes 684 affordable homes were delivered, averaging less than 100 homes per year.

4.34 The GM SHMA also identifies that there are 1,118 households on the housing waiting list in the Borough who are either in unsuitable homes or cannot afford to meet their housing needs. The GM SHMA also estimates that Rochdale will have the second highest rate of population growth among the GM authorities between 2018 and 2043.

Annual Monitoring Report (2019)

4.35 The Council published its latest Annual Monitoring Report [AMR] in July 2019. The AMR identifies that the scale of affordable housing requirements in the borough has increased and that there is now an overall net annual imbalance of 204 affordable dwellings per year.

Rochdale's Brownfield Land Register

4.36 The Site is listed on Rochdale's Brownfield Land Register under reference SH 1775.

5.0 Main Planning Considerations

5.1 This section deals with the planning issues pertinent to the consideration of this application comprising the following matters:

- 1 Principle of development;
- 2 Impact on the Greenspace Corridor; and,
- 3 Impact on the Green Belt.

5.2 In all respects, the starting point for the assessment is compliance with the Development Plan (in accordance with Section 70(2) of the Town and Country Planning Act 1990 and Section 38(6) of the Planning and Compulsory Purchase Act (2004), and any other material planning considerations.

Principle of Development

5.3 The Framework defines previously developed land as:

“Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure...”

5.4 The Site extends 2.7ha and comprises brownfield land in accordance with the Framework’s definition. Five buildings remain on the Site with the majority of the original buildings having been cleared but with hard standing remaining. Trees which are allocated as a Greenspace Corridor under saved UDP Policy G/8 amount to roughly one quarter of the Site’s area.

5.5 The remaining buildings on the Site comprise various size industrial buildings. The Site was previously occupied by the former cotton spinning mill associated with Tack Lea Works Limited.

5.6 Within the adopted Development Plan, the majority of the Site is located within the Defined Urban Area (G/D/1) with the northern most sliver of the Site located within the allocated Green Belt. However, within the draft Allocations Plan, the entirety of the Site is proposed to be allocated for residential development (ref. AL/HOU/54) with the capacity for 60 homes. The Site does not comprise the full extent of the draft housing allocation. This emerging allocation is indicative of in-principle support from the Council, for the residential development of the Site.

5.7 Policy C1 (delivering the right amount of housing in the right places) seeks to maximise the potential of previously developed sites, within the urban area to achieve a target of 80% of new housing on previously developed land. As noted, the elements of the Site where development is proposed accord with the Framework’s definition of previously developed land and the Site is located within the defined urban area.

5.8 Policy C1 also seeks that development proposals are located sustainably. The closest bus stop is located 55 metres west of the Site. As detailed in paragraphs 2.3 and 2.4 of this Statement, there are a number of local services including a convenience store, two primary schools, a village high street containing an opticians, restaurants and public houses and

local parks within 500m of the Site. Manual for Streets states that a walkable neighbourhood is typically characterised by having a range of facilities within a ten-minute walk, up to 800 metres distance. Noting the various services located within walking distance, the Site is considered to be sustainably located.

- 5.9 Policy C1 also seeks that proposals have limited adverse impact on green infrastructure or amenity value and that proposals incorporate green infrastructure into the scheme. The amended proposals have reduced the development footprint considerably from that proposed as part of the 2021 Application, and have retained the majority of the green corridor which is located within the Site. The proposed development is located on previously developed land that has comprised built development for over 100 years. With the retention and safeguarding of the green corridor, in terms of impacts on amenity, the proposed development is considered to have no greater impact than the industrial buildings that previously occupied the Site. As such, it is considered that the proposed development accords with RCS Policy C1.
- 5.10 Policy C3 (delivering the right type of housing) seeks to deliver the right types of homes, be well designed and built to appropriate densities, to meet the overall needs of the Borough. The proposed development offers a mix of 2, 3 and 4 bedroom family homes to meet the needs of local residents. The GM SHMA (2019) identified that there were 1,118 households within the Borough on the housing waiting list as they could not afford their housing needs. The provision of 49 affordable homes across a variety of size homes will therefore help to meet an identified need in the Borough. It is considered that the proposals accord with RCS Policy C3.
- 5.11 Furthermore, criterion 2 of Strategic Objective SO2 (to create successful and healthy communities) seeks to *'improve the range of housing to meet everyone's needs and aspirations including affordable housing...'* According to data from the 2021 Census, the area where the Site is located offers a very low amount of affordable housing with less than 1% of households in the output area 'E00028192' which includes the Site, comprising socially rented either from the Council or other social rented arrangement¹. Data from the 2021 Census confirms that 0% of the homes in the aforementioned output area are owned as part of a shared ownership scheme². Output areas are the smallest, lowest level areas of census statistics. Moreover, the five adjoining output areas have a similarly low level of social rented and shared ownership homes. The proposed development of 100% affordable homes therefore supports the Council's Strategic Objective SO2 by increasing the range of housing available in the area.
- 5.12 Overall, it is considered that the principle of residential development at the Site is acceptable and in accordance with RCS Policies C1, C3, Strategic Objective SO2 and the Framework paragraph 120(c).

¹ <https://www.ons.gov.uk/census/maps/choropleth/housing/tenure-of-household/hh-tenure-9a/social-rented-other-social-rented?oa=E00028192>

² <https://www.ons.gov.uk/census/maps/choropleth/housing/tenure-of-household/hh-tenure-9a/shared-ownership-shared-ownership?oa=E00028192>

Impact on the Greenspace Corridor

- 5.13 Saved UDP Policy G/8 relates to Greenspace Corridors which pass through the Site. This is shown on Figure 5.2 below. The Greenspace Corridor passes through the Site, from north to south and surrounds the Edenfield Road access.
- 5.14 While the majority of trees within the greenspace corridor are proposed for retention, it is required to remove a limited number of trees to allow for the construction of the internal spine road only. It is not proposed to remove trees which would result in the narrowing of the greenspace corridor. No homes have been proposed in the area allocated as the greenspace corridor to minimise tree loss and to limit the effect on its continued function as a wildlife corridor. It is therefore considered that the proposals protect the integrity and safeguard the areas designated as a greenspace corridor that are located within the boundaries of the Site.
- 5.15 The existing access bridge located opposite cottages 9-15 Greenbooth Road will be retained as part of the proposals. No physical barrier is proposed on the bridge and thus this route will remain available as an emergency exit as well as for day-to-day use by pedestrians, cyclists and the movement of wildlife. This in turn will also ensure permeability through the Site for the future residents of the scheme.
- 5.16 The amended layout with less units is considered to have addressed the Council's concerns with regards to protecting the Greenspace Corridor as it has largely retained the area of trees which currently exist. Landscaping is proposed to be a reserved matter and details of landscaping will be provided as part of a subsequent reserved matters application in due course. As such, it is considered that the proposals are in accordance with saved UDP Policy G/8(A).

Figure 5.1 Greenspace Corridor



Source: Rochdale Unitary Development Plan Policies Map

Impact on the Green Belt

- 5.17 The Site comprises a vacant former industrial site, with a sliver of land in the north-western most corner allocated as Green Belt (see figure 4.2). The Green Belt allocation forms approximately 0.12ha of the overall Site (approximately 4.5% of the overall site). The assessment below relates to this element of the application site only.
- 5.18 The Green Belt boundary is defined by adopted UDP by Policy G/D/2 and is shown on the proposal map. The associated Policy D/4 in the UDP that controls development in the Green Belt was superseded by Policy G4 of the RCS. This states that:
- “Development will be restricted to those limited types of development which are deemed not to be inappropriate by national planning policies unless very special circumstances can be demonstrated.”*
- 5.19 Therefore, RCS Policy G4 does not seek to define appropriate or inappropriate development, instead it simply references the definitions in the Framework. Thus, it falls to consider the proposals against the Framework, and specifically the requirements of paragraph 149 in Section 13 of the Framework.
- 5.20 For the reasons set out above, the Site, including the sliver of land designated as Green Belt is considered to be previously developed land. The site is located within the curtilage of the former cotton spinning mill. As a result, the site comprises previously developed land in accordance with the Framework’s definition set out at Annex 2.

- 5.21 The Framework [paragraphs 149 & 150] defines those developments and uses that are considered ‘appropriate’ within the Green Belt. Specifically, paragraph 149(g) permits the partial or complete redevelopment of previously developed land which would:
- “- not have a greater impact on the openness of the Green Belt than the existing development; or*
- not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority.”*
- 5.22 Paragraph 149(g) applies because the site is uncontestably previously developed land. The proposed development is therefore not necessarily inappropriate development as defined by the Framework.
- 5.23 In terms of the first criteria, it is accepted that the buildings on the small part of the site that was Green Belt have been demolished. The fact that those buildings were there is clear from the presence of hardstanding that remain on the site. These areas of hardstanding are development which does impact upon the openness of the Green Belt. Openness is the absence of development and thus by virtue of the presence of built development there is an impact upon openness. This is predominantly a visual effect rather than a spatial one.
- 5.24 Turning to the second criterion listed under paragraph 149(g) in the Framework, the application is for a scheme of 100% affordable homes being delivered for a Registered Provider to meet an identified local need. That need is defined in the GM SHMA (2019), which identified that over the time period 2011-2012 to 2017-2018, on average, only 100 affordable homes were delivered in the Borough per year against a policy target of 204. As a result, the GM SHMA (2019) noted that there is now a backlog of 1,118 households currently waiting on the affordable housing register within the Borough. It is clear from the Council’s own evidence that is being relied upon in an emerging Local Plan (i.e. PfE) that there is a currently need for affordable housing that is not being met. Based on the Borough’s track record of affordable housing delivery, the proposed development of 49 affordable homes would significantly increase the delivery of affordable homes within the Borough.
- 5.25 The second criterion of paragraph 149(g) is therefore applicable to this scheme. It therefore falls to consider whether or not the proposals give rise to substantial harm to the openness of the Green Belt.
- 5.26 The precise alignment of the Green Belt boundary is difficult to deduce because of the scale of the proposals map in the UDP and the absence of the buildings shown on the map at that time (as they have in part subsequently been demolished). However, we have sought to estimate the boundary on the site layout plan. The boundary only impacts upon Plots 25 to 33. Of these, it is only the rear gardens of Plots 25, 26 and 33 that are impacted. Any impact is therefore limited to the change from hardstanding to garden and associated domestic paraphernalia with enclosing fence. Such fences are otherwise permitted development (with no limitations in the Green Belt) and therefore its impacts upon openness in themselves are limited. Of the remaining 6 dwellings, the Green Belt boundary effects all of the dwelling and associated curtilage of Plot 31, the majority of the dwelling on Plot 30 and its associated curtilage and parts of the footprint and curtilage of the dwellings on Plots 27-29 and 32. In

rough terms, if the parts of the dwellings were assimilated into wholes, the proposals are equivalent to around 4 dwellings being located in the Green Belt.

- 5.27 In this context we turn to the impacts on openness of the Green Belt below. There are two issues to consider, namely: (a) the openness of the wider Green Belt; and, (b) the openness of the Green Belt within the Site.

Openness of the Wider Green Belt – Visual Openness

- 5.28 The site is contained by the side of the valley to the north and east and includes dense tree coverage, the Naden Brook to the west and by previously developed land to the south. There is an approximate 20 metre drop in ground levels between Tenterhill Lane to the west and the site and an approximate 30 metre drop in ground levels between the agricultural land located to the east of the site. The homes that are proposed on that part of the site that is identified as Green Belt will be two storeys in height. The proposed dwellings are between 6 and 8 metres in height to the ridge. This is similar in height to the former industrial buildings. Taking into account the dense tree coverage and the steep drop in ground levels, there are no viewpoints overlooking the site from a position within the wider Green Belt where you would be able to see the homes on that part of the site that is Green Belt (or indeed any part of the site).
- 5.29 In the context of the visual links to the wider Green Belt, due to the site's topography, it is considered that the area of Green Belt within the application Site has limited connections to the wider Green Belt located to the north. It is considered that the proposed development of the equivalent of 4 homes that are on the sliver of Green Belt will therefore, largely have no effect on the visual openness of the wider Green Belt.

Openness of the Site – Spatial Openness

- 5.30 As discussed, the site is located on the floor of the valley, with the sides of the valley located to the north and east. The application site encompasses land that is Green Belt that will remain outside the curtilage of the proposed dwellings and will be retained as open land or woodland and thus is unaffected by the development.
- 5.31 The curtilages of plots 25-33 that are partially affected by the Green Belt designations will not comprise entirely built development. Indeed, in terms of equivalency it amounts to only 4 homes and their respective curtilages. Of these in rough terms 1/3rd is garden, 1/3rd is hardstanding (parking access etc), and 1/3rd is the footprint of the dwellings. In this regard, bearing in mind the site is effectively all hardstanding, there is 1/3rd that is neutral in terms of effects, 1/3rd where there is a betterment in terms of openness, and 1/3rd where there is harm to openness compared to the current situation. There is an overall betterment compared to the industrial buildings that existed on the site.
- 5.32 Arguably, overall the Green Belt will therefore, remain largely open, with only a limited impact on openness.
- 5.33 The second criterion of paragraph 149(g) of the Framework sets the threshold for harm to the openness to the Green Belt at 'substantial'. It has been demonstrated that we consider that the proposed dwellings that will be partially located within the sliver of Green Belt will only result in a limited impact on the openness of the Green Belt. Therefore, the proposed

development within the area of Green Belt is considered to be appropriate development and in accordance with the Framework.

- 5.34 Overall, it is considered that the proposed development on the sliver of Green Belt accords with paragraph 149(g) of the Framework and RCS Policy G4 (Protecting Green Belt). As such, the proposed development is considered to be appropriate development.

6.0 Other Planning Considerations

Design & Layout

- 6.1 The former mill building that occupied the Site has already been demolished. The five remnant buildings that occupy the Site comprise various size industrial buildings. Refer to Appendix 2 of the submitted Preliminary Ecological Appraisal prepared by E3P for images of the buildings. If viewing the Site from Edenfield Road, due to the dense tree coverage surrounding the Site, it is not possible to view the existing buildings. As such, the demolition and clearance of the five remaining buildings is not considered to impact the existing street scene of Edenfield Road.
- 6.2 The parts of the Site that have been cleared have largely been used as a car park with what appears to be a caravan and port-a-loos visible from Edenfield Road looking into the Site. It is considered that the proposals will amount to a betterment by revitalising the brownfield site which, in its current form, is considered to offer potential for antisocial behaviour.
- 6.3 In terms of the surrounding area, there is not considered to be one prevalent architectural style. The housing estates located to the west and east of the Site were built around the 1980's and 1990's according to public access, whereas the homes located on Greenbooth Road and Edenfield Road appear to be far older. There is a clear difference in architectural style between those aforementioned homes. The wider area continues in this patchwork like style of design, with traditional stone-built cottages and contemporary style housing estates. It is therefore considered that the area does not have just one set architectural style.
- 6.4 The scheme has however been designed with a nod to the Site's industrial past and the heritage of the mills in the wider area. The layout of the scheme has largely been influenced by the parameters of the Site, including the topography and policy limitations including the greenspace corridor designation.
- 6.5 The three-storey terraced homes proposed to be located adjacent to the Site entrance near Edenfield Road have been designed to reference the former cotton mills of the area in so much as is possible. Not dissimilar in style to the development at Blackpits Road. The proposed density of the terraced homes are considered to be sympathetic to the existing built form found located on Edenfield Road and Greenbooth Road.
- 6.6 Travelling west through the Site, immediately after the row of terraced homes, the Green Corridor and woodland area is to be protected as much as possible and retained on Site. Continuing west through to the Site, located to the north of the existing industrial buildings located on Greenbooth Road, terrace style homes and semi-detached homes are proposed with the occasional detached home. The proposed variety of houstypes is considered to be similar to the existing built form of the housing estates located to the east and west of the Site.
- 6.7 The single spine road curves and bends in parallel with the Naden Brook which is considered to present a less rigid built environment and one that is sympathetic to the natural surroundings.
- 6.8 Parking for the terrace style homes at the entrance to the Site is proposed to be located to the rear or the side of the homes. Small front gardens are proposed for these homes. In

relation to the homes located to the west of the Site, parking is proposed to be located either at the front of the house or the side. It is considered that the variety in location of parking ensures the development is not car dominated and front gardens and areas of soft landscaping are proposed to break-up areas of hardstanding between the homes.

- 6.9 Overall, the design and layout of the scheme is appropriate and in keeping with the surrounding residential character of the area. It is considered that the proposals are in accordance with RCS Policy P3 (Improving Design of New Development) and DM1 (General Development Requirements).

Residential Amenity

- 6.10 As discussed at paragraph 2.15 of this Statement, the trees located within the Site and located on the Site perimeter are protected by TPOs. In addition, the trees located within the allocated greenspace corridor that runs through the Site will be protected from the proposed development.
- 6.11 The Site is located in the floor of the valley, surrounded by the sides of the valley. There is a circa 20-30 metre drop between the top of the valley, including Edenfield Road to the south, homes located at Tenterhill Lane to the east and the farmhouse located to the north-east of the Site off Woodhouse Lane. In addition to the drop, mature tree coverage surrounds the Site. For the homes located at Tenterhill Lane, Heap Road and Dumford Close to the east, the tree coverage exceeds the height, by some margin, of all two-storey homes. No trees located outside of the application Site boundary are proposed for removal. As such it is considered that the views over the valley floor for the existing residents surrounding the Site will remain obscured.
- 6.12 The residents of the cottages on Greenbooth Road currently look north, out of their homes (in the direction of the Site) over dense tree coverage. This view will not be impacted as the trees located opposite these existing homes is not proposed for removal. In terms of the view from a first-storey window from these cottages, residents currently look north over a brownfield site in disrepair, hardstanding and the miscellaneous businesses located on Greenbooth Road. It is considered that the proposed development will improve the view that residents currently have by tidying up the Site.
- 6.13 For the homes located to the east and west of the Site, the tallest of the proposed homes will be three storeys. As such, none of the proposed homes will exceed the 30m height of the valley sides plus the height of the trees. Therefore, the secluded nature of the topography of the Site is considered to protect the residential amenity for existing neighbouring homes.
- 6.14 Overall, in terms of residential amenity, it is considered that the proposals are acceptable and in accordance with RCS Policy DM1 (General Development Requirements).

Noise

- 6.15 The application is accompanied by a Noise Impact Assessment [NIA] prepared by E3P.
- 6.16 The NIA identified increased noise levels as a result of vehicular traffic on Edenfield Road, in the area which will accommodate the terraced homes, plots 1-10. The NIA suggests mitigation comprising higher specification glazing to all plots and a mechanical ventilation system to reduce the requirement for residents to open their windows.

- 6.17 The NIA did not identify any other plots that would be adversely affected by raised noise levels in relation to road users.
- 6.18 With regards to the industrial buildings located to the south of the Site on Greenbooth Road, the NIA states:
- “During the survey and site walkover, no significant commercial noise was noted, therefore a commercial noise impact assessment is not required.”*
- 6.19 The NIA concludes that no adverse impacts are predicted day or night from existing sound sources and that noise need not to be a material consideration of the application. As such, it is considered that the proposed development is acceptable with regards to noise levels and in accordance with RCS Policies DM1 (General Development Requirements) and the element of DM2 (Delivering Planning Contributions and Infrastructure) in relation to mitigating noise impacts on residential development.

Landscape

- 6.20 Details of landscaping are to be submitted as part of a subsequent reserved matters application in due course, however, the Landscape GA Plan (ref. UG_2003_LAN_GA_DRW_01 rev. PO4) provides a high-level overview of the proposals. As with the layout, the landscape proposals are largely dictated by the existing form and constraints of the site. The majority of existing woodland in the site would be retained. Additional tree planting is proposed to line the streets of the development, softening the appearance of the development and providing ecological value.

Highways

- 6.21 The application is accompanied by a Transport Statement [TS] prepared by Eddisons.
- 6.22 The estate roads within the development have been designed to be safe and attractive to move through and the information set out is in full accordance with national policy regarding highway safety. The roads within the Site are provided as a 5.5m wide carriageway with one 2 metre wide pavement through the greenspace corridor and then two 2 metre wide pavements (one on each side) through the rest of the development. This includes the main Site access which will be a modified access from Edenfield Road. The highway within the Site is will be offered for adoption.
- 6.23 The proposals provide one access for vehicles with a secondary emergency and pedestrian access located opposite plot 50, via Greenbooth Road, which is an existing access and will be retained. The primary access is designed to accommodate two lane traffic and the movements of refuse and delivery vehicles.
- 6.24 A Proposed Site Access Plan prepared by Eddisons also accompanies this application which demonstrates that the access is suitable for a standard refuse vehicle measuring 9.925m in length and 2.450m in width has sufficient room to safely access the Site without traversing the footpath. The Proposed Site Access Plan also demonstrates that a medium size car measuring 4.319m in length and 1.686m can access the Site whilst a stationary medium sized car is waiting at the junction, exiting the Site.

- 6.25 The TS also includes a swept path analysis at page 28. The swept path analysis confirms that a refuse vehicle can safely travel through the entire Site.
- 6.26 The TS confirms that it is expected the development to result in 23 two way vehicle movements in the weekday AM peak and in the weekday PM peak. This equates to around an additional vehicle every 3 minutes. The TS confirms that the minimal increase that is anticipated would only have a minimal impact on the operation of the local highway network. The TS concludes that no further detailed analysis of the local highway network has been undertaken or is considered to be necessary.
- 6.27 It is proposed to provide 1-2 parking spaces per dwelling, in accordance with the Council's maximum parking standards. Plots with 1 parking space also benefit from a shared visitor parking space.
- 6.28 It is therefore considered that the proposals are safe in terms of highways impacts both in terms of impacts on the local highway network and the proposed highway design as part of the application. The proposals are therefore considered to be acceptable in terms of highways and in accordance with RCS Policy T2 (Improving Accessibility).

Affordable Housing

- 6.29 RCS Policy C4 (providing affordable homes) seeks affordable housing on all developments of 15 dwellings or more, equivalent to 7.5% of the development sales value. Whilst it is not financially viable to provide any affordable housing at the site, through grant funding the application proposes to deliver 49 affordable homes which represents 100% of the proposed dwellings.
- 6.30 According to the Council's AMR (2019) and the GM SHMA (2019) there is a growing number of households within the Borough that require affordable homes. Therefore the delivery of 49 affordable homes on brownfield land, which amounts to 100% of the dwellings proposed, far exceeding the requirements of local policy, should carry significant weight in the determination of the application.
- 6.31 The affordable housing will be delivered by our client's registered providers, Great Places. Great Places intend to offer the homes on a shared ownership basis, offering local people an opportunity to get onto the property ladder. The proposed development achieves the objective of promoting mixed communities and helps to minimise social exclusion. It is therefore considered that the proposed development is in accordance with RCS Policy C4 (providing affordable homes).

Biodiversity

- 6.32 The application is accompanied by a Biodiversity Metric Report prepared by E3P. The report confirms that the proposed scheme would result in a total gain of 0.19 habitat units with no net change in watercourse units.
- 6.33 E3P recommend that neutral grassland and mixed scrub are planted within the Site outside of the homes and also recommend that 22 trees of medium size are included within the design.

- 6.34 The submitted Landscape GA Plan prepared by Urban Green confirms that it is proposed to plant 22 trees within the development. The number of trees proposed is double what has been recommended and is considered to be acceptable.
- 6.35 The metric concludes that there is a net gain of 1.12% in habitat units and therefore the proposed development is considered to be acceptable and in accordance with paragraphs 174(d) and 179(b) of the Framework and RCS Policies G6 (Enhancing Green Infrastructure) and G7 (Increasing the Value of Biodiversity and Geodiversity).

Ecology

- 6.36 The application is accompanied by a Preliminary Ecological Appraisal prepared by E3P. The report identifies that several of the remaining buildings onsite offer moderate bat roosting potential, badger setts were identified on Site, the Naden Brook has potential for great crested newts and otters. The report also identified that the broadleaved woodland could be utilised by hedgehogs and common amphibians.
- 6.37 The report recommends that further surveys be undertaken to identify the presence of the aforementioned species. The surveys identified are currently being undertaken.
- 6.38 The report also recommends a range of mitigation including precautionary working methods for badgers comprising buffer zones to be maintained from the outlier setts on site, removal of common amphibians during the site clearance phase, retaining vegetation, checking for hedgehogs during site clearance, eradicating invasive species, producing a lighting strategy and a suitable buffer zone is provided before the Brook becomes culverted.
- 6.39 However, the proposed development will largely be focused on the areas of previously developed land. The majority of the woodland within the Site is to be retained as part of the proposals. It is only proposed to remove a limited number of trees.
- 6.40 No development is proposed on the Naden Brook which is located outside of the ownership boundary. The existing access from Greenbooth Road into the development will be retained which will allow local species to travel between the Site and the wider area.
- 6.41 It is considered that the proposals are acceptable in terms of ecology and in accordance with RCS Policies G6 (Enhancing Green Infrastructure), G7 (Increasing the Value of Biodiversity and Geodiversity) and G8 (Managing Water Resources and Flood Risk).

Arboriculture

- 6.42 The application is accompanied by an Arboricultural Impact Assessment [AIA] prepared by E3P. The AIA identifies one woodland graded category B and two groups of trees graded category C on and adjacent to the Site.
- 6.43 The AIA confirms that a limited number of trees, that are protected by a Tree Preservation Order, are proposed to be removed in order to make way for the development. Refer to figures 6.1 and 6.2 below and appendix IV in the AIA for the full plan.
- 6.44 The AIA confirms that there were no trees identified within the Site that are category 'A' high-quality trees.

- 6.45 Earlier discussions with the Council identified issues with the layout of the proposed scheme, which included a greater loss of trees than what is proposed. Following discussions with the Council, the layout has been amended with the position of the internal road being relocated so to reduce the number of trees that are required to be removed to allow the development.
- 6.46 Moreover, the secondary emergency access which connects the development to Greenbooth Road was not considered to be acceptable as a main entrance for the Site. This means the primary access for the Site, from Edenfield Road is the only acceptable access. As a result, the internal highway network is required to pass through the woodland area. While there will be a small loss of trees, the majority of the trees on Site will be safeguarded by the proposals. The trees that are proposed to be removed are all category B trees, meaning that the trees are of moderate quality and should be accommodated within the development proposals wherever possible. The majority of the trees are being accommodated, and as discussed, the proposals have been revised to accommodate the largest number of trees within the development.
- 6.47 The submitted Landscape GA Plan prepared by Urban Green confirms that it is proposed to plant 45 trees within the development. The number of trees proposed is considered to be appropriate for the trees that are proposed to be removed. The proposed internal road is parallel to the adjacent river while travelling through the greenspace corridor. It is considered that the river is a greater physical barrier to the permeability of the Site to wildlife travelling from the north of the Site to Greenbooth Road. As the proposed internal road follows the river line, where possible, it is considered that the impact of the hard surfacing will therefore be limited.
- 6.48 The Site is a draft housing allocation within the emerging Rochdale Allocations Plan with a capacity of 60 dwellings (ref. AL/HOU/54). The subject application seeks permission for 49 dwellings. To accommodate the scheme of 49 homes, it is required to remove a limited number of trees. As the Site is a draft housing allocation, it is considered that the loss of trees would have been considered by the Council and deemed to be acceptable. Therefore, it is considered that the loss of the limited number of trees while safeguarding the remaining trees protected by a TPO is acceptable.
- 6.49 Overall, in terms of arboriculture, it is considered that the proposals are acceptable and in accordance RCS Policies G6 (Enhancing Green Infrastructure) and G7 (Increasing the Value of Biodiversity and Geodiversity).

Figure 6.1 Areas of Proposed Tree Removals



Source: Arboricultural Impact Assessment

Figure 6.2 Areas of Proposed Tree Removals



Source: Arboricultural Impact Assessment

Flood Risk and Drainage

- 6.50 The application is accompanied by a Flood Risk Assessment [FRA] and Drainage Strategy [DS] prepared by Townsend Water Engineering Limited.
- 6.51 The FRA confirms that the majority of the Site is within Flood Zone 1 but that the southern boundary is located within Flood Zone 3. Flood Zone 3 is an area at risk of fluvial flooding up to and greater than the 1 in 100 year event.
- 6.52 In terms of groundwater flooding, the FRA notes there is a medium risk of flooding. However, it is not proposed to have development below the ground level, such as cellars and the FRA concludes that the risk to homes is considered to be low.
- 6.53 The FRA confirms that the proposed finished floor levels of the scheme are set at a 1 in 1,000 year event. The FRA notes that the houses are therefore outside of the flood plain and do not require compensatory storage.
- 6.54 The FRA also confirms that the access road on and off the Site is above 163 metres AOD and is therefore above the 1 in 100 year event plus climate change. The FRA notes that the Site has dry access and egress.
- 6.55 The Greenbooth Reservoir is located approximately 420 metres from the Site. As a result, the FRA notes that the Site is within the area at risk of flooding from a reservoir breach. The FRA confirms that flooding from reservoirs is very rare and in the unlikely event of such a breach, the consequences would be high. However, the FRA concludes due to the unlikelihood of a reservoir failing, the risk of flooding from a reservoir is low.
- 6.56 The FRA concludes that the risk of flooding to the proposed development is low. As such, it is considered that the proposals are acceptable in terms of flood risk and in accordance with RCS Policy G8 (Managing Water Resources and Flood Risk) and saved UDP Policy EM/8 (Protection of Surface and Ground Water).
- 6.57 In terms of drainage, the Site is comprises brownfield land including hardstanding and the DS assumes that surface water from the existing site conditions drains into the Naden Brook.
- 6.58 The DS confirms that infiltration systems have been discounted from the proposals as the ground does not infiltrate. Attenuation basins have been proposed in the areas of public open space. The DS notes that the drainage will be split into two catchment areas, phase 1 comprises the eastern element of the development and phase 2 comprises the development located to the west of the Site. The DS confirms that the surface water from the Site will drain into the Naden Brook with a maximum discharge for phase 1 will be 60l/s and for phase 2 68l/s. The DS confirms that both discharges will not exceed the discharge of 128l/s as agreed with the LLFA for the entire site.
- 6.59 The entire discharge for the Site will be restricted to a total of 128l/s via hydro-breaks up to and including the 1 in 100 year event, plus climate change (45%). The storage will be held in oversized pipes up to and including the 1 in 100 year event plus climate change.
- 6.60 The surface water system is proposed to be offered up to United Utilities for adoption.

- 6.61 It is considered that the proposed development is acceptable in terms of drainage and in accordance with RCS Policies G1 (Tackling and Adapting to Climate Change) and G8 (Managing Water Resources and Flood Risk).

Air Quality

- 6.62 The application is accompanied by an Air Quality Assessment [AQA] prepared by E3P.
- 6.63 The AQA identifies that the proposed development has the potential to cause air quality impacts as a result of fugitive dust emissions during the construction and road traffic exhaust emissions associated with vehicles travelling to and from the site during operation.
- 6.64 The AQA assessed the potential impacts. Assuming good practice, E3P found the residual significance of potential air quality impacts from dust generated by earthworks, construction and trackout activities was predicted to be not significant.
- 6.65 E3P found the potential impacts during the operational phase of the proposed development in relation to traffic exhaust emissions to also be not significant, due to the low number of vehicles movements predicted.
- 6.66 The AQA concludes that based on the assessment results, air quality issues are not considered to be a constraint to the proposed development.
- 6.67 As such, it is considered that the proposed development is acceptable in terms of air quality and in accordance with RCS Policies DM1 (General Development Requirements) and G9 (Reducing the Impact of Pollution, Contamination and Land Instability) and relevant national policy that seeks to safeguard human health and prevent unacceptable level of pollutants.

Ground Conditions

- 6.68 The application is accompanied by a Phase II Geoenvironmental Site Assessment [GSA] prepared by E3P.
- 6.69 Due to the Site's industrial past, a number of contaminants have been identified. The GSA recommends various additional works be undertaken including further investigation of inaccessible areas, plot specific foundation schedule, application for a flood risk activity permit, arboricultural survey, settlement analysis for earthworks design, slope stability assessment, structural survey of retaining walls, geotechnical earthworks strategy (infrastructure), remediation and enabling works strategy, and construction phase surface water management plan. For the avoidance of doubt, an arboricultural survey accompanies this application.
- 6.70 It is considered that the additional intrusive investigations can be conditioned as part of any subsequent permission. Following the required remediation, it is considered that the proposed development will be acceptable in terms of ground conditions and in accordance with RCS Policies DM1 (General Development Requirements) and G9 (Reducing the Impact of Pollution, Contamination and Land Instability).

Heritage

- 6.71 The Site and wider area have been in industrial use from at least the early 19th century. Mapping from this time depicts the application site in use as 'Woodhouse Mill', a bleaching mill. Sandstone quarries and reservoirs were also present in the surrounding area.
- 6.72 The bulk of the site has continued to be in industrial use until the present day. Historic structures have largely been demolished, and those that remain are mostly modern, although the presence of stone masonry indicates that fragments of older structures may remain. Given the poor state and legibility of the structures they are not considered to hold value as non-designated heritage assets in their own right. These buildings are not considered to contribute to the character of the area. The demolition of these remaining buildings is therefore considered to be acceptable.
- 6.73 The stone-built cottages located on Greenbooth Road do have value as historic structures contribute to local character. They are located outside of the Site and will not be directly impacted by the proposed development. The proposed development is of a high-quality and will improve, rather than detract from the setting of these buildings.
- 6.74 The homes are proposed to comprise red brick and grey roof tiles. The submitted houstypes plan illustrates how the development will look. The conservation officer noted in their pre-application response that they would like to see a mix of materials. The amended proposals include three-storey townhouses at the entrance to the Site, with the front gable roof profiles referencing the industrial heritage of the Site. As such, it is considered that the proposed materials palette, design and layout of the scheme is acceptable for the area in terms of respecting local heritage.
- 6.75 As such, it is considered in terms of heritage and archaeology, the proposed development is acceptable and in accordance with RCS Policy P2 (Protecting and Enhancing Character, Landscape and Heritage).

Energy

- 6.76 The application is accompanied by an Energy Statement prepared by Stonebond.
- 6.77 The Statement details the energy performance of the proposed homes and provides an energy assessment of the overall development. It is considered that the proposed development is acceptable in terms of energy performance and in accordance with RCS Policies G1 (Tackling and Adapting to Climate Change) and G2 (Energy and New Development).

Crime

- 6.78 The application is accompanied by a Crime Impact Statement prepared by Paul Martin. The layout has been designed to be an attractive and safe place to live. The statement explains how the scheme reduces impact on and susceptibility to crime and disorder and also makes a number of recommendations.
- 6.79 The layout has adopted the principles of Secured by Design. The report sets out the features that have been incorporated into the scheme to deter crime. These include increasing

natural surveillance through orientation of dwellings, the use of landscaping to create a defensible yet visible space and appropriate lighting.

- 6.80 It is considered that the proposals are in accordance with RCS Policies P3 (improving design of new development) and DM1 (general development requirements).

Planning Obligations

- 6.81 The Council has identified a number of potential contributions relating to affordable housing, open space, and education.
- 6.82 The Site faces considerable viability challenges, owing to constraints of the Site and the costs of demolition and remediation of brownfield land.
- 6.83 As set out previously, the proposed development will deliver 100% affordable housing using Homes England grant funding, and therefore will considerably exceed the requirement of 15% affordable housing set out in the RCS (and the accompanying Affordable Housing SPD). This should be weighed as a considerable positive element in the planning balance.
- 6.84 The Site benefits from access to significant areas of open space including recreational routes which provide direct access to the reservoirs and the land to the north, as well as a more localised area of designated open space to the south of Edenfield road (circa 50 m south-west of the Site entrance). It is therefore considered that the Site location provides sufficient access to open space, supporting health and well-being.
- 6.85 Clearly this is a brownfield site with significant abnormal costs, bearing in mind the constraints of the Site including the previous industrial uses, and the need to provide infrastructure to cross existing watercourses. In this context the Site is not capable of providing further planning obligations or financial contributions.
- 6.86 Given the high level of affordable housing provision, and good access to designated recreational routes and open space, we consider that this is acceptable in the context of the overall planning balance.
- 6.87 We welcome the opportunity to discuss these matters further with the Council, including arrangements for securing affordable housing, which we would propose to controlled by way of planning condition.

7.0 **Very Special Circumstances**

7.1 We have set out in Section 5 that it is considered that the proposals amount to appropriate development in the Green Belt that accords with the definition of such set out in the Framework, and thus that the proposed development accords with Policy G4 of the Local Plan.

7.2 However, without prejudice to that view, even if more than substantial harm was considered to arise from the development, it is considered that there are material considerations that weigh in favour of the scheme. These can be summarised as follows:

- 1 Provision of affordable housing to meet an identified need;
- 2 Restoration and remediation of previously developed land that is known to be contaminated, including the removal of an extensive area of hardstanding and the reduction of surface water run off that currently arises;
- 3 The achievement of Biodiversity Net Gain over and above that currently required by local and national policies;
- 4 The protection of the retained area of the Greenspace Corridor and its long-term management and maintenance;
- 5 Provision of public open space on the Site accessible to existing and proposed residents;
- 6 Reducing the potential for antisocial behaviour and the fear of crime arising from the existing derelict site;
- 7 Economic benefits of the scheme in terms of temporary construction jobs, spin off jobs, and longer term jobs in the local economy supported by occupiers of the residential development;
- 8 The enhancement of the retained Green Belt which will compensate for the slight incursion;
- 9 Removal of unsightly buildings thereby improving the visual amenity of the area whilst also protecting the retained trees and securing their long term retention and management;
- 10 A high quality design and layout of the scheme that references the heritage of the area; and,
- 11 Increased choice in the local housing market.

7.3 These benefits have not been set out in great detail as we consider that the proposed development is not inappropriate development in the Green Belt. Should the Council require further detail on the points above we would be happy to provide a fuller explanation of the individual points.

7.4 On this basis, even if the proposals were considered by the Council or others to amount to inappropriate development, it is our view that the above benefits and the other material considerations (having regard to the limited harm to openness and the purposes of defining the Green Belt) give rise to Very Special Circumstances.

- 7.5 For the avoidance of doubt it is considered that the proposals do not give rise to any other harm, as outlined in our assessment of technical and other considerations in Section 6 and elsewhere in this statement.
- 7.6 It is therefore considered in accordance with paragraph 145 of the Framework that the harm to the Green Belt and other harm is outweighed by other considerations. Very Special Circumstances exist which warrant the grant of planning permission in this instance.

8.0 Conclusions

- 8.1 The Planning Statement and the associated supporting plans and documents demonstrate that all material planning matters have been given due consideration. In particular, allowing the level and type of development that is proposed within this application will contribute significantly to the delivery of the aims and aspirations that the Council had in producing their Development Plan.

Sustainable Development

- 8.2 The proposed development performs a positive economic, social and environmental role in the following way:

Economic

- 8.3 In addition to the delivery of affordable housing, the development of the site will result in on-site construction jobs and off-site jobs in construction related industries. In the longer-term new residents will increase local expenditure which will boost the local economy and sustain local jobs. It is predicted that the development will generate first occupation expenditure and resident expenditure in local shops and services. The proposals will also generate Council Tax revenue for the Council.

Social

- 8.4 The proposed development will support the creation of a strong, vibrant and healthy community by providing 49 affordable homes which is 100% of the proposed dwellings. The proposals will provide an appropriate mix of accommodation including detached, semi-detached, terrace and apartment style dwellings. The site is in a highly sustainable location within walking distance of a number of services, facilities and amenities.
- 8.5 In this regard the proposed development meets the social component of sustainable development by providing the supply of housing required to meet the needs of the present and future generations; and by creating a high-quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural wellbeing.

Environmental

- 8.6 The environmental impacts of the development have been considered in detail as part of this application. It has been demonstrated that the proposed development within the sliver of Green Belt located within the Site is not inappropriate. The proposal will not harm the natural, built or historic environment and will help to protect and enhance biodiversity. The proposals will enhance the overall character of the area through providing high quality homes that are distinctive, with clear references to the site's industrial past. The development will incorporate appropriate biodiversity enhancement features, tree planting and landscaping that will contribute towards mitigating the loss of the existing trees on site.

Overall Conclusions

- 8.7 The proposals will provide 49, high-quality, affordable homes, amounting to 100% of the homes proposed. This is in excess to the policy requirement for affordable homes and will contribute to Rochdale's Local Housing Need through meeting identified affordable housing which is much needed. The proposals are of high-quality design, situated within a sustainable and appropriate location for residential development. Specifically, the proposals are considered to fall within the definition of appropriate development defined (in the negative) by paragraph 149(g) of the Framework. It is accepted that the proposals will give rise to some harm to the Green Belt, but that such harm is less than substantial. On the basis that the proposals are for 100% affordable housing, the development is thereby appropriate development in the Green Belt. It is therefore considered the proposals accord with national and local policy.
- 8.8 The Framework [§11] states that if development proposals accord with the development plan, they should be approved 'without delay'. On the basis of the above and in accordance with the balance of consideration in the Framework, the proposal clearly amounts to sustainable development and accords with all material policy considerations. The development should therefore be approved without delay.

Appendix 1 Public Consultation Leaflet



Land at Greenbooth Road

Stonebond Properties and Great Places Housing Group would like to give local residents the opportunity to review their proposed residential development on brownfield land at Greenbooth Road, located north of Edenfield Road. You may recall that a planning application was previously submitted in relation to the site in January 2021. Following feedback from residents and discussions with the Council regarding the application, the design and layout of the scheme has been amended. The purpose of this consultation is to update local residents and businesses on the revised proposals.

The proposed development now comprises:

- Delivery of 49 new homes, reduced from the original proposal of 56;
- A mix of houstypes reflecting the local area and sizes;
- The tenure will be 100% shared ownership;
- The main access to the site will be formed from the existing site access via Edenfield Road, circa 70 metres west of St. Paul's Church.
- Secondary emergency vehicle/ pedestrian access via Greenbooth Road;
- Safeguarding and retention of green corridors and woodland areas;
- 1 - 2 parking spaces per home, along with visitor parking.

The shared ownership scheme will offer local people an opportunity to get their foot on the property ladder by purchasing a share of their home which they can afford.

The proposals will deliver a mix of terraced, semi-detached and detached homes. The houses will comprise a mix of 2, 3 and 4 bedrooms to provide a choice of housing for smaller and larger families. Once built, Great Places will manage the affordable homes, committing to the community for the long term. Great Places is an established housing association in the north of England with a track record of delivering high quality schemes and supporting sustainable local communities. If you would like to find out more about Great Places, please visit: <https://www.greatplaces.org.uk>.

The proposed development will revitalise the disused brownfield site and provide an attractive, safe and sustainable place for residents to live. The scheme has been designed to contribute to and enhance the local area.

What happens next?

The revised proposals will now be submitted to the Council for further consideration and consultation against the application submitted in January 2021. We would like to hear your views on the updated proposals. Once you have had an opportunity to review this leaflet, please send any comments on the scheme to:

Land at Greenbooth Road, Lichfields, Ship Canal House, 98 King Street, Manchester, M2 4WU

or email:

greenboothroad@lichfields.uk

Please provide any comments you may have by 5pm on the **30th of June 2023**.

This leaflet has been sent to local residents and businesses surrounding the site. Once the revised proposals have been submitted, the Council will undertake their own re-consultation so you will also have an opportunity to provide comments at this stage.



Indicative layout plan and selection of proposed house types



Nathaniel Lichfield & Partners Limited ('Lichfields') is registered with the Information Commissioners Office (registration number Z6193122).

Your responses will be analysed by Lichfields on behalf of our client Stonebond Properties (Manchester) Limited. It is not envisaged that any personal data will be supplied by virtue of completion of the survey, but in the event that any personal data is supplied, it will be disregarded and deleted without undue delay. Responses to this consultation may be made publicly available.

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