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Whitehall Academy Ltd

21 Whitehall Street, Rochdale, OL12 0LN

Planning Statement

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1. Introduction

- 1.1 This Planning Statement has been prepared by Paul Butler Associates on behalf of the applicant, Whitehall Academy Ltd. The statement has been provided in support of a full planning application the change of use of 21 Whitehall Street, Rochdale, OL12 0LN from a nursery (Class E) to a privately funded school for children with special educational needs (SEN). The application description of development is 'Change of use of vacant former children's nursery (Class E) to an SEN school (Class F1)'.
- 1.2 In order to provide a clear understanding of the application proposal this statement includes:
- A description of the application site and surrounding area;
 - A review of the site's planning history;
 - A description of the proposed scheme;
 - A review of national and local planning policies of relevance to the scheme;
 - An appraisal of the scheme against relevant planning policies and an assessment of the scheme in relation to its immediate and surrounding context; and,
 - A conclusion.
- 1.3 In addition to this Statement, the application is also supported by the completed Application Forms and Ownership Certificates, and a suite of drawings prepared by Create It Studios.

2. The Application Site and Surrounding Area

The Application Site

- 2.1 The application site comprises 21 Whitehall Street, Rochdale, OL12 0LN (see figure 2.1 below). The application site includes a vacant former nursery and its associated curtilage. It is understood that the nursery closed in May 2022.

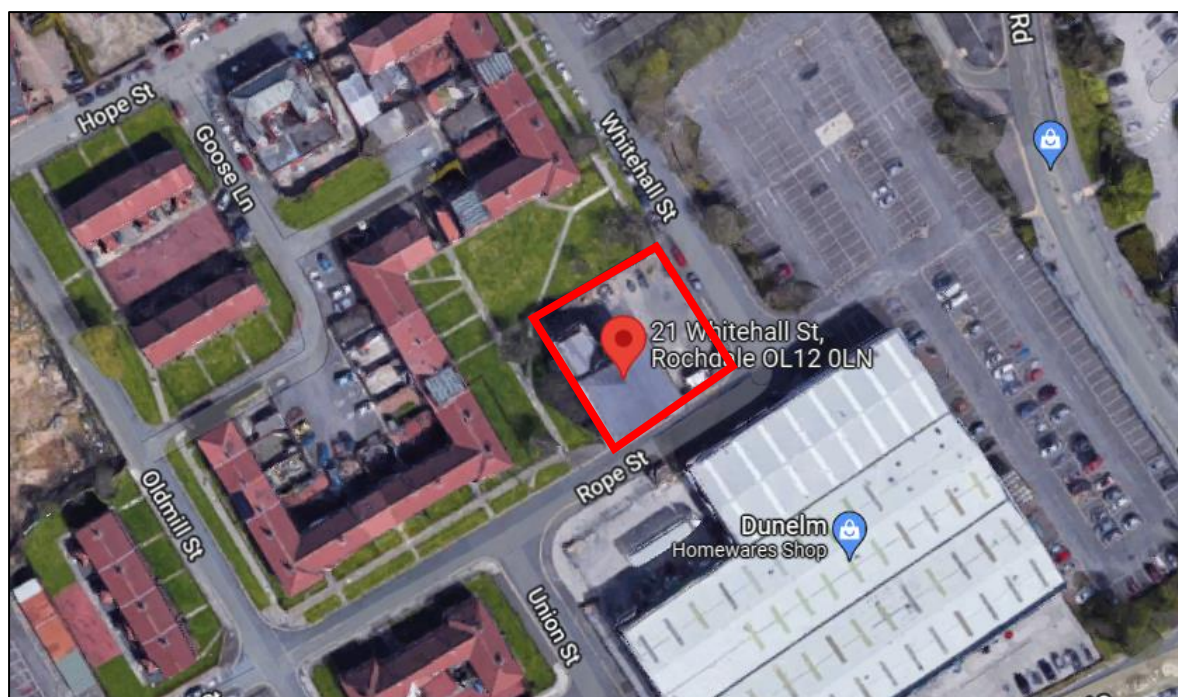


Figure 2.1: Aerial view of the site (outlined in red).

- 2.2 The site is located on the west side of the junction of Whitehall Street and Rope Street and lies approximately 100m to the north of the A58 / St Mary's Way. To the south of the A58 / St Mary's Gate is Rochdale Town Centre. The site lies within the 'Defined Urban Area' boundary. To the north of the site is an area of incidental open space known as 'Century Gardens' and beyond this two storey housing. To the west the open space separates the site from further two storey housing. To the south of the site on the opposite side of Rope Street is 'Dunelm' and 'Carpet Right' occupying a retail warehouse premises, and their associated surface car parking.

- 2.3 The main part of the subject building is two storeys in height but has high floor to ceiling heights and large windows. The main building has been extended to the north with a three storey addition. The main building and extension are constructed of red brick beneath pitched slate roofs. The building occupies the west part of the site with a tarmacked front car park and yard area accessed (on foot and by car) from Whitehall Street. This is defined by c.2m high brick walls with fencing atop, with a gated access.
- 2.4 The application site is located within flood zone 1 (lowest level of risk) and is approximately 0.09 ha in size. The site is not located within an Air Quality Management Area and there are no trees on the site. The property is not located within a conservation area, nor is the building nationally listed. The building is not identified by Rochdale Council as a non-designated heritage asset.

The Surrounding Area

- 2.5 The surrounding area is mixed in character which reflects its central location on the edge of Rochdale Town Centre. There are a range of shops, services and other amenities present in the immediate vicinity, together with residential uses including apartments and houses. These vary in age, format and style but contribute to a mixed and varied community.
- 2.6 The site has a highly accessible and sustainable location with convenient access on foot to a range of shops, services, amenities and employment opportunities within Rochdale to meet the day-to-day needs of residents (approximately 125m to the south). There are high quality public transport connections available to users of the site including Rochdale Town Centre Metrolink station / Rochdale Interchange (c.420m to the south), and Rochdale Railway Station (c.1.2Km to the south). There are also a wide number of bus stops within the vicinity of the site serving much of the surrounding conurbation.

3. Planning History

3.1 In accordance with best practice a review of the site's planning history was undertaken in July 2024 using the Council's online database. The applications identified are set out in the table below for reference. It is of significance that the conversion of the building to a private school has previously been accepted by the Council (application ref 02/D40673).

Reference	Description	Decision and Date
14/01041/FUL	Change of use and conversion of community centre to children's nursery including alterations to all external elevations	Approved 12 November 2014
07/D49380	Demolition Of Snooker Hall And Erection Of 3 Storey Block Of 12 Apartments - Submission Of Reserved Matters For Landscaping (Outline Application D48714)	Approved 1 August 2007
07/D48714	Outline Application For The Demolition Of Snooker Hall And Erection Of 3 Storey Block Of 12 Apartments	Approved 18 April 2007
02/D40673	Change Of Use From Snooker Club To Private Primary School	Approved 23 October 2002
00/D37990	Change Of Use From Snooker Club To Clothing Manufacturer (B2 Use)	Withdrawn 19 November 2000
84/D17134	Single Storey Extension To Snooker Club.	Approved 18 October 1984
84/D16452	Front And Side Extension To Snooker Club	Refuse 21 January 1984
83/D15038	Continuance Of Use Of Premises As A Snooker Club Without Compliance With A Condition	Application details not available online.
81/D12073	Change Of Use To Warehouse And Light Assembly Workshop	Application details not available online.
81/D12034	Use Of Premises As A Snooker Club	Application details not available online.
81/D12029	Use Of Premises As A Billiard Hall	Application details not available online.

4. The Proposed Scheme

- 4.1 The application proposal is for the 'Change of use of vacant former children's nursery (Class E) to an SEN school (Class F1)'. The school will be privately funded, and therefore the change of use does not benefit from permitted development rights under Class T of the GPDO. Whilst privately funded, the school will be operated in liaison with local authorities to provide much needed support to primary school aged children with complex needs. The facility will cater for approximately 20 to 30 pupils, with circa 15 staff.
- 4.2 The School will be operated as 'Whitehall Academy' by a team who are already one of the leading providers of alternative provision to many of the schools in the Rochdale Borough. Whitehall Academy is to be a specialist independent primary school, supporting vulnerable young people with complex needs. Young people might have been diagnosed with Autism, Learning Difficulties, and Complex Neurological Conditions. They may be receiving ongoing CAMHS (Child and Adolescent Mental Health Services) support or be awaiting multi-agency assessment. All our students have an Education, Health, and Care Plan, or are in the process of being assessed. The facility operators will work in liaison with different local authorities, which could be outside the Borough of Rochdale.
- 4.3 Whitehall Academy strives to provide a broad and holistic curriculum that caters to pupils with a variety of needs, including autism, communication, sensory needs, and specific learning difficulties. The curriculum strives to be tangible in every part of the school day which begins with breakfast club, allowing all learners to be ready to engage in the formal curriculum and provides opportunities for staff to have conversations, address concerns, and prepare learners for the day ahead. The implementation of the curriculum is broad, balanced, and holistic, allowing all pupils to follow the core and foundation of the formal curriculum at (KS1 –KS2), the Engagement Curriculum at all Key Stages.
- 4.4 At Whitehall Academy the local community will be seen as valuable to pupils' learning, so opportunities will be taken to thread links between the curriculum and the local community. As part of this, the outdoors will be used as a learning environment; this can be both school-based or supplemented with visits, trips and activities at external locations.

- 4.5 The school will be open from 9 am to 3 pm for pupils and 8 am to 4 pm for staff. If including breakfast club and some after-school club, then the opening hours may be from 8 am to 5 pm for staff and pupils on some days.
- 4.6 The proposed school will accommodate two classrooms, an office / reception, head office and a centrally located multi-purpose room on the ground floor. Other ancillary rooms located on the ground floor include a shower room, WCs and a store. The second floor level will be retained as existing and provide ancillary floorspace including a kitchen area. There are no external alterations proposed to the building.
- 4.7 Externally the layout of the car park and the playground will be retained; six car parking spaces, including one accessible bay, will be demarcated in the existing car parking area to the front of the building. A timber bin store is proposed within the car park adjacent to the gated access. A new fence with a pedestrian access is proposed within the site to replace the existing fence which separates the playground from the car park, and a new sheltered bike store accommodating Sheffield stands to store six bikes will be sited adjacent to the northern boundary of the playground.

5. Planning Policy Context

5.1 Planning policy guidance of relevance to the proposed scheme, and which provides the context for its assessment, is set out within the following:

- The Development Plan for Rochdale;
- Places for Everyone Joint Development Plan; and,
- National Planning Policy Framework.

The Development Plan for Rochdale

5.2 The Development Plan for Rochdale comprises the following documents:

- Rochdale Adopted Core Strategy (October 2016);
- Rochdale Borough Unitary Development Plan (June 2006); and,
- Places for Everyone Joint Plan (March 2024).

Rochdale Adopted Core Strategy (October 2016)

5.3 The Rochdale Core Strategy was formally adopted by the Council on 19 October 2016. It forms part of the Local Plan for Rochdale Borough and will be used in decision-making on planning applications.

5.4 Policies SO1 to SO5 in Chapter 4 of the Core Strategy set out the strategic objectives of the Council. These are centred on the themes of: economy; healthy and successful communities; design and quality place; greener environment; and accessibility and sustainable transport. The detailed policies for the Core Strategy are then grouped under these key themes. In accordance with the guidance contained in the National Planning Policy Framework, Policy SD1 states that the Core Strategy is centred on delivering and supporting sustainable development.

- 5.5 The following detailed policies of the Core Strategy have been considered in the preparation of this planning application.
- 5.6 Policy C6 'Improving health and well-being' supports the creation of an economic, social and physical environment which promotes and supports healthy lifestyles and outlines a number of policy objectives to achieve this.
- 5.7 Policy C7 'Delivering education facilities' seeks to improve education, skills and training in the borough and raise educational achievement by providing good quality primary and secondary education facilities. This will be achieved through, amongst other things, providing educational facilities in appropriate and accessible locations; and, improving accessibility to educational facilities by foot, cycling and public transport.
- 5.8 Policy P1 'Improving image' requires design which is of a high standard in all developments. Development should also help green the urban environment which promotes and supports healthy lifestyles. The policy also promotes the development and re-use of under-used land and buildings and seeks to maximise the potential for heritage assets to provide a sense of place and image.
- 5.9 Policy P2 'Protecting and enhancing character, landscape and heritage' seeks to protect and enhance the Borough's valued and distinctive landscape and heritage assets, including non-statutory heritage assets of local interest.
- 5.10 Policy G1 'Tackling and adapting to climate change' aims to ensure that new development minimises its impact on climate change and also adapts to its impacts. This involves locating growth in areas which are likely to minimise the need for travel and which are well served by public transport, services and infrastructure and encouraging the efficient re-use of buildings.
- 5.11 Policy G6 'Enhancing green infrastructure' supports the enhancement of a green network to support growth and regeneration in the borough.

- 5.12 Policy G7 'Increasing the value of biodiversity and geodiversity' this policy states that opportunities for enhancing biodiversity and geodiversity, creating new sites and features of interest and improving opportunities for public enjoyment will be supported.
- 5.13 Policy G8 'Managing water resources and flood risk' seeks to ensure that new development does not lead to any increased form of flooding locally or downstream, does not impede natural water or flood risk management, is not detrimental to existing or potential flood storage areas, contributes where possible to alleviating flood risk, is itself protected from flood risk and ensures prudent use of flood resources.
- 5.14 Policy T1 'Delivering Sustainable Transport' states that the Council will secure a programme of sustainable transport proposals to ensure accessibility for all users and reduce pollution and climate change emissions. It is further stated that the Council will reduce the need to travel, make best use of the existing transport infrastructure and ensure the transport network continues to become safer and more secure for all users.
- 5.15 Policy T2 'Improving Accessibility' states that the Council will improve accessibility by locating development where good access to public transport is available or can be provided, and will ensure that development is located to minimise the need to travel by car. Development proposals should also satisfy the accessibility hierarchy.
- 5.16 Policy DM1 'General Development Requirements' sets out a number of basic planning and design considerations which development proposals will be expected to demonstrate compliance with.

Rochdale Borough Unitary Development Plan (June 2006)

- 5.17 Upon adoption of the Core Strategy, the majority of policies within the Rochdale Unitary Development Plan were deleted. Those policies which were saved will be replaced through the Site Allocations DPD or other DPD. The saved policies of relevance to this application are outlined below.

- 5.18 Policy G/D/1 'Defined Urban Area' seeks to concentrate new development within the urban area in order to support urban regeneration and protect the countryside.
- 5.19 Policy CF/2 'General Criteria for the Development of Local Community and Health Facilities' this policy sets out requirements in relation to location and accessibility, impact on amenity and highways impacts.
- 5.20 Policy EM7 'Development and Flood Risk' states that development will not be permitted in areas identified as flood plains, or other areas where development could contribute to increased flood risk, unless an appropriate flood risk assessment has been carried out and certain criteria met.
- 5.21 The detailed assessment of the scheme within the following planning appraisal section confirms that the proposal accords with the above Core Strategy and UDP policies.

Places for Everyone (PfE)

- 5.22 PfE is a joint Development Plan Document being prepared by nine Greater Manchester districts (Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan). It identifies the quantum of new housing and employment development, supports the delivery of key infrastructure, and protects environmental assets. The joint plan determines the kind of development that takes place in their boroughs, maximising the use of brownfield land and urban spaces while protecting Green Belt land from the risk of unplanned development. The Places for Everyone Plan took effect and became part of the statutory development plan for each of the nine PfE authorities on March 21, 2024.
- 5.23 The policies which are relevant to the application proposals are listed below:
- JP-S 1 – Sustainable Development
 - JP-S2: Carbon and Energy
 - JS-P 4 – Flood Risk and the Water Environment
 - JP-S 6 – Clean Air
 - JP-G 9 – A Net Enhancement of Biodiversity and Geodiversity

- JP-P 1 – Sustainable Places
- JP-P 5 – Education, Skills and Knowledge
- JP-C 7 – Transport Requirements of New Development

National Planning Policy Framework

- 5.24 The revised National Planning Policy Framework (NPPF) was published in July 2018 and last updated in December 2023, and sets out the government’s planning policies and how these are expected to be applied. It replaces the Framework published in March 2012, however a presumption in favour of sustainable development continues to be at the heart of the NPPF which ensures that development is pursued in a positive way.
- 5.25 Development proposals that accord with an up-to-date Development Plan should be approved without delay. Where there are no relevant development plan policies, or the policies which are most important for determining the application are out of date, permission should be granted unless:
- The application of policies in the Framework that protect areas or assets of particular importance provides a clear reason for refusing the proposed development; or
 - Any adverse impact of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.
- 5.26 Paragraph 8 confirms that there are three dimensions to sustainable development; economic, social and environmental. To achieve sustainable development, economic, social and environmental gains should be pursued in mutually supportive ways through the planning system.

Delivering Sustainable Development

5.27 The NPPF explains that the purpose of the planning system is to contribute to the achievement of sustainable development. Planning policies and decisions should play an active role in guiding development towards sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area. These sustainable objectives should be delivered through the preparation and implementation of plans and the application of the policies in the framework. The NPPF is split into 17 chapters, the chapters of relevance to this development are identified below.

- Building a strong, competitive economy (Chapter 6)
- Promoting healthy communities (Chapter 8)
- Promoting sustainable transport (Chapter 9)
- Making effective use of land (Chapter 11)
- Meeting the challenge of climate change, flooding and coastal change (Chapter 14) -
- Conserving and enhancing the natural environment (Chapter 15).

6. Planning Appraisal

6.1 Having regard to the relevant planning policy guidance in the previous section, the key material considerations against which the proposed scheme should be considered, and which are discussed in this section, include:

- Principle of Development
- Potential Impact on Amenity
- Highways, Accessibility and Parking
- Waste Management
- Sustainable Development

6.2 The principle of converting the vacant former children's nursery (Class E) to a school (Class F1) is appropriate, given that the nature of the uses will be similar. It is noted from the planning history that consent for the use of the building as a school has previously been granted (application 02/D40673), this is a material consideration in the planning process.

6.3 It is also worth highlighting that permitted development rights under Class T of the GPDO allow for the change of use of a nursery to a state funded school. The proposed SEN school will not be state funded, and therefore planning permission is required, however the private funding of the school will not have any implications for the planning considerations associated with the proposals. This may be regarded as a 'fall back' position when considering the principle of development.

6.4 Core Strategy Policy C7 states that the Borough will seek to improve education, skills and training and raise educational achievement by, amongst other things, providing good quality primary and secondary educational facilities and promoting new facilities which have the opportunity to encourage and promote better links with schools and colleges. This will be achieved through, amongst other things, providing educational facilities in appropriate and accessible locations; and, improving accessibility to educational facilities by foot, cycling and public transport. Policy CF/2 (part a) of the UDP requires that community

facilities are accessible to the community it is intended to serve, and where practicable, within District or Local Centres.

- 6.5 Places for Everyone Policy JP-P 5 states that significant enhancements in education, skills and knowledge to benefit existing and new residents will be promoted, including by enabling the delivery of new and improved accessible facilities and ensuring the delivery of sufficient school places to respond to the demands from new housing.
- 6.6 Paragraph 95 of the NPPF states that it is important that a sufficient choice of school places is available to meet the needs of existing and new communities. LPAs should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education, by: giving great weight to the need to create, expand or alter schools through decisions on applications; and, work with school promoters, delivery partners and statutory bodies through the preparation of plans and decisions on applications.
- 6.7 The application seeks permission for the conversion of a vacant former children's nursery to a special education needs (SEN) school for circa 30 – 40 children. This would wholly satisfy the above local, regional and national policy aims. It is reiterated that 'great weight' should be afforded to the need to create schools through planning decisions.
- 6.8 The site is located in an established urban area and has a highly sustainable location due to its proximity to existing services and amenities within Rochdale Town Centre, which is approximately 125m to the south. The site also benefits from a highly accessible location and is well served by public transport facilities, including high frequency bus services, proximity to Rochdale Town Centre Metrolink station / Rochdale Interchange (c.420m to the south) and Rochdale Railway Station (c.1.2Km to the south).
- 6.9 Saved UDP Policy G/D1 'Defined Urban Area' seeks to concentrate new development within the urban area in order to support urban regeneration and protect the countryside. The proposed conversion of the vacant building will achieve these policy aims.

- 6.10 The proposal will also have positive sustainability credentials since it involves the re-use of an existing building, and the re-development of brownfield land therefore having less environmental impact than new build education provision. The reuse of a vacant building is also supported by Core Strategy Policy P1.
- 6.11 It is important to highlight that the proposed scheme is also deliverable on the site for the following reasons:
- **It is Available** – The applicant has an agreement to purchase the property and is therefore in a position to develop it once permission is secured.
 - **It is Suitable** – The suitability of the site for educational development is confirmed throughout this report, by reason of its sustainable / accessible location including its proximity to an array of amenities and services.
 - **It is Achievable** – There are no policy restrictions or development constraints that would impact on the scheme's deliverability. Should planning permission be granted, the applicant is keen to commence works on site immediately.
 - **It is Viable** – The scheme is viable and deliverable in the short-term.

Potential Impact on Amenity

- 6.12 Paragraph 191 of the NPPF requires that new development is appropriate for its location, taking into account the effects of living conditions. In doing so, they should mitigate and reduce impacts resulting from noise of new development, avoiding noise that would give rise to significant adverse impacts on health and quality of life. Core Strategy Policies G9 and DM1 also set out that development proposals should avoid or mitigate against impacts due to noise, while Places for Everyone Policy JP-P1 sets out that development should be consistent with the aim to offer comfortable and inviting indoor and outdoor environments, by offering a high level of amenity that minimises exposure to pollution. Policy CF/2 (part b) of the UDP requires that the proposal would have no unacceptable impact on the amenity of surrounding land uses, particularly residential, by reason of visual appearance, scale, noise or other nuisance.

- 6.13 The application building is located within an area which is characterised by a mix of uses including shops, services, residential properties and other facilities. The proposed use of the application building as an education facility will be compatible with the various uses in the area including the residential uses located to the north and west.
- 6.14 The type of development proposed and use of the site as an education facility is not expected to result in any undue impact on the amenity of surrounding users or occupiers. Likewise, surrounding land uses, which are largely residential and commercial, would not be expected to present undue impact to the future users of the development proposed. The proposed school would only be used during daytime hours and thus no significant noise generation would be expected to occur during night-time hours. It is worth highlighting that the site could lawfully be brought back into use as a nursery, or be converted to a state funded school, which would be anticipated to have a similar level of noise generation.
- 6.15 The application proposal does not involve the creation of new floorspace or extensions which could impact on the amenity of users within the adjoining properties. As such, there will be no overbearing or overshadowing impacts resulting from the proposals. The proposals are considered to be wholly consistent with local and national planning policy in relation to amenity considerations.

Highways, Accessibility and Parking

- 6.16 The site is located in an extremely sustainable and accessible location and benefits from excellent public transport links, including high frequency bus services and proximity to Rochdale Town Centre Metrolink station / Rochdale Interchange (c.420m to the south), and Rochdale Railway Station (c.1.2Km to the south).
- 6.17 Policy CF/2 (part c) of the UDP requires that the surrounding road network is capable of accommodating any additional vehicular traffic likely to be generated by the proposal

without damage to the local environment or road safety. Policies T1 and T2 of the Core Strategy promote the use of sustainable transport and improved accessibility.

- 6.18 The site will continue to be accessed as per the existing arrangements, via the existing gated access on Whitehall Street. The site will accommodate six car parking spaces (including one accessible bay) for staff and school drop off / pick ups. There is also on street parking within a short distance of the site were this to be necessary, and there are publicly accessible electric vehicle charging points available in the car park adjacent to the site, which can be used by staff and visitors. The proposals also include for provision of six secure cycle spaces to further promote sustainable patterns of travel.
- 6.19 It is not considered the proposed use as a school accommodating circa 20 -30 pupils and 15 staff would result in any significant increase in vehicle movements or have any unacceptable impact on the highway network. It is worth highlighting that the former nursery on site catered to a much greater number of children, as confirmed in the Ofsted reports. NPPF paragraph 115 states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.
- 6.20 It has been demonstrated that the scheme accords with the transport requirements of the NPPF and relevant local planning policies.

Waste Management

- 6.21 The proposed scheme includes a timber bin store within the car park for the provision of bins for the storage of refuse and recyclable waste. Bins will be collected by collection crews from Whitehall Street adjacent to the building which is understood to tie in with the existing servicing arrangement for the property.

Sustainable Development

- 6.22 Economic: Education is a cornerstone to accessing employment opportunities. The proposed development is for an educational facility which will cater to children and young people with special educational needs, thereby providing a much-needed form of education to help all people access the best opportunities in life. The school will also be a privately run, thereby helping to support business in Rochdale.
- 6.23 Social: The proposed facility will provide much needed school places for primary school aged children who have special educational needs, and would relieve significant pressure on existing educational facilities and services within the Borough and also reduce reliance on out of Borough placements.
- 6.24 Environmental: The proposal involves the re-use of an existing vacant building, in a highly sustainable location close to Rochdale Town Centre and high-quality public transport facilities. The scheme will provide much needed educational infrastructure, which will help to ease pressure on Green Belt sites and potentially more valuable greenfield sites.

7. Conclusion

- 7.1 The proposal accords with national and local planning policy guidance, conforming with policies of the NPPF, Places for Everyone Joint Plan, Core Strategy, and saved UDP policies.
- 7.2 The proposed scheme involves the conversion of a vacant building and its associated curtilage to a school for children with special educational needs. The development will bring the building back into use, enabling it to make a positive contribution to the area and helping to relieve pressure for on existing educational facilities in Rochdale. In accordance with paragraph 99 of the NPPF, this attracts 'great weight' in the determination of the planning application. Furthermore, the development will provide economic, social and environmental benefits and constitutes sustainable development.
- 7.3 On this basis Paul Butler Associates are pleased to submit this planning application and look forward to working with the Council on progressing it through to a positive determination.