

Trammell Crow Company

Heywood Stores Manchester Road

Planning Statement
October 2022



Planning Statement

Heywood Stores, Manchester Road, Heywood, OL10 2QR

On behalf of: Trammell Crow Company Logistics (Heywood) Ltd

October 2022

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1 Introduction

1.1 This Planning Statement is prepared on behalf of Trammell Crow Company Logistics (Heywood) Ltd (“the Applicant”) in support of a full planning application for submission to Rochdale Borough Council (“the Council”) for the redevelopment of Heywood Stores, Manchester Road, Heywood, OL10 2QR (“the site”).

1.2 The proposed description of development is:

“Redevelopment of the site comprising the demolition of all existing units and erection of new storage and distribution units (Use Class B8) with ancillary office space, vehicular, pedestrian and cycle access, external yards, parking, landscaping and associated works.”

1.3 This application has been submitted electronically via the Planning Portal (ref: PP-11592094) and comprises the following documents:

- Planning application forms (signed and dated)
- Land Ownership Certificates (signed and dated)
- Drawings Pack prepared by Ashton Smith Associates (see **Appendix A**)
- The following drawing prepared by BWB:
 - Proposed Site Access Plan (ref. MRR-BWB-GEN-XX-RP-TR-101)
- The following drawings prepared by TPM Landscape:
 - Landscape Masterplan (ref. 4146-101F)
 - Planting Plan (1 of 8) (ref. 4146-201A)
 - Planting Plan (2 of 8) (ref. 4146-202A)
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 - Planting Plan (7 of 8) (ref. 4146-207A)
 - Planting Plan (8 of 8) (ref. 4146-20A)
 - Landscape Sections (ref. 414-301)
- The following drawings prepared by Burrows Graham:
 - Proposed Levels (ref. 21194-BGL-XX-XX-DR-C-0200-P16)
 - Earthworks Volumes (ref. 21194-BGL-XX-XX-DR-C-0201-P11)

- Air Quality Assessment prepared by BWB
- Arboricultural Impact Assessment prepared by Brooks
- Archaeological Desk-Based Assessment prepared by Salford Archaeology
- Bat Activity Survey prepared by Brooks
- Bat Roost Tree Survey prepared by Brooks
- Bat Survey Report prepared by Brooks
- Coal Mining Risk Assessment prepared by RSK
- Construction Management Plan prepared by KAM
- Crime Impact Assessment prepared by Design for Security
- Daylight and Sunlight Statement prepared by GIA
- Design and Access Statement prepared by Ashton Smith
- Ecological Impact Assessment prepared by Brooks
- Energy Efficiency and Sustainable Development Report prepared by Synergy
- Flood Risk Assessment and Drainage Strategy prepared by Burrows Graham
- Geo-Environmental Site Investigation prepared by RSK
- Great Crested Newt eDNA Survey prepared by Brooks
- Invasive Species Survey and Management Plan prepared by Brooks
- Landscape and Visual Impact Appraisal prepared by TPM Landscape
- Lighting Assessment prepared by Synergy
- Noise Impact Assessment prepared by BWB
- Planning Statement prepared by Gerald Eve LLP
- Socio-Economic Assessment prepared by Hatch Regeneris
- Statement of Community Involvement prepared by UK Networks
- Transport Statement prepared by BWB
- Travel Plan prepared by BWB

1.4 A payment has been made via BACS to the Planning Portal in the total amount of £100,277.00, which is the requisite statutory planning application fee in this instance.

1.5 This Planning Statement provides a summary of the site and the proposed development, before analysing how the proposal accords with the relevant planning policy framework.

1.6 The remainder of this Planning Statement is set out as follows:

- Planning Application Background
- Site Description and Allocations
- Planning History
- Proposed Development
- Planning Policy
- Planning Matters
- Planning Balance
- Summary

2 Planning Application Background

- 2.1 This Section sets out the background to the planning application including a summary of the pre-application engagement undertaken with the Council, the wider pre-application public consultation to date, as well as the Environmental Impact Assessment (EIA) screening process.

Pre-Application Discussions

- 2.2 Prior to submission of the planning application, the site has been the subject of extensive pre-application discussions with the Council's Planning Officer, Ryan Grant.
- 2.3 The previous landowner of the site originally undertook formal pre-application discussions in November 2021 (ref. PREAPP/00104/21) before formally marketing the site for sale. As part of this pre-application advice, the Planning Officer confirmed that the principle of redeveloping the site for further employment use was acceptable, subject to addressing detailed design and technical matters.
- 2.4 Following the Applicant's acquisition of the site, further pre-application discussions have continued with the Planning Officer to receive feedback on the proposal. An initial meeting was held in February 2022 to discuss the Applicant's initial design ideas and the feedback from this discussion aided the Applicant in preparing an initial scheme for three new logistics units.
- 2.5 Following the initial meeting, the Applicant has maintained a regular dialogue with the Planning Officer to discuss and agree detailed design matters in relation to building heights, visual amenity of both existing and future residents, landscaping and boundary treatments, and acoustic mitigation. The feedback from these discussions has been thoroughly considered and incorporated into the final proposals submitted with this planning application.
- 2.6 Alongside engagement with the Planning Officer, the Applicant has also liaised with relevant consultees, including, but not limited to, the Environmental Health Officer, National Highways, Transport for Greater Manchester, the Local Highway Department, the Greater Manchester Ecology Unit (GMEU) and the Greater Manchester Archaeological Advisory

Service (GMAAS). Detail of such pre-application discussions are summarised within the relevant technical reports, where necessary.

Pre-Application Consultation

- 2.7 In line with best practice, a pre-application consultation exercise was carried out by UK Networks with key stakeholders and the local community prior to submission of this application. The exercise included a combination of traditional and modern means of consultation and engagement including resident notices, face to face meetings, online briefings, a project website and online feedback form, and availability of a project telephone line and Freepost address.
- 2.8 Full details of the public consultation exercise, the feedback received, and how the project has responded to such feedback is set out within the submitted Statement of Community Involvement.

EIA Screening

- 2.9 Whether or not a proposal constitutes EIA development is governed by the schedules within the Town and Country Planning (Environmental Impact Assessment) Regulations (2017), as amended (“EIA Regulations”). An EIA is mandatory for projects appearing in Schedule 1 and is required for projects appearing in Schedule 2 if they are likely to give rise to significant effects on the environment.
- 2.10 To assess whether a Schedule 2 project is likely to give rise to significant effects, it must be screened if:
 - a) it is located within a “sensitive area” (defined as Areas of Special Scientific Interest, Areas of Outstanding Natural Beauty, National Parks, World Heritage Sites, Special Protection Areas and Special Areas of Conservation); or
 - b) if it exceeds the applicable thresholds specified in the Schedule (which primarily relate to the scale of the proposed development).
- 2.11 The proposed development does not appear within the list of developments falling within Schedule 1, nor is the site is located within a “sensitive area” as defined by Schedule 2(a). The proposed development does, however, fall under the definition of ‘Industrial Estate

Development Projects’ as set out under Class 10(a) of Schedule 2 and exceeds the applicable thresholds (i.e. the site area is greater than 5 ha). The Applicant therefore submitted a formal screening request to the Council in June 2022.

2.12 The Council formally issued its screening opinion on 14 October 2022 confirming that the proposal, whether alone or in cumulation with the existing and proposed development, would be unlikely to give rise to significant effects on the environment. As such, an EIA is not required in this case.

2.13 The Council’s screening opinion is attached at **Appendix B**.

3 Site Description and Allocations

Site Description

- 3.1 The site comprises the Heywood Stores, located on Manchester Road, Heywood. It extends to approximately 11.1 ha and comprises nine warehouse buildings (Use Class B8) that have historically been used for archive storage by the Department of Work and Pension and which will become vacant in Spring 2023. Collectively, these buildings measures approximately 31,900 sqm (GEA) and vary in height across the site, with the lowest ridge line at approximately 6 metres and the highest at 10 metres.
- 3.2 Alongside the existing buildings, the site contains a network of hard surfaced roads and paths used for circulation around the site and access to the buildings, alongside other areas of hardstanding used for parking and servicing purposes. The remainder of the site is covered by soft landscaping and contained by a fenced boundary. Access is taken via Manchester Road.
- 3.3 A Site Location Plan is attached at **Appendix C**, which denotes the site's boundary in red.
- 3.4 The site's wider surroundings include a mixture of residential development, community uses, industrial estates, and development parcels associated with the South Heywood Masterplan. The South Heywood Masterplan was granted outline planning permission in March 2020 (ref. 16/01399/HYBR) and comprises, inter alia, up to 1,000 new homes, 135,460 sqm of employment floorspace, and 2,500 sqm of commercial uses, a primary school, and a new link road from Junction 19 of the M62.
- 3.5 The site is in a highly accessible location between Rochdale and Bury and is less than half an hour's drive from Manchester City Centre. It has immediate access to J19 of the M62, linking the site to 3 main motorways (M60, M62, M66).
- 3.6 The site is in close proximity to public transport networks with the nearest bus stops located on the A6045 Manchester Road and within 20 metres walking distance of the site access. Rochdale train station is 4 miles to the north east of the site, whilst Bury Bolton Street train station is just over 4 miles to the north west.

- 3.7 From a heritage perspective, the site is not situated within a conservation area, and it does not contain, nor is it in the setting of, a listed building or other heritage assets. There are no known archaeological resources within the site.
- 3.8 In terms of ecology, the site is not situated within or adjacent to a statutorily designated site or a non-designated site. The site does not contain any priority habitats. Existing site features, such as landscaping, trees and woodland, do support nesting birds and low levels of foraging by bats.
- 3.9 The site is not situated within any areas designated in recognition of their landscape quality or value at either a statutory national level (i.e. AONBs and National Parks) or at a non-statutory local level (i.e. Special Landscape Areas).
- 3.10 The entire site lies within Flood Zone 1 as defined by the Environment Agency's Flood Map for Planning. This means that the site has a low risk of flooding.

Allocations and Designations

- 3.11 The site is not covered by any specific designations or allocations as part of the Council's Development Plan.
- 3.12 Full details of the Development Plan and other material considerations is set out in Section 6 of this Statement.

4 Planning History

The Site

- 4.1 A Lawful Development Certificate was granted on 14 December 2021 which confirmed that the site's existing lawful use was Use Class B8 (ref. 21/01298/CPE). Alongside this, there are also numerous historical applications associated with the site's use, as shown in the table below.

Application Reference	Description of Development	Decision
01/D39243	Construction of New Roof and Installation of External Cladding to Existing Walls of Building 110	Granted 11 Oct 2001
93/D30123	Erection of Single Storey Office Block with Link Corridor	Granted 14 Dec 1993
93/D29615	Recladding and Refurbishment of Existing Building	Granted 12 Aug 1993
93/D29408	Erection of Four Boiler Houses at Benefits Agency Storage and Distribution Centre	Granted 17 Jun 1993
92/D28630	Relocation of Prefabricated Building Adjacent to Building 113 With Provision of Link Corridor	Granted 22 Oct 1992
92/D28572	Recladding of Existing Building	Granted 22 Oct 1992
92/D28123	Recladding Of Existing Building	Granted 18 Jun 1992

- 4.2 These historic applications at the site are not considered to be relevant to the determination of this proposal and are therefore not considered further.

South Heywood Masterplan

- 4.3 It is also important to note that the site lies directly adjacent to the South Heywood Masterplan which has planning permission for a major mixed-use development comprising residential development and 135,000 sqm of commercial floorspace (ref: 16/01399/HYBR).
- 4.4 The approved Masterplan allocates the land surrounding the site to the west for residential uses and several reserved matters applications have been submitted in this area that have either been approved or are awaiting determination. A summary of all the reserved matters applications submitted in the context of the South Heywood Masterplan are shown in the table below.

Ref	Description of Development	Decision
22/00467/REM	Reserved matters application for landscaping (with access already approved) for the area of Public Open Space between the residential phases of Hareshill Road North and Manchester Road West, pursuant to Hybrid Permission 16/01399/HYBR	Pending
22/00130/REM	Reserved matters application for appearance, layout and scale (access already approved) for 120 residential dwellings and associated works pursuant to Hybrid Permission 16/01399/HYBR	Granted 13 Sept 2022
22/00787/REM	Submission of reserved matters (including Appearance, Landscaping, Layout and Scale) for the construction of a distribution centre with ancillary office accommodation, gatehouse and access arrangements, car parking, HGV bays, sprinkler tanks and pump house, attenuation ponds, landscaping, spine road and other associated works, together with preparatory earthworks and landscaping on adjoining development plots pursuant to 16/01399/HYBR.	Granted 8 Sept 2022

21/01811/REM	Submission of Reserved Matters for the construction of extension to spine road, pumping station, landscaping and other associated works pursuant to 16/01399/HYBR	Granted 25 Aug 2022
21/00909/REM	Reserved Matters Approval for appearance, landscaping, layout and scale (with access already approved) for 164 dwellings and associated works pursuant to Hybrid Permission 16/01399/HYBR.	Granted 27 May 2022
20/01524/REM	Reserved Matters Approval for appearance, landscaping, layout and scale (with access already approved) for 64 dwellings and associated works pursuant to Hybrid Permission 16/01399/HYBR.	Granted 27 May 2022
20/01480/REM	Submission of reserved matters (including Appearance, Landscaping, Layout and Scale) for the construction of a distribution centre with ancillary office accommodation, gatehouse and access arrangements, car parking, HGV bays, sprinkler tanks and pump house, attenuation ponds, landscaping, spine road and other associated works, together with preparatory earthworks and landscaping on adjoining development plots pursuant to 16/01399/HYBR.	Granted 17 Jun 21

- 4.5 The South Heywood Masterplan and the associated reserved matters applications have been considered in detail during the design evolution of the scheme, including the distance between the proposed development and the future residential properties and potential impacts on amenity. Further detail on this is set out in the Design and Access Statement and in Section 7 of this Statement.

5 Proposed Development

- 5.1 Full planning permission is being sought for the following development:

“Redevelopment of the site comprising the demolition of all existing units and erection of new storage and distribution units (Use Class B8) with ancillary office space, vehicular, pedestrian and cycle access, external yards, parking, landscaping and associated works”.

- 5.2 A summary of the proposal is set out below, but reference should also be made to the accompanying Design and Access Statement and full drawing pack.

Use and Amount

- 5.3 The proposed development comprises the demolition of the existing outdated units and the erection of three modern logistics units. The units will be used for storage and distribution purposes (Use Class B8) and will have a combined total floor area of circa 45,755 sqm (GEA) split out as follows:

- Unit 1 – 4,918 sqm
- Unit 2 - 4,528 sqm
- Unit 3 – 36,309 sqm

- 5.4 When factoring in the demolition of the existing units, this represents an uplift in floorspace of 13,855 sqm across the site.
- 5.5 Units 1 and 2 will have an ancillary first-floor office measuring approximately 440 sqm and Unit 3 includes approximately 2,360 sqm of ancillary office space, split between a three storey office block accessed at first floor level via a pedestrian bridge, a two storey hub and welfare facility.
- 5.6 Alongside the main structures, there will be various ancillary buildings and structures including a gatehouse to access the service yard for Unit 3, substations, gas governors, sprinkler tanks and pumphouses, cycle shelters and refuse stores.

Access

- 5.7 The existing access location from the Site onto the A6045 Manchester Road will be retained. However, changes are proposed to the geometry of the junction to accommodate two-way HGV movements and pedestrian footways on both sides of the access road. The proposed geometry for the site access junction is:
- Carriageway width of 12.3m.
 - Left junction radii 13m with a 3m wide footway.
 - Right junction radii 13m with a 2m wide footway.
- 5.8 The visibility splays have been provided in accordance with Design Manual for Roads and Bridges:
- To the Left: A visibility splay in excess of 2.4m x 90m can be achieved for vehicles travelling southwards along the A6045 Manchester Road north.
 - To the Right: A visibility splay in excess of 2.4m x 90m can be achieved for vehicles travelling northwards along the A6045 Manchester Road south.
 - To the Right: The available visibility splay for approaching vehicles turning left from the Link Rd western arm to the A6045 Manchester Road north is 2.4m x 63.2m.
 - To the Right: the available visibility splay for approaching vehicles turning right from the Link Rd eastern arm to the A6045 Manchester Road north is 2.4m x 96.4m
- 5.9 The car parks are accessed separately from the main internal site road and are separated from HGV entrances to service yards for safety and to create functional vehicle flows. There is an emergency access road around the full perimeter of Unit 3 for fire vehicles.
- 5.10 A total of 398 parking spaces are proposed across the site, including 21 EV charging spaces, 26 accessible spaces and 18 car sharing spaces. There will also be capacity for 60 cycle parking spaces.
- 5.11 Pedestrian and cycle access routes are proposed to follow the new internal access road with access to each unit serving staff /visitors. Access to the site is linked to existing bus stops on Manchester Road and existing cycle lanes.

Layout

- 5.12 The proposed development looks to reconfigure and rationalise the number of buildings on site, condensing to three units, with one larger independent unit to the rear and two joined units towards the front of the site adjacent to the site access. Each of the units have their own separate car parks and service yards, which will be overlooked by the offices to provide natural surveillance. For Unit 3, there will also be the incorporation of a gate house to control access to the service yard.
- 5.13 The main site access will be from Manchester Road and will connect to a main internal site road, which provides connections to car parking and service yards. There is an emergency access road around the full perimeter of Unit 3 for fire vehicles.
- 5.14 The proposed building levels and unit locations allow for suitable separation distances from both existing and proposed residential properties, as well as the retention of key boundary landscaping. For Units 1 and 2 there is a minimum separation distance of 29.3 metres to adjacent properties to the north, whilst for Unit 3 there is a minimum separation distance of 41.7 metres to existing properties to the east, 59 metres to future residential properties to the west¹ and 39.2 metres to future residential development to the south².
- 5.15 As well as separation distances, the proposed layout also incorporates a range of acoustic mitigation measures to protect existing and future residential amenity. This includes a mixture of 3 metre and 5 metre acoustic fencing, which will have an external green wall included where this is externally facing and visible to residents.
- 5.16 There are two attenuation ponds on the site, located near to the site entrance and to the south of the internal access road. These will be landscaped appropriately and provide both a sustainable drainage and ecology functions, whilst also enhancing the landscape setting of the buildings on the site.
- 5.17 The existing gas governor will remain in situ but rehoused in a smaller and more efficient enclosure. The exact details of this can be controlled by condition. The existing substations

¹ As there is no approved detail layout, these measurements are based on an assumed layout up to the principal rear elevation and allowing for a standard rear garden

² As above

on site will also be retained as part of the proposals, alongside two new substations. Alongside these structures, there will also be a range of ancillary structures located alongside and near to the units including a cycle shelters, refuse stores and sprinkler tanks.

- 5.18 The layout of the site is shown on the Proposed Site Plan (ref: 21157-ASA-00-ZZZZ-D-A-0003-P7).

Appearance

- 5.19 The building finishes are high quality and integrate with the surrounding context. The buildings are provided with glazed main office entrance areas which break up the external façade and create interest whilst also providing welfare and operational space internally.
- 5.20 Units 1 and 2 have a glazed main entrance screen outlined with a projecting cladding border, with office ribbon windows at ground floor and translucent panels over the dock areas. There are 3 HGV loading docks and 3 level access doors located to the rear of each unit.
- 5.21 The main office of Unit 3 is projected in front of the main warehouse building and linked back with a predominantly glazed elevation. The main office is accessed via a link bridge located at first floor level, which creates a feature of the entrance to the building from the car park.
- 5.22 The articulation of the proposed elevations colour palette, which grades from grey to dark blue, has been developed to anchor the buildings in their setting and represent the Applicant's branding. This provides a contemporary look and helps break up the massing of the building.
- 5.23 The external finishes to the development have been chosen to suit the use of the area. The yard will be a reinforced concrete brushed finish whilst the car parking will be a tarmacadam surface. The ends of the parking will be landscaped to provide a break in this surface area. 2.4 m high dark green paladin fencing will be provided to the full extent of the perimeter which provides site security and access via gates for pedestrians and vehicles

Scale

- 5.24 Units 1 and 2 will have an approximate eaves height of 13.6m and ridge height of 15.5m, whilst Unit 3 will have an approximate eaves height of 19.1 m and a ridge height of 21.1m.

The overall maximum heights of the building have been kept to a minimum to minimise the impact of the development on the surrounding area, whilst still meeting the functional requirements of modern occupiers. In particular, the office element of Unit 3 has been reduced in scale to the remainder of the building to minimise impacts on future residential development to the south.

- 5.25 Although the proposed units are taller than the existing buildings, they are consistent in scale with other warehouse facilities in the locality. The materials have also been carefully considered to help break up the mass and height of the building; and the façade colour shades (grey) help to minimise the building within the skyline.

Landscaping / Green Infrastructure

- 5.26 A carefully selected mix of hard and soft landscaping is proposed around the boundaries of the site to soften the visual and acoustic impacts of the scheme on the residents of Bader Drive. This includes a 1.8m high close boarded timber fence to the north of Units 1 and 2 together with the retention of existing vegetation which will be reinforced with new native shrub and semi-mature tree planting.
- 5.27 Existing vegetation will also be retained around the rest of the site boundary and reinforced with new native shrub and tree planting, particularly where there are sensitive views into the site.
- 5.28 A more natural and informal landscape approach will be set within the periphery of the site around the units. This approach will add to biodiversity enhancements, with varied and native use of plants and trees and a less formal management regime to allow more natural colonisation of wildlife. This includes a wetland seed mix to the north and south of the site and wildflower planting at the site entrance.

6 Planning Policy

- 6.1 This Section sets out the relevant planning policy context in respect of the site and proposed development. It highlights any site constraints and the relevant criteria against which this proposal should be determined.

The Development Plan

- 6.2 Section 38(6) of the Planning and Compulsory Purchase Act (2004) identifies that applications for planning permission should be determined in accordance with the development plan unless material considerations indicate otherwise.

- 6.3 In this instance, the relevant documents of the Development Plan comprise:

- Rochdale Core Strategy (October 2016)
- Rochdale Borough Unitary Development Plan (2006)

Rochdale Core Strategy (October 2016)

- 6.4 The Rochdale Core Strategy was adopted in October 2016 and is the lead document of the Rochdale Borough Local Plan. It provides an overview of the Council's objectives for the whole of the borough
- 6.5 The following policies are considered relevant to the site and proposed development:
- 6.6 **Policy SP1 Delivering Sustainable Development** outlines, inter alia, that when considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the national policy.
- 6.7 **Policy SP2 The Spatial Strategy for the Borough** seeks to deliver employment and commercial development in areas where there is good access to existing facilities and infrastructure, the motorway corridor, public transport facilities and the wider Greater Manchester city region, such as in Heywood.
- 6.8 **Policy E2 Increasing Jobs and Prosperity** seeks to ensure a sufficient supply of suitable land, buildings and infrastructure in the right places to support the creation and retention of successful businesses and increase the number and quality of jobs to create a more

prosperous lower carbon economy. To achieve this the Council will, inter alia, promote the regeneration of major employment locations suitable for continued employment use.

- 6.9 **Policy C6 Improving Health and Well Being** seeks to improve people's health and well-being by, inter alia; seeking high quality design of buildings, streets and spaces to create neighbourhoods that are safe to use, easy to move through, adaptable and sustainable; managing and mitigating the effects of climate change by tackling greenhouse emissions, reducing risks of flooding, promoting tree planting and seeking to avoid adverse microclimates; identifying and implementing measures to reduce traffic movements and congestion to reduce air and noise pollution.
- 6.10 **Policy P1 Improving Image** requires high quality design in all new developments, which is of a high standard, demonstrating innovation and originality.
- 6.11 **Policy P2 Protecting and Enhancing Character, Landscape and Heritage** aims to protect and enhance the borough's character by requiring new development to, inter alia, integrate successfully with the key natural features of the borough.
- 6.12 **Policy P3 Improving Design of New Development** requires all new developments to adhere to high standards of design by adhering to a specific set of design principles relating to scale, density, massing, height, layout, access and landscaping.
- 6.13 **Policy G1 Tackling and Adapting to Climate Change** seeks to address climate change and ensure growth does not increase CO2 emissions. New developments will be expected to:
- a) *"Be zero carbon in line with national targets and definitions;*
 - b) *Adhere to the 'energy hierarchy' as outlined in policy G2, being designed in such a way that ensures that buildings require the minimum amount of energy to function over their lifetime;*
 - c) *Reduce CO2 emissions through the use of renewable and low carbon decentralised energy technologies and networks. This will be through both on-site provision in new developments and through connection to local networks;*
 - d) *Address the impacts of climate change by incorporating comprehensive adaptation measures."*

- 6.14 **Policy G2 Energy and New Development** expects all new development to adhere to the following energy hierarchy:
- a) *“Allowable solutions*
 - b) *Energy efficiency and low / zero carbon technologies and networks*
 - c) *Demand reduction”*
- 6.15 **Policy G6 Enhancing Green Infrastructure** seeks to sustain and enhance a green network to support growth and regeneration in the borough.
- 6.16 **Policy G7 Increasing the Value of Biodiversity and Geodiversity** states that no development should result in a net loss of biodiversity or geodiversity interest in the borough and overall development in the borough should result in a net gain.
- 6.17 **Policy G8 Managing Water Resources and Flood Risk** seeks to ensure that new development (including flood risk mitigation measures) does not lead to any form of increased flooding locally or further downstream, does not impede natural water and flood risk management, is not detrimental to existing or potential flood storage areas, contributes where possible to alleviating existing flood risk, is itself well protected from flood risk and ensures prudent use of water resources.
- 6.18 **Policy G9 Reducing the Impact of Pollution, Contamination and Land Instability** seeks to reduce all forms of pollution by inter alia, requiring that development does not have impacts that lead to an unacceptable increase in air, water, noise, light or other pollution.
- 6.19 **Policy T1 Delivering Sustainable Transport** aims to reduce the need to travel and make best use of the existing transport infrastructure.
- 6.20 **Policy T2 Improving Accessibility** aims to improve accessibility by locating development where good access to public transport is available or can be provided, backed by measures to reduce the need for travel and effective provision for cyclists, pedestrians and people with impaired mobility. Transport Assessments and Travel Plans will be required for major developments and new developments will be expected to provide parking in compliance with the Council’s Parking Standards.

6.21 **Policy DM1 General Development Requirements** states that all development proposals, including changes of use of land and buildings, extensions and alterations, will be expected to demonstrate that they:

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

6.22 **Policy DM2 Delivering Planning Contributions and Infrastructure** requires developers to contribute towards the cost of providing, any physical and social infrastructure that is needed

because of proposed development, and or mitigate the impact of development, through planning obligations and agreements, if the development would otherwise have a negative impact on the delivery of a Strategic Objective.

Saved Rochdale Unitary Development Plan (2006)

- 6.23 The Unitary Development Plan (UDP) was adopted in 2006 and the policies are still in place until the emerging Allocations Development Plan is adopted. The following saved policies are relevant to this application.
- 6.24 **Policy BE/2 Design Criteria for New Development** is similar to Core Strategy Policy P3 in that it requires new development proposals to demonstrate good design, ensuring that they are compatible with or improve their surroundings by virtue of their scale, density, height, massing, layout, materials and architectural design.
- 6.25 **Policy EM/2 Pollution** states that new development will not be permitted where it would be likely to result in an increase in air, water, noise, light or other pollution, which would be harmful to the environment, and to land uses and land users in the area. Where permission is granted, it will be subject to appropriate conditions or obligations to ensure that air, water and noise pollution is kept to acceptable levels.
- 6.26 **Policy EM/3 Noise and Development** states that development will not be permitted where it would lead to unacceptable levels of noise nuisance to nearby existing or future occupants of buildings, or users of open space. It then adds that, where the effects of existing noise on proposed new development, or noise likely to be generated by new development, can be controlled by design, landscaping and other measures, as enforced by planning conditions, the Council will grant planning permission, provided the development is acceptable in all other respects.

Other Material Considerations

National Planning Policy Framework (2021)

- 6.27 The National Planning Policy Framework (NPPF) sets out national planning policy objectives that are relevant to this proposal. The overarching aim of the NPPF is to achieve sustainable

development by satisfying the economic, social, and environmental dimensions. The following paragraphs are considered to be particularly relevant.

6.28 **Paragraph 11** states that in the context of both plan-making and decision-taking the NPPF sets a presumption in favour of sustainable development, which requires that development proposals that are found to be in accordance with the development plan should be approved without delay.

6.29 **Paragraph 56** confirms that planning conditions should be kept to a minimum and only imposed where they are necessary, relevant to planning and to the development to be permitted, enforceable, precise and reasonable in all other respects.

6.30 **Paragraph 57** relates to planning obligations and confirms that these must only be sought where they meet all the following tests, as set out in Regulation 122(2) of the Community Infrastructure Levy Regulations (2010), as amended:

- a) *“necessary to make the development acceptable in planning terms;*
- b) *directly related to the development; and*
- c) *fairly and reasonably related in scale and kind to the development.”*

6.31 **Paragraph 81** relates to the Government’s objectives to build a strong and competitive economy, stating (inter alia):

“Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.”

6.32 **Paragraph 83** outlines that planning policies and decisions should recognise and address the specific locational requirements of different sectors. This includes, inter alia, making provision for storage and distribution operations at a variety of scales and in suitably accessible locations.

6.33 **Paragraph 104** identifies the importance of considering transport issues from the earliest stages of development proposals so that:

- a) *“the potential impacts of development on transport networks can be addressed;*

- b) opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised;*
- c) to promote walking, cycling and public transport use are identified and pursued;*
- d) the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account; and*
- e) patterns of movement, streets, parking and other transport considerations are integral to the design of schemes.”*

6.34 **Paragraph 111** confirms 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.

6.35 **Paragraph 112** outlines that planning applications should:

- a) “give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;*
- b) address the needs of people with disabilities and reduced mobility in relation to all modes of transport;*
- c) create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;*
- d) allow for the efficient delivery of goods, and access by service and emergency vehicles; and*
- e) be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.”*

6.36 **Paragraph 113** requires all developments that will generate significant amounts of movement to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed. This planning application is accompanied by a Transport Assessment and Travel Plan, which both aim to address the objectives of paragraphs 104-113 above.

6.37 **Paragraph 119** confirms that planning policies and decisions should promote an effective use of land in meeting the need for various land uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Direct support is provided for the re-use of previously developed or brownfield land.

6.38 **Paragraph 120** states, inter alia, that decisions should give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land. As the Site is previously developed, this objective is considered to be particularly pertinent to the determination of the outline application.

6.39 **Paragraph 130** sets out that decisions should ensure that developments:

- a) *“will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*
- b) *are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;*
- c) *are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);*
- d) *establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;*
- e) *optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and*
- f) *create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.”*

6.40 **Paragraph 131** outlines that trees make an important contribution to the character and quality of urban environments and can also help mitigate and adapt to climate change. Planning decisions should ensure that new streets are tree-lined (unless justified), that opportunities are taken to incorporate trees elsewhere in developments (such as parks and

community orchards), that appropriate measures are in place to secure the long-term maintenance of newly planted trees, and that existing trees are retained wherever possible.

6.41 **Paragraph 134** confirms development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design, considering any local design guidance and supplementary planning documents. such as design guides and codes. The submitted Design and Access Statement by Ashton Smith sets out the principles and rationale for the Site’s design.

6.42 **Paragraph 152** notes that the planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure

6.43 **Paragraph 154** outlines that new development should be planned in ways that:

“avoid increased vulnerability to the range of impacts arising from climate change and can help to reduce greenhouse gas emissions, such as through its location, orientation and design”

6.44 **Paragraph 157** relates to decision making and confirms that local planning authorities should expect new development to a) comply with any development plan policies on local requirements for decentralised energy supply unless it is not feasible or viable to do so and b) take account of landform, layout, building orientation, massing and landscape.

6.45 **Paragraph 167** confirms that when determining planning applications, local planning authorities should ensure that flood risk is not increased elsewhere. Where appropriate, applications should be supported by a site-specific flood-risk assessment. Development should only be allowed in areas at risk of flooding where it can be demonstrated:

a) *“within the site, the most vulnerable development is located in areas of lowest flood risk, unless there are overriding reasons to prefer a different location;*

- b) the development is appropriately flood resistant and resilient such that, in the event of a flood, it could be quickly brought back into use without significant refurbishment;*
- c) it incorporates sustainable drainage systems, unless there is clear evidence that this would be inappropriate;*
- d) any residual risk can be safely managed; and*
- e) safe access and escape routes are included where appropriate, as part of an agreed emergency plan.”*

6.46 **Paragraph 169** outlines that major developments should incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate. The systems used should:

- a) “take account of advice from the Lead Local Flood Authority;*
- b) have appropriate proposed minimum operational standards;*
- c) have maintenance arrangements in place to ensure an acceptable standard of operation for the lifetime of the development; and*
- d) where possible, provide multifunctional benefits”*

6.47 **Paragraph 174** sets out that planning policies and decisions should contribute to and enhance the natural and local environment by (inter alia):

- minimising impacts on and providing net gains for biodiversity
- remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.

6.48 **Paragraph 180** confirms that when determining planning applications, local planning authorities should apply the following principles:

- a) “if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;*
- b) development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The*

only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;

- c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons⁶³ and a suitable compensation strategy exists; and*
- d) development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate. “*

6.49 **Paragraph 183** outlines that planning policies and decisions should ensure that:

- a) “a site is suitable for its proposed use taking account of ground conditions and any risks arising from land instability and contamination. This includes risks arising from natural hazards or former activities such as mining, and any proposals for mitigation including land remediation (as well as potential impacts on the natural environment arising from that remediation);*
- b) after remediation, as a minimum, land should not be capable of being determined as contaminated land under Part IIA of the Environmental Protection Act 1990; and*
- c) adequate site investigation information, prepared by a competent person, is available to inform these assessments.”*

6.50 **Paragraph 185** confirms that planning decisions should also ensure that new development is appropriate for its location. In doing so, the following should be taken account of (inter alia):

- mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life;
- limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.

- 6.51 **Paragraph 186** similarly outlines that decisions should sustain and contribute towards compliance with relevant limit values or national objectives for air borne pollutants, taking into account the cumulative impacts from individual sites.

Climate Change Adaptation Supplementary Planning Document (2012)

- 6.52 The Council's Climate Change Adaption Supplementary Planning Document (SPD) was adopted in 2012 and outlines actions for developments to help climate change adaptation under eight broad headings: location, layout and orientation, materials / structure, environmental performance, green roofs and walls, rainwater harvesting, Sustainable Drainage Systems (SUDS) and green and blue infrastructure.
- 6.53 The SPD should be read in conjunction with the Council's Core Strategy Policy G1.

Biodiversity and Development SPD (2008)

- 6.54 Adopted in 2008 and subsequently updated in 2017, the Biodiversity and Development SPD outlines guidance in relation to the natural environment, particularly wildlife habitats and species, within development proposals. It sets out general principles to be adopted, specific advice for habitats and species, and ecological survey requirements.

Guidelines and Standards for Residential Development SPD (2016)

- 6.55 The Guidelines and Standards for Residential Development SPD was adopted in 2016 and relates to both new residential developments, but also developments which affect existing residential properties.
- 6.56 For the purposes of this application, the space standards for new and existing residential development are considered to be particularly important. Section 4 of the SPD states:

"Although it is expected that most new development will have some impact on neighbours, it is important to ensure that the impact is not so significant that it results in unacceptable harm. All new developments should avoid causing a significant loss of privacy and/or light for occupiers of new neighbouring dwellings and existing dwellings. The following minimum space standards will be applied to all new residential developments and developments which affect existing residential properties:

- i. 21m between directly facing principal windows of habitable rooms, at an upper floor level AND 10.5m between a principal window at an upper floor level and a directly facing boundary of the curtilage (Figure 2);
- ii. 14m between a principal window and any directly facing two storey elevation which does not contain a principal window to a habitable room (Figure 3);
- iii. 10m between a principal window and any directly facing single storey elevation which does not contain a principal window to a habitable room (Figure 4).

Where buildings of three or more storeys are proposed, or there is a marked difference in levels, it may be necessary for the minimum distances set out in (ii) and (iii) above to be increased.”

Places for Everyone

- 6.57 Places for Everyone (PfE) is a joint development plan which covers nine of the ten boroughs within Greater Manchester, with Stockport the only borough not included within the Plan.
- 6.58 In August 2021 a publication version of PfE was published for consultation in an eight-week period between August and October 2021. Following this period of consultation, it was subsequently submitted to the Secretary of State on the 14 February 2022. Hearing sessions for the Examination in Public are set to begin in November 2022 and run through until March 2023.
- 6.59 There are various strategic site allocations and detailed development management policies set out within the draft PfE, but for the purposes of this application the Northern Gateway and its associated allocations are of relevance.
- 6.60 The Northern Gateway is a strategic mixed-use employment and residential-led allocation comprising two development sites along the Rochdale-Bury boundaries at the intersections of the M60, M62 and M66 motorways. The most relevant of the two sites is JP Allocation 1.1 ‘Heywood / Pilsworth’ as this is located immediately to the west of Trammel Crow’s proposed site. This seeks to deliver, inter alia, around 1,200,000 sqm of industrial / warehousing space, around 1,000 additional homes and a new primary school. Whilst an emerging allocation in

PfE, such development has started to partially be delivered via the South Heywood Masterplan (ref. 16/01399/HYBR).

- 6.61 Given that, at the time of writing, PfE is not part of the development plan and has not yet been fully examined by the examining Inspectors, let alone found sound, it is considered that only limited weight can be attached to the emerging policies and allocations at this time.

Planning Policy Summary

- 6.62 The relevant Development Plan documents for this site comprise the Core Strategy (2016) and UDP (2006). Whilst the site is not covered by any relevant allocations or designations under such documents there are numerous relevant planning policies relating to matters such as employment, ecology, trees, flooding and drainage, amenity and highways.
- 6.63 Alongside the Development Plan, there are several material considerations relevant to the proposed development.
- 6.64 The NPPF, which sets out strategic objectives for plan making and decision making in England, is significant material consideration. Within the NPPF, there are several policies relevant to the site including those related to the presumption in favour of sustainable development, employment, transport, design, the natural environment and the historic environment.
- 6.65 There are also various SPDs relevant to the site and proposal, including the Climate Change Adaption SPD, Biodiversity and Development SPD and Guidelines and Standards for Residential Development SPD.
- 6.66 PfE is a joint development plan which covers nine of the ten boroughs within Greater Manchester, with Stockport the only borough not included within the Plan. At the time of writing, it is considered that only limited weight can be attached to the draft policies given that it is still subject to examination.
- 6.67 A detailed assessment of how the proposed scheme fits within the planning policy context outlined above is set out within the subsequent Planning Matters section of this Statement.

7 Planning Matters

7.1 This Section discusses the following key planning matters in relation to the proposed development:

- Principle of Employment Development
- Design and Landscaping
- Daylight and Sunlight
- Crime Prevention
- Landscape and Visual Impact
- Energy and Sustainability
- Trees
- Ecology
- Lighting
- Highways
- Noise
- Air Quality
- Flood Risk and Drainage
- Ground Conditions
- Archaeology

Principle of Employment Development

7.2 As set out within Section 3 of the Planning Statement, the Council issued a Lawful Development Certificate on 14 December 2021 confirming that the site's lawful use was Use Class B8. This proposal would not amend the site's lawful use, but instead modernise the site so that it is fit for modern logistic uses.

7.3 From a planning policy perspective, there is clear in principle support for such redevelopment. Firstly, Core Strategy Policy E2 sets out, inter alia, that the Council will promote the regeneration of major employment locations suitable for continued employment use. Secondly, Core Strategy Policy SP1 seeks to deliver employment and commercial development in areas where there is

good access to existing facilities and infrastructure, the motorway corridor, public transport facilities and the wider Greater Manchester city region.

- 7.4 This in principle support for employment use was highlighted in the Council's pre-application advice in November 2021 (PREAPP/00104/21). Within this, the Council confirmed that the principle of redevelopment to provide modern upgraded provision within the same use class is acceptable. The pre-application response further outlined that the redevelopment of the site could, subject to design and relevant technical matters, be considered appropriate in the context of national planning policy, through making best use of brownfield land and maximising employment opportunities on site.
- 7.5 In addition to the above, the proposed development would also deliver a range of economic and social benefits to Heywood, the wider borough, as well as the wider Greater Manchester economy. The Socio-Economic Statement, prepared by Hatch Regeneris, identifies that during the construction phase, the development is expected to generate demand for up to 390 workers over a 13-month period.
- 7.6 Once completed and fully occupied, the Socio-Economic Statement states that the proposed development could deliver 595 full-time equivalent jobs across a full spectrum of occupations from senior managers and professionals to skilled occupations and process/elementary roles. The direct GVA from the completed development is calculated to be £29 million per annum, representing an additional contribution to the output generated by Rochdale borough's economy.
- 7.7 The above are all significant economic benefits and should be afforded significant weight in the determination of this planning application.
- 7.8 In summary, there is clear planning policy support for modernised employment uses at the site and therefore it is clear that the proposed employment uses as part of this planning application are acceptable in principle subject to other material considerations. The proposed development would deliver very clear and significant economic benefits, contributing to the local economy through investment, job creation and GVA generation.

Design and Landscaping

- 7.9 As the NPPF sets out at paragraph 126, the creation of high quality, beautiful and sustainable buildings and places is fundamental to the planning process. This national guidance is set out further at the local level through various Development Plan policies including Core Strategy Policies P1, P2 and P3, which set out several criteria for achieving the highest standards of design and site planning.
- 7.10 A Design and Access Statement (D&A) and accompanying drawing package has therefore been prepared by Ashton Smith Architects in support of this application. This illustrates the key design principles adopted across the site to achieve both the required uplift in floorspace and unit heights to meeting modern occupier requirements.
- 7.11 In particular, the D&A sets out how a key constraint of the site is its proximity to the existing residential housing and proposed future residential developments via the South Heywood Masterplan. The design of the proposed development in terms of its layout, height, mass and scale, has therefore been governed by the need to protect the amenity of existing and future residential properties from a visual perspective. Details of how this has been achieved can be summarised as follows:
- The separation distances between Units 1 and 2 and the existing residential properties along Bader Drive will remain the same as the existing units to maintain privacy, whilst for Unit 3 there is a minimum separation distance of 41.7 metres to existing properties to the east, 59 metres to future³ residential properties to the west and 39.2 metres to future residential development⁴ to the south. All these distances exceed the requirements set out in the Guidelines and Standards for Residential Development SPD.
 - New boundary treatment, in the form a landscaping and a new 1.8 metre fence will be provided between Units 1 and 2 and properties along Bader Drive, thereby delivering a betterment for some residents where there is limited existing boundary treatment between their gardens and the site.
 - New and maintained landscaping is used to create visual screening of the site to provide a green buffer, which helps to soften the setting of the building.

- The offices on Units 1 and 2 have been positioned adjacent to the boundary of Bader Drive to ensure that the lowest part of the development is located next to the existing residential properties.
- The overall maximum heights of the building have been kept to a minimum to minimise the impact of the development on the surrounding area, whilst still meeting the functional requirements of modern occupiers. This includes a reduction in the floor levels for Units 1 and 2.
- The office element of Unit 3 has been reduced in scale to the remainder of the building to minimise impacts on future residential development to the south.
- In terms of materials and appearance, the units will be clad in a mix of light to dark greys and blue to help to break up the mass and height of the building and minimise the building within the skyline.

7.12 Other key design principles, which are expanded on in detail within the D&A, relate to providing functional buildings that meet the needs of the occupiers, providing clear legible and segregated vehicular movement strategy to provide efficient movement patterns for HGV vehicles, and ensuring that development is designed to reduce carbon emissions by targeting a BREEAM 'Very Good' rating as a minimum.

7.13 In addition to the above, a comprehensive landscaping scheme has been developed by TPM Landscape. This is illustrated on the Landscaping Masterplan (ref. 414-301) and various detailed planting plans.

7.14 The Masterplan adopts a carefully selected mix of hard and soft landscaping within and around the boundaries of the site to soften the visual impacts of the scheme on existing and future residents. This results in a more natural and informal landscape approach for the site, with the use of varied and native plants and trees and a less formal management regime to allow more natural colonisation of wildlife.

7.15 In summary, the proposals have been developed with due regards to the existing site, its constraints, context and surroundings, to create an attractive, contemporary and cohesive

³ As there is no approved detail layout, these measurements are based on an assumed layout up to the principal rear elevation and allowing for a standard rear garden

⁴ As above

design that is fit for purpose. It is therefore considered to accord with relevant Development Plan policies, including Core Strategy Policies P1, P2 and P3, as well as the relevant other material considerations including the design requirements of the NPPF and the Council's Guidelines and Standards for Residential Development SPD.

Daylight and Sunlight

- 7.16 Due to the increased heights of the proposed units, GIA has prepared a Daylight and Sunlight Assessment to ensure that such levels at the existing and future residential properties are not adversely impacted by the proposed scheme.
- 7.17 The Assessment uses the methodologies set out within the Building Research Establishment Guidelines entitled 'Site Layout Planning for Daylight and Sunlight – A Guide to Good Practice (2011)' and the updated 2022 Guide (the "BRE Guidelines").
- 7.18 The BRE Guidelines provide methodologies for the assessment of the potential to impact the existing daylight and sunlight amenity of surrounding residential properties. The first test is known as the '25° rule'. Paragraph 2.25 and Figure 14 of the BRE Guidelines explain the methodology in further detail:

"Draw a section in a plane perpendicular to each affected main window wall of the existing building (Figure 14). Measure the angle to the horizontal subtended by the new development at the level of the centre of the lowest window. If this angle is less than 25° for the whole of the development then it is unlikely to have a substantial effect on the diffuse skylight enjoyed by the existing building. If, for any part of the new development, this angle is more than 25°, a more detailed check is needed to find the loss of skylight to the existing building. Both the total amount of skylight and its distribution within the building are important." (emphasis added)

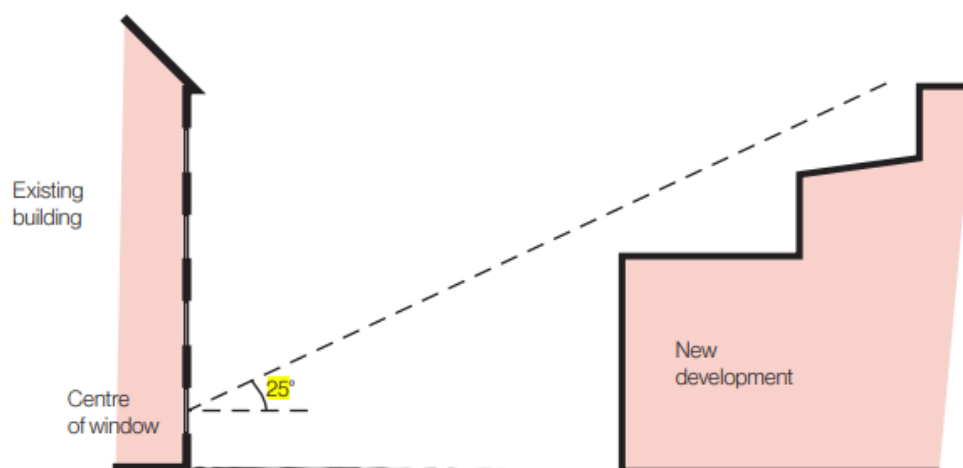


Figure 14: Section in plane perpendicular to the affected window wall

- 7.19 GIA undertook the '25° rule' analysis to the closest existing houses to the proposed development. The Assessment confirms that all the existing houses meet the rule and as such, the light is unlikely to be significantly affected.
- 7.20 The Assessment also considers the South Heywood Masterplan and subsequent reserved matters applications. The most recent reserved matters application that provides sufficient detail to undertake any assessment is immediately south of the proposed development and is separated from the site by the proposed new link road, approximately four times the distance from the proposed development as the existing houses to the north. As such, there is no meaningful potential for any impact and no '25° rule' assessment has been undertaken.
- 7.21 There are currently no other reserved matters applications submitted in relation to the other plots on the masterplan in closer proximity and as such no analysis can be undertaken, but it is considered that the orientation of the houses is such that the main living rooms of the new houses will face away from the proposed development and continue to have an unobstructed view to the south.
- 7.22 Considering the above, it is considered that daylight and sunlight levels in both the existing residential properties and future residential properties are unlikely to be significantly affected by the proposed development, and thus the proposed development accords with Core Strategy Policy DM1, as well as the relevant provisions of the NPPF.

Crime Prevention

7.23 The safety and security of site users, visitors and nearby residents has been carefully considered throughout the design evolution of the scheme. Details of the proposed crime prevention features are included in the D&A and can be summarised as follows:

- Car parks will be well overlooked.
- Dark spaces will be well lit, where appropriate.
- The units will be designed in robust materials comprising metal sheet cladding on a steel frame.
- A dedicated team will operate 24 hours, 7 days a week, specifically charged with maintenance, landscaping and security of the site.

7.24 The site-specific Crime Impact Statement submitted with the application confirms that the site has been well-considered from a crime perspective and makes several recommendations that will be adhered to by the end user.

7.25 As such, the proposed development is safe to use by both staff and visitors and is in accordance with Core Strategy Policy C6 as well as the relevant provisions of the NPPF.

Landscape and Visual Impact

7.26 A Landscaping and Visual Impact Appraisal (LVIA) has been prepared by TPM Landscape in support of this application to provide an assessment of the landscape and visual effects of the proposed development. Each is assessed in turn below.

Landscape

7.27 In terms of the landscape character baseline, the LVIA confirms that the site is not subject to any national landscape designations such as National Park or AONB. It confirms that the site falls within National Character Area 54: Manchester Pennine Fringe, which is identified as a:

“landscape containing countryside elements with a heavy influence of urban features associated with the industrial towns and busy road infrastructure.”

7.28 The LVIA further adds that the site is identified within the Landscape Character and Sensitivity Assessment for Greater Manchester (2018) as being located within the Landscape Character

Type (LCT) 'Urban Fringe Farmland', which is further subdivided into Landscape Character Areas (LCA), of which the site falls within the 'Simister, Slattocks and Heald Green' LCA.

- 7.29 Alongside these national and regional classifications, the LVIA has also undertaken a site-specific character appraisal to understand the landscape character and the interface between these varying character areas around the proposal site. This splits the surrounding area into three Character Areas (CA): Urban Fringe Farmland, Urban Settlement and Commercial and Industrial.
- 7.30 Having established the relevant baseline position around the site, the LVIA subsequently assesses the sensitivity to change of such areas and the impact of the proposed development (pre- and post-mitigation). The results of this are illustrated in the extracted table below:

Table 1 - SUMMARY OF LANDSCAPE EFFECTS					
Landscape Receptor	Hierarchy of Importance	Sensitivity	Change to Landscape (Impact)	Landscape Effect	Landscape Effect
				Year 1 pre-mitigation	Year 15 with mitigation
National Landscape Character					
NCA 54 Manchester Pennine Fringe	National	Low	Negligible	Negligible	Negligible
Regional Landscape Character					
Urban Fringe Farmland & Simister, Slattocks and Healds Green	Regional	Medium	Low	Slight-Moderate	Slight
Urban Fringe Farmland & Simister, Slattocks and Healds Green South Heywood Masterplan Area		Low-Medium	Low	Slight	Negligible
Local Landscape Character					
Character Area 1 Urban Fringe Farmland	Local	Medium	Low	Slight-Moderate	Slight
Character Area 1 Urban Fringe Farmland with South Heywood Masterplan Area		Low-Medium	Low	Slight	Negligible
Character Area 2 Urban Settlement	Local	Low	Low	Slight	Slight
Character Area 3 Commercial and Industrial	Local	Low	Negligible	Negligible	Negligible

- 7.31 In light of the above findings, the LVIA concludes that the redevelopment of the site is appropriate in its setting and the scale and height is judged to be within the parameters already set by the existing built form of the wider industrial estates. Visually, the new development, although taller, will not intrude further over areas of green space and will retain the existing mature vegetation located to the perimeter of the site. The proposed development is therefore not considered to significantly alter or harm the characteristics of this landscape area.

Visual

- 7.32 In terms of the visual impacts of the proposed development, viewpoints have been selected from various locations and vantage points identified through site visits and analysis. Views for the appraisal have been chosen to be both representative of the range of differing receptors (public, community, residents and visitors) within the study areas and of the visual amenity available at points north, south, east and west of the site.
- 7.33 When factoring in the schemes landscape mitigation measures, such as new planting and the retention of existing mature boundary vegetation, the LVIA outlines the following impacts on the various surrounding receptors:

Residential Receptors

- 7.34 Three representative residential receptor groups have been identified and assessed. Of these the largest visual effect is for those properties on Bader Drive and White House Close (adjoining the north eastern boundary). The LVIA notes that although there will be a large change to the view for some of the properties, the nature of the view will remain the same as existing industrial buildings already occupy the site. Once the mitigation proposals establish it is assessed that the effect will reduce, and the proposed maturing tree groups will screen the proposed buildings.

Pedestrian Receptors

- 7.35 Five representative pedestrian receptors have been identified including public rights of way within the vicinity of the proposal site. The largest change is for the public footpath in the field adjacent to the north western boundary which is assessed as experiencing a Slight-Moderate adverse effect reducing to Slight neutral following mitigation planting. This effect will be less as the future phases of the wider South Heywood Masterplan come forward and development take the place of the agricultural fields that surround the west and north west of the site.

Vehicle Receptors

- 7.36 Two representative travel receptors have been identified and assessed. No vehicle users will experience significant effects and the change is low level and in keeping with the existing character of views travelling through this landscape. The largest change will be along the new

link road, however, due to the direction of travel, retention of existing tree cover along the boundary and presence of existing warehouse buildings, the visibility will be limited.

- 7.37 Overall, visual impacts are assessed as low and will further reduce as the South Heywood Masterplan continues to develop.
- 7.38 Given the above, it is considered that the proposal is acceptable from a landscape and visual perspective and in accordance with Core Strategy Policies P2 and DM1, as well as the relevant provisions of the NPPF.

Energy and Sustainability

- 7.39 The Applicant has sought to ensure energy reduction, renewable technologies and sustainability are an integral part of the project. As such an Energy and Sustainability Statement, including a BREEAM Assessment, has been prepared by Synergy and submitted in support of this application address these requirements.
- 7.40 The Statement confirms that the proposed units have been designed in line with the Energy Hierarchy to achieve a Design Stage EPC Rating of 'A' and will achieve 40% betterment of the site specific BRUKL Target Emission Rate (TER) in excess of previous Building Regulation requirements and 2% of the new Part L Building Regulations by inclusion of the following;
- The treated areas of the building will have a 50% improvement in 'Air Permeability'.
 - 21 live electric vehicle charging points.
 - LED Luminaires with an efficiency at least 40% better than 2013 Building Regulations.
 - Presence control and daylight compensation lighting controls.
 - High efficiency air source heat pumps for heating and comfort cooling.
 - External lighting optimised for maximum efficiency.
 - High efficiency motors and controllers.
 - Water low flow control devices and leak detection to reduce wastage.
 - Rooflights to 15% of the loading area roof to provide natural light and reduce artificial lighting and energy use

- MVHR to offices and staff areas to reduce the heating requirement and improve air quality.

- 7.41 In addition, to achieve compliance with the current Part L Building Regulations the scheme will incorporate renewable energy infrastructure. The type and extent of this will be confirmed at the detail design stage. Such detail can be requested by the Council prior to occupation via a suitably worded planning condition.
- 7.42 Whilst not a planning policy require, the Applicant has also committed to achieve a minimum BREEAM rating of 'Very Good', with aspirations to achieve a BREEAM rating of 'Excellent'.
- 7.43 Given the above, the development is considered to accord with key objectives of relevant Development Plan policies, including Core Strategy Policies C6, G1 and G2, the requirements of the NPPF, as well as the Council's Climate Change Adaption SPD.

Trees

- 7.44 An Arboricultural Impact Assessment (AIA), which includes an appropriate tree survey, has been prepared by Brooks in support of this application. The tree survey revealed a total of two hundred and eighty-seven individual trees and sixteen groups of trees. Of these, 120 trees/groups of trees were identified as Category 'B', 181 trees/groups were identified as Category 'C' and 2 trees were identified as Category 'U'. No Category 'A' trees identified on site.
- 7.45 Having established the baseline position, the AIA has undertaken an assessment by overlaying the findings of the tree survey with the proposed layout plan. The AIA identifies that 3 groups, sections of 7 groups and 192 individual trees are expected to be removed to facilitate the development and this is indicated in the Tree Removal and Retention Plans located within the AIA.
- 7.46 However, the majority of trees shown to be removed on the Tree Retention Plan are considered to be of limited arboricultural value and graded as category C accordingly. In addition, an accompanying new planting scheme will compensate for the loss of tree material through additional tree planting to quickly replenish and improve the canopy cover initially lost.

7.47 Alongside this assessment, the AIA also outlines measures to provide protection to the above and below ground elements of the retained trees. It utilises the use of protective fencing of root protection areas to restrict damage features during construction.

7.48 In light of the above, the proposed development is considered to be in accordance with Core Strategy Policies G6 and G7, alongside other material considerations including the NPPF which seeks to retain and protect trees in new developments where possible.

Ecology

7.49 An Ecological Impact Assessment (EclA) has been prepared by Brooks in support of this planning application. The EclA has been informed by a full desk top study and the following dedicated field surveys:

- Extended Phase 1 Habitat Survey
- Updating habitat surveys to allow habitat condition assessments
- Bat Activity Surveys
- Bat Emergence Survey
- Great Crested Newt (GCN) eDNA analysis
- Invasive Species Survey

7.50 In terms of the ecology baseline, the EclA confirms that the site is not covered by, or in proximity to any statutory (international and national) or non-statutory designations, and their interests have been ruled out in the assessment.

7.51 The EclA found that the site comprises the following habitats, as shown on figure 3.1 below.



7.52 These habitats have mostly been valued at a ‘negligible’ or ‘local level’ scale, whilst the following features have been valued at a ‘site level’ scale:

- Urban Trees - Numerous semi mature trees are found within the sites landscaped areas. While these specimens add some value at a site wide level, owing to their position within a developed and managed site they fail to offer significant wider ecological value.
- Ponds - A single small pond is present within the band of woodland, at the time of survey water depth was no greater than 5cm.

7.53 As part of the baseline assessment, some invasive non-native species were identified at the site, in particular Himalayan Balsam is abundant in isolated patches around the site’s margins, while very small amounts of Japanese knotweed are also present. Cotoneaster and rhododendron are also present on the south-eastern boundary. An Invasive Species Survey and Management Plan has therefore been submitted with this planning application.

7.54 Having established the ecological baseline at the site, Section 5 of the EclA sets out the impacts and effects of the proposed development in relation to the habitats and species present on site.

The main impact relates to clearance and permanent loss of the baseline habitats that will take place across the majority of the site and the potential impacts that could occur to the retained habitats on site, which are mostly limited to the site boundaries.

- 7.55 The EcIA therefore sets out a series of measures to mitigate against these identified effects, which includes achieving the required Biodiversity Net Gain (BNG) position to ensure that effects relating to habitat loss are addressed. In this regard, Brooks have carried out calculations in relation to BNG which demonstrate an overall net gain, providing 1.44 additional Habitat Units (+3.85%) and 2.37 additional Hedgerow Units (+155%) predicted.
- 7.56 The full details of the BNG position will be set out in a Biodiversity Management Plan (BMP), which can be controlled by way of a suitably worded planning condition. This will, inter alia, detail the habitat creation and enhancement measures, and their required management to achieve the outlined final BNG position.
- 7.57 In terms of the species present on the site, the following table (taken from table 3.2 of the EcIA) provides a summary of the protected species surveys carried out and the potential constraints related to relevant groups.

Species / Group	Notes	Valued at what scale
Amphibians	Surveys concluded the likely absence of great crested newt in the on site and adjacent ponds within 250m. The site is unlikely to be of value to any amphibian species.	N/A
Bats	Seasonal activity surveys confirmed very low-level foraging by common pipistrelle bats only, with activity sporadic both spatially and temporally within the site. Emergence survey of all buildings offering potential roosting features on the site have confirmed the likely absence of roosting. The site is therefore of low importance to bats	Site Level

Birds	The site supports habitat which offers nesting opportunities to urban fringe bird species.	Local Level
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7.58 To provide suitable mitigation / compensation for these species, the EclA confirms that the BMP will also include measures such as bat and bird roosting features across the site.

7.59 Overall, the site has been suitably assessed to identify ecological issues and opportunities as a result of development, with potential for mitigation and enhancement measures. The proposal is therefore considered to accord with relevant Development Plan policies, including Core Strategy Policy G7, as well as other material considerations including the Biodiversity and Development SPD as well as the relevant provisions of the NPPF.

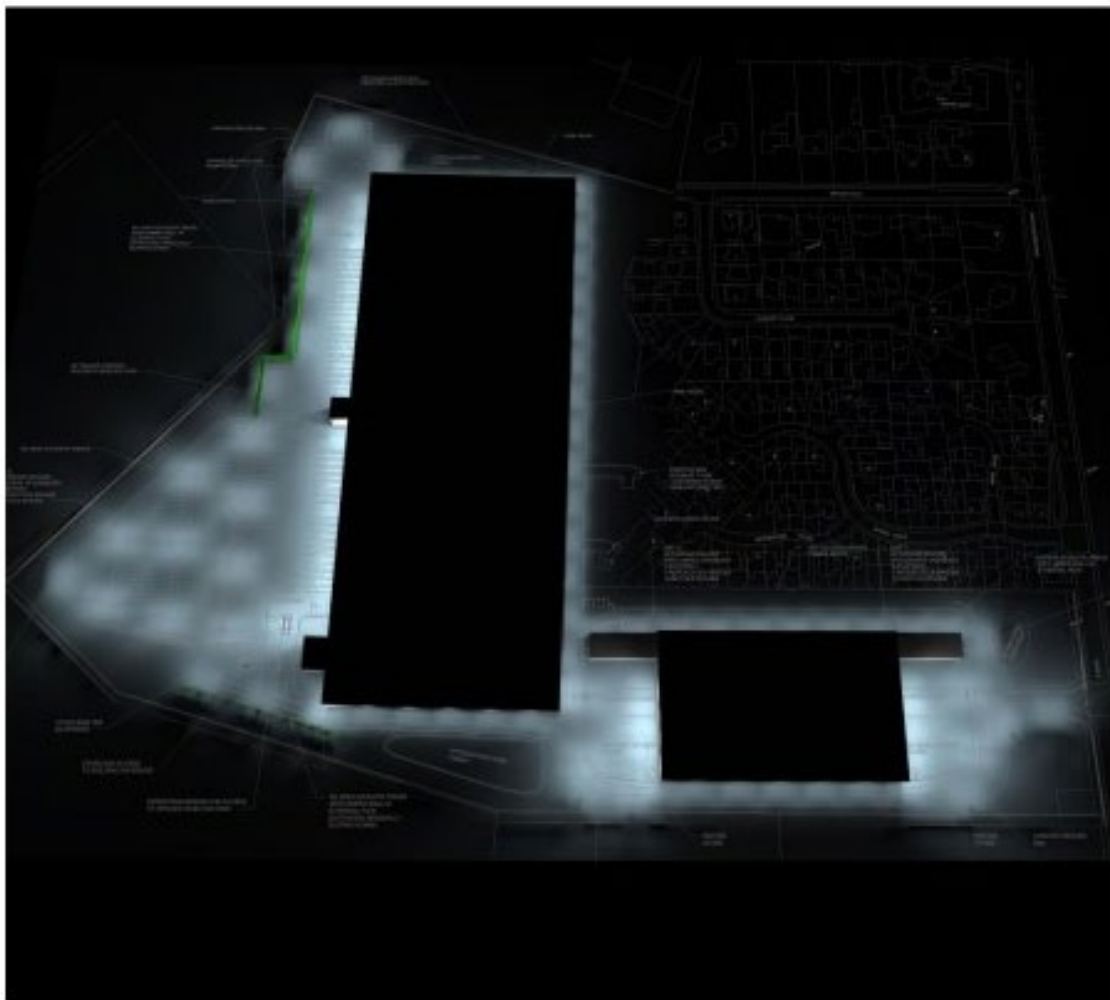
Lighting

7.60 Due to the nature of the proposed use, it is necessary for artificial lighting to be included as part of the proposals for both operational and security reasons. Such artificial lighting, particularly if poorly designed, has the potential to result in adverse environmental effects (e.g. light pollution) and as such an External Lighting Report has been prepared to ensure a suitable lighting scheme for the redevelopment.

7.61 In terms of the lighting proposed, this comprises the following:

- Column mounted single flat glass luminaires on the outer perimeter, mounted at 12m, aimed inwards away from the site boundary towards the service yard, roadway or parking areas.
- Column mounted twin headed luminaires in the centre of the larger service yards, mounted at 12m, where perimeter lighting does not reach the centre.
- Wall mounted luminaires at high level on the facades of the buildings 12m overlooking the service yard and loading docks, and 8m high on other building elevations.

- 7.62 The Report confirms that the lighting levels to the car park and service yards have been selected to meet the requirements of British Standards⁵ and are in line with the recommendations of the Bat Conservation Trust guidance “Artificial Lighting and Wildlife”.
- 7.63 The results of the Lighting Report show that the target lighting levels have been achieved, and the effect on the surrounding environment has been minimised. In particular, overspill is minimised and there is zero direct upward light.
- 7.64 For reference, a sample image from the calculations is illustrated below to illustrate the lighting proposals:



⁵ BSEN 12464 Part 2: 2014 – Light and Lighting – Lighting of Work Places, Part 2: Outdoor work Places

- 7.65 Overall, it is considered that an appropriate lighting scheme has been developed for the site, in accordance with Core Strategy Policies P3 and G9, as well as other material considerations such as the provisions of the NPPF.

Highways

- 7.66 A Transport Assessment (TA) has been prepared by BWB in support of this planning application to assess the implications of the proposed development on the local transport network. This follows pre-application discussions with both the Local Highway Authority, Transport for Greater Manchester, and National Highways on the scope of the assessment.
- 7.67 As noted in Section 5, the existing access location from the site onto the A6045 Manchester Road will be retained. However, changes are proposed to the geometry of the junction to accommodate two-way HGV movements and pedestrian footways on both sides of the access road. The TA confirms that such access arrangements for the site are safe and suitable for the proposed development.
- 7.68 Regarding non-car modes of transport, the TA demonstrates that the site is accessible by walking, cycling and public transport. A Travel Plan has also been prepared by BWB to encourage sustainable opportunities for travel to and from the proposed development
- 7.69 Given the above, it is considered that the proposed development sufficiently promotes the use of a choice of sustainable transport modes for members of staff and visitors.
- 7.70 From a trip generation perspective, as the site is not currently fully occupied and has been operating a reduced capacity for some time, a traffic survey of the existing site access would not provide a true representation of the potential vehicle trip generation associated with the existing use and has therefore not been utilised.
- 7.71 Instead, the industry standard TRICS database has been used instead to estimate the potential vehicle trip generation of the site. The peak period vehicle trip rates have been applied to the total existing floor area to provide a more realistic measurement of extant trip generation. This approach has been agreed with the Local Highway Authority and National Highways during the pre-application process.
- 7.72 Using the TRCIS peak period rates, the Assessment concluded that the site's existing lawful Use Class B8 use has the potential to generate 67 and 80 two-way vehicle trips during the weekday

morning and evening peak hours respectively (27 and 30 of which would be HGV trips, respectively)

- 7.73 The proposed land use class will not change as a result of the redevelopment proposal, and therefore the same Use Class B8 vehicle trip rates have been used to calculate the traffic generation associated with the total proposed floor area (45,755 sqm). Using this methodology, the TA concludes that the proposed development is expected to generate 96 and 116 two-way vehicle trips during the weekday morning and evening peak hours respectively (39 and 43 of which would be HGV trips, respectively). This results in a residual vehicle trip generation of 29 and 36 residual two-way vehicle movements (12 and 13 of which would be HGV trips, respectively).
- 7.74 Although the proposed development would result in an increase of vehicular trips, the TA notes that the South Heywood Link Road to the south of the site is currently under construction and once complete, would result in 39 fewer traffic flows along the A6045 Manchester Road in the weekday morning peak hour and 129 fewer traffic flows in the weekday evening peak hour. Therefore, the TA concludes that with the new Link Road in place the residual increase in vehicle trips as a result of the redevelopment proposal can be accommodated with negligible change to the operation of the local road network.
- 7.75 Overall, there are no severe highway impacts associated with the proposed development and suitable sustainable travel options have been presented as part of the Travel Plan. It is therefore considered that the proposed development is in accordance with Core Strategy Policies T1 and T2, as well as the relevant provisions of the NPPF.

Noise

- 7.76 A Noise Impact Assessment has been prepared which includes the results of a baseline noise survey undertaken in the vicinity of the closest noise sensitive receptors to the site. The noise survey predicts the likely noise emissions from the proposals, any required mitigation and determines suitable noise limits for any fixed plant which will be installed as part of the scheme (details for which are currently unknown).
- 7.77 Noise emissions at the site have been assessed during daytime and night-time periods in accordance with the methodology outlined in BS 4142. Despite in built mitigation through the proposed layout of the proposal, in particular the offices for Units 1 and 2 screening the rear

yard spaces, potentially adverse impact have been predicted at the nearest existing receptors and at some adjacent land parcels which have approval for residential development.

- 7.78 Mitigation, in the form of acoustic barriers, has therefore been recommended to be incorporated into the proposed development. This includes a mixture of 3 metre and 5 metre acoustic fencing, which will have an external green wall included where this is externally facing and visible to residents.
- 7.79 With this mitigation in place, the predicted noise levels at the site are predicted to be no greater than the respective background sound levels during daytime and night-time periods at the assessment locations. Therefore, a low impact would be predicted in accordance with BS 4142 for both daytime and night-time periods at these locations.
- 7.80 In terms of fixed plant, the Assessment notes that the cumulative effect of all external plant and noise breakout from the development should be controlled so that the following limits apply:
- A rating level limit of 50 dB during the daytime and 46 dB during the night-time at the nearest noise sensitive receptors to the south and southwest of the site; and
 - A rating level limit of 42 dB during the daytime and 40 dB during the night-time at the nearest noise sensitive receptors to the north and east of the site.
- 7.81 When applying these mitigation factors, the Assessment concludes that noise need not be a determining factor in granting planning permission for the proposed development and the proposed development is therefore considered to accord with Core Strategy Policies DM1 and G9, saved UDP Policies EM/2 and EM/3, as well as the relevant provisions of the NPPF.

Air Quality

- 7.82 Whilst the site is not situated within an Air Quality Management Area (AQMA), sections of the Greater Manchester Combined Authority AQMA located within the surrounding area, with the closest section of the AQMA located approximately 400m south of the Site along the M62 motorway. As such an Air Quality Assessment (AQA) has been prepared by BWB in support of this application.
- 7.83 A qualitative construction phase dust assessment has been undertaken in accordance with Institute of Air Quality Management guidance and measures recommended for inclusion in a Dust Management Plan to minimise emissions during construction activities. Such measures

have been incorporated into the submitted Construction Management Plan. With the implementation of these mitigation measures the impact of construction phase dust emissions are '*not significant*' in accordance with Institute of Air Quality Management guidance.

- 7.84 A detailed operational phase road traffic emissions assessment has also been undertaken to consider the impact of development-generated road traffic on local air quality at identified existing receptor locations. Using a suitable dispersion model, the development is not predicted to result in any new exceedances of the relevant air quality objectives and the impact of the development on local air quality is predicted to be '*negligible*' in accordance with guidance.
- 7.85 Given the above findings, it is evident that proposed development is acceptable from an air quality perspective. As such, it accords with relevant Development Plan policies, namely Core Strategy Policy G9, and the relevant policies of the NPPF.

Flood Risk and Drainage

- 7.86 A Flood Risk Assessment (FRA) and Drainage Strategy has been prepared by Burrows Graham in support of this application.
- 7.87 In terms of flood risk, the Assessment notes that the site lies within Flood Zone 1 and is therefore at a low risk of flooding from rivers. There is also a low risk of flooding from sewers, tidal influences and reservoirs, and no significant risk of groundwater flooding on the site or in the surrounding areas.
- 7.88 The Assessment further adds that the site is mostly at very low risk of surface water flooding. However, there are some localised areas of low to high risk of surface water flooding associated with low lying parts of the site. The development will therefore include provision of a new site wide drainage system, which will mitigate against these areas of surface water flooding.
- 7.89 The issue of surface water drainage to the proposed development has been considered with reference to the hierarchy of surface water disposal, as summarised below:
- 1) into the ground (infiltration);
 - 2) to a surface water body;
 - 3) to a surface water sewer, highway drain, or another drainage system;
 - 4) to a combined sewer.

- 7.90 The Assessment notes that infiltration is not feasible due to the presence of made ground underlying clay and areas of high ground water across the site. Using the hierarchy, the next best option is to discharge to a watercourse, which is how surface water is currently discharged at the site through an unnamed watercourse to the south of Hareshill Road via 600mm diameter pipe. A small part of the site also discharges to an unknown outfall in Manchester Road. The drainage strategy is therefore based on the site draining surface water as existing, with the relevant betterments and climate change allowances applied.
- 7.91 Sustainable Urban Drainage Systems (SuDS) have been utilised to minimise the impact the development has on the runoff quantity and quality, and to maximise amenity and biodiversity opportunities. In line with the SuDS hierarchy, the drainage strategy will incorporate prevention by using rainwater harvesting systems where possible, and site control in the form of flow control, associated attenuation ponds, and below ground tanks.
- 7.92 In terms of foul water drainage, the Assessment confirms that foul water will drain separately from surface water via a 225mm foul sewer.
- 7.93 Overall, the site and proposed development is not at risk from flooding and a suitable drainage strategy has been prepared. As such, the proposal is in accordance with relevant Development Plan policies, including Core Strategy policies G1 and G8, as well as the relevant provisions of the NPPF.

Ground Conditions

- 7.94 A detailed Geo-Environmental Assessment has been prepared by RSK in support of this planning application to identify potential sources of contamination, receptors, and pathways and to develop a preliminary risk assessment for the site.
- 7.95 The Assessment confirms that ground conditions comprised topsoil at all exploratory locations. In terms of the chemical testing, the results were screened against the RSK Generic Assessment Criteria (GAC) for a commercial end use and the results confirmed that no exceedances of the GAC were reported, and asbestos materials were not identified in any of the samples screened for asbestos. The results of the gas monitoring confirmed that the development will not require the inclusion of gas protection measures.

- 7.96 It should be noted that no investigation works could be completed in the footprint of the existing buildings and therefore the conditions in these areas are unknown. Further detailed investigations will therefore be undertaken in these areas, which can be controlled by way of a suitably detailed planning condition.
- 7.97 In addition, a Coal Mining Risk Assessment (CMRA) has been prepared by RSK, as Coal Authority records show that the site lies within a coal mining area albeit, it is not within a “Development High Risk Area”.
- 7.98 The CMRA confirms that the site does not appear to have been subject to historical mining. However, mining activities have occurred off the site to the east which includes shallow underground mining, with workings extending away from the site boundary. The closest known mine entry is approximately 50 metres to the east of the site boundary and the report concludes that this is far enough away to not present a stability hazard to the proposed development.
- 7.99 Considering the above conclusions, the proposed development is considered suitable for the proposed use and is in accordance with Core Strategy Policy G9, as well as the relevant provisions of the NPPF.

Archaeology

- 7.100 An Archaeological Desk-Based Assessment has been prepared by Salford Archaeology in support of this planning application, which assesses the potential for archaeological remains based on the currently available evidence.
- 7.101 The Assessment notes that the potential for the site to contain buried archaeological remains from the prehistoric to the industrial period is very low. The most likely remains may include post-medieval agricultural activity in the form of field boundaries and the remains of a late nineteenth century structure which would be of local significance. However, the construction of the existing buildings on site, which were developed in the late twentieth century likely affected any surviving remains.
- 7.102 The exact scope and extent of any further investigation of the proposed development area will be determined by GMAAS, in their capacity as archaeological advisor to the Council. However, the Assessment considers that no further archaeological investigation is required in this case.

- 7.103 Considering the above findings, the proposed development is acceptable in archaeological terms and therefore in accordance with relevant Development Plan policies, as well as other material considerations such as the NPPF.

8 Planning Balance

- 8.1 Section 38(6) of the Planning and Compulsory Purchase Act (2004) requires that all planning applications must be determined in accordance with the Development Plan unless material considerations indicate otherwise. In this case, the assessment of planning matters in Section 7 has shown that the development is in accordance with the Development Plan when read as a whole.
- 8.2 Having established that the proposal is in accordance with the Development Plan, it is necessary to consider the second strand of Section 38(6) and determine whether there are any material considerations indicating planning permission should be refused.
- 8.3 In this case, it is considered that there are no material considerations that suggest planning permission should not be granted. There is, however, a material consideration in favour of granting planning permission at the site.
- 8.4 The NPPF at paragraph 11 is clear that where a proposal accords with the Development Plan that the presumption in favour of sustainable development applies, and that planning permission should be approved without delay.
- 8.5 Notwithstanding the above, should the Council conclude conflict with the Development Plan during the determination process, it is considered that there exist material considerations of sufficient weight to outweigh any perceived conflict to warrant the grant of planning permission in accordance with Section 38(6) in this case. These material considerations are summarised below:
- The reuse of a brownfield and soon to be vacant site for continued employment use in a sustainable location.
 - Socio-economic benefits, including the creation of 390 construction related jobs, 595 full-time equivalent jobs and £29 million GVA per annum.
 - Sustainable and energy efficient design, with a minimum BREEAM rating of 'Very Good'.
 - A biodiversity net gain of 1.44 additional Habitat Units (+3.85%) and 2.37 additional Hedgerow Units (+155%), which is in excess of current planning policy requirements.

9 Summary

9.1 This Planning Statement is prepared on behalf of Trammell Crow Company Logistics (Heywood) Ltd in support of a full planning application for the redevelopment of the site to provide a modern logistics park (Use Class B8) with ancillary office space, vehicular, pedestrian and cycle access, external yards, parking, landscaping and associated works.

9.2 The site comprises the Heywood Stores, located on Manchester Road, Heywood. It extends to approximately 11.1 ha and comprises nine warehouse buildings (Use Class B8) that have historically been used for archive storage by the Department of Work and Pension and which will be vacant in Spring 2023.

9.3 Several planning matters have been assessed in Section 7 of this Statement, as set out below:

- Principle of Employment Development
- Design and Landscaping
- Daylight and Sunlight
- Crime Prevention
- Landscape and Visual Impact
- Energy and Sustainability
- Trees
- Ecology
- Lighting
- Highways
- Noise
- Air Quality
- Flood Risk and Drainage
- Ground Conditions
- Archaeology

9.4 This assessment demonstrates that the proposal complies with the Development Plan, when read as a whole, and that there are no material considerations that indicate planning permission should be refused.

- 9.5 Therefore, in accordance with the Core Strategy and the NPPF, the presumption in favour of sustainable development applies and this development should be approved without delay.
- 9.6 Notwithstanding the above, should the Council consider that conflict with the Development Plan exists during determination, it is considered that the redevelopment of the site for continued employment use, the significant economic benefits, sustainable and energy efficient design, and the biodiversity net gain achieved on site are material considerations of sufficient weight to outweigh any perceived conflict in the planning balance to enable the grant of planning permission.

APPENDIX A

Schedule of Drawings

- Site Location Plan (ref: 2035-JSA-XX-00-DR-A-00001-P1)
- Existing Site Plan (ref: 21157-ASA-00-ZZZZ-D-A-0002_S3-P1)
- Proposed Site Plan (ref: 21157-ASA-00-ZZZZ-D-A-0003-P7)
- Existing and Proposed Site Sections 1 of 2 (ref: 21157-ASA-00-ZZZZ-D-A-0004_SP6)
- Existing and Proposed Site Sections 2 of 2 (ref: 21157-ASA-00-ZZZZ-D-A-0005_P6)
- Proposed Demolition Plan (ref: 21157-ASA-00-ZZ.ZZ-D-A-0006_S3-P1)
- Proposed Ground Floor Plan Units 1 & 2 (ref: 21157-ASA-00-ZZ.GF-D-A-0010_P4)
- Proposed First Floor Plan Units 1 & 2 (ref: 21157-ASA-00-ZZ.01-D-A-0011_P5)
- Proposed Roof Plan Units 1 & 2 (ref: 21157-ASA-00-ZZ.RT-D-A-0012_P5)
- Proposed Building Elevations Units 1 & 2 (ref: 21157-ASA-00-EL.ZZ-D-A-0013_P5)
- Proposed Building Sections Units 1 & 2 (ref: 21157-ASA-00-ZZ.ZZ-D-A-0014_P5)
- Proposed Ground Floor Plan Unit 3 (ref: 21157-ASA-00-ZZ.GF-D-A-0020_P1)
- Proposed First Floor Plan Unit 3 (ref: 21157-ASA-00-ZZ.01-D-A-0021_P1)
- Proposed Second Floor Plan Unit 3 (ref: 21157-ASA-00-ZZ.02-D-A-0022_P1)
- Proposed Third Floor Plan Unit 3 (ref: 21157-ASA-00-ZZ.03-D-A-0023_P1)
- Proposed Roof Plan Unit 3 (ref: 21157-ASA-00-ZZ.RT-D-A-0024_P2)
- Proposed Building Elevations Unit 3 (ref: 21157-ASA-00-EL.ZZ-D-A-0025_P2)
- Proposed Building Sections Unit 3 (ref: 21157-ASA-00-ZZ.ZZ-D-A-0026_P2)
- Proposed Bridge Link and Stair Tower Unit 3 (ref: 21157-ASA-00-EX.ZZ-D-A-0027_P1)
- Proposed Gatehouse Unit 3 (ref: 21157-ASA-00-EX.YD-D-A-0028_P1)
- Proposed Sprinkler Tanks and Pumphouse (ref: 21157-ASA-00-EX.00-D-A-0029_P1)
- Proposed Fencing (ref: 21157-ASA-00-EX.00-D-A-0030_P2)
- Proposed Fencing Details (ref: 21157-ASA-00-EX.00-D-A-0031_P1)
- Proposed Cycle Shelter Details (ref: 21157-ASA-00-EX.00-D-A-0032_P1)
- Proposed Bin Store Details (ref: 21157-ASA-00-EX.00-D-A-0033_P1)

APPENDIX B

EIA Screening Opinion

Town and Country Planning Act 1990

The Town and Country Planning (Environmental Impact Assessment)
Regulations 2017

ENVIRONMENTAL IMPACT ASSESSMENT SCREENING OPINION

APPLICATION REFERENCE: 22/01341/SO

Name and address for correspondence:	Applicant name:
James Gibbs Gerald Eve LLP 1 Marsden Street Manchester M2 1HW	

Part 1 - Particulars of Application

Date of Application: 8 June 2022

Proposal:	Request for Screening Opinion in respect of redevelopment of the site comprising the demolition of all existing units and erection of new storage and distribution units (Use Class B8) with ancillary office space, vehicular, pedestrian and cycle access, external yards, parking, landscaping and associated works
Location:	Heywood Stores, Manchester Road, Heywood, OL10 2QR,

Part II - Particulars of decision

The proposed development does not fall within Schedule 1 of the above regulations.

The proposed development falls within the description of paragraph 10(a) of Schedule 2 of the above regulations.

The proposed development would not be located in a sensitive area and having taken into account the criteria in Schedule 3 of the regulations, would not be likely to have significant effect on the environment by virtue of factors such as its nature, size and location.

The proposed development for which planning permission is sought is not EIA development and an Environmental Statement would not be required for the proposed development.

Date Decision Issued 14 October 2022

Daniela Ripa
Interim Head of Planning Services

INFORMATIVE

This decision should be read in conjunction with the attached statement of reasons which clarify the Council's decision in this particular case.

Statement of Reasons

The Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 2017 (as amended) allows scope for an applicant to request a formal opinion from the Local Planning Authority about whether a proposed development is development requiring an Environmental Impact Assessment (EIA). Gerald Eve LLP has requested a Screening Opinion to enable consideration of the above proposal.

The application site is located in the south Heywood / Hopwood area off Manchester Road. The site comprises an existing industrial estate in use for B8 Storage and Distribution, having originally been constructed primarily for RAF hangar facilities. The site is within the defined urban area but does not have a specific policy designation within the saved Rochdale Unitary Development Plan. Whilst there are small areas to the periphery of the site which have remained unbuilt, the site is predominantly previously developed land.

Under the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (Regulations) as amended, "EIA development" is development which is either Schedule 1 development or Schedule 2 development that is likely to have significant effects on the environment by reason of factors such as its nature, size or location.

The proposed development does not fall under Schedule 1 development. However, Part 10 'Infrastructure Projects' of Schedule 2 of the Regulations includes:

- a) Industrial estate development projects [where] the area of the development exceeds 5 hectare*

If a proposed project is listed in the first column in Schedule 2 of the 2017 Regulations and exceeds the relevant thresholds or criteria set out in the second column the proposal needs to be screened by the local planning authority to determine whether significant effects on the environment are likely and hence whether an Environmental Impact Assessment is required. Projects listed in Schedule 2 which are located in, or partly in, a sensitive area also need to be screened, even if they are below the thresholds or do not meet the criteria.

In this case, the site area measures circa 11.1ha hectares and therefore screening is required. However, the site is not located within a 'sensitive area' as defined by the Regulations.

It should be noted that the NPPG states that it should not be presumed that developments above the indicative thresholds should always be subject to assessment, or those falling below these thresholds could never give rise to significant effects, especially where the development is in an environmentally sensitive location. Each development will need to be considered on its merits.

This Screening Opinion has been undertaken in accordance with the selection criteria set out in Schedule 3 to the Regulations and with reference to the applicant's letter dated 8 June 2022. Consideration has been given to NPPG guidance, including the Indicative screening thresholds set out therein.

Characteristics of development

(a) The size and design of the whole development.

The overall site area for the proposed development measures approximately 11.1ha. The proposals comprise the demolition of 9 existing units totalling 31,900sqm and their replacement with 3 modern units totalling 44,566sqm for an increased floorspace on site of 12,666sqm.

Whilst reducing the overall number of buildings the proposals would follow the general shape of the existing layout. Two smaller units would be situated within the southern/south-eastern part of the site whilst the larger third unit would sit across the western part of the site (running north-south).

The proposals also seek to increase the height of the buildings on site with the current units comprising low rise industrial units of up to 10m. The proposed development seeks buildings with heights of up to circa 21m.

Viewed in isolation the proposed development, comprising 12,666sqm uplift in B8 units of greater heights, would not be considered a particularly large or significant development. The indicative screening thresholds set out in NPPG for Schedule 2 developments highlights

developments of more than 20ha in site area. These proposals would be roughly half this scale and on an existing industrial estate. This suggests that the proposals would be unlikely to require EIA due to its scale alone.

Nonetheless scale is not the only determining factor and it is necessary to consider the likely impacts arising and the context in which they sit.

(b) Cumulation with other existing development and/or approved development.

The site's wider surroundings include the South Heywood Masterplan which comprises, up to 1,000 new homes, 135,460sqm of employment floorspace and 2,500sqm of commercial uses, a primary school and a new link road from Junction 19 of the M62. This was granted outline planning permission in March 2020 (ref. 16/01399/HYBR) since which time, several reserved matters permissions have been approved for residential and industrial development. Furthermore, the new link road to J19 of the M62 is due for completion in October 2022.

The South Heywood Masterplan proposal was subject to a full EIA covering the following technical matters: socioeconomics; landscape and visual; ecology; archaeology and heritage; ground conditions; drainage and flood risk; highways; air quality; and noise and vibration. The supporting Environmental Statement for this proposal confirmed that no significant adverse environmental impacts were identified and that all impacts would be at acceptable levels or could be made acceptable through mitigation.

Given the scale of this proposal as assessed in section (a) above, it is not considered that the proposals would see a significant addition in the area beyond the already approved cumulative schemes. There are a number of factors from the cumulative developments which are of relevance to the proposals in this report. Firstly, the South Heywood Masterplan is bringing forward a new link road which will provide extra capacity within the local highway network. Secondly, the Masterplan will include uses that generate traffic movements of cars and HGVs, using some of the generated capacity, whilst giving rise to some impacts on air quality and noise. Thirdly the Masterplan will introduce residential development at the border of these EIA screening proposals.

A key consideration of cumulative impacts relates specifically to the site access and its relationship with the new signalised junction being created on Manchester Road. In particular, vehicles turning right out of the site towards the new link road will need to cross Manchester Road traffic and queue at the new junction before moving east or west towards main motorway junctions. Detailed modelling will be required on the operation of this junction in support of any application

(c) The use of natural resources, in particular land, soil, water and biodiversity

It is not envisaged that there would be a significant use of natural resources in either the construction or operation of the proposed development. As a relatively level and previously developed site, there would not be actions which caused any significant topographical changes in the local area, nor would there be a need for disproportionate use of above or below ground materials/minerals which are in short supply. Furthermore, the site is not considered to be an important natural asset for forestry, agriculture, or minerals.

(d) The production of waste.

Waste arising from the demolition and construction stage will be dealt with in accordance with details submitted with the planning application. A suitable planning condition would ensure that opportunities for waste minimisation, segregation and the transfer to appropriate processing facilities could take place.

Operational waste will be produced by end users, however, this would be typical of such a warehousing unit of this scale and it is therefore not considered that waste and waste management is a matter that is required to be assessed through an EIA.

(e) Pollution and nuisances.

Contamination

As a previously developed site, there is potential risk of ground contamination. The historic uses on the site have not however been of any kinds known to be particularly harmful to ground conditions and with exception of some additional developments over the sites history,

the built development remains largely as it has been for decades since its original construction.

As such it is not considered likely that the site would give rise to ground contamination levels beyond other typical comparable sites. Any planning application would be expected to be supported by a comprehensive geo-environmental assessment. The extent of this assessment would be informed through an initial Phase 1 assessment, with recommendations for any further intrusive investigations to follow.

Through the submission of standard validation requirement documentation and the use of planning conditions, it is considered that any risk from ground contamination could be readily managed.

Air Quality

During the construction phases there is the potential for air quality impacts resulting from dust generation. Such an impact can generally be controlled through the imposition of a planning condition requiring a Construction Environmental Management Plan. It is not considered the proposals would give rise to any air quality impacts beyond what is typical of this type of development.

The main operational impacts would be through an increase in traffic movements brought about by the development proposals. As noted elsewhere the proposals lie in a location that has strong highways infrastructure including the soon to be new South Heywood Link Road to J19 of the M62 lying directly to the south of the site. Whilst it is considered that there may be technical constraints to overcome with relation to accessing this infrastructure safely and ensuring junctions operate efficiently, there is not considered to be any issues with lack of capacity to accommodate the proposals. Furthermore, the site is not within an AQMA and so is not considered a more sensitive area in relation to the likely impacts.

Any planning application would still be expected to provide an Air Quality Impact Assessment.

Noise

During the construction phase there is the potential for typical impacts on the noise environment surrounding the site, particularly for residents who live closest. As such a Construction Method Statement would be expected as part of any planning conditions in order to ensure best practice for construction workers and control hours of work and deliveries.

Once operational the proposals are likely to give rise to noise impacts through traffic movements, particularly HGVs, and through any plant equipment on the proposed units. It is noted that the site at present has no acoustic attenuation measures and as such affords no protection to surrounding residents. Whilst the proposals involve an uplift in activity and traffic movements on site, they would also offer opportunities for appropriately designed acoustic mitigation measures to be incorporated throughout.

The design of these acoustic mitigation measures could be controlled through any application, with installation and maintenance further controlled by planning condition.

Lighting

The proposals would require typical levels of lighting for security and operation during both the construction and operational stages. It is not considered that these would be more than what is typical of their use and which can be controlled through a well-designed lighting scheme to ensure impacts are not be harmful to local residents or sensitive ecological receptors.

(f) The risk of major accidents and or disasters relevant to the development concerned; and

(g) The risk to human health

Risk of accidents during the construction phases can be controlled through standard health and safety measures incorporated within a Construction Management Plan as mentioned previously. It is not considered that the proposed end-use is likely to result in any significant risk of accident, however if a future end user wished to use the site for storage and distribution of controlled substances for example, this would be subject to other legislating regimes and consent requirements.

The nature of the development will not cause a significant risk to human health once completed and occupied. Best working practices are required to be carried out during construction to limit any risks to human health during the construction stage.

These factors, in addition to the reasons provided in the pollution and noise section of this report are considered to ensure that there would be no more than a low risk of major accidents, disasters or to human health.

Location of development

- (a) The existing land use

The existing and approved use of the site is B8. The site will remain in the existing use.

- (b) The relative abundance, quality and regenerative capacity of natural resources in the area.

There are no known natural resources on the site that can be extracted. The site contains a number of areas with existing established planting, particularly towards the site boundaries, however there are no protected features and the proposals could seek to accommodate protection and enhancement of some of the onsite planting. As such the proposals are not considered to raise any significant adverse effects on the abundance, availability, quality and regenerative capacity of natural resources in the area.

- (c) The absorption capacity of the natural environment.

The site does not contain, nor does it lie in close proximity to wetlands, coastal zones, mountain and forest areas, areas where environmental standards have been exceeded (e.g. Air Quality Management Areas), densely populated areas or landscapes and sites of known historical, cultural or archaeological significance.

Ecologically, the site is not closely connected to any features which would be considered sensitive with regards to EIA development. The Rochdale Canal SAC is located circa 2.4 km east of site. The SAC is not hydrologically connected to site and is geographically separated from the proposal site. Therefore, it is considered unlikely there would be a direct loss or degradation of habitats that support the qualifying features of the SAC. Hopwood Woods Local Nature Reserve lies approximately 1.1km from the site but is again severed in any connection with the site by major infrastructure and a lack of continuous linking features. Three Sites of Biological Importance are located within 2km of the site, although the closest is 1.5km and these are again physically separated from the site and unlikely to experience any significant impacts by nature of the development proposals.

The impacts of the proposals are considered likely to be highly localised and unlikely to impact on any ecologically sensitive areas. Therefore, it is not anticipated that there will be any detrimental impact on the absorption capacity of the natural environment. Any application would also be expected to contain full proposals for ecological mitigation and enhancements, including proposals for achieving biodiversity net gain.

Types and characteristics of the potential impact

- (a) The magnitude and spatial extent of the impact

Given the scale of the proposals, and the respective uplift compared with the existing use on site, it is considered that the impact of the proposals would be localised. Nonetheless, the impact locally could be substantial, subject to finalised design, specifically for residential properties directly bordering the site. As highlighted previously in this report, it is therefore considered essential that the proposals are supported by assessments on Landscape and Visual Impact as well as daylight/sunlight, with particular regard to local residents. Furthermore, the localised impact on the junction at Manchester Road will require detailed modelling to ensure safe and efficient operation of this signalised junction.

The wider context of the site is not of great sensitivity and so it is not considered that the spatial extent of any impacts will be significant.

- (b) The nature of the impact

The nature of the impacts are considered to mainly relate to landscape and visual impact, transport, air quality, ecology, ground conditions, noise, and socio economics.

Nonetheless, these are not considered to be unusual impacts for a proposal of this nature and could be controlled through a well-designed scheme, full suite of planning documents, and where necessary, planning conditions or obligations to demonstrate that any potential harm can be effectively reduced and mitigated.

(c) The transboundary nature of the impact

Given the location of the site no significant transboundary impact is expected.

(d) The intensity and complexity of the impact

It is not considered that any of the impacts are likely to be of significant complexity. The only impacts considered to have potential for significant intensity are in relation to landscape and visual impact, specifically for residents directly bordering the site, and transport and highways. Specifically related to the junction at Manchester Road. These are not considered complex matters beyond what is typical of a development of this type but will require detailed modelling, design and landscaping. Furthermore, the highly specific and localised nature of the impact is not considered to warrant an EIA.

(e) The probability of the impact

The identified impacts would be highly probable by their nature, however these would be proactively mitigated as set out in this report.

(f) The expected onset, duration, frequency and reversibility of the impact

The impacts will be realised as the proposed development commences on site and would be temporary for those impacts associated with construction activities and permanent for those impacts associated with the end-use. No impacts have been identified that would not be reversible.

(g) The cumulation of the impact with the impact of other existing and/or approved development.

As previously covered in this report, it is considered there will be notable interaction between the proposals and cumulative developments, but that these would not give rise to significant environmental impacts.

(h) The possibility of effectively reducing the impact.

As set out within the relevant sections of this report, it is considered that all impacts associated with the proposals are capable of mitigation through standard practices in the design, planning, construction, and operation stages.

Conclusion

The proposed development has been screened in accordance with Schedule 3 and considered in cumulation with existing development and the proposed development on the adjacent land. The assessment concludes that the proposal, whether alone or in cumulation with the existing and proposed development, would be unlikely to give rise to significant effects on the environment. Therefore, Rochdale Metropolitan Borough Council concludes that the proposed development is not EIA development within the meaning of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017.

APPENDIX C

Site Location Plan

