

For and on behalf of
Cornerstone Place

Transport Statement

Land at Whitworth Road, Rochdale

**Prepared by
Sustainable Development and Delivery
DLP Planning Ltd
Sheffield**

March 2022



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Date: March 2022	Office: Sheffield	Issue: Revision D

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1.0 INTRODUCTION

- 1.1 This Transport Statement has been prepared by DLP Planning Ltd's Sustainable Development & Delivery Team (SDD), on behalf of Cornerstone Place, in support of a full planning application for the provision of 14 purpose-built homeless and support accommodation units on land off the A671 Whitworth Road in Rochdale. The site masterplan is contained within **Appendix A**.
- 1.2 By way of background, a pre-application Highways Technical Note was prepared in May 2021 relating to the provision of circa 30 homeless accommodation units and 7 car parking spaces, which was to be built on the existing public car park and children's play area off the A671 Whitworth Road.
- 1.3 However, subsequently, a revised scheme was developed which allowed for 14 purpose-built homeless and support accommodation units to be built on the existing children's play area, and for the existing public car park and access to be retained.
- 1.4 A pre-application response was received dated 11th January 2022 (see **Appendix B**) in relation to the 14-unit scheme, with a request for the following issues to be addressed as part of any forthcoming planning application:
- Potential requirement for staff car parking
 - Impact upon parking in the vicinity of the site
 - Impact upon public highway including closure of footpath link between Industry Road and the public car park
 - Requirement for Travel Plan
- 1.5 In light of the above, this Transport Statement has been prepared with the focus being upon addressing the issues raised above.
- 1.6 This report takes into account Government policy contained within the National Planning Policy Framework (NPPF, 2021) and guidance contained within 'Manual for Streets' (MfS) (2007). Furthermore, local guidance contained within the "Residential Design Guide" (2007) which is the current adopted guidance of Rochdale Borough Council, will also be reviewed.
- 1.7 The structure of the remainder of this report is summarised below:
- **Section 2:** provides an overview of the existing baseline site conditions, including a review of the available walking and cycling routes and facilities, public transport options, the accessibility of key local facilities, as well as the highway characteristics of the site and adjacent highway network;
 - **Section 3:** outlines the development proposals and composition, as well as details relating to the site access, servicing and parking.
 - **Section 4:** provides an analysis of the proposed development's likely impact on the local highway network, estimating the vehicular trips likely to be generated by the development and any impact upon local parking; and
 - **Section 5:** summarises and concludes the key points in the report.

2.0 EXISTING CONDITIONS

Site Location and Description

2.1 The site lies to the immediate west of the A671 Whitworth Road. The site is split into 3 parcels as follows and as shown in **Figure 1**:

- Site / Block 1 = Lies to the immediate south of a public car park
- Site / Block 2 = located to the immediate west of the public car park entrance off Grasmere Street
- Site / Block 3 = lies to the immediate northwest of the Grasmere Street / Noon Sun Street junction

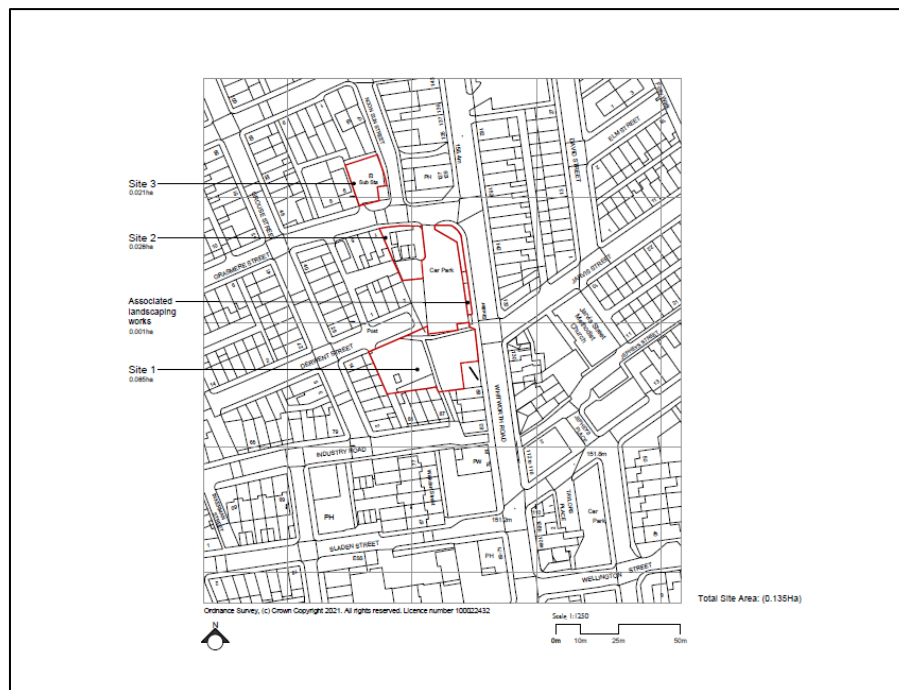


Figure 1. Site Location Plan

2.2 The site is bound by the A671 Whitworth Road to the east and existing residential properties to the north, south and west. The site lies approximately 1.7 kilometres to the north of Rochdale Town Centre.

2.3 Site 1 currently comprises a disused children's playground and a small area of open space. Site 2 comprises 4 dilapidated garages owned by the Local Authority whilst Site 3 is currently occupied by vacant land under the ownership of the Local Authority.

Local Highway Network

2.4 The site lies to the west of the A671 Whitworth Road which measures approximately 8.3 metres in width and is subject to a 30mph speed limit with streetlighting provided (see **Figure 2**). There are double yellow line parking restrictions along both edges of the carriageway. Furthermore there is no loading permitted between 08:00 – 09:00 and 16:30 – 18:00.



Figure 2. A671 Whitworth Road in vicinity of site

- 2.5 There are footways provided along both edges of the A671 Whitworth Road, and an advisory cycle lane along the western side of the carriageway.
- 2.6 The A671 Whitworth Road forms a priority junction with Grasmere Street to the northeast of the site. To the immediate north of this junction, dragon teeth and 'SLOW' carriageway markings are provided along the A671 Whitworth Road to alert drivers of the 20mph advisory speed limit during school peak periods.
- 2.7 Grasmere Street forms part of a 20mph zone, with red carriageway surfacing provided at its junction with the A671 Whitworth Road (see **Figure 3**). Grasmere Street is approximately 5 metres in width with footways and streetlighting provided. There are double yellow line parking restrictions at the eastern end of Grasmere Street; however these terminate approximately 33 metres to the west of the A671 Whitworth Road junction.
- 2.8 Whilst there are loading restrictions at the A671 Whitworth Road / Grasmere Street, these do not extend beyond offering junction protection.



Figure 3. Grasmere Street in vicinity of site

Existing Parking Provision

- 2.9 The above has outlined that parking restrictions extend along the A671 Whitworth Road in the vicinity of the site, and also offering junction protection with Grasmere Street. However, **Figure 4** highlights the extent of on-street parking within a 100 metres walking distance of the centre of the sites, to highlight where staff / visitors (and also existing residents in the vicinity of the site) could park. The proposals also allow for the retention of the Grasmere Street public car park which could also be utilised.

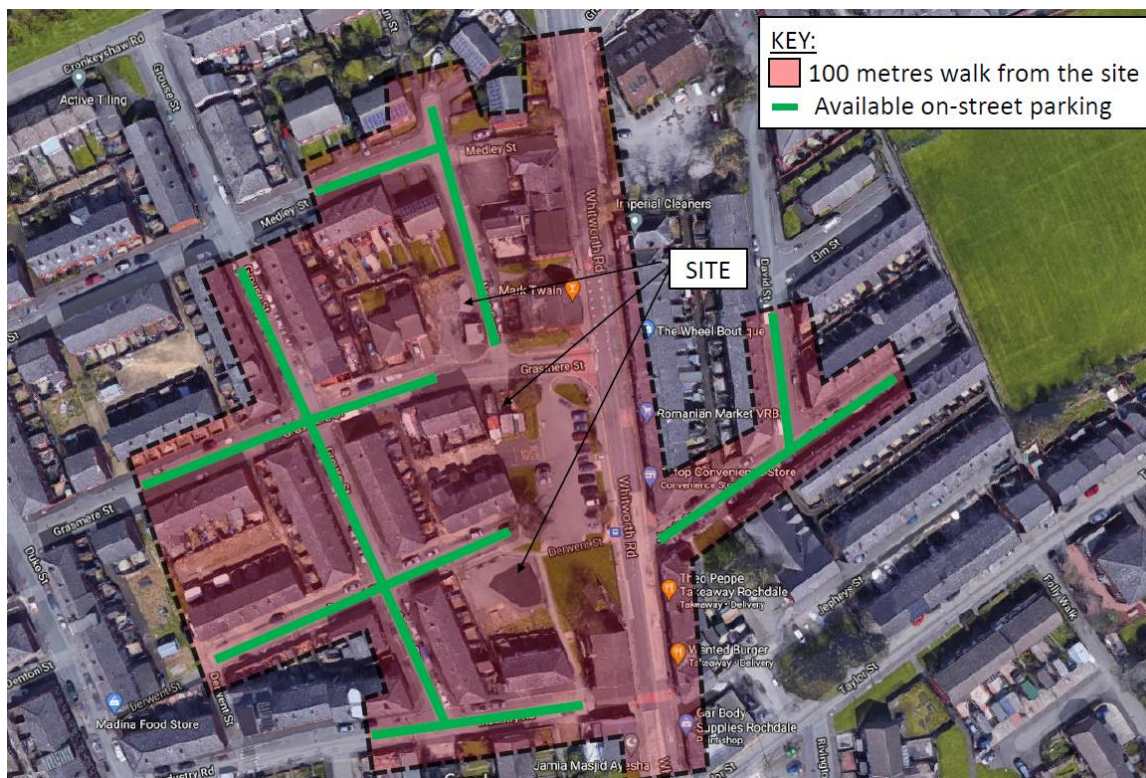


Figure 4. On-street parking in the vicinity of the site (100 metres walk distance from centre of sites)

- 2.10 The above includes unrestricted parking along Jarvis Street, Grasmere Street, Derwent Street and Industry Road. During the site visit undertaken on 19th May 2021, there was ample spare capacity for on-street parking to occur (see **Figure 5**).



Figure 5. On street parking available along Jarvis Street

Accessibility

- 2.11 Paragraph 110 of the NPPF requires that plans and decisions consider whether:

“Appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;”

- 2.12 Furthermore, Paragraph 104 of the NPPF states that:

“opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be accommodated

opportunities to promote walking, cycling and public transport use are identified and pursued;”

Pedestrian Travel

- 2.13 Table 3.2 of The Institute of Highways & Transportation publication ‘Guidelines for Providing for Journeys on Foot’ (2000) recommends a preferred maximum walking distance of 2000 metres for commuting.
- 2.14 Similarly, the above document states that people are generally willing to walk between 100 metres and 1,250 metres for shopping, however this is dependent upon the quality of shops
- 2.15 Given the site allows for homeless accommodation, it is likely that the destinations for walking would vary amongst staff and residents at the facility.
- 2.16 In light of the above, **Figure 6** shows a 2000 metres pedestrian isochrone, confirming that residential areas such as Shawclough, Syke, Newbold Brow and part of Rochdale centre are located within comfortable walking distance for staff to walk to work.

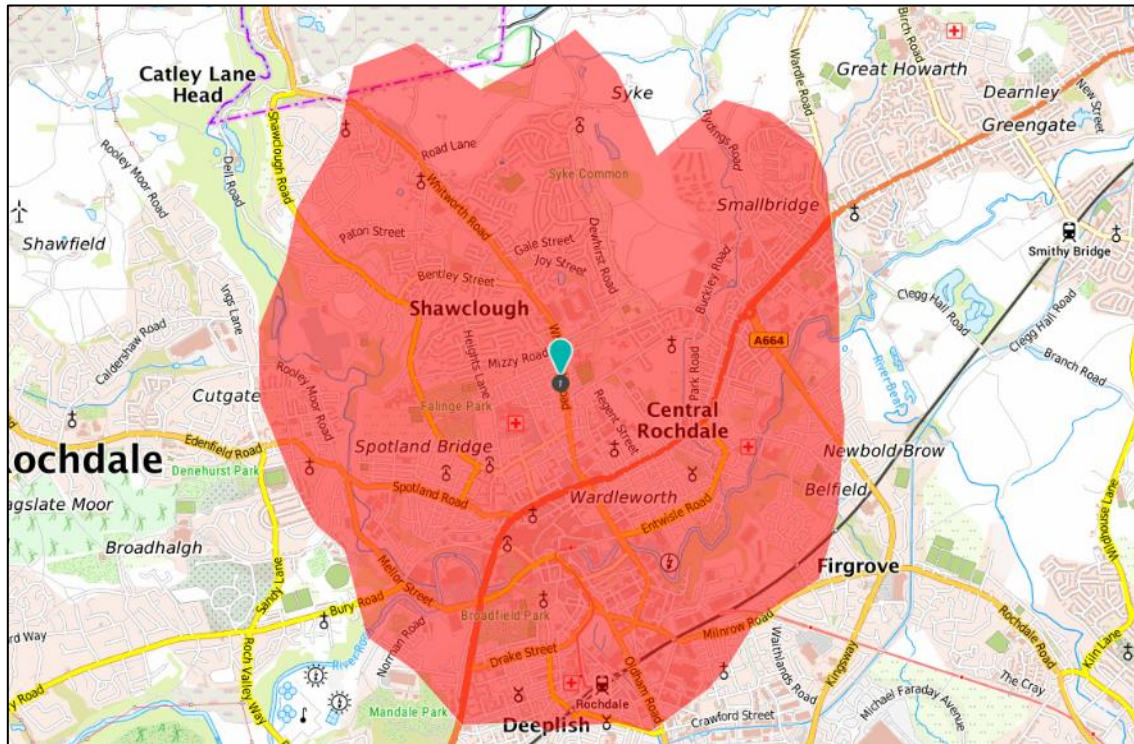


Figure 6. Pedestrian Isochrone

- 2.17 Pedestrian footways are provided along both edges of the A671 Whitworth Road and Grasmere Street in the vicinity of the site.
- 2.18 A signalised crossing point is provided approximately 45 metres to the south of the site along the A671 Whitworth Road (see **Figure 7**). This forms part of a key desire line for residents to the east of the A671 Whitworth Road, as it connects directly to Industry Road which has been stopped up at its eastern end.



Figure 7. Signalised pedestrian crossing at A671 Whitworth Road / Industry Road

- 2.19 An informal pedestrian crossing is also provided approximately 145 metres to the north of the site along the A671 Whitworth Road, with dropped kerbs, tactile paving and a central refuge provided.
- 2.20 To the southwest of the site, an off-road pedestrian link connects from Derwent Street to Whitworth Road. This narrow footpath (circa 1 metre wide) extends between the public car park and the disused children's play area (see **Figure 8**). However, this link does not form part of a formal Public Right of Way.



Figure 8. Footpath between A671 Whitworth Road and Derwent Street

Cycle Travel

- 2.21 Cycle trips provide a healthy alternative mode of transport to that of the private car. With reference to acceptable cycling distances, Paragraph 1.5.1 of DfT's Local Transport Note 2/08 'Cycle Infrastructure Design' states that:

"In common with other modes, many utility cycle journeys are under three miles (ECF, 1998), although, for commuter journeys, a trip distance of over five miles is not uncommon. Novice and occasional leisure cyclists will cycle longer distances where the cycle ride is the primary purpose of their journey."

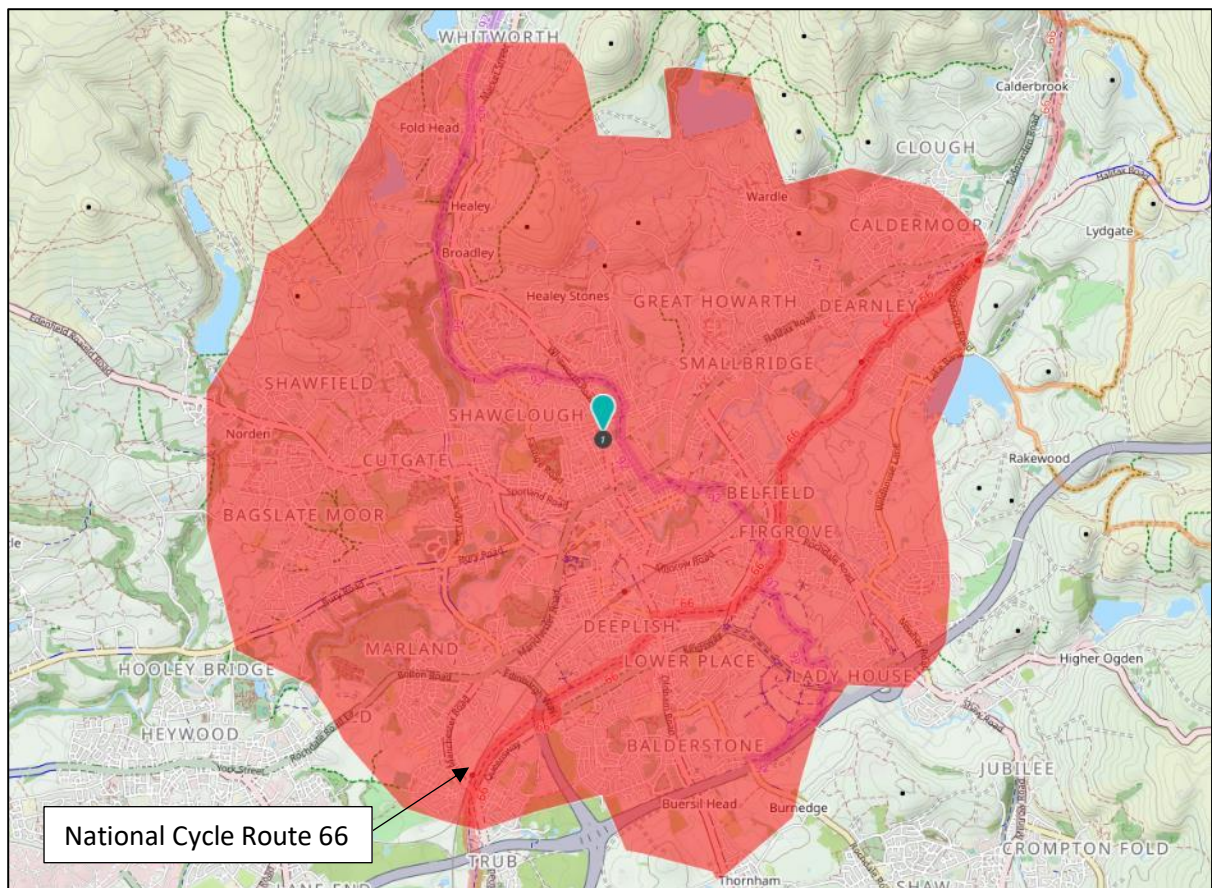


Figure 9. Cyclist Isochrone

- 2.22 **Figure 9** shows a 5 kilometres catchment area in the vicinity of the site which includes all of Rochdale as well as other locations such as Shawclough, Broadley, Great Howard, Firgrove, Milnrow, Lower Place, Balderstone, Castleton, Marland and Baglata Moor.
- 2.23 In the immediate vicinity of the site, there is an advisory cycle lane along the A671 Whitworth Road in a northbound direction (see **Figure 2**).
- 2.24 National Cycle Route 66 lies approximately 215 metres to the east of the site (as shown as the red route on **Figure 9**) which extends from Manchester city centre to Spurn Head in Yorkshire via Bradford, Leeds, York, Beverley, and Kingston upon Hull, and is a combination of traffic-free and on-road routes in the vicinity of the site.

Public Transport

- 2.25 Within the Rochdale Council “Residential Design Guide” (2007), there is no specific guidance in relation to the distance that residents / commuters are expected to walk to the nearest bus stop. However, within the CIHT “Planning for Walking” (2015) document, it is stated that for bus stops in residential areas, 400 metres has traditionally been the cut-off point, and in town centres, this reduces to 200 metres.
- 2.26 The nearest northbound bus stop is located to the immediate west of the site along the A671 Whitworth Road. This bus stop comprises a flag and shelter with timetable information, and bus stop cage markings within the carriageway (See **Figure 7**).



Figure 10. Northbound bus stop along A671 Whitworth Road

- 2.27 The nearest southbound bus stop is located either 122 metres to the north or 125 metres to the south of the site along the A671 Whitworth Road. The bus stop to the north is provided with a shelter, seating and timetable information with a bus lay-by facility. The bus stop to the south of the site is provided with a flag and timetable information only.
- 2.28 The bus stops are served by Routes 464, 862, 867 and 999 and the R9 Rochdale Runners. Services are provided to Accrington and Rochdale with timetable information summarised in **Table 1** below.

Service	Route	Frequency		
		Mon – Fri	Sat	Sun
464	Accrington – Rochdale	15 mins	30 mins	30 mins
862	St Cuthbert's School Bus			
867	St Cuthbert's School Bus			
999	Bacup Grammar School Bus			
R9 Rochdale Runners	Rochdale – Buckley (circular)	09:52 12:57	09:52 12:57	09:52 12:57

Table 1. Bus Services in the vicinity of the site

- 2.29 This shows that Routes 464 and R9 could accommodate potential future trips by staff to work, and that they are provided within an acceptable walking distance of the proposed site.

Sustainable Travel Summary

- 2.30 Overall, the proposed development is considered to be in an excellent location for travel by sustainable modes for both staff and residents, with frequent bus services available within comfortable walking distances. As a result, staff / visitors will be provided with a wide range of realistic sustainable travel options other than to travel via car.
- 2.31 For residents who would unlikely have access to a private car, there are opportunities to access nearby services and facilities by alternative modes of travel.

Personal Injury Accident Data

- 2.32 A review of the 'Crashmap' website to assess the Personal Injury Accident (PIA) data of the roads in the vicinity of the site has been undertaken. In accordance with Planning Practice Guidance document 'Travel Plans, Transport Assessments and Statement in decision-taking' (2014) an analysis should be undertaken of:

"Accident records on the public highway in the vicinity of the site access for the most recent 3-year period or 5-year period if the proposed site has been identified as within a high accident area"

- 2.33 Whilst the study area has not been identified as a high accident area, the Crashmap database has been analysed for the previous 5-year period to represent a robust assessment, and establish if there have been any key highway-related concerns.

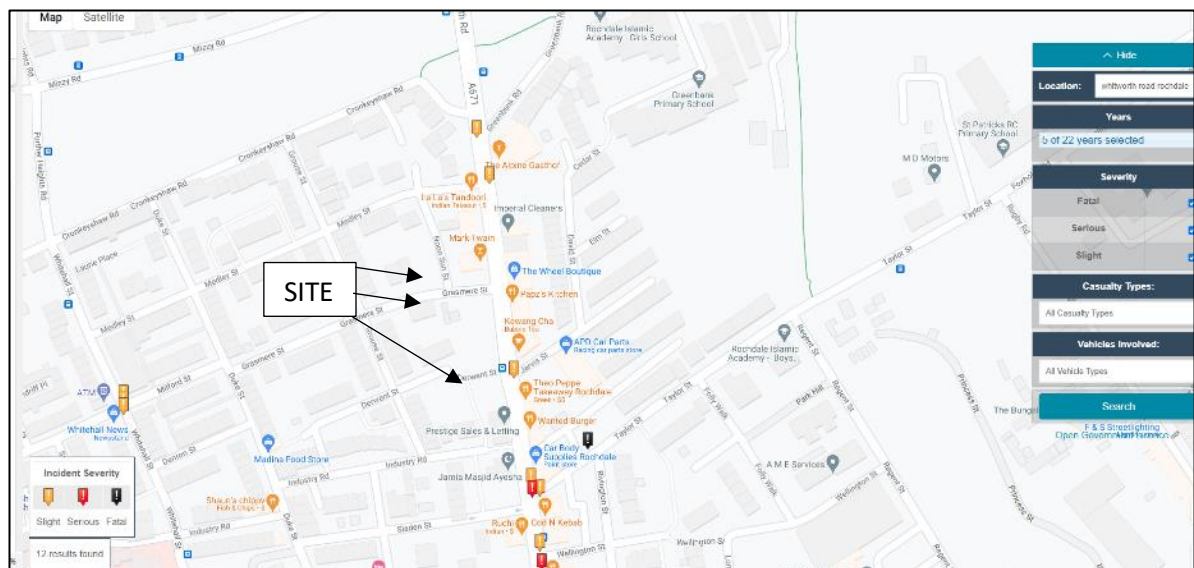


Figure 11. Extract from Crashmap (2016 – 2020)

- 2.34 **Figure 11** shows that over the period of five years during 2016 – 2020, there has been no recorded accidents located along Grasmere Street or Industry Road in the immediate vicinity of the site.
- 2.35 There was an isolated incident which occurred at the Whitworth Road / Jarvis Street junction to the immediate southeast of the site. This incident occurred in 2016, involved 2 vehicles and was deemed slight in severity,
- 2.36 Beyond this, three accidents occurred at the Whitworth Road / Taylor Street junction approximately 78 metres to the southeast of the site. Of these accidents, the first occurred in 2016 and was deemed serious. This incident involved a pedal cycle. The remaining two incidents at this location occurred in 2019, were deemed slight in severity, and involved no vulnerable users.
- 2.37 To the north of the site, two isolated incidents occurred along Whitworth Road in 2017 and 2019. These incidents were deemed slight in severity, and did not involve vulnerable road users.
- 2.38 Whilst there have been incidents occur along the A671 Whitworth Road to the north and south of the site, given the urban nature of the road with frontage activity, this is not unexpected. However given the presence of formal cycle lane provision and a signalised pedestrian crossing facility immediately adjacent to the site, this contributed to the negligible number of incidents involving vulnerable road users in the vicinity of the site.
- 2.39 Given there is no cluster of incidents occurring in the immediate vicinity of the site, it can be concluded that there are no existing highway safety problems, and that the proposed development should not give rise to an unacceptable impact on highway safety in accordance with Paragraph 111 of the NPPF.

3.0 PROPOSED DEVELOPMENT

Development Proposals

- 3.1 The proposed development is to comprise 14 bedrooms with the latest site masterplan contained at **Appendix A**. At this stage, the anticipated composition will comprise:
- Block A = 8 bedrooms
 - Block B = 4 bedrooms
 - Block C = 2 units
 - Total = 14 units
- 3.2 Within each block, kitchen / dining / living areas would also be provided in association with each bedroom.
- 3.3 As part of the proposals, the pedestrian link between Derwent Street and Whitworth Road (to the south of the public car park) would be retained and realigned / widened.
- 3.4 There would be no vehicle parking on site, however there would be 9 Sheffield type cycle standards provided to the west of Block A.
- 3.5 As part of the proposals, it is understood that there would be a single member of staff on site within a security office in Block 1. In addition to this there could also be up to 5 visitors based at the site Monday to Friday to include support staff, management, specialist advisers, health services workers.
- 3.6 During the weekend, there would be fewer health service visitors attending the site, with a maximum of 1 member of staff on site during any given time.

Servicing

- 3.7 Given the proposed land use, it is likely that 4 wheeled containers would be utilised. In terms of refuse collections, Paragraph 6.8.11 of MfS recommends that:
- “the distance over which containers are transported by collectors should not normally exceed 15m for two-wheeled containers, and 10m for four-wheeled containers”*
- 3.8 As part of the proposals, refuse collections for Block A would occur kerbside along Derwent Street. This accords with the prevailing conditions whereby kerbside collections occur kerbside for the existing terraced properties along Derwent Street. The latest masterplan (see Appendix A) shows that the bin storage point is located to the west of the residential block. On bin collection day, on site staff would drag bins to the kerbside.
- 3.9 At Block B, the bike store is located to the west of the building, with kerbside collections to occur along Grasmere Street as per the prevailing highway conditions. Whilst double yellow line parking restrictions occur along Grasmere Street at the Block B site frontage, this does not preclude refuse vehicles from collecting waste.
- 3.10 The bin storage point for Block C would be located to the north of the proposed building, with

refuse collections occurring kerbside along Noon Sun Street. Once again this is in accordance with the prevailing highway conditions.

- 3.11 As part of the proposals there is no requirement for a refuse vehicle to enter the curtilage of any of the plots.

Vehicle Parking

- 3.12 Within the Rochdale Adopted Core Strategy (2016), Appendix 5 sets out the schedule of parking standards associated with new developments. Within this guidance, there is no specific advice in relation to “homeless accommodation” land use.
- 3.13 Based upon the end users of the site, it is likely that the only demand for car parking would be that of staff and visitors. Given the site is served by excellent public transport links and there is walking / cycling infrastructure in the immediate vicinity of the site, it is unlikely that all 5 staff would drive to the site.
- 3.14 Furthermore, it is noted that Block B and C will utilise an area of informal hardstanding used for parking by local residents, and also 4 dilapidated garages. Nevertheless, the review undertaken in Section 2 of this report has clearly demonstrated that there is ample opportunity for such displaced parking to be accommodated on-street.
- 3.15 Nevertheless the review undertaken within Section 2 of this report has already identified that there are ample opportunities for future staff / visitors to park on-street in the vicinity of the site. The demand for circa 5 parking spaces at any given time should be satisfactorily accommodated on-street in the vicinity of the site. Alternatively, the Grasmere Street car park would also be retained as part of the proposals, and therefore offers ample opportunity for visitors to park adjacent to the site.

Cycle Parking

- 3.16 As per the above car parking standards, there are no standards applicable to the proposed land use. The nearest comparable category is that of “Sheltered Accommodation” which sets out the following requirement:
- space per 40 beds (min 2 spaces)
- 3.17 Based upon the provision of 14 beds in total, this equates to a requirement for a minimum of 2 cycle spaces.
- 3.18 The current masterplan (see **Appendix A**) shows the provision of 9 Sheffield cycle stands to accommodate 18 cycles. This is deemed to be more than adequate to meet the needs of the development.

4.0 HIGHWAY IMPACT

- 4.1 As part of the pre-application submission, a review of the TRICS database was undertaken to determine the likely level of traffic that could be generated by the proposals. However within the TRICS database, there is no land use category for “Homeless Accommodation”.
- 4.2 Instead, a ‘first principles’ approach was undertaken to determine the likely level of traffic generated by the site, based upon the proposed number of staff / visitors. No concern was raised with regards to this methodology as part of the pre-application response from the Local Highway Authority, and it is therefore deemed to be acceptable.
- 4.3 As set out in Section 3 of this report It is likely that the key member of staff would be a staff member in the security office at Block 1. In addition to this there would be visiting health professionals and service providers throughout the day. We have been informed that there would likely be a maximum of 5 staff / visitors on site during any given time. As such, **Table 2** below provides an overview of the likely vehicle trips associated with the site. This also allows for visitors travelling to / from the site throughout the day.

Time Period	Arrivals	Departures	Two-Way
08:00 – 09:00 Trip Generation	2	0	2
17:00 – 18:00 Trip Generation	0	2	2
07:00 – 19:00 daily Trip Generation	10	10	20

Table 2. Proposed Trip Generation (first principles approach)

- 4.4 The above shows that the development could generate in the order of 2 two-way movements in the morning peak and 2 two-way movements in the evening peak, and up to 20 two-way daily trips associated with staff and visiting professionals.
- 4.5 Current national policy contained within the NPPF no longer provides a numerical value for determining where significant impact could occur and instead states in Paragraph 111 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.”

- 4.6 Predating the above policy was the now archived ‘Guidance on Transport Assessment’ (DfT, March 2007) document, which advised that developments may have a significant highway impact where increases of 30 or more two-way vehicle movements occur during peak hours. It goes on to state that “whilst there is no suggestion that 30 two-way peak hour vehicle trips, would, in themselves, cause a detrimental impact, it is a useful point of reference from which to commence discussions”. Given the proposals would result in circa 2 two-way movements during the peak period (1 vehicle every 30 minutes), it is considered that the proposed development would not trigger a severe impact in accordance with local and national policy

and guidance.

- 4.7 In terms of parking demand, Section 2 of this report has highlighted how the above demand for parking could be accommodated on-street or within the adjacent public car park. The displaced parking created as a result of Block B and Block C (circa 6 cars) could also be accommodated on the surrounding on-street / public car park provision.
- 4.8 In light of the above, given the additional traffic generated by the site is not deemed to materially impact upon how the surrounding highway network is currently operating, no further assessment is deemed to be required.

5.0 SUMMARY AND CONCLUSION

- 5.1 This Transport Statement has been prepared by the SDD Team at DLP Planning Ltd, on behalf of Cornerstone Place, in support of a planning application for a 14 unit purpose-built homeless and support accommodation scheme on land to the west of Whitworth Road in Rochdale.
- 5.2 The proposed development is considered to be in an excellent location for future staff and residents to travel by sustainable modes, with frequent bus services located within a comfortable walking distance. The proposals would provide a direct and easy route for residents / staff to connect into the existing infrastructure located in the vicinity of the site.
- 5.3 A review of 5 year historic accident data records confirms that there has been no cluster of incidents occurring in the immediate vicinity of the site. It can be concluded that there are no existing highway safety problems, and that the proposed development should not give rise to an unacceptable impact on highway safety in accordance with Paragraph 111 of the NPPF.
- 5.4 In terms of traffic generated by the site, it has been demonstrated that there would be minimal vehicle trips associated with the land use. In terms of parking demand, the Transport Statement has clearly demonstrated that there is ample opportunity for staff / visitors to park on the surrounding public highway or the adjacent Grasmere Street car park.
- 5.5 The site would be serviced by kerbside refuse collections, which accords with the prevailing highway conditions. There would be no requirement for refuse vehicles to enter the sites.
- 5.6 In conclusion, having due regard to the NPPF, this Transport Statement has clearly demonstrated that staff / visitors would have excellent opportunities to travel by sustainable modes, adequate cycle parking provision has been made, and that the development will not lead to a severe impact on the surrounding highway network. It is therefore considered that the proposed development would comply with national planning policy and best practice guidance, and the concerns raised during the pre-application process have been fully addressed, such that the scheme can be supported by the Local Planning Authority and Local Highway Authority.

LAN5059-2PD Whitworth Road, Rochdale
Transport Statement
Cornerstone Place
March 2022



Appendix A Latest Site Masterplan



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DRAWING TO BE READ IN CONJUNCTION WITH THE HEALTH & SAFETY PLAN, AND ALL RELEVANT RISK ASSESSMENTS AND THE FOLLOWING DRAWINGS:

Site Plan Legend

- Soft landscaping (details TBC by landscaping proposal)
- Hard landscaping (details TBC by landscaping proposal)
- Screening planting (details TBC by landscaping proposal)
- SP = Lampost / telegraph pole / signpost
- LP = Lampost / telegraph pole / signpost
- Existing tree replaced / removed
- New tree planting
- Existing tree retained

Tree Schedule

- T1 Existing tree removed
- T2 Existing tree retained
- T3 Existing tree replaced by new tree
- T4 Existing tree replaced by new tree
- T5 Existing tree removed
- T6 New tree
- T7 New tree
- T8 New tree

Total trees removed: 2no.
Total trees replaced: 2no.
Total trees planted: 5no.

P03 22.03.22 JS Issued for planning with updated redline boundary.
P02 02.03.22 JS Updated as engineer comments.
P01 20.01.22 JS Issued for client comment.

Rev Date By Remarks

Client:		Cornerstone Place	
Project No. / Project Name:		21-032 / Whitworth Road, Rochdale	
Drawing Name:		Proposed Site Plan	
Drawing Purpose:		PLANNING	
Project:	Origin:	Vol/Sys:	Level:
WHI - TRI - ZZ - ZZ - DR - A - 3010			
Status:	Scale @ A1	Drawn:	Check:
As indicated	JS	AJD	March 2022

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LAN5059-2PD Whitworth Road, Rochdale
Transport Statement
Cornerstone Place
March 2022



Appendix B Pre-application comments

Mr Rhys Bradshaw
DLP Planning
18 Regent Place
Rugby
Warwickshire
CV21 2PN

BY EMAIL ONLY

Dear Rhys

Reference No:	PREAPP/00135/21
Proposal:	Residential development - provision of purpose built homeless and support accommodation
Location:	Land at Whitworth Road/Grasmere Street, Rochdale

I write further to your request for pre-application advice, and meetings that took place between the LPA and Housing Officer (4th October 2021) and the LPA and Triangle Architects (6th October 2021 and 2nd December 2021) in respect of the proposed development of three blocks accommodating 14 residential units (C2/C3 use class) at the above referenced site.

This response is based upon the following submitted information:

- Whitworth Road Revised Site Plan
- Site Constraints Diagram WH-TRI-ZZ-ZZ-DR-A-2001 Rev. P02
- **Design Option 8 WHI-TRI-ZZ-ZZ-DR-A-2018 Rev. P1**
- Design Option 6 WHI-TRI-ZZ-ZZ-DR-A-2016 Rev. P02
- Site Photos WHI-TRI-XX-XX-SU-A-2701 Rev. P02
- Pre-application Statement dated August 2021
- **Revised Plans and 3D Visual (Block A) received 16th December 2021**

For clarity, it has already been accepted that Design Option 6 has been discounted and this response therefore predominantly relates to the plans and drawings highlighted in bold font in the list above.

EIA Screening Opinion

It is not considered that the development as proposed would exceed the applicable thresholds and criteria for screening as outlined in Schedule 2, Part 10 of the Environmental Impact Assessment Regulations (2017). Therefore a formal request for a Screening Opinion under the above regulations will not be required.

Development Plan

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that applications are determined in accordance with the Development Plan unless material considerations indicate otherwise. The Development Plan consists of the Rochdale Core Strategy (CS) and saved Unitary Development Plan (UDP) policies. Other material considerations include, amongst other things, Supplementary Planning Documents (SPDs), Development Plan Documents (DPDs), the Greater Manchester Joint Minerals Plan, the National Planning Policy Framework (NPPF), and the National Planning Practice Guidance (NPPG).

Principle of Development

Despite some incursion by Block A into incidental greenspace, overall the proposed development site(s) can be considered to be previously developed land. The site lies within the Defined Urban Area. On this basis the principle of the proposed development in this location can be considered to be acceptable.

It will, however, be necessary to correctly ascertain and describe the proposed use class of the dwellings within the planning statement submitted in support of any application. The pre-application statement states that the dwellings would be a mix of C2 and C3 dwellings but does specify which units or blocks would fall into which use class.

Design, Appearance and Layout

Extensive discussion has already taken place in respect of the design and layout of the proposed development. The latest revised preliminary design and position of Block 1 is considered to be broadly positive both in terms of its visual relationship with the surrounding development and the street/pathway layout.

The revised scale, massing and roof formation would appear to work well for the most part, although particular care would be required with the design of the gable elevation facing the public car park given the wide aspect towards it from Whitworth Road and the somewhat prominent and incongruous position of the building. Sufficient land to provide a satisfactory landscape buffer would be required in this location.

The overall form of Block 2 is generally acceptable but care will need to be taken with the eaves height, ridge height roof pitch and window proportions to ensure a



satisfactory degree of correspondence with the adjacent terrace.

Block 3 potentially offers more leeway in overall design given the existing piecemeal development surrounding it. The preliminary details of this block appear to be broadly acceptable.

In terms of the collective grouping of buildings, each will be read differently as a result of its position and relationships with other buildings. It may be that a separate design solution is required for each, especially for Block 1, which will be read completely independently.

Particular care will need to be taken with boundary treatments, especially where they front or line the highway or public realm. Brick boundary walls will be expected at a minimum to the rear of Block 2 and the side of Block 1 along Derwent Street. Bin storage should be provided in accordance with the Council's Waste Collection Policy which is available on the Council's website.

Impact on Residential Amenity

Policy DM1 of the Core Strategy sets out a number of basic planning considerations that apply to all development proposals, including that they should be compatible with surrounding land uses and not adversely affect the amenity of residents or users through visual intrusion, overbearing impact, overshadowing or loss of privacy.

The Council's adopted Supplementary Planning Document '*Guidelines and Standards for Residential Development*' contain a number of guidelines and requirements for the design and layout of new housing in order to preserve the amenity standards for surrounding residents. Included within the above document are the expected space standards for new residential development:

- 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;
- ii. 14m between a principal window and any directly facing two storey elevation which does not contain a principal window to a habitable room;
- iii. 10m between a principal window and any directly facing single storey elevation which does not contain a principal window to a habitable room.

As a result of the generally dense urban grain in this particular location, a reduction in the above separation distances may be considered to be acceptable, although it must be demonstrated within any application for planning permission that any reduction would not unduly affect the amenity of surrounding occupiers.

At Block 1, care will clearly need to be taken with the position of windows in the elevations closest to the existing digital advertisement board to ensure an appropriate outlook is achieved, free from excessive light spill or flicker, and also to protect the current or future occupiers of Nos. 89 Whitworth Road and 87 Industry Road from



overlooking and loss of privacy. The position of the car park facing elevation would also raise clear challenges in ensuring an appropriate degree of privacy for the future occupiers of the ground floor dwelling should windows be inserted into this elevation.

Based on the type of accommodation and location, it is accepted that private outdoor amenity space will be somewhat limited. However, there is scope with the revised Block 1 to provide a reasonably sized area of communal outdoor space subject to careful positioning of waste and cycle storage facilities within the site.

Access and Highways

The Highways Authority have reviewed the revised and reduced scheme. The size of the development may not technically warrant a Transport Statement (TS), however the development raises many highways issues and it has been requested that a TS is submitted to address those issues.

The site can be considered to be in a relatively sustainable location in terms of access to amenities and public transport links and this should be fully discussed with the supporting TS and also in a Travel Plan which should accompany any future application.

Parking requirements for the development are likely to be lower than expected owing to the nature of the development and the relatively sustainable location. From the submitted plans there may be a need for staff parking and maybe some residual parking for the proposed residents. The developments impact on parking in the area as a whole must be discussed within the TS as development will result in the loss of garages and informal parking on the electricity substation site.

As a whole the three sites may have some impact on land which has highway status which must be fully researched prior to the submission of an application. Block 1 does seem to have the most impact on highways as it will result in the closure of the direct footpath link between Industry Road and the main car park. In addition there is likely to be statutory undertaker's equipment in the highways and on the development sites - this should be thoroughly investigated.

With regards to servicing, Block raises the most concern. However it would appear refuse is already collected from the end of Derwent Street and taking into account the size of the development this appears to be acceptable.

Transport for Greater Manchester have commented on the originally submitted scheme so their comments suggesting a required Transport Assessment have been superseded. However, the organization will be consulted as part of any planning application process.



Arboricultural & Ecological Impacts

The most recent sketch drawing appears to indicate that the tree to the rear of the digital display board would be retained, although due to the proximity of Block 1 this looks unlikely. This will need to be addressed in any application for planning permission. As existing trees would need to be cleared to facilitate the development a Tree Survey and Arboricultural Impact Assessment will be required in support of any planning application. In the event that protection/retention is not feasible and tree removal is accepted, the Authority requires replacement planting at a minimum ratio of 2:1 within the site.

A Phase I ecological appraisal should be submitted in support of any planning application, including any additional surveys that are highlighted as requirements. Due to the condition of the existing garages on site, the potential for bat roosts and nesting birds cannot be ruled out. There could also be the potential for invasive species to be growing on site.

The site clearly has a low ecological value overall, but the preliminary ecological appraisal should inform the level of mitigation and enhancement that would be required (particularly if the application is delayed and 10% biodiversity net gain becomes mandatory as a result of the Environment Act 2021).

It is important to note that whilst local policy requires no net loss of biodiversity, the revised NPPF requires enhancement, regardless of the requirements of the Environment Act. Any application should therefore include an ecological mitigation and enhancement plan that demonstrates net gain with the net gain assessment using the Defra metric (currently version 3). For the avoidance of doubt, it would be expected that Biodiversity Net Gain would be delivered within the site rather than off-site.

Flood Risk & Drainage

The application site is located within Flood Zone 1; however the scheme comprises 'major' development. Accordingly, the application should be accompanied by an outline drainage strategy/SUDs assessment and a Flood Risk Assessment is required.

For any greenfield parts of the site, rainfall runoff should be attenuated such that any rainfall discharges from the developed site are not increased. Greenfield runoff rate of 5 l/s/ha shall be applied, unless an assessment conclusively demonstrates greenfield runoff to be greater than this. The minimum practical flow control value that can be applied using a vortex flow control is 5 l/s so that the outlet diameter of the flow control does not block.

In respect of surface water drainage proposals, the site should be drained in the most sustainable method in accordance with the hierarchy set out within the National Planning Practice Guidance. Additional advice on Sustainable Urban Drainage for major development is available on the council's website, and guidance is provided by



United Utilities on their respective website.

The UK's National Planning Policy Framework (NPPF) requires new developments to take account of the effects of climate change. Table 5 of the NPPF indicates increases in peak rainfall intensity of up to 30% by 2085.

Following the flooding events experienced nationally in 2015, new climate change allowances and criteria were introduced by the Environment Agency in February 2016 and updated in July 2021. This recommends that a 40% upper end climate change allowance should be used to assess the potential flood risk implications arising from the critical duration design rainfall event. New development drainage and attenuation features must take account of this potential 40% increase in order to mitigate surface water flooding within the proposed development.

United Utilities need to minimize surface water flows entering the foul sewerage network to avoid a detrimental impact on the public sewer network. Before planning to discharge surface water to public sewer, the applicant will need to demonstrate that infiltration is not feasible by carrying out permeability tests on site in accordance with BRE 365 Guidance.

For the buildings, a foul water discharge consent agreement from United Utilities will be required. Early engagement with United Utilities is recommended.

Rochdale Core Strategy policy G8 and saved UDP policies EM/7 and EM/8 are relevant.

Energy Demand/Climate Change Adaptation

Core Strategy Policy G1 sets out measures to address climate change and emissions, whilst Policy G2 requires that new development adhere to the energy hierarchy. The development should be designed in order to meet the requirements of these policies and an Energy Statement should be submitted with the application setting out the detail of how the development complies with the policy base. Where it is possible for developments to achieve higher standards than required by building regulations and contribute actively towards targets for a net zero carbon future will be considered a strong positive in the planning balance of any such application.

Ground Contamination and Coal Mining

The application should be accompanied by at least a Phase I Site Investigation or Preliminary Risk Assessment to provide an initial assessment of potential land contamination within/adjacent to the site. If an initial assessment identifies a need for further intrusive investigations or remediation strategy to be required, these would be required as part of pre-commencement conditions on any permission unless provided as part of the main application.

The site does not lie with the Development High Risk Area for Coal mining. A Coal Mining Risk Assessment is therefore not required.



Air Quality

CS Policy G9 seeks to reduce all forms of pollution and contamination in the borough by amongst other things, focusing on measures that reduce air pollution in Air Quality Management Areas. The site lies in close proximity to a significant Air Quality Management Area centered on Whitworth Road. Whilst it is not expected that the residents of the development would generally have private motor vehicles, support workers and staff visiting the site are likely to travel by car. You should set out in the planning statement how any support packages would be expected to be delivered and provide details of the expected frequency of visits and numbers of staff involved to demonstrate that the development would not have an unacceptable impact on air quality. Nonetheless, as the site does not sit within an identified Air Quality Management Area and there are sufficient opportunities to access the site by means of transport other than the car, it is not considered that an Air Quality Assessment will be required in this instance.

Crime Impacts

A Crime Impact Statement is a validation requirement and legislative requirement for major development. The report should be completed by a suitably qualified security assessor, and identify, predict, evaluate and mitigate the site-specific crime and disorder effects of a development and should be produced by a professional individual/organization independent of the design process. The CIS can then be submitted as part of the planning application, indicating that the proposed development has been designed to avoid/reduce the adverse effects of crime and disorder and enabling the planning process to run more smoothly.

Planning Obligations and Section 106 Requirements

The Core Strategy requires, for proposals of this scale, developer contributions in relation to Public Open Space (POS) and formal sports provision. At 14 units, the development would not meet the threshold for Affordable Housing contributions, although any such provision would carry a positive weight in the planning balance. Similarly, Education contributions would not be required. Core Strategy policy DM2 is most relevant.

Public Open Space/Outdoor Sports Provision

The Council's Public Open Space requirements are set out in the Provision of Recreational Open Space in New Housing SPD. The open space standard is 2.1 hectares per 1000 population; this is split between 1.1 hectares of Outdoor Sports Provision and 1.0 hectares of Local Open Space. The occupancy rate used in the calculation (see page 11 of the SPD) is 1 person per bedroom.

A contribution towards Public Open Space / formal sports provision is expected. This would be spent on improvements to outdoor sports provision within the local area to be



of benefit to the residents of the new development, with the most likely spend being on the Multi-Use Games Area at Cronkyshaw Common.

POS and outdoor sports commuted sum figures are calculated in accordance with the latest table of charges.

Viability

The Council is mindful of the need to ensure that financial planning obligations do not undermine the viability and deliverability of any scheme, having regard to site specific requirements, whilst ensuring that the impacts of the development are adequately mitigated. As such, the developer may wish to provide a viability appraisal at application stage, which may demonstrate the ability of the scheme to provide the contributions. Should a viability appraisal be submitted, the Council requires an independent review of such appraisals, with the cost to be met by the applicant.

Public and Stakeholder Consultation

The Council has an adopted Statement of Community Involvement that we would encourage developers to consider when preparing engagement plans. We encourage that developers seek to engage with surrounding residents and, where appropriate, undertake consultation with ward councilors - the site lies within Central Rochdale ward.

The method of consultation undertaken by yourselves, detail of where any consultation event was held and details of how the development has been presented to the local community should be outlined within a Statement of Community Involvement to be submitted with any application for planning permission. This statement should also include details of the feedback received, including if any amendments have been made as a result of comments received.

Conclusion

In conclusion, it is the view of the Local Planning Authority that the principle of residential development on this site could be considered to be acceptable. However, having not yet had sight of a fully worked through revised scheme it is not possible to conclude that the potential negative impacts of the development on residential amenity can be satisfactorily overcome. Any matters arising as a result of the required survey work and further research, such as in relation to highway status, should be addressed prior to submission of any planning application to reduce the potential for delays during the application process.

Planning Performance Agreements

Central government encourages the use of Planning Performance Agreements (PPA). A PPA is an agreement between the Local Planning Authority and an applicant to provide a project management framework for handling a major planning application.



The agreement sets out the standard of service and target decision programme that can be expected. In recognition of the additional burden of work and activity which the agreed programme is likely to require of the LPA, an additional fee contribution will be required and agreed between the LPA and the applicant prior to the submission of the planning application. Please let me know if you wish to discuss this further.

Validation Requirements

In the event that a formal application is submitted, the following list of supporting information would be required:

In the event that a formal planning application is submitted, the following list of supporting information would be required:

- Compliance with National Information Requirements
- Compliance with the Council's adopted Local List
- Biodiversity Statement
- Community Involvement Statement
- Crime Impact Statement
- Design & Access Statement
- Phase I Ecological Appraisal (any subsequent surveys recommended)
- Energy and Climate Change Adaptation Statement
- Flood Risk Assessment and Outline Drainage Strategy (NW SuDS pro-forma - Version 4)
- Invasive Species Method Statement (if required)
- Phase I Site Investigation Report/PRA and Phase II Ground Investigation & Remediation Strategy (the latter pair can be conditioned in the alternative)
- Planning Statement
- Transport Statement and Travel Plan
- Tree Survey and Arboricultural Impact Assessment

Please note that any advice provided above is an informal opinion of the author only and is made without prejudice to any formal determination which may be given in the event of an application being submitted. In particular, it does not constitute a formal decision of the Council with regard to any future planning applications, which will be subject to wider consultation and publicity, and provides no guarantee of a future decision.

Yours sincerely,



Michael Atkinson-Smith
Senior Planning Officer
Planning & Development



Appendix 1 – Relevant Policies

In addition to the requirements of the National Planning Policy Framework, any application for the proposed use of the site would be subject to an assessment against the following list of key policies contained within the adopted Rochdale Core Strategy:

SP3/R The Strategy for Rochdale

S02 Creating successful and healthy communities

- C1 Delivering the right amount of housing in the right places
- C3 Delivering the right type of housing
- C4 Providing affordable homes
- C7 Delivering education facilities
- C8 Improving community, sport, leisure and cultural facilities

S03 To improve design, image and quality of place

- P1 Improving image
- P3 Improving design of new development

S04 Promoting a greener environment

- G1 Tackling and adapting to climate change
- G2 Energy and new development
- G6 Enhancing green infrastructure
- G7 Increasing the value of biodiversity and geodiversity
- G8 Managing water resources and flood risk
- G9 Reducing the impact of pollution, contamination and land instability

S05 Improving Accessibility and delivering sustainable transport

- T2 Improving Accessibility
- DM1 General development requirements
- DM2 Delivering planning contributions and infrastructure
- SD1 Delivering sustainable development

Appendix 5 - Schedule of parking standards

The following saved policies from the Rochdale Unitary Development Plan (UPD) are also relevant:

G/D/1 Defined Urban Area

- EM/7 Development and Flood Risk
- EM/8 Protection of Surface and Ground Water

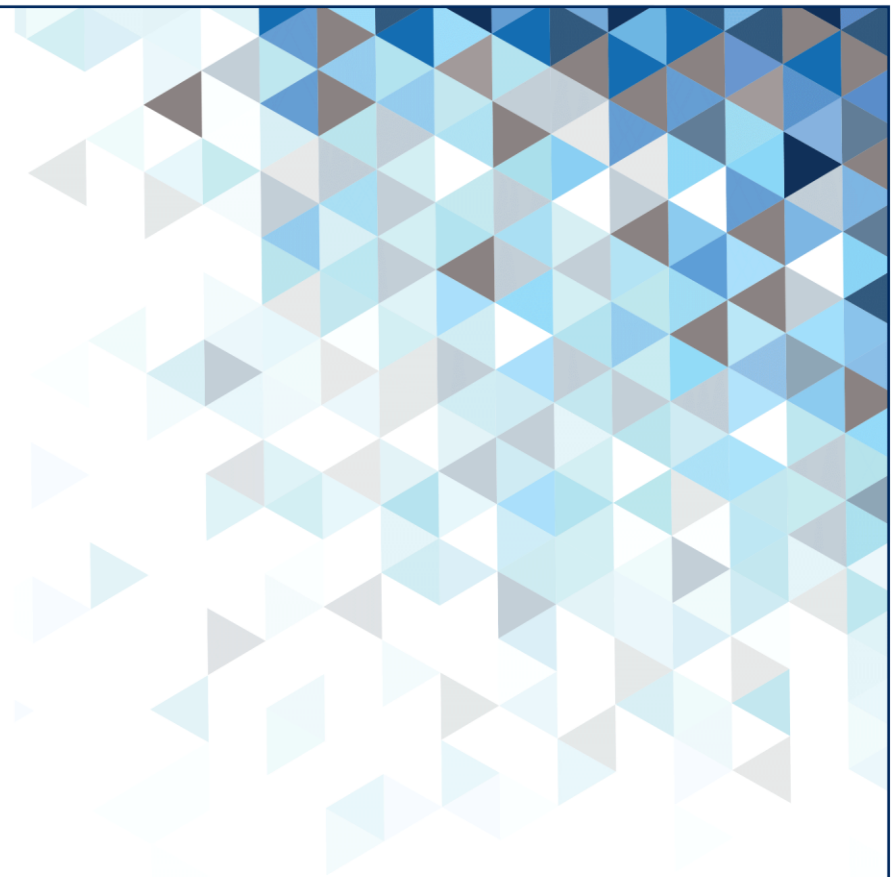
Additional Core Strategy and saved UDP policies may also be relevant depending upon the details of any submitted proposal.



Supplementary Planning Documents:

- Affordable Housing (March 2008)
- Guidelines and Standards for Residential Development (June 2016).
- Oldham and Rochdale Urban Design Guide (Design Principles) (Sept 2007)
- Oldham and Rochdale Residential Design Guide (Sept 2007)
- Biodiversity and Development (January 2008 – updated February 2017)
- Climate Change Adaption (June 2012)
- Provision of Recreational Open Space in New Housing (March 2008 – updated January 2017)
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