

DWD

Planning Statement

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Revision	Description	Originated	Checked	Reviewed	Authorised	Date
1	Final	GS	SP	SP	SP	14/03/2025
DWD Job Number: 17688a						

1.0 INTRODUCTION

1.1 This Planning Statement has been prepared on behalf of the applicant, in support of an application for full planning permission for a proposed development at Kingsway Business Park.

1.2 The application relates to the use of the site as a van storage facility and the construction of ancillary infrastructure. The full description of development is:

‘Elevation alterations to include the installation of louvres and installation of ancillary infrastructure for staff welfare, maintenance, security and site operations (including details of sprinkler tank and pump house, amendments to retaining wall and installation of metal grid ramp) and amendments to lighting.’

1.3 The area of works relates to areas of hard-standing only as shown on the approved site plan. It is noted that the landscaping for the warehouse has not yet been installed and is due to be installed in the next available planting season. There are no proposals to amend the approved landscaping strategy as part of this application.

1.4 This Planning Statement describes the proposed development and assesses the development against the Development Plan. This statement will also outline the material benefits of the proposal.

1.5 The remainder of this Statement is set out as follows:

- Section 2 describes the site and the surrounding area as well as the planning history;
- Section 3 sets out the pre-application response;
- Section 4 sets out the proposals for the site that are the subject of this planning application;
- Section 5 describe the relevant national and local planning policies and other material considerations;
- Section 6 assesses the proposed development against the relevant national and local planning policies and other material considerations;
- Section 7 sets out the planning benefits as a result of the application; and
- Section 8 sets out our overall conclusions on the planning merits of the proposals.

2.0 SITE LOCATION, DESCRIPTION AND PLANNING HISTORY

Site Location and Description

- 2.1 The Site is located approximately 1.75km south east of central Rochdale. The Site is situated to the western side of Kingsway Business Park with a significant amount of other employment uses containing a mixture of different sized industrial units. To the immediate east of the site there are a mixture of large and small warehouses with associated parking, including the warehouse that it will serve. The site is a recently constructed warehouse that has practically completed. The details of this permission are contained below.

Planning History

- 2.2 DWD has undertaken an in-depth desk top review of the site's planning history and note that the following previous planning permissions for industrial development have been historically approved.
- **09/D52264** - Outline Application With All Matters Reserved For A Proposed Business Park Comprising Buildings Within Development Plots C To X Inclusive As Shown On The Master Plan For : General And Light Industrial Use Classes B1 & B2, Offices In Use Class B1, Distribution And Storage In Use Class B8, Research And Development Facilities In Use Class B1, Hotels In Use Class C1 , Ancillary Retail And Leisure In Use Class A1-A5 & D2, Housing In Use Class C3.
 - **14/00542/OUT** - Outline application, with all matters reserved, for a mixed use business park comprising buildings within development plots as shown on the site location plan for General and Light Industrial Uses (Classes B1 and B2), Offices in the Use Class B1, Distribution and Storage Uses (Class B8), Research and Development Uses in Use Class B1, Car Showrooms (Sui Generis Use), Hotels in Use Class C1, Ancillary Retail and Leisure in Use Classes A1 - A5 and D2, and Residential in Use Class C3
 - **16/01085/VRCON** - Variation of condition 12 (maximum floorspace thresholds) on planning permission 14/00542/OUT to remove the references to Use Classes B1(c)/B2 and B8 and the associated floorspace figures
 - **18/00943/VRCON** - Removal of condition 45 (requirement for BREEAM rating) of outline planning permission 16/01085/VRCON
 - **21/00608/FUL** - Development of site for storage of operational vehicles, including site levelling, drainage and resurfacing, formation of access, associated parking, acoustic and

security fencing, retaining walls, guard hut, welfare building, substations, landscaping, lighting columns and all related engineering and infrastructure works.

- **22/01200/FUL** - Erection of two industrial units/warehouses (Classes E(g)(iii), B2 and B8) with ancillary office space, new access, car parking, servicing, boundary treatments, hard and soft landscaping and other associated works.
- **24/00694/NMA** - Application for non-material amendment to planning permission 22/01200/FUL comprising of:- Revised electric vehicle charger point provision for Unit J1; car park/pedestrian access gates added to site plan; condenser compounds indicated; car share spaces added; retaining wall arrangement revised; new security fencing to car parks and rear of buildings; unit J1 car park realigned to avoid electric services, service margin to buildings revised from concrete to asphalt, ground floor window added to both units; 1no. final exit door on unit 1 repositioned, 1no. final exit door on unit 2 repositioned, louvres added to elevations of both units and composite cladding changed to built up.

3.0 PRE-APPLICATION

3.1 This submission has reflected on the comments that were received as part of the pre-application engagement with Rochdale Council.

3.2 [Pre-Application Response](#)

3.3 A meeting took place with the planning officer regarding the principle of development of the proposal and the key matters that are likely to be considered during the planning application. Below we have summarised the discussion of the officer's report.

[Principle of Development](#)

3.4 The pre application response confirms that the *'proposed use of the site would fall within those consented by the permission under which the application site has been developed'*. On this basis the proposal is not seeking permission for the use of the premises. Therefore, the description of development has been amended to remove any reference to the use of the site.

[Highways Consideration](#)

3.5 The officer's pre-application response states that the submitted transport statement would need demonstrate that the proposed use of the site would not have a greater impact on the highways network in comparison to the earlier permissions on the site. It is also noted that the Highways Officer offered no objection to the proposed development.

[Non-Material Amendment to the Existing Permission](#)

3.6 The pre-application officer details that the uncertainty between the previously approved details can suitably be reconciled as part of the expected application. On this basis it was confirmed that a separate non-material amendment application would not be required.

4.0 PROPOSED DEVELOPMENT

4.1 The proposed development would provide external alterations to an existing dedicated storage facilities for the vans required to operate the existing distribution warehouse. There is a requirement to make a limited number of modifications to the site, for example the introduction of a sprinkler tank and louvres in the building. The team has sought to ensure that the proposals would not impact on any areas of approved landscaping (which is due to be installed in the next planting season as a requirement of the baseline planning permission), therefore all of the landscaping would remain as existing.

4.2 A summary of the proposed changes proposed to the site are detailed below:

Installation of louvres in the elevations
Details of sprinkler tanks and pumps house (siting is as per the approved planning drawings)
Use of hardstanding for van storage with associated white-lining
Amendments to retaining wall including removal of handrail
Metal grip ramp
Installation of winter module (small scale facility for storing site maintenance materials)
New transformers
New waste storage area
Installation of new guardhouse
New smoking shelter

4.3 There are also some elements of the proposal that are not considered to require planning permission – for example the laying of a cattlegrid.

4.4 The van storage will be in association with the last-mile warehouse on Kingsway as detailed within the included transport note. The proposals preserve the existing active EV provision on site for cars, which would be available to users of the site and also include for futureproofing for easy conversion of the fleet bays to EV in the future.

5.0 PLANNING POLICY CONSIDERATIONS

- 5.1 This section sets out the national and local planning policies relevant to the proposals that seek to achieve sustainable development, build a strong, competitive economy, achieve good design, conserve and enhance the natural environment, promote safe and sustainable transport, and meet the challenge of climate change and flooding.
- 5.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that, if regard is to be had to the development plan for the purpose of determining planning applications, then determination must be made in accordance with the development plan, unless material considerations indicate otherwise.
- 5.3 The Development Plan relevant to the site and material considerations is outlined below:
- Rochdale Core Strategy (2016);
 - Rochdale Unitary Development Plan (2006) saved policies; and
 - Places for Everyone joint development plan
- 5.4 Below is a summary of the key adopted planning policies that are relevant to the Site.

Principle

- 5.5 The Site forms part of Kingsway Industrial Park. In accordance with Rochdale Council's adopted Proposals Map, the Site is located within a designated 'Business Park'.
- 5.6 **Policy EC7 (Kingsway Business Park)** states that land, between the A664 Kingsway, M62 Motorway, B6194 Broad Lane and the Rochdale–Oldham railway line, is allocated and has outline planning permission for high quality general and light industry, offices, distribution and storage, research and development, and associated and complementary uses. The Council will strictly apply the following criteria to the development of the site (to be known as the Kingsway Business Park):-
- a) A high quality of built development in an attractive landscape setting, designed to be in sympathy with the topography and location of the site;
 - b) Retention, wherever possible, of those features which provide the site with its existing character, such as trees, hedges and watercourses;
 - c) A high standard of extensive landscaping within and around the site, including "buffer zones" between the surrounding residential areas and development in the site;

- d) The creation of new, and extension of existing, public open space and informal recreation areas, including the extension and improvement of Stanney Brook Corridor and Park under policy UG/9;
- e) The enhancement of the recreational and leisure potential of the site, including the Canal and any new open water areas that may be created as part of the development;
- f) The protection and enhancement of the Stanney Brook Site of Biological Importance (in line with Policy NE/2 – Designated Sites of Ecological and Geological / Geomorphological Importance);
- g) The retention of existing ‘rights of way’ for pedestrian and cycle use. In order to enable development the diversion of ‘rights of way’ may be necessary, however their closure will only be allowed as a last resort;
- h) The preservation and continued productive use, wherever possible, of buildings of architectural or historical interest and their local settings;
- i) The protection, wherever possible, of existing property rights within and around the site commensurate with the proposal;
- j) Vehicular access to the site to be from the A664 Kingsway and from Junction 21 of the M62 Motorway only. Significant improvements to the geometric layout of M62 junction 21 will be necessary;
- k) The site to be served by a main distributor road linking the A664 and Junction 21, which should avoid, wherever possible, important natural features and buildings and minimise its impact on surrounding areas;
- l) Adequate provision for public transport to and within the site;
- m) Small scale retail, financial and other office services will be allowed to serve the needs of employees in the Business Park;
- n) The preservation and enhancement or creation of other sites/features of ecological importance (e.g. habitats) wherever possible;
- o) Limited residential development may be acceptable provided it is appropriate in scale, location, access and design.

Design Based Policies

Air Quality

- 5.7 **Policy G9 (Reducing the impact of pollution, contamination and land instability)** states that in air quality management areas air pollution should be reduced. Air pollution should especially be decreased in areas around motorways and main roads.

Biodiversity

- 5.8 **Policy G7 (Increasing the value of biodiversity and geodiversity)** states that no development should result in a net loss of biodiversity or geodiversity.

Climate Change

- 5.9 **Policy SO4 (To promote a greener environment)** aims to minimise contributions to climate change and to mitigate against its adverse effects.

Design and Amenity

- 5.10 **Policy SO3 (To improve design, image and quality of place)** states that natural assets and the character of open spaces should be protected and enhanced. Developments should also maximising the value of green open areas and provide opportunities for recreation, amenity, biodiversity and flood management.
- 5.11 **Policy P1 (Improving image)** requires high quality design. Image improvement will be achieved by the below.
- a) Requiring design which is of a high standard, demonstrating innovation and originality;
 - b) Working with developers of major developments to incorporate public art in the design of buildings and spaces or contribute to public art projects as appropriate;
 - c) Helping to 'green' the urban environment, for example by securing tree planting on sites and along streets and roads;
 - d) Promoting the development and re-use of under-used land and buildings, maximising the potential for heritage assets to provide a sense of place and image; and
 - e) Creating people-friendly, safe, vibrant, uncluttered public areas.
- 5.12 **Policy P2 (Protecting and enhancing character, landscape and heritage)** ensures the protection of the character of the area. The policy also ensures the conservation, enhancing and promoting key heritage assets.
- 5.13 **Policy P3 (Improving design of new development)** requires development to adhere to high standards of design.
- 5.14 **Policy DM1 (General development requirements)** all proposal should demonstrate the below.
- 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.

Energy Efficiency

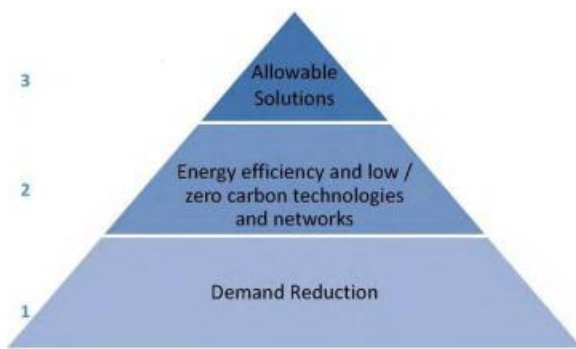
5.15 Policy JP-P1 (Sustainable Places) requires the below:

1. Distinctive, with a clear identity
2. Visually stimulating, creating interesting and imaginative environments which raise the human spirit through the use of green space, public art and quality design
3. Socially inclusive

4. Resilient, capable of dealing with major environmental events
5. Adaptable, able to respond easily to varied and changing needs and technologies
6. Durable, being built to last and using robust materials that reflect local character, weather well and are easily maintained
7. Resource-efficient
8. Safe, including by designing out crime, reducing opportunities for anti-social behaviour and by ensuring that developments make appropriate provision for response and evacuation in the case of an emergency or disaster.
9. Supported by critical infrastructure, such as energy, water and drainage and green spaces
10. Functional and convenient, enabling people and uses to act efficiently with minimal effort, and responding to needs relating to servicing, recycling facilities, refuse collection and storage
11. Incorporating inclusive design within all spaces with support for tackling inequality and poverty to form part of creating sustainable places
12. Legible, being easy to understand and navigate, with the protection and enhancement of key views and new development well-integrated into the place
13. Easy to move around for those of all mobility levels, particularly by walking and cycling, with enjoyable routes free from obstacles and disorienting stimuli, and with places to rest
14. Well-connected to other places, particularly by public transport and digital infrastructure enabling everyone to take advantage of the employment, cultural and leisure opportunities across Greater Manchester and beyond
15. Comfortable and inviting, with indoor and outdoor environments
16. Incorporating high quality and well managed green infrastructure and quality public realm
17. Well-served by local shops, services and amenities, including education and health facilities

5.16 **Policy SO4 (To promote a greener environment)** ensures that developments are energy efficient and contributes to carbon reduction.

5.17 **Policy G2 (Energy and new development)** states that new developments should adhere to the below energy hierarchy and reflect national policy, targets and requirements.



Employment/ Economic

- 5.18 **Policy E2 (Increasing Jobs and Prosperity)** ensures to increase jobs and prosperity in order to protect employment zones and B1-B8 uses outside employment zones. Employment development should be focused in certain areas of the borough including the Rochdale town centre / Kingsway corridor (this corridor links the Site to Rochdale Town Centre).
- 5.19 **Policy E3 (Focusing on economic growth corridors and areas)** in Kingsway corridor it is ensured that economic growth is ensured, including linkages between Kingsway business park and Rochdale town centre. This policy also promotes the co-ordinated development of Kingsway Business Park. This is achieved by large, high quality serviced sites available on this major inward investment site for B1 (including B1 office), B2 & B8 and other employment uses.
- 5.20 **Policy JP-J1 (Supporting Long-Term Economic Growth)** aims to maintain a very high level of economic diversity.
- 5.21 **Policy JP-J2 (Employment Sites and Premises)** requires a diverse range of employment sites and accessible premises.
- 5.22 **Policy JP-J4 (Industry and Warehousing Development)** the policy requires at least 3,513,000 sqm of new, accessible, industrial and warehousing floorspace will be provided in the Plan area over the period 2022-2039. Therefore, a high level of choice and flexibility will be provided in the supply of sites for new industrial and warehousing floorspace

Flood risk

- 5.23 **Policy G8 (Managing water resources and flood risk)** states that development is well protected from flood risk and doesn't increase the risk elsewhere.
- 5.24 **Policy EM/8 (Protection of surface and ground water)** states that development likely to pose an unacceptable risk to surface water and ground water quality, or to water supply will not be permitted.

Heritage

- 5.25 **Policy JP-P2 (Heritage)** aims to positively conserve, sustain and enhance our historic environment and heritage assets and their setting.

Noise

- 5.26 **Policy G9 (Reducing the impact of pollution, contamination and land instability)** states that developments shouldn't have an unacceptable increase on water. Planning condition will be included to control the impact of pollution from new developments.

Transport

- 5.27 **Policy JP-C7 (Freight and Logistics)** supports the more efficient and sustainable movement of freight.
- 5.28 **Policy JP-C8 (Transport Requirements of New Development)** requires development to be designed to enable and encourage walking, cycling and public transport use, to reduce the negative effects of car dependency, and help deliver high quality, attractive, liveable and sustainable environments.
- 5.29 **Policy SO5 (To improve accessibility and deliver sustainable transport)** will be achieved by ensuring that new developments will contribute to transport improvements and the use of other sustainable transport.
- 5.30 **Policy T2 (Improving accessibility)** states that development should be where good access to public transport is available and with effective provision for cyclists, pedestrians and people with impaired mobility. The transport hierarchy is listed below:
- i. People with impaired mobility and pedestrians;
 - ii. Cyclists;
 - iii. Public transport (Bus, Heavy and Light Rail) and "clean fuelled" vehicles;
 - iv. Taxi, private hire vehicles;
 - v. Powered two wheeled vehicles;
 - vi. Commercial traffic for local access;
 - vii. Shopping, visitors / tourist and off peak traffic; and
 - viii. Long stay and peak time commuter traffic.

Transport assessments and travel plan will be required for developments located in Air Quality Management Areas (AQMA).

A transport assessment is required if forecast trips exceed the indicative thresholds set out in DfT Guidance on Transport Assessments or the following thresholds:

- i. 100 or more vehicle movements per day (24 hours);
- ii. 60 or more person trips in any peak hour (between 07-00 & 10-00 and / or 16-00 & 19-00);
- iii. 30 or more vehicle movements in any hour;
- iv. More than 20 Heavy Goods Vehicles (over 7.5 tonnes) movements per day;
- v. Any goods vehicle movement between midnight and 6am; vi. Any significant abnormal loads; and
- vi. 50 or more car parking spaces are proposed.

A Transport Statement for smaller developments that exceed the guidance on Transport Assessment thresholds will be required when:

- i. Generate 50 to 99 vehicle movements per day (24 hours);
- ii. Generate 30 to 59 person trips in any peak hour (between 07-00 & 10-00 and / or 16-00 & 19-00);
- iii. Generate 20 to 29 vehicle movements in any single hour;
- iv. Generate up to 20 Heavy Goods Vehicles (over 7.5 tonnes);
- v. Propose 10 to 49 parking spaces; or vi. Consist of 50 to 79 residential units.

Finally, financial contributions will be required if transport improvements where additional traffic movements cannot be accommodated on the existing network are needed.

National Planning Policy Framework

Achieving Sustainable Development

- 5.31 The NPPF sets out the Government's planning policies for England and how they should be applied. It specifies that the purpose of the planning system is to contribute to the achievement of sustainable development through 3 overarching objectives, which should be delivered through the preparation and implementation of plans and the application of the NPPF policies:

- 5.32 An economic role – to ensure a strong, responsive and competitive economy by ensuring that sufficient land of the right type is available in the right places to support growth, innovation and improved productivity;
- 5.33 A social role – to support strong, vibrant and healthy communities by fostering a well-designed and safe built environment; and,
- 5.34 An environmental role – making effective use of land and contributing to protecting and enhancing the natural, built and historic environment (paragraph 8).
- 5.35 At the heart of the NPPF is a presumption in favour of sustainable development, which should be applied by approving development proposals that accord with an up-to-date development plan without delay (paragraph 11c).
- 5.36 Where there are no relevant development plan policies, or the policies which are most important for determining the application are out of date, permission should be granted unless there is a clear reason for refusing the proposal (based on NPPF policies that protect areas of assets of particular importance), or any adverse impacts of doing so would significantly or demonstrably outweigh the benefits, when assessed against the NPPF taken as a whole (paragraph 11d).
- 5.37 Building a Strong and Competitive Economy
- 5.38 Paragraph 85 of the NPPF promotes economic growth and states that decisions should “help create the conditions in which businesses can invest, expand and adapt. 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. The approach taken should allow each area to build on its strengths, counter any weaknesses and addresses the challenges of the future”.
- 5.39 Local Planning Authorities are required to make provision for storage and distribution operations at a variety of scales and in suitable accessible locations (paragraph 87).
- 5.40 Promoting Sustainable Transport
- 5.41 Paragraph 11 requires the environmental impacts of traffic and transport infrastructure to be identified, assessed and taken into account. Significant development should be focused on locations which are, or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes (paragraph 110).

- 5.42 In addition, it should be ensured that safe and suitable access can be achieved for all users (paragraph 115). Developments should create places that are safe, secure and attractive, and respond to local character and design standards (paragraph 117).
- 5.43 With regard to distribution centres, the NPPF specifically requires that proposals should make provision for sufficient parking to cater for their anticipated use (paragraph 114). Although reference in this paragraph is made to lorry parking, it is considered to be applicable to all operational parking requirements for distribution centres.
- 5.44 Making Effective Use of Land
- 5.45 Local planning authorities are required to promote an effective use of land in meeting the need for various uses, while safeguarding and improving the environment (paragraph 124). Substantial weight is to be given to the value of using suitable brownfield land within settlements, and the development of under-utilised land should be promoted and supported (paragraph 126).
- 5.46 Achieving Well-Designed Places
- 5.47 Developments are required to be sympathetic to local character, including the surrounding built environment, while not preventing or discouraging appropriate innovation or change, and should optimise the potential of the site to accommodate and sustain an appropriate amount of development, and support local transport networks (paragraph 135).
- 5.48 In determining applications, the NPPF advises that great weight should be given to innovative designs that promote high levels of sustainability, so long as they fit in with the overall form and layout of their surroundings (paragraph 139).
- 5.49 Conserving and Enhancing the Natural Environment
- 5.50 The NPPF states that the planning system should contribute to and enhance the natural and local environment by minimising impacts on biodiversity and preventing new development from contributing to unacceptable levels of pollution (paragraph 187).
- 5.51 Paragraph 196 requires planning decisions to ensure that sites are suitable for the proposed use, taking account of ground conditions and any risks arising from land instability and contamination.

6.0 POLICY COMPLIANCE

- 6.1 The proposed development is assessed against the planning policies identified in Section 5 of this Statement. In addition to the planning assessment provided in this Section, the Application is supported by a number of technical reports (referenced in the relevant sections below) which provide greater detail, and which demonstrate how the proposed development has been interrogated and found to be compliant with relevant national and local policies as well as best practice and industry standards.

Principle of Development

- 6.2 The proposed scheme represents sustainable economic development on the basis that it would allow the occupier to operate an efficient last mile delivery station serving the local area from a site which is allocated for employment use. The proposal makes effective use of brown-field land and is comparable to the recently consented use of the site. On this basis the proposal is considered to be compliant with Policy JP-P1 as it is an efficient use of land.
- 6.3 Sustainable development is achieved through the collaboration of a number of key requirements. As such, compliance with the above overarching policies requiring sustainable development is set out below.

Transport

- 6.4 The proposed van storage area forms part of the servicing infrastructure and operational requirements for the last mile delivery centre and is therefore supported by local and national planning policy.
- 6.5 The van storage area is comparable to previous use of the Site and has been designed to complement the industrial nature of the site and its surrounding area and reflects the prevailing scale of built development in the area.
- 6.6 PBA has been appointed to produce a Transport Statement to consider there to be no impact on the local highway network as a result of the proposals. This is considered to be in compliance with Policy T2.
- 6.7 The application site is accessible by a various means of transport. The site is accessed via James Kearns Avenue, which has a 2m footway to the northern carriageway edge and a 3m footway/cycleway on the southern carriageway edge. John Milne Avenue also has a 3m footway/cycleway to the eastern side of the carriageway and a 2m footway on the western side of the carriageway.

- 6.8 Therefore, the site is demonstrated to be accessible, and the proposals would allow for sustainable travel to and from the Site by drivers. The proposal is, therefore, considered to comply with national, regional and local planning policy seeking to promote sustainable transport.

Building a Strong and Competitive Economy

- 6.9 The proposed development is required to enable the last mile distribution centre to operate efficiently and successfully from the site, which should be afforded significant weight in accordance with national planning policy.
- 6.10 The proposals consist of a form of economic development that will support economic growth by supporting the use of the existing site. The site is therefore considered to be compliant with policy as the policy EC2 and Policy E3 as the proposal helps to increase the prosperity of the site. In addition, the site is accessible, and the proposed changes help the functionality of the site therefore supporting long term economic growth, therefore in compliance with both Policy JP-J1 and Policy JP-J2 (Employment Sites and Premises) requires a diverse range of employment sites and accessible premises.
- 6.11 In light of the above, the proposed development is compliant with national and local planning policy seeking to secure sustainable economic growth and productivity.

Meeting the Challenge of Climate Change and Flooding

- 6.12 In terms of flood risk, the entire Site and surrounding area are located within Flood Zone 1.
- 6.13 The site makes minimal changes to the recently consented site that was judged to be acceptable in planning terms, it is noted that the pre-application response also acknowledges this. The physical changes are modest in scale and appropriate to the industrial context of the site.
- 6.14 A Flood Risk Assessment has been prepared by EirEng which concludes that the proposals will not result in any increase in runoff. The surface water drainage will continue to be discharged into the public sewer as per existing. On this basis No additional SUDS or drainage systems are required.
- 6.15 It is therefore considered that the proposed development is consistent the NPPF in seeking to meet the challenge of climate change and flooding, including sustainable drainage.

Impact on Receptors

- 6.16 The proposed development would be considered exempt from the requirements of Biodiversity Net Gain.

- 6.17 The nearest residential properties are located approximately 50m to the north west of the site on Bishopsgate Walk. As such the modest scale of the changes proposed are not considered to have an impact on receptors as per the previous consent. There are modest lighting changes proposed as part of the changes but these are not considered to give rise to amenity issues. A lighting scheme has been designed for the Site the lightspill from which would not impact the receptors.
- 6.18 A Noise Impact Assessment produced by Tetra Tech has been submitted. This confirms that a Noise Intrusion assessment has been undertaken with additional consideration given to the operational noise level criteria outlined in Condition 23 of the outline planning permission (14/00542/OUT). The results found all receptors fall under Condition 23 Band reference B. the report concludes that the proposed development does not adversely affect or put sensitive receptors at risk from noise pollution. In addition it has been predicted that on-site operational noise effects will be below the LOAEL, and therefore will have a negligible impact in relation to noise.
- 6.19 In light of the above, it is considered that the proposed development complies with national, and local policies seeking to conserve and enhance the natural environment.

Heritage

- 6.20 A heritage statement has been produced by RPS which concludes that the proposed site change would not result in heritage harm and therefore will be in accordance with planning policy P2.
- 6.21 In light of the above matters, the proposed development is considered to comply with national, regional and local planning policies concerned with conserving and enhancing the historic environment.

7.0 PLANNING BENEFITS

- 7.1 The proposed installation of a van storage facility would result in a number of planning benefits, as well as being an optimal solution to meet the business needs of the identified occupier.
- 7.2 As discussed above, and within the accompanying Transport Statement, the proposed development would improve operational efficiencies and will assist the prospective occupier to achieve its objectives relating to reducing emissions.
- 7.3 The proposals involve the use of a fleet of delivery vans to be managed by the operator, which would comprise more modern, efficient, well-maintained vehicles. This would result in environmental benefits particularly to air quality.
- 7.4 In terms of economic benefits, the proposals would provide employment opportunities for those wishing to take up delivery driver jobs, but who are unable to afford to purchase or hire their own vehicle.
- 7.5 Overall, the proposed development represents an opportunity to make efficient use of this existing employment in such a way that provides a variety of economic, social and environmental benefits.

8.0 CONCLUSION

- 8.1 The proposals, the subject of this planning application, are required to provide a secure van storage facility close to the distribution facility, it is considered to be the optimum location for such a facility in sustainability terms and has previously been approved by Rochdale in this location. The current proposal is different to the previous approval in terms of the physical condition of the site, proposing to use a recently constructed warehouse building and requiring minor changes to the site to accommodate the proposed use.
- 8.2 All key planning considerations have been taken into account in the preparation of the development proposals, which comply with national and local Development Plan policies.
- 8.3 In summary, these proposals represent sustainable development, securing an employment generating economic use of a currently vacant site. It would result in improvements to economic productivity without negatively impacting on highway capacity, highway safety, biodiversity, arboricultural, flood risk, air quality, heritage or amenity interests.
- 8.4 The development has been demonstrated to be compliant with the Development Plan and, therefore, warrants support from the Local Planning Authority. Please refer to the table in Appendix 1 which highlights how the proposal is compliant against all relevant policies.

APPENDIX 1

Policy	Policy Compliance
Policy EC7 (Kingsway Business Park)	The site already benefits from planning permission. The proposal is of high quality. The proposal is compliant with this policy.
Policy G9 (Reducing the impact of pollution, contamination and land instability)	The site is not located within an air quality management areas. The proposal is compliant.
Policy G7 (Increasing the value of biodiversity and geodiversity)	No existing landscaping is impacted, therefore there is no loss of biodiversity. The proposal is compliant with this policy.
Policy SO4 (To promote a greener environment)	As per the Energy & Climate Change Adaptation Statement, the existing building complies with all relevant regulations and local policy guidelines, and the proposed works do not impact the energy performance of any existing heat or cooled space. The proposal is considered to be policy compliant
Policy SO3 (To improve design, image and quality of place)	No existing landscaping is impacted, and the land is brownfield. Therefore, there is no impact to open spaces. The proposal is compliant with this policy.
Policy P1 (Improving image)	The site already benefits from planning permission. The proposal is of high quality. The proposal is compliant with this policy.
Policy P2 (Protecting and enhancing character, landscape and heritage)	The site already benefits from planning permission. The proposal is of high quality. The proposal is compliant with this policy.
Policy P3 (Improving design of new development)	The site already benefits from planning permission. The proposal is of high quality. The proposal is compliant with this policy.

Policy DM1 (General development requirements)	The site already benefits from planning permission. The proposal is of high quality. A noise impact assessment has been submitted. The submitted pack shows that the proposal does not have an adverse impact. The proposal is compliant with this policy.
Policy JP-P1 (Sustainable Places)	The proposed scheme represents sustainable economic development on the basis that it would allow the occupier to operate an efficient last mile delivery station serving the local area from a site which is allocated for employment
Policy SO4 (To promote a greener environment)	As per the Energy & Climate Change Adaptation Statement, the existing building complies with all relevant regulations and local policy guidelines, and the proposed works do not impact the energy performance of any existing heat or cooled space. The proposal is considered to be policy compliant.
Policy G2 (Energy and new development)	As per the Energy & Climate Change Adaptation Statement, the existing building complies with all relevant regulations and local policy guidelines, and the proposed works do not impact the energy performance of any existing heat or cooled space. The proposal is considered to be policy compliant.
Policy E2 (Increasing Jobs and Prosperity)	The proposals consist of a form of economic development that will support economic growth by supporting the use of the existing site. The proposal helps to increase the

	prosperity of the site. On this basis the proposal is compliant with this policy.
Policy E3 (Focusing on economic growth corridors and areas)	The proposals consist of a form of economic development that will support economic growth by supporting the use of the existing site. The proposal helps to increase the prosperity of the site. On this basis the proposal is compliant with this policy.
Policy JP-J1 (Supporting Long-Term Economic Growth)	The proposed changes help the functionality of the site therefore supporting long term economic growth, therefore in compliance with the policy.
Policy JP-J2 (Employment Sites and Premises)	The proposed changes help the functionality of the site therefore supporting long term economic growth, therefore in compliance with the policy.
Policy JP-J4 (Industry and Warehousing Development)	The existing warehouse works towards warehousing floorspace figures mentioned in this policy. On this basis the proposal is compliant.
Policy G8 (Managing water resources and flood risk)	The proposal will not increase runoff from the site, as surface water drainage flows will continue to be discharged to the public sewer as per the existing scenario, making the proposal policy compliant as flood risk will not be increased elsewhere.
Policy EM/8 (Protection of surface and ground water)	The proposal will not increase runoff from the site, as surface water drainage flows will continue to be discharged to the public sewer as per the existing scenario, making the proposal policy compliant.

Policy JP-P2 (Heritage)	As per the submitted Heritage Statement the proposed site change would not result in heritage harm. This is therefore in accordance with the policy.
Policy G9 (Reducing the impact of pollution, contamination and land instability)	The proposal will not have an unacceptable increase on water as per the submitted FRA. This therefore makes the proposal policy compliant.
Policy JP-C7 (Freight and Logistics)	The proposed development would improve operational efficiencies and will assist the prospective occupier to achieve its objectives relating to reducing emissions. Therefore the proposal is compliant with the policy.
Policy JP-C8 (Transport Requirements of New Development)	As per the submitted Transport Statement the proposal will have no effect on the public highways. The existing & consented cycle parking & EV charging will remain. The proposal is considered to comply with the policy.
Policy SO5 (To improve accessibility and deliver sustainable transport)	As per the submitted Transport Statement the proposal will have no effect on the public highways. The existing & consented cycle parking & EV charging will remain. The proposal is considered to comply with the policy.
Policy T2 (Improving accessibility)	a Transport Statement to consider there to be no impact on the local highway network as a

	result of the proposals. This is considered to be in compliance with the policy.
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