

Planning Statement

Land Known as Castleton Service Station

Manchester Road

Rochdale

OL11 3AD

Proposal: Change of Use of Land from the Sale of Motor Vehicles (Sui Generis) to a Mixed-Use Comprising Tyre Storage, Processing (Including Shredding and Bailing), Export, and Tyre Sales and Fitting (Sui Generis) Including Erection of a Single Storey Rear Extension to House Bailing Machine.

May 2024

Building Design Services (BDS)

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1.0 INTRODUCTION

- 1.1 This planning statement is submitted by Building Design Services on behalf of the applicant Mr Suleman Yousaf who owns and manages the 'Global Tyre Recycling Limited' unit/site on Manchester Road, Rochdale. The sites last known lawful use was as a Petrol filling station, thereafter the building and forecourt areas were used for second hand car sales, however, there is no planning history for this use. More recently (past year) the site has been in mixed use relating to car/van tyres. This current use does not have the benefit of planning permission.
- 1.2 Given the unauthorised use of the site, an Enforcement Notice was issued by Rochdale Council on 31st August 2023. The breach of planning control as alleged in the notice is 'without the benefit of planning permission, a material change of use of the land from the sale of motor vehicles (Sui Generis) to a mixed use comprising tyre storage, processing (including shredding and baling), and export, and tyre sales and fitting (Sui Generis) facilitated by operational development consisting of the erection of a single storey rear extension to house a baling machine'.
- 1.3 Subsequently an appeal was lodged by the owner against the Councils Enforcement Notice, the appeal was dismissed, and the enforcement notice was upheld by the Inspector. The applicants appeal argued that planning permission ought to be granted in respect of the breach of planning control alleged in the notice.
- 1.4 Having considered the reasons for dismissing the appeal decision and the main issues which impact the development, further justification, design, and consideration is provided as part of this planning application. The issues stated below will be dealt with categorically and include;
- (i) highways safety, and the free flow of traffic,
 - (ii) the living conditions of the occupiers of neighbouring properties in respect of noise and disturbance and;
 - (iii) the character and appearance of the area.
- 1.5 In the past Rochdale's local economy has underperformed in comparison to Greater Manchester and the rest of the north-west with low levels of employment and high levels of unemployment. Rochdale is therefore looking to widen its employment base, with an increase in the range and quality of jobs in the borough and improved access to jobs outside the borough. There are significant opportunities within the borough to achieve this over the next 15 years.

- 1.6 A more prosperous local economy, which is diverse, competitive, sustainable, and lower carbon, is essential to the success of Rochdale borough. It can help to:
- Create the right environment for more successful and healthier communities;
 - Attract more inward investment;
 - Create a greener environment;
 - Provide more resources to improve services, facilities and quality of life; and
 - Improve the image of the borough as a destination of choice for businesses.
- 1.7 Castleton's redevelopment and regeneration potential is an important vision which offers residents and businesses an opportunity to develop a sustainable community with excellent transport links, including into Manchester City Centre, with a vibrant mixture of living, working and recreational opportunities.
- 1.8 The applicant would like to work with the Council in order to secure approval for the proposed use.

2.0 SITE AND SURROUNDINGS

- 2.1 The appeal site comprises a modest single storey building positioned centrally of the site formerly used as a kiosk for the now shut down petrol filling station, a large area of hardstanding surrounds the building to all sides. The building is set back approximately 20m from the highway of Manchester Road into the site. The hardstanding areas area predominantly to the building's north, east and west (fronting Manchester Road). The site is bounded by 1.8m high steel fencing painted black.
- 2.2 Residential accommodation (Rose Court) is located immediately to the south, including accommodation facing onto and looking over the site. To the north is a recently constructed car park constructed for use by residents who have had on- street car parking displaced following the highway improvements in the area. Beyond it to the north is a large area of amenity space, laid to grass and with a number of trees dispersed within it. On the opposite side of Manchester Road is a small convenience store, with residential properties either side and to its rear. To the east of the site are large industrial/commercial units.
- 2.3 Manchester Road is a classified road (A664), part of the Strategic Highway Network and additionally, is part of the Transport for Greater Manchester (TfGM) Key Route Network. A newly built cycleway, part of the Bee Network, a scheme to improve active travel provision across Greater Manchester through the provision of cycling and walking infrastructure, also passes along the entire frontage of the site. The site currently has two access points, both from Manchester Road, however one is currently blocked off.
- 2.4 The UDP Proposals map shows that the site is unallocated but in the defined urban area. Rochdale Town Centre is located to the north. To the south is Castleton town centre, see below;



- 2.5 **Above:** The site is located adjacent to and accessed off Manchester Road. The surrounding area consists of a mixture of uses with industrial to the east, residential to the south, and commercial to the west.



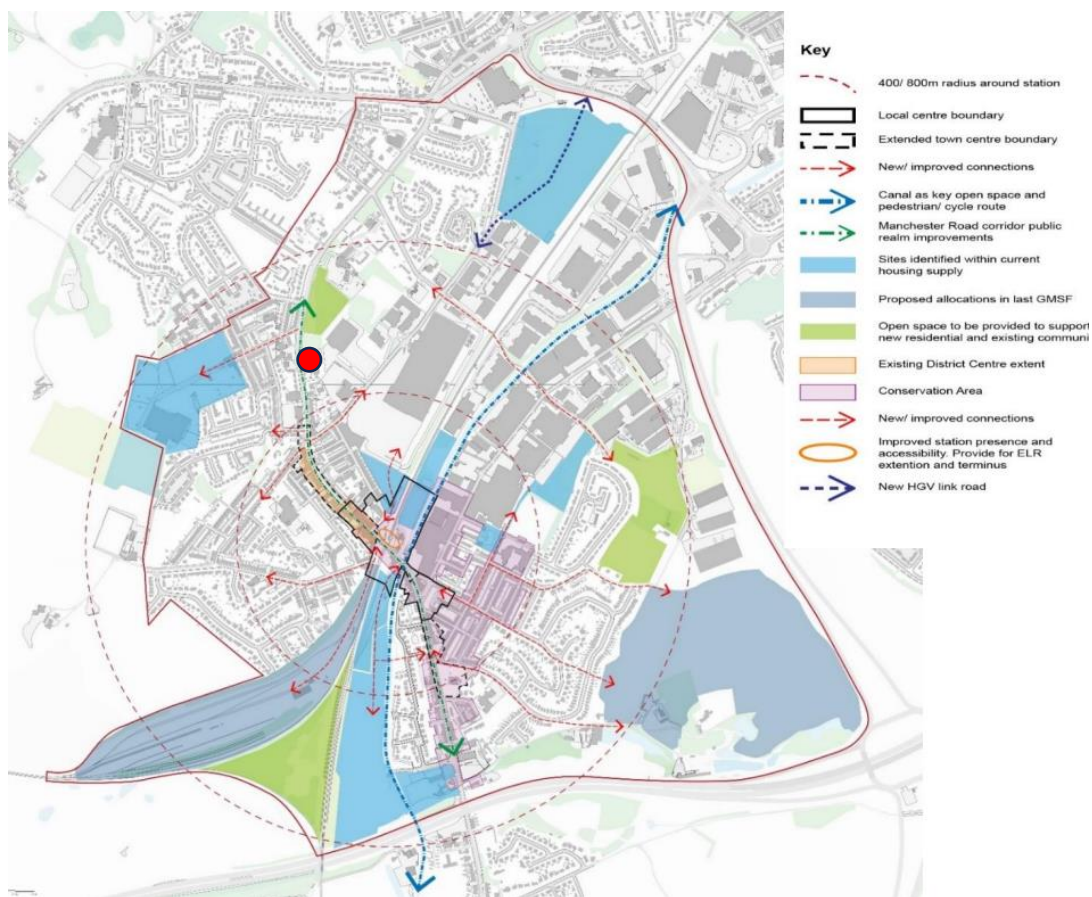
- 2.6 **Above:** The site is located adjacent to and accessed off Manchester Road. The surrounding area consists of a mixture of uses.



2.7 **Above:** Image above shows the existing access from Manchester Road



2.8 **Above:** Image above shows the front of the site where the historic exit has been blocked off.



2.9 **Above:** Image above taken from the Castleton Station SPD shows the site located adjacent to the Manchester Road public realm improvement corridor and to the north of Castleton local centre and Train Station.

3.0 PROPOSED DEVELOPMENT

3.1 The applicant is applying for planning permission to regularise the developments on site, this includes the change of use of the land from the sale of motor vehicles (Sui Generis) to a mixed-use comprising tyre storage, processing (including shredding and bailing), export, and tyre sales and fitting (Sui Generis) including erection of a single storey rear extension to house the bailing machine.

3.2 It is acknowledged that the Appeal decision is conclusive in terms of the existing operations at the site, and that the manner in which the site functions as existing is unacceptable. However, as part of this application, those issues raised by the Inspector have been considered in full and a significant number of changes are to be introduced. In addition, an Acoustics Survey is submitted and a vehicle tracking plan provided to clearly justify acceptability of the proposed business at the site.

3.3 The proposed changes and information submitted as part of this proposal include;

Highways Safety and Free Flow of Traffic;

- Dedicated parking for customers and employees;
- Vehicle tracking plans submitted for HGVs;
- Existing blocked off Exit to be opened up, and separate access and exit at the site re-established
- Loading ramp to be re-positioned

Noise and Disturbance;

- Noise impact assessment submitted as part of this proposal
- Tyre bailing machine mitigation measures introduced to reduce noise;
- Forklift and HGV reversing alarms considered as part of NIA
- Hours of operation to not take place outside of the hours of 8am to 6pm Monday – Friday, and 8am to 1pm on Saturdays, with no use taking place on Sundays or Bank Holidays.

Character and appearance;

- Tyres to be stored towards the rear of the site;
- 2m high fencing be erected within the site limiting views to the rear;
- Tyres to be reduced in number overall and stored neatly and tidily;

4.0. INVOLVEMENT

- 4.1 No formal pre-application advice in this instance has been sought from the Council given the appeal decision and previous correspondence. The scheme put forward is an acceptable proposal providing good quality mixed used commercial business in the area.
- 4.2 Paragraph 39 of the NPPF states;
- “Early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties. Good quality preapplication discussion enables better coordination between public and private resources and improved outcomes for the community.”.
- 4.3 This planning Statement has been submitted as part of this planning proposal to provide a reasoned justification of the proposal using local and national planning policy and guidance.
- 4.4 The issues of Highways safety, visual amenity of the surrounding area, and noise are taken into consideration in the assessment below.

5.0 HISTORY

5.1 A history check has been undertaken which has revealed the following planning history for the site;

- **77/D04971** – Canopy. Grant subject to conditions.
- **87/D21309** - Use Of Part Of Forecourt For Car Sales/Display Area. Granted subject to conditions.
- **96/D33841** – Change of Use from Petrol and Service Station and Car Wash to Car Wash Service and Car Sales. Granted subject to conditions.
- **97/A4701** - Canopy Sign Pole Mounted Signs & Various Free Standing Signs With External Illumination From Lamp Columns (Retrospective Application). Refused.
- **98/A4748** - Retrospective Application For Canopy Sign Pole Mounted Signs And Various Free Standing Signs With External Illumination From Lamp Columns (Resubmission Of A4701). Withdrawn.

6.0 RELEVANT PLANNING POLICY

- 6.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that decisions should be made in accordance with the development plan unless material considerations indicate otherwise.
- 6.2 Rochdale's Core Strategy was adopted in July 2016 and is the key Development Plan Document. It replaces significant elements of the existing Unitary Development Plan as the document that sets out the long-term strategic policies for Rochdale's future development and will form the framework that planning applications will be assessed against.
- 6.3 The Core Strategy seeks to deliver sustainable development and growth in accordance with the objectives of the National Planning Policy Framework (NPPF). It aims to increase investment in the borough and to make it a more prosperous place by 2028. The Core Strategy will have a major role in guiding the regeneration of the borough, building on the investment that has already taken place in some areas and identifying where to focus on next.
- 6.4 The following Local Plan policies have relevance to the proposal:
- Adopted Rochdale Core Strategy (CS) – Adopted October 2016:
- 6.5 In order to deliver its Vision for the Borough in 2028 the Council has a number of Strategic Objectives (SO's) set within its Core Strategy, setting out what the Council needs and wants to achieve if it is to achieve a more sustainable borough with a better quality of life for residents. Those SO's are set out below, along with their associated policies including an overview of each, which are relevant to this appeal.
- 6.6 **SO2** (Focusing on Regeneration Areas and Economic Growth Corridors/Areas) objective is in place to create successful communities, and to do this, it is stated that the right environment needs to be created, as it will help to make the borough more attractive and widen its appeal.
- 6.7 **Policy C2** seeks to focus housing development in regeneration areas, including Castleton and in and around economic growth corridors to assist in the creation of 4 sustainable patterns of development. The appeal site is located along an economic growth corridor.
- 6.8 **SO3** (Improving design, image and quality of place) - This objective is in place to improve design, image and quality of place. To achieve this objective it is required, inter alia, to raise design quality, make development more attractive and sustainable and to promote sustainable development.

- 6.9 **Policy P1** states that high quality design will be sought in all new developments and that it will be ensured that new development improves the image of the borough by; “Requiring design which is of a high standard, demonstrating innovation and originality” and will be particularly important in prominent sites.
- 6.10 **Policy P3** requires “all new developments, including associated landscaping, regardless of location in the borough, to adhere to high standards of design and should adhere to the relevant design principles, including “Enhancing the borough’s identity and sense of place, by respecting context where it is positive and having regard to the scale, density, massing, height, layout, landscape, materials and access of surrounding buildings and areas in general.
- 6.11 **Policy E2** of the Councils Core Strategy is relevant and which states ‘We will ensure a sufficient supply of suitable land, buildings and infrastructure in the right places to support the creation and retention of successful businesses and increase the number and quality of jobs to create a more prosperous lower carbon economy’.
- 6.12 **S04** and **Policy G9** seek amongst other things to protect/improve the environment to deliver a better borough, including a requirement that new development does not have unacceptable increases in all forms of pollution, including noise pollution.
- 6.13 **Policies T1 and T2**’s objective and the aforementioned policies demonstrate the Council’s commitment to ensuring that transport and accessibility are key to improving the overall sustainability of the borough, given its key strategic location. As part of its aim to improve accessibility and enhance sustainable travel policies seek to ensure accessibility for all users and to ensure that the transport network continues to become safer and more secure for all users. Policy T2 states that in all circumstances the safety, accessibility and amenity of those who live or have business in the area will have priority.
- 6.14 **Policy DM1** sets out those general planning considerations to which all development proposals should demonstrate compliance with, including;
- demonstration of high quality design that enhances the quality of an area
 - demonstrating compatibility with surrounding land uses,
 - Ensuring amenity of residents is not adversely impacted;
 - Providing mitigation against pollution, traffic generation or inadequate access; and
 - Providing satisfactory vehicular access with adequate parking, manoeuvring, and servicing arrangements taking into account of the proposed use and location.

Supplementary Planning Documents (SPD):

- 6.15 Rochdale Borough Council's Supplementary Planning Document - Castleton Station Supplementary Planning Document (Adopted March 2022).
- 6.16 This SPD has been prepared to establish an appropriate framework to guide and deliver development by setting out the development, design and accessibility principles, and the identification of focus areas where more specific guidance is necessary. It demonstrates the Council's commitment to improving and regenerating Castleton, which is a strategy priority, and its overall vision is to redevelop and regenerate Castleton in a sustainable way.

NPPF (2023)

- 6.17 The NPPF clearly states 'that the purpose of the planning system is to contribute to the achievement of sustainable development' (paragraph 7). Paragraph 10 confirms that 'in assessing and determining development proposals, local planning authorities should apply the presumption in favour of sustainable development'. Paragraph 11 states that a presumption in favour of sustainable development is at the heart of the NPPF. It goes on to say that 'for decision-taking this means:
- c) approving development proposals that accord with an up-to-date development plan without delay; or
 - d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:
 - i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
 - ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.
- 6.18 Paragraph 85 of the NPPF states:
- "Planning policies and 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 address the challenges of the future. This is particularly important where Britain can be a global leader in driving innovation, and in areas with high levels of productivity, which should be able to capitalise on their performance and potential."

6.19 Paragraph 87 of the NPPF states that Planning policies and decisions should: recognise and address the specific locational requirements of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations.

6.20 Paragraph 128 of the NPPF states:

Planning policies and decisions should support development that makes efficient use of land, taking into account:

- a) the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it.

6.21 Paragraph 135 of the NPPF, advises that Planning policies and decisions should ensure that developments create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users.

6.22 Paragraph 115 of the NPPF states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

6.23 The general perspective of the NPPF is that planning should proactively drive growth and support sustainable economic development. It also states that planning should make effective use of land by reusing land that has been previously developed and sets out a presumption in favour of sustainable development. The government is committed to ensuring that the planning system does everything it can to support sustainable economic growth.

National Planning Practice Guidance (NPPG)

6.24 The government published its NPPG on 6 March 2014. This is intended to complement the NPPF and to provide a single resource for planning guidance, whilst rationalising and streamlining the material. Almost all previous planning Circulars and advice notes have been cancelled. Specific reference will be made to the NPPG or other national advice in the Analysis section of the report, where appropriate.

7.0 ASSESSMENT

Principle

- 7.1 Policy E2 of the Councils Core Strategy is relevant and which states 'We will ensure a sufficient supply of suitable land, buildings and infrastructure in the right places to support the creation and retention of successful businesses and increase the number and quality of jobs to create a more prosperous lower carbon economy'.
- 7.2 The proposed mixed use development proposed would be located within the defined urban area as allocated under the Rochdale Unitary Development Plan. As such policy G/D/1 is relevant to any applications on the site and this establishes that development should be located in the urban area so as to support urban regeneration and protect the countryside.
- 7.3 Apart from being within the urban boundary, the site is unallocated but adjacent to the dedicated Employment Area to the east. The proposed mixed use proposed would make good use of a site which needs investment and one that needs bringing up to a good standard in this mixed-use area. The site prior to the current tyre business was disused and not looked after, it appeared generally tired and unloved. The proposed investment as part of this proposal would bring the site back to a suitable functional use and where it would not have a negative impact on the surrounding area.
- 7.4 The site is well located in relation to small- and large-scale commercial and general industrial uses on the fringes of Castleton local centre as well as bringing employment in an urban area so as to support urban regeneration. Large industrial buildings including Walkers Transport are located to the back of the site, a Nisa Local store with Post office is positioned on the opposite side of Manchester Road, with a large parking area on the adjacent land to the north for residents and visitors. This indicates the makeup of the surrounding area. Consideration should also be given to previous uses at this site, which include a petrol filling station, and a car sales and repair garage.
- 7.5 The proposal would provide a good quality accessible business which would include tyre repair for the local community as well as bailing and shredding of tyres to support local tyre repair businesses within the wider Castleton and Rochdale areas which is much needed in this inner urban area. The proposal would enhance the character of the area by making good use of existing land, it would consider the needs of the local community, protect the surrounding built environment and provide the surrounding community with services within walking distances reducing the need to travel long distances to other units.

- 7.6 The effect on residential amenity by reason of noise or other nuisance would be kept to a minimal given – the proposed hours of operation, mitigation measures proposed, the amount of use the site would generate, its positioning amongst other commercial and industrial uses, and also considering the sites previous uses, and by virtue of its location along the busy Manchester Road.
- 7.7 It is also considered that the proposal would not have a detrimental effect on the safe and efficient operation of the existing transport and road infrastructure. Highways safety is further discussed in the relevant section below.
- 7.8 In respect of part of the above policies, the area is predominantly mixed-use and the proposed uses would be amongst existing commercial and industrial businesses surrounding the site. The proposal is not therefore considered to have a negative impact on the character of the area. The site is also located in a sustainable area with good access and facilities, and which makes efficient use of the land whilst delivering an appropriate use for the site.
- 7.9 In light of the above it is considered that the principle of providing the proposed uses at the application site is acceptable.

Noise and disturbance

- 7.10 The application site is positioned adjacent to flats directly to the south of the site. The newly formed extension that houses the tyre bailing machine has been located approximately 10m from these flats. The machine that compresses the tyres does generate some noise and is in use for parts of the day. Therefore, given the noise generated Sound Testing has been conducted and a Noise Impact assessment is submitted as part of this proposal.
- 7.11 Furthermore, in order to reduce the amount of noise reaching the flats acoustic insulation measures are to be introduced to the extended building in order to reduce the amount of noise. Also, where the original building and the hardstanding areas in front of it are used for tyre replacement / fitting, this would be for short periods where the side door would be closed, and an acoustic barrier fitted to limit noise escape. Given the mitigation measures and NIA submitted, this shows the impact on neighbouring occupiers would be kept to a reasonable acceptable standard.
- 7.12 Concerns were also raised in relation to forklift trucks that load/unload tyres throughout the site and that a reversing alarm can be heard, in addition, a reversing alarm can also be heard from HGV's that enter the site

to load. The forklift truck is used to move tyres from the bailing machine, and to load the bailed tyres on to an HGV using the ramp on site.

- 7.13 Taking the above into account, including the submission of an NIA and mitigation measures, and that HGV's would only enter the site 2-3 times a week to load, and that the site would only be open from 8am to 6pm Monday – Friday, and 8am to 1pm on Saturdays, with no use taking place on Sundays or Bank Holidays, the proposed operations would not cause unacceptable levels of noise and disturbance to the occupiers of neighbouring properties in the day time, and where it would be closed during the evenings and night where residents can enjoy a relaxed period of comfort and sleep.
- 7.14 Therefore, given the information submitted, the proposed development accords with the amenity requirements of policies G9 and DM1 of the CS and paragraphs 135(f) and 191 of the National Planning Policy Framework.

Character and appearance

- 7.15 Evidence shows that the site has been used in a manner where tyres are stored across most of the site and in a haphazard manner. Some of the tyres are stored in a prominent position when viewed from Manchester Road. In its current state, the unauthorised development gives the site a more industrial and unplanned appearance. The applicant acknowledged that the site is materially at odds with the otherwise mainly planned environment.
- 7.16 Given the comments made by the Inspector and concerns raised by the Council, significant changes are to be introduced to improve the current poor appearance of the site. The plans submitted show that the actual number of tyres on site would be significantly reduced. Also, the number of tyres stored to the front of the site would be placed to the rear of the site. As such there would be no tyres stored immediately adjacent to the highway of Manchester Road, by virtue of this change the site would appear considerably cleaner and acceptable and planned in this location. Furthermore, the parking would be arranged with formal parking lines for both customers and employees.
- 7.17 The above changes would ensure that the front of the site is organised and appears acceptable along this part of Castleton along the busy Manchester Road. The hardstanding in front of the building would be open, clear

with formal parking, as such this area would mainly be used by customers who wish to use the tyre repair shop.

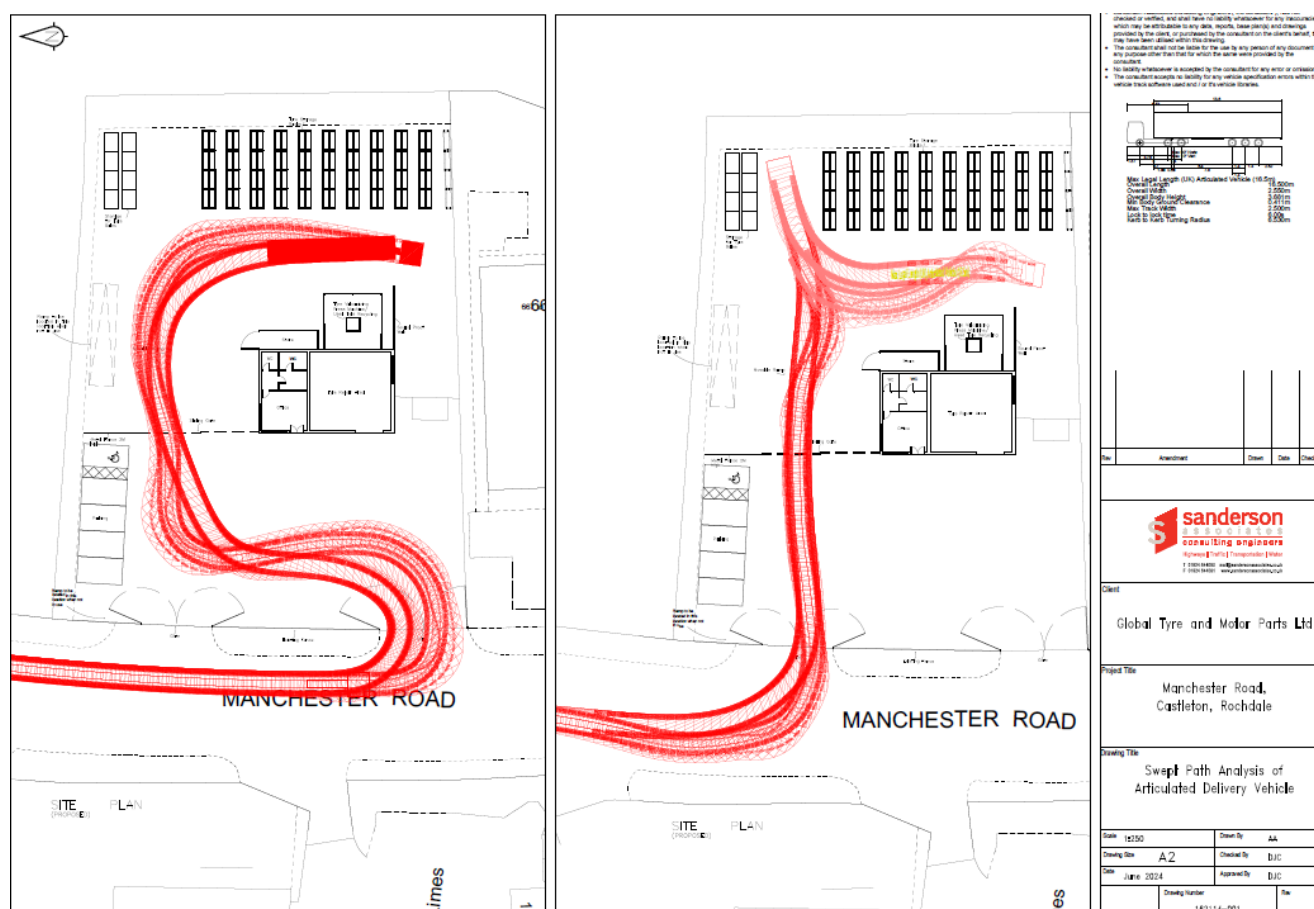
- 7.18 In order to reduce the appearance of tyres further, a 2m high fence and large gate would be erected between the front of the building and the northern side boundary. This would reduce the tyres being seen from vantage points. Also, it is paramount that the tyres are not stacked higher than the fencing, more than 2m in height.
- 7.19 As such, given the positioning of the bails and tyres to the back of the site, erection, height and design of fencing, and limiting the stack height of the tyres, the site would not appear unsightly and haphazard when viewed from public vantage points or from neighbouring residential flats.
- 7.20 In terms of the extension to the building, this is located to the rear and is not prominent in the street-scene albeit that it can be seen from the car park adjacent to the site. It is considered acceptable in terms of its appearance and building material which is similar to the materials used on the on original kiosk building.
- 7.21 Mention has also been made to the number, colours, and positioning of the advertisements, and that they materially detract from the character and appearance of this part of Manchester Road where there is generally an absence of advertisements. The advertisements detract from the more muted tones and colours in the area and are seen as cluttered and unplanned additions in the street-scene. However, this would require a separate application for advertisement consent. The applicant has agreed to submit an application once the conclusions of the uses at the site have been reached.
- 7.22 Therefore, given the positive changes proposed to the appearance of the site, the proposed development would accord with the design, character, and appearance requirements of policies DM1, C2, P1, P3 of the CS, the SPD and chapter 12 of the Framework.

Highway safety and the free flow of traffic

- 7.23 Manchester Road is a classified highway and is part of the 'Bee Network' which includes the provision of new cycle lanes including to the front of the appeal site. The access into the site is historic and has been used by large vehicles throughout its history.
- 7.24 Concerns have been raised by the Highway Authority that there is inadequate internal turning space to accommodate a 16.5-metre-long articulated vehicle which is used to ship the bailed tyres from the back of the

site. Also, appeal representations stated that lorries have had to manoeuvre within Manchester Road to facilitate reversing into the site as part of dropping off and collecting tyres.

7.25 Given the existing operations and concerns raised by the Council and neighbouring occupiers, a significant number of changes are to be introduced to drastically improve the functions of the site. While it may be possible to service the site using smaller heavy goods vehicles, a vehicle tracking plan is provided as part of this proposal which shows adequate provision of an on-site turning facility, see below.



7.26 The turning for HGV's is now achievable by the reduction in the number of tyres being stored outside and especially to the front of the site, a dedicated area for the parking of vehicles used/owned by staff and visitors which naturally provides larger open space to the front of the site, and by the re-opening of the second access exit.

7.27 Therefore, in the context of the above, owing to the location of the tyres to the back of the site and the now available on-site turning facilities to the front and separate exit to enable all heavy goods vehicles to enter and leave in forward gear, it is considered that the development would not cause unacceptable harm to highway

safety arising from the likely conflicts between reversing heavy goods vehicles and oncoming motor vehicles, bicycles, and pedestrians.

- 7.28 Overall, the proposed development would not result in any manoeuvring on the highway and would not severely interrupt the free flow of traffic on Manchester Road which is heavily trafficked. Therefore, the proposed development would accord with the highway safety and traffic management requirements of policies DM1, T1 and T2 of the Rochdale Core Strategy 2016 (CS), the Council's Castleton Station Area SPD 2022 (SPD), and paragraph 115 of the National Planning Policy Framework 2023 (the Framework).

8.0 CONCLUSION

- 8.1 It has been demonstrated that the proposed development can be carried out in full compliance with the Councils policies in the Local Plan and the National Planning Policy Framework. The development would provide a good quality development which would bring a positive contribution into the local area of Castleton and Rochdale as a whole without creating a significant detrimental impact on the amenity of the local occupiers and residents.

APPENDIX