



**TOWN AND COUNTRY PLANNING ACT 1990
(AS AMENDED)**

PLANNING STATEMENT

Proposal: Outline planning application for the erection of 36 residential apartments, with access, layout and scale for determination.

Site: Land off Waterfold Lane, Heap Bridge
Bury

Applicant: Mr D. Gibbons

Date: August 2022

Our ref: GIB975/2

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1. INTRODUCTION

- 1.1 This Planning Statement has been prepared on behalf of Mr David Gibbons by Knights plc. It accompanies an outline planning application for the erection of 36no. residential apartments in the form of a pair of two storey buildings. The location of the proposed development is a site of 0.78 hectares at Waterfold Lane, Bury.
- 1.2 Access, layout and scale are for determination as part of the application. Appearance and landscaping are reserved for future determination.
- 1.3 In addition to this planning statement, the application includes the following:
- Location plan
 - Site layout plan
 - Design and Access Statement
 - Air Quality Assessment
 - Arboricultural Impact Assessment
 - Crime impact study
 - Ecology Appraisal and Biodiversity Net Gain Assessment
 - Flood Risk Assessment and Surface Water Drainage Strategy
 - Geo-environmental Phase 1 desk top study
 - Noise Impact Assessment
 - Transport Technical Note
 - Landscape proposals (indicative)
- 1.4 This planning statement also incorporates an affordable housing statement and a statement of community involvement.
- 1.5 Prior to submitting this planning application, the applicant instructed Pullman Associates to engage with the LPA on a proposed scheme of 19 dwellings. A letter of response was received from the Council dated 21 July 2021 (reference PREAPP/00063/21). This advice has informed the form and scope of the planning application which has been amended since the pre-application submission:
- The pre-application submission did not address Green Belt policy issues and the application now sets out a case that the scheme would comprise one of the limited types of development deemed under national policy not to be inappropriate development in the Green Belt.

- The Council's pre-application response also set out issues that needed to be considered as part of the supporting technical documentation. This application has been scoped and assembled to reflect the advice provided.

2. SITE AND SURROUNDINGS

- 2.1 The application site is located at Waterfold Lane, Heap Bridge, with the towns of Heywood to the east and Bury to the west (grid reference 382114 410336). The site is outlined in red on the image below. A section of Waterfold Lane to the east is also included in the application site boundary, as this would require widening in order to facilitate access.

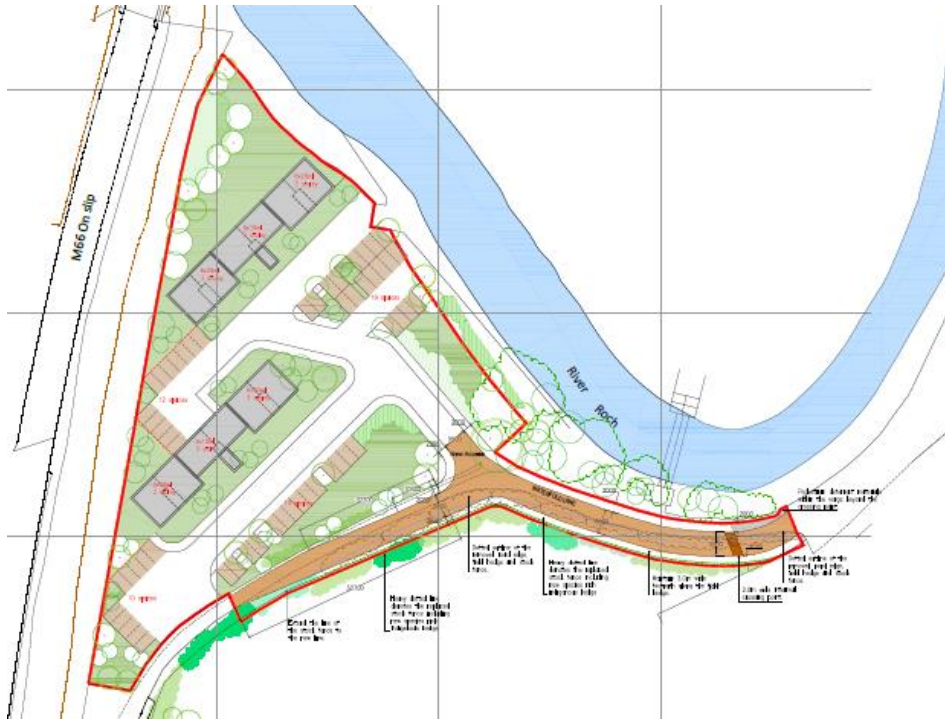


Figure 1 - site location

- 2.2 The land is the former site of Water Fold Mill, a woollen mill built in the mid-1800s. The mill fell into disuse and was eventually demolished in the late 1960s/early 1970s, when the motorway was constructed. At that point the site was used as a construction compound and it has since remained vacant.
- 2.3 The application site and surroundings are shown on the photographs at Appendix 2. As these images show the land has the appearance of a cleared but not remediated brownfield site; vegetation cover is limited and some areas of hard surfacing are present. The site is largely flat, with a bund to the south east separating the site from Waterfold Lane to prevent unauthorised access.

- 2.4 The section of Waterfold Lane leading to the site is a narrow hard-surfaced road, bordered by a low hedge to its south and more extensive vegetation to the north, where the land falls steeply to the river.
- 2.5 The application site is roughly triangular in shape and elevated above the River Roch, which runs to the north of the site at the base of a steep slope. The site boundary is set back from this slope down to the river. The M66 motorway is elevated above the site and the base of the embankment up to the motorway forms the western boundary of the site. A screen of trees and scrub separates the site from the motorway. Waterfold Lane forms the southern site boundary and is partly included in the site (in order to facilitate widening).
- 2.6 From its connection with the A58 around 300m north of the site, Waterfold Lane is lined with residential properties up to a point around 50m from the application site. The lane also provides local farm access to the south, where it passes under the East Lancashire Railway (heritage railway line) in a short tunnel 120m to the south of the site. There is also access here for pedestrians and cyclists, connecting beneath the M66 with the employment area to the west of the motorway.
- 2.7 Details of the facilities and services available in the locality are set out on the table and map at Appendix 1. As these show for instance the nearest primary school is a 0.8km walk, the nearest shop is at 0.8km and the nearest bus stop is at 325m. Bus services would provide access to locations including Bolton, Bury, Heywood, Rochdale, and Manchester. Details of local facilities and services are set out on the table and map provided at Appendix 2. The transport report by SCP accompanying this application provides details of bus services
- 2.8 The site sits within a location designated as Green Belt. There are no statutory nature conservation or heritage designations applying. The land is not within the setting of a listed building or located in a conservation area.
- 2.9 In respect of flood risk from rivers, the River Roch and its immediate bank are in Environment Agency (EA) Flood Zones 2 and 3 but the greater part of the site and the development area are located in Flood Zone 1 (lowest risk). The site is not shown on EA maps as at risk from surface water flooding.

3. STATEMENT OF COMMUNITY INVOLVEMENT.

- 3.1 In accordance with best practice the applicant has carried out pre-application engagement with residents who live in the locality.
- 3.2 The applicant attended a meeting of the Waterfold Lane resident's group meeting on 8 November 2021. The venue was Heap Bridge Social Club on Waterfold Lane and a presentation was given in respect of the emerging development proposals, followed by a question and answer discussion session. A record was kept of the meeting and there were 19 residents in attendance.
- 3.3 Feedback received indicated that, with the site being vacant unused land, many had concerns regarding the unmanaged nature of the site and were broadly receptive to a well-planned residential development coming forward here.
- 3.4 Concerns raised included any potential increase in car parking on Waterford Lane. This was already an issue in respect of staff from local businesses parking on street near houses, making it difficult for residents to park. The potential impact of construction phase traffic and larger vehicles in particular was a key issue raised.
- 3.5 It is noted sufficient parking to serve the proposed apartments can be provided on-site and construction phase traffic could be a matter covered in a construction management plan. Such a requirement could be secured and agreed via planning condition..

4. THE PROPOSED DEVELOPMENT

- 4.1 The application is submitted in outline planning application for the erection of 36 residential apartments, with access, layout and scale for determination.
- 4.2 The proposed development comprises 2 blocks of residential apartments, 3 storeys in height, 36 apartments in total. Whilst floorplans would be agreed at the reserved matters stage 24no 2 bed units plus 12no 1 bed units are proposed. There will also be resident and visitor parking, communal gardens and access roads all set within landscaping. Details are shown M21-13-08 rev 05.
- 4.3 The plan is largely indicative as the application is made in outline, however the layout is to be agreed as part of the application and in respect of the location of the buildings it is intended these be located with their front elevations facing south east (shielded from road noise) and rear elevations facing the motorway embankment.
- 4.4 Access is also proposed for determination as part of the application and Waterfold Lane would require widening to provide access to the site. It is proposed to provide a 5.5m wide carriageway with a 2m wide footway to the north side of the road. A replacement hedgerow to the south side of the lane is proposed, comprising appropriate native species.
- 4.5 As shown on M21-13-08 rev 02 a level of car parking compliant with parking standards can be achieved, whilst allowing for a well landscaped design (parking for 63 vehicles is shown on M21-13-08 rev 05).
- 4.6 The development will be set back from the river with the boundary of the development set beyond the top of the embankment that leads down to the river. As such the existing vegetation here will not be affected, nor will the tree screen on the slope up to the motorway be affected by the proposals. As shown on the indicative landscape proposals an attractive tree-lined development would be created and the proposed hedgerow and tree planting would create an attractive frontage to Waterfold Lane, seeking to enhance the surroundings.

5. AFFORDABLE HOUSING STATEMENT

- 5.1 The development plan policy approach is set out in Rochdale Core Strategy policy C4 - Providing affordable homes which states that the LPA *“will seek affordable housing on all developments of 15 dwellings or more”*. The contribution to affordable housing sought is *“7.5% of the development sales value of the overall scheme”* and *“an assumption of 15% of the homes being affordable with an average discount of 50% of the open market value”*.
- 5.2 In this case the proposed development of 36 apartments is to be 100% affordable and it is intended a Registered Social Landlord (RSL) will take ownership of the completed development and manage the homes/site. Whilst floorplans would be agreed at the reserved matters stage a mix of 24no 2 bed units plus 12no 1 bed units is proposed. The affordable housing is to be secured in perpetuity by way of a S106 legal agreement and each housing unit would therefore be restricted to occupation as affordable housing as the private residence of the occupier.
- 5.3 This application is submitted in outline and final plans of the two apartment buildings are not available as part of the application. As such it is not possible at this stage to provide floorspace details for the mix of housing tenures. The RSL, in consultation with the Council housing officer would determine the specific mix of housing tenures to be provided in the scheme at the reserved matters stage. This would therefore seek to address the priorities in respect of identified need at that point in time.

6. PLANNING ASSESSMENT

- 6.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states: *“If regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise.”* Development Plan policies are therefore the primary material consideration in planning decisions.
- 6.2 The current development plan for the site comprises:
- Saved Rochdale Unitary Development Plan (UDP) policies (as adopted June 2006).
 - Rochdale Core Strategy (CS) (adopted Oct 2016)
 - Adopted Proposals Map.
- 6.3 In addition, the joint development plan for the Greater Manchester local planning authorities entitled ‘Places for Everyone Joint Development Plan Document’ was submitted for examination in February 2022. As this plan is not adopted at the time of writing however, significant weight cannot be given to these policies.
- 6.4 The National Planning Policy Framework (‘the NPPF’) was republished in July 2021. It provides national policy to guide development plan preparation and planning application decision making. At the heart of the Framework is a presumption in favour of sustainable development as set out in paragraph 11. It is noted that the NPPF sets out national policy in respect of the Green Belt.
- 6.5 Rochdale Borough Council also has a Residential Design Guide (adopted September 2007) which was also reviewed in preparing the planning application.
- 6.6 Consideration has been given to the key planning issues and the relevant development plan policies applying. A central planning consideration here is that, as identified on the adopted proposals map, the site is located outside the development boundary and within the Green Belt. As such the main matters to address are considered to be firstly the principle of development in the Green Belt and then to weigh the potential impacts of the development against the benefits of the proposals.

A. GREEN BELT

- 6.7 The site is identified on the adopted proposals map as located outside the development boundary and within the Green Belt as defined under saved UDP policy G/D/2. As such key policies applying include Core Strategy policy G4 - Protecting Green Belt Land, UDP policy G/D/1 Defined Urban Area and G/D/2 Green Belt, along with national policy on Green Belts.

- 6.8 Core Strategy policy G4 says Green Belt land will continue to be protected from development with development restricted to those limited types of development deemed not to be inappropriate by national planning policies unless very special circumstances can be demonstrated.
- 6.9 As set out in NPPF paragraph 149 (g) the redevelopment of previously developed land is a policy exception where the construction of new buildings can be appropriate in the Green Belt subject to the proviso that the proposals would *“not have a greater impact on the openness of the Green Belt than the existing development; or not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority”*.
- 6.10 It is therefore important to note:
- The site was formerly occupied by buildings and still has areas of hardstanding and a retaining wall alongside the river. Evidence of the site’s previously developed land status is set out at Appendix 2 with further details of the history of the site including maps showing the previous built development on the site and site photographs showing hard surfaced areas of the site. As is clearly seen it retains the overall appearance of a site where buildings have been demolished and is considered to comprise previously developed land.
 - As set out in Section 5 above the proposed development will provide a component of affordable housing and so *“contribute to meeting an identified affordable housing need within the area of the local planning authority”* in accordance with NPPF paragraph 149 (g).
 - The site is well contained, being enclosed by the river Roch to the north, Waterfold Lane to the east and the M66 motorway to the west. The motorway is elevated above the site and has an embankment of trees that form a screen between the site and the motorway. The proposed buildings on the site would therefore be seen with this tree screen at a higher level to the rear. As such in accordance with NPPF paragraph 149 (g) the proposals would *“not cause substantial harm to the openness of the Green Belt”*
- 6.11 As such the proposals would comprise one of the limited types of development deemed not to be inappropriate development in accordance with NPPF paragraph 149 (g) where the proposals would *“not cause substantial harm to the openness of the Green Belt”*.

B. THE IMPACT OF THE PROPOSALS

(i) Access and highway impacts

- 6.12 Core Strategy policy T2 - Improving accessibility seeks development with good access to public transport and effective provision for cyclists, pedestrians and people with impaired mobility. Development should be located so as to minimise the need to travel by car to access local amenities. Core Strategy policy T2 also requires developments provide parking in compliance with a schedule of parking standards at Appendix 5 of the Core Strategy

- 6.13 This planning application is accompanied by a Transport Technical note by consultants SCP. The anticipated level of traffic generation associated with proposals has been assessed and the report concludes that this would not have a material impact on Waterfold Lane the A58 (an 9 additional vehicles per hour at peak was forecast).

- 6.14 The report also details the proposals to improve the access to the site. It is proposed to widen the existing single-track road which serves the site. The details have been discussed with the highways officer by SCP and would allow for two-way movement along the access road as well provide a segregated provision for pedestrians. As such it is concluded these changes would represent and improvement over the existing situation in access and highway safety terms.

- 6.15 The layout plan has sufficient space to allow for at least 2 spaces per dwelling of off-street parking and will accord with the parking standards in Appendix 5 of the Core Strategy and with Policy T2 of the Core Strategy. In addition a swept path drawing is provided to demonstrate that the internal site layout would allow a refuse vehicle to safely service the site.

- 6.16 The accessibility of the site has been reviewed. Details are set out in both the SCP report and at Appendix 1 to this statement. It is considered that the site offers a realistic range of travel mode other than the private car with employment and services located within a short walking distance and ready access to regular and frequent bus services that travel along the A58 Bury New Road. Giving access to locations including Bolton, Bury, Heywood, Rochdale, and Manchester. The nearest bus stops located around 300 – 400m from the site and have shelters, seats, and raised kerbs.

- 6.17 It is therefore concluded that there would be no unacceptable transport impacts arising from the proposals and the effect of the scheme on the operation of the road network or highway safety would be appropriate. As such the proposed development would accord with Policy T2 of the Core Strategy.

(ii) Noise

- 6.18 Core Strategy policy G9 - Reducing the impact of pollution, contamination and land instability seeks to ensure that development does not have impacts that lead to an unacceptable increase in noise or other pollution. NPPF paragraph 185 requires that planning decisions “*avoid noise giving rise to significant adverse impacts on health and the quality of life*”.

- 6.19 The applicant has undertaken a Noise Impact Assessment to identify the key sources of noise in the vicinity of the site and consider the potential for noise impacts on the development. The most significant is road traffic noise and a survey was completed to monitor such noise from the M66 motorway and accurately quantify the level of this. Noise issues were considered in detail during the development of the proposals and the initial scheme envisaging houses with gardens was refined to a final scheme in the form of residential apartments, with no associated balconies or private gardens.

- 6.20 The Noise Impact Assessment demonstrates that internal noise levels across the development meet the relevant daytime and night-time noise criteria levels where upgraded glazing and alternative ventilation in form of window frame-mounted acoustic trickle ventilation is applied. In addition there are no external private amenity areas which may have unduly high levels of road traffic noise proposed.
- 6.21 Where these recommended noise mitigation measures are implemented as identified, the assessment concludes that a 'No Observed Adverse Effect Level' as detailed in the relevant guidance¹ will be achieved for occupiers of the development and as such, no unacceptable noise impacts in accordance with Core Strategy policy G9 and NPPF paragraph 185

(iii) Air Quality

- 6.22 Core Strategy policy G9 - Reducing the impact of pollution, contamination and land instability seeks to ensure that development does not have impacts that lead to an unacceptable increase in air, water, noise, light or other pollution. NPPF paragraph 186 states planning decisions should *"contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas. Opportunities to improve air quality or mitigate impacts should be identified"* and *"new development in Air Quality Management Areas and Clean Air Zones is consistent with the local air quality action plan"*.
- 6.23 As the site is located immediately to the east of M66 motorway within an Air Quality Management Area (AQMA) and further to the detailed advice on this matter at the at the pre-application stage, the applicant has undertaken an Air Quality Assessment (AQA) assessing the potential air quality impacts associated with the construction and operational phases of the proposed development.
- 6.24 The main pollutants giving rise to health concerns were considered to arise from road traffic exhaust releases from the M66. Data applied was derived from a GMCA air quality monitor adjacent to the M66 located 1.5km to the north of the site. Given the proximity of the M66 slip lane in relation to the proposed development site, the AQMA includes various modelling approaches in order to provide a 'worst-case' assessment (including a no-improvement sensitivity test where older more polluting vehicles remain on the network). The various scenarios all identified concentrations of pollutants below the objectives and the AQMA therefore robustly demonstrates a low risk of exceedance of the required air pollution limits in respect of the proposed development.
- 6.25 No specific mitigation to protect future occupants from adverse air quality is deemed to be required. However it was recommended best practice measures be adopted where possible, and include: electric vehicle charging points; travel plan and any gas-fired boilers installed to meet a higher emissions standards.

¹ Noise Policy Statement for England (DEFRA, 2010)

- 6.26 Construction dust control measures are listed in the report and can ensure that residual dust impacts during the construction phase are not significant.
- 6.27 The proposals would therefore not lead to unacceptable air pollution issues and would accord in this regard with Core Strategy policy G9 and NPPF paragraph 186.

(iv) Ground conditions and contamination

- 6.28 Core Strategy policy G9 - Reducing the impact of pollution, contamination and land instability requires that “any risks arising from contaminated land or land instability, and appropriate actions to address these risks, are identified prior to any development taking place on that land and the identified actions taken”.
- 6.29 The planning application includes a Geo-environmental Phase 1 report by consultants Earth Environmental which sets out the available geological and environmental data for the site and surroundings and provide a preliminary assessment of geo-environmental risks. It would provide a framework, where necessary, for design of a Phase 2 Ground Investigation.
- 6.30 Potential sources of on-site contamination were considered to be the construction, operation and demolition of the mills and other previous on-site activity. It was considered there is the potential for made ground and ground gas associated with past on-site activities. It was also considered that there could be off-site sources of contamination.
- 6.31 The site is located within an identified coal mining area but not found to be located within a High Risk Area.
- 6.32 The overall risk from soil contamination to end users and construction workers was concluded to be moderate. There was considered to be a high risk to controlled waters was seen due to the soil conditions and proximity to the Rover Roch. The risk to end users and construction workers from ground gas was considered to be moderate.
- 6.33 The Geo-environmental Phase 1 report recommends an intrusive (phase 2) investigation be undertaken to inform the design of house foundations, floor slabs and pavement construction and roadways. This can be secured by condition on any outline planning permission.
- 6.34 The proposals would therefore not lead to unacceptable land stability or contamination issues and would accord with Core Strategy policy G9 and NPPF paragraph 184.

(v) Flood risk

- 6.35 Core Strategy Policy G1 – Tackling and Adapting to Climate Change seeks “the incorporation of appropriate water conservation and management measures, such as Sustainable Drainage Systems (SuDS), including ensuring that the rate of run-off on ‘greenfield’ sites is not increased

and on 'brownfield' sites is significantly reduced, and avoiding the use of impermeable surfaces". Core Strategy Policy G8 - Managing water resources and flood risk requires that development does not lead to any increased flooding locally, contributes where possible to alleviating existing flood risk, is itself well protected from flood risk that development should integrate measures of sustainable water management to reduce flood risk and avoid an adverse impact on water quality and quantity. NPPF para 159 seeks to avoid development in areas at risk of flooding.

- 6.36 The site is identified in the Environment Agency (EA) Flood Map as falling almost entirely within Flood Zone 1 (lowest probability of flooding). Housing development is appropriate within Flood Zone 1 in accordance with the NPPF para 159.

- 6.37 A Flood Risk Assessment (FRA) has been undertaken by Earth Environmental and this identifies and evaluates the various possible sources of flood risk to the application site and identifies any mitigation or protection measures deemed necessary or feasible to manage the risk of flooding to the development and surrounding land.

- 6.38 The site is adjacent to the River Roch which is the main potential source of flood risk, although the site is elevated above it. The site is also on significantly higher ground than the opposite riverbank. As noted above the site is within EA flood zone Flood Zone 1, defined as land with a low probability of fluvial flooding (<0.1% annual probability). However, the north-eastern boundary of the site, adjacent to the River Roch abuts Flood Zone 2 and a small area extends very marginally into this area. As set out in the FRA report however topographic LIDAR data² confirms that ground levels across the entire application site are elevated above applicable flood water level. This is more accurate data representing the most up-to-date flood model and predicted flood water levels for the site. As such it is reasonable to conclude that the risk of fluvial flooding within the whole site is very low.

- 6.39 Given the above we consider that the site should be viewed as effectively in Zone 1 for flood risk purposes and as such we consider the requirement for sequential test should not apply.

- 6.40 A 35% climate change allowance has been applied and the modelled flood water level data confirms that the site would remain safe and dry during the design flood event. However, the design flood water level has informed consideration in respect of design principles including consideration of finished floor levels and ensuring there is safe and access and egress from the development at times of flood.

- 6.41 Other potential forms of flooding were also found to pose low risk to the site.

- 6.42 With regard to the drainage proposals for the site the study found that discharge of surface water runoff via infiltration to ground would not be feasible. Therefore, based on the relatively low permeability ground conditions and proximity of the adjacent River Roch, it is proposed that

² This data is sourced from the Environment Agency's 2017 Lower Roch study.

surface water runoff would discharge to the River Roch. A maintenance schedule to ensure the drainage system continues to operate as designed is also set out in the report.

- 6.43 Surface water attenuation is proposed on-site, via the introduction of permeable paving beneath the property driveways and below ground storage beneath the internal access road. Appropriate management of surface water quality would be provided by the permeable paving filter media, catchpits and a final separator, prior to discharge to the River Roch.
- 6.44 No built development is proposed within an 8m easement from the top of bank of the River Roch in order to maintain access to the river corridor for future monitoring and maintenance.
- 6.45 The FRA report therefore demonstrates that the proposal would not result in an increase in flooding on site or elsewhere and an appropriate detailed drainage scheme design can be secured at the reserved matters stage
- 6.46 The proposals would therefore would not lead to increased flood risk and would accord with Core Strategy policy G8 and NPPF paragraph 159.

(vi) Biodiversity.

- 6.47 Core Strategy policy G7 - Increasing the value of biodiversity and geodiversity seeks to Protect existing biodiversity within new developments, and protect and enhance existing features such as trees and hedges.
- 6.48 An Extended Phase 1 Habitat Survey has been undertaken assessing the habitats for their potential to support protected species and also surveying the site for invasive, non-native plant species
- 6.49 No European or no statutory protected ecological sites are located close by. The on-site habitat was found to be mainly sparsely vegetated land, with some scrub and taller ruderal vegetation also present. It was considered to be of low distinctiveness and typical early successional habitats seen in disturbed areas. Non-native invasive species were also identified.
- 6.50 The hedgerow was found to be entirely comprised of native hawthorn and in relatively poor condition due to limited size and significant canopy gaps.
- 6.51 With regard to protected species:
 - Given the nature of the habitat it was concluded highly unlikely that Great Crested Newts would be present.
 - No evidence of badgers (was observed during the survey, however the locality was considered to offer potentially suitable habitat and the presence of badgers was not ruled out. It is recommended that precautionary measures in relation to badgers are implemented during the construction phase.

- No further surveys were considered required in relation to roosting bats given the habitat involved. If any impacts are anticipated to the woodland corridor as a result of the proposed development, then a survey is recommended in relation to foraging bats, although it should be noted that this corridor is off site and no direct impact is expected.
- Standard measures to protect nesting birds in respect of any clearance of vegetation in the nesting period (March – September) would be required.
- Due to the species present the site was not seen to be favourable invertebrate habitat and no further surveys are recommended in relation to invertebrates.
- The habitats present and connectivity to the wider area were considered suitable for reptiles and further surveys to establish presence/likely absence were recommended.
- No further surveys are recommended for mammals.

6.52 In accordance with the above it was concluded no unacceptable harm should therefore arise to protected species and all habitats identified are widespread and any loss is will not represent a significant ecological impact. In order however to avoid a reduction in biodiversity value appropriate enhancements and landscaping would be needed and the report makes recommendations in this regard.

6.53 A Biodiversity Net Gain Assessment was undertaken using the 'Biodiversity Metric 3.1 Calculation Tool Beta' (BM3.1) distributed by Natural England (2022). A score of +3.13% net change in habitat and a +126% net gain in hedgerow was calculated. It should be noted however that the current layout plan is essentially indicative and does not necessarily represent the final approved composition of the development and associated landscaping. As such it is anticipated that a re-calculation will be undertaken at the reserved matters stage following the completion of the finalised layout plan.

6.54 The development will therefore not give rise to negative impacts on biodiversity and will accord with Core Strategy policy G7.

(vii) Trees and Hedgerows

6.55 Core Strategy policy G1 - Tackling and adapting to climate change seeks the planting of trees and policy G7 - Increasing the value of biodiversity and geodiversity seeks to protect and enhance existing features such as trees and hedges. Core Strategy policy C6 - Improving health and well-being seeks to promote tree planting. The pre-application letter from the Council also advised tree loss should be avoided where possible and where retention is not feasible, replacement at a ratio of 2:1 would be sought. The NPPF also seeks the provision of tree-lined streets.

6.56 The application is accompanied by an Arboricultural Impact Assessment and Tree Constraints Plan provided by FRH Consultants. The trees in the vicinity are largely just off site and no tree removals are required to facilitate the proposed development, although a section of hedgerow

would be required to be removed in order to facilitate the widening of Waterfold Lane. This was found to be a hawthorn hedge (ie species poor) but, as shown on the layout plan and the landscape proposals a replacement hedgerow could be planted containing a range of appropriate native species. The indicative landscape proposals set out how a significant amount of tree and hedgerow planting could come forward.

- 6.57 The proposed development will therefore be acceptable with regard to impact upon trees and hedgerows in accordance with Core Strategy policies G1, G7 and C6

(viii) Landscape impact

- 6.58 Core strategy P2 - Protecting and enhancing character, landscape and heritage seeks development that will integrate successfully with the landscape, protect and open up important views, and enhancing the setting of key features such as the River Roch.
- 6.59 The land has the current appearance of a site where previous development has been cleared but vacant land remains. There have also been previous issues with regard to unauthorised access and fly tipping. There is therefore the opportunity for a significant improvement in respect of the landscape and visual impact of the site on its surroundings.
- 6.60 A high-quality well-landscaped scheme is proposed. The indicative landscape proposals set out how a significant amount of tree and hedgerow planting could come forward to create an attractive tree-lined development. In addition the visual influence of the site is limited by the M66 embankment to the west and public views of the site would be mainly from Waterfold Lane where the apartment buildings would be seen against the wooded motorway embankment backdrop. Due to the intervening vegetation the development would be visible only to a small number of the houses on Waterfold Lane and to pedestrian and cycle users of the Lane. The proposed hedgerow and tree planting would however create an attractive frontage to the development, seeking to enhance the surroundings.
- 6.61 The development will therefore not give rise to negative landscape impacts and will accord with Core Strategy policy P2.

(ix) Affordable housing

- 6.62 Core strategy policy C4 - Providing affordable seeks affordable housing on all developments of 15 dwellings or more at a level which the Affordable Housing SPD sets out should be at least 15% of total site capacity.
- 6.63 As set out in the affordable housing statement at section 5 above, the development is proposed to comprise 100% affordable units and would therefore accord with Core Strategy policy C4 - Providing affordable homes.

(xi) Design and Community safety

- 6.64 Core Strategy policy P3 - Improving design of new development seeks high standards of design and requires incorporating design measures that design out crime and ensure developments and spaces are safe to use and access.

- 6.65 The planning application has been submitted in outline with access, layout and scale for determination as part of the application. Appearance and landscaping are reserved for future determination and as such details of the design approach remain to be confirmed. General design principles have however been considered in developing the proposals.

- 6.66 Given the location of the proposed buildings on the plot and the scale of the development it will be viewed from Waterfold Lane against the tree-lined backdrop of the embankment to the rear that rises to the M66. It also is also sited in a location where the scale and massing of the apartment blocks would reflect the previous history of the mill on site.

- 6.67 Although elevations and floorplans of the two apartment buildings remain to be finalised it is expected that the buildings will be well proportioned and contribute positively to the townscape.

- 6.68 The car parking areas would incorporate substantial landscaping to reduce their visual impact and there would be a significant overall improvement given the current vacant nature of the site. A swept path drawing has also been provided to show that the layout is suitable for refuse collection and emergency service vehicles.

- 6.69 The application is accompanied by a Crime Impact Report. This provides detailed recommendations in respect of the detailed design of the scheme and covers such matters as the doors and windows for the building, boundary treatments, bin storage and lighting.

- 6.70 Although matters such the specification of the doors and windows for the building, boundary treatments, bin storage and lighting will therefore be considered at the reserved matters stage, the advice provided in the Crime Impact Report will however help ensure that the detailed design is appropriate from a community safety standpoint in respect of these matters identified. It is therefore intended that the proposals seek to design out crime.

- 6.71 The development would therefore accord with Core Strategy policy P3 and NPPF paragraph 130

C. THE BENEFITS OF THE DEVELOPMENT

- 6.72 In order to assess the planning balance for the scheme it is also necessary to consider the benefits of the development.

6.73 NPPF paragraph 8 explains that *“Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways”* These comprise:

- Economic objective – *“to help build a strong, responsive and competitive economy”*
- Social objective – *“to support strong, vibrant and healthy communities” including “by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations”*
- Environmental objective *“to protect and enhance the natural built and historic environment”.*

6.74 The site has had no beneficial use for a considerable number of years as it is neither garden land nor land that has been cultivated or grazed. The suitability of the site for agricultural use is limited as it is a relatively small land parcel not connected to other larger fields and given the nearby housing development. The land therefore provides no economic or social benefits and as such there is no identifiable harm in respect of loss of the agricultural land.

6.75 As set out above there would be a significant improvement in the landscape and visual impact of the site on its surroundings. Furthermore there are clear benefits that would arising from the provision of housing.

6.76 The proposed development would supply 36 homes and deliver a social benefit to which significant weight should be afforded. In accordance with NPPF paragraph 60 the Government’s objective is *“significantly boosting the supply of homes”*.

6.77 This is a national priority: annual housebuilding nationally fell to a low of 140,000 in 2012/13 and the Conservative Government elected in December 2019 included a manifesto pledge to *“continue to increase the number of homes being built”* and to *“continue our progress towards our target of 300,000 homes a year by the mid-2020s*. Although rates increased they have fallen again as a result of Covid-19. This caused the number of new homes registered to be built by UK housebuilders to fall by 23 per cent in 2020³, according to the NHBC, with just 123,151 new homes registered by the NHBC in 2020, compared to 160,319 in 2019. With ever rising house prices and young people increasingly unable to access the housing market and the government target of 3000,000 will require a significant boost to supply.

6.78 In addition to the social benefits that new housing brings there would be economic benefits of a variety of types:

- Direct capital expenditure in construction and construction jobs, plus employment within contractors and suppliers;

³ 2020 New home statistics review NHBC Jan 2021

- Spending of new residents supporting local services and businesses;
- Increases in Local Public Finance e.g. Council Tax, CIL payments and New Homes Bonus awarded (the grant paid by central government to local councils to reflect and incentivise housing growth).

- 6.79 Due to the scale and complexity of the house building industry, there is no single source of data that provides comprehensive information on the economic activity arising from the sector. There are however also sources of evidence that can be drawn upon to assist in quantifying the economic contribution that house building makes to the economy. The June 2015 report by Nathaniel Lichfield on behalf of the HBF and July 2018 update⁴ is a summary that brings together findings of a number of academic studies on quantifying the number of direct jobs created by house building activity across the UK.
- 6.80 The report sets out that there is evidence that for each new dwelling built there will be around 1.5 direct construction jobs created. Furthermore in addition to direct employment, it is widely recognised that the house building industry has a large supply chain. Much of this supplier spending is retained within the UK; for example, it is estimated that for every £1 spent in construction at least 90% stays in the UK. The NLP report reviews recent academic studies that have identified a range of multipliers to calculate the extent of the sector's supply chain in employment terms and these are summarised. It is concluded that for every construction job created, around 1.5 - 1.6 indirect jobs are created elsewhere in the supply chain and wider UK economy.
- 6.81 There is therefore evidence that for each new dwelling built there will be around 1.5 direct construction jobs created and 2.25 jobs created elsewhere in the supply chain and wider UK economy. These will include jobs in local service sectors, helping to maintain the vitality of the local economy. In the case of the construction of the housing element of the proposed development (36 dwellings), it is estimated that a total of 54 direct and 81 indirect jobs will be created.
- 6.82 This is in addition to the expenditure by residents on occupation of the new dwellings that will typically have a significant positive impact on the local economy. It is likely that a high proportion of such expenditure would be spent locally, helping to keep local facilities open and encourage further investment by attracting new services to an area.
- 6.83 In accordance with NPPF paragraph 81 these economic benefits should be given significant weight.
- 6.84 Furthermore, the affordable housing proposed here would bring an important social benefit to which considerable weight should also be attached in determination of the application.

⁴ The Economic Footprint of House Building in England and Wales, July 2018

7. CONTRIBUTIONS

- 7.1 The pre-application response letter from the Council identified that planning contributions would be expected to be required to cover such matters as off-site sports pitch provision or a contribution towards school places costs. A legal argument would also be expected to be entered into in respect of securing the affordable housing.
- 7.2 The applicant would be prepared to enter into a section 106 agreement to cover these matters. Once details of the amounts requested have been agreed, the applicant would be happy to work with the LPA in respect of the Council's standard template agreement.

8. CONCLUSION

- 8.1 This Planning Statement has been prepared has been prepared on behalf of Mr David Gibbons by Knights plc to support a full planning application for the erection of 36 apartments at Waterfold Lane, Bury.
- 8.2 The scheme has been carefully designed with consideration given to the relevant development plan policies and national policy as set out above.
- 8.3 With regard to Green Belt policies,
- The site was formerly occupied by buildings and has areas of hardstanding. It retains the overall appearance of a site where buildings have been demolished and is considered to comprise previously developed land in accordance with NPPF paragraph 149 (g).
 - The proposed development will provide a component of affordable housing and so “*contribute to meeting an identified affordable housing need within the area of the local planning authority*” in accordance with NPPF paragraph 149 (g).
 - The site is well contained by the river Roch to the north, Waterfold Lane and the M66 motorway to the west. The motorway is elevated above the site and has an embankment with a tree screen between the site and the motorway. The proposed buildings on the site would therefore be seen with this tree screen at a higher level to the rear. As such the proposals would “*not cause substantial harm to the openness of the Green Belt*” in accordance with NPPF paragraph 149 (g).
- 8.4 It is therefore concluded the proposals comprise one of the specific limited types of development deemed not to be inappropriate development in accordance with NPPF paragraph 149 (g). As such the proposed development would accord with Core Strategy policy G4 - Protecting Green Belt Land, UDP policy G/D/1 Defined Urban Area and G/D/2 Green Belt, along with national policy on Green Belts.
- 8.5 With regard to other impacts of the proposals, in summary:
- The scale and layout of the proposed development appropriately address their surroundings and would employ appropriate design and landscaping. The proposals therefore accord with Core Strategy Policy P3 - Improving design of new development and NPPF paragraph 130.
 - There would be no unacceptable transport impacts arising from the proposals, the effect of the scheme on the operation of the road network or highway safety would be appropriate and sufficient parking to meet the Council’s standards can be achieved. As such the proposed development would accord with Policy T2 of the Core Strategy.
 - With the identified noise mitigation measures in place there will be no unacceptable noise impacts in accordance with Core Strategy policy G9 and NPPF paragraph 185

- The proposals would not lead to unacceptable air pollution issues and would accord in this regard with Core Strategy policy G9 and NPPF paragraph 186.
- The proposals would therefore not lead to unacceptable land stability or contamination issues and would accord with Core Strategy policy G9 and NPPF paragraph 184 .
- The proposals would not lead to increased flood risk and would accord with Core Strategy policy G8 and paragraph 159.
- The development would not give rise to negative impacts on biodiversity and will deliver a net gain in accordance with accord with Core Strategy policy G7.
- The proposed development would be acceptable with regard to impact upon trees and hedgerows in accordance with Core Strategy policies G1, G7 and C6
- The development would not give rise to negative landscape impacts and would provide a significant improvement in respect of the landscape and visual impact of the site on its surroundings. As such the proposals accord with Core Strategy policy P2

8.6 In order to assess the planning balance for the scheme it is also necessary to consider the benefits of the development:

- There are clear social and economic benefits that would arising from the provision of housing and, in accordance with NPPF paragraphs 60 and 81 these should be given significant weight in the determination of this planning application.
- The affordable housing in particular would bring an important social benefit to which considerable weight should also be attached in determination of the application.
- In addition, the site has had no beneficial use for a considerable number of years and there would be a significant improvement in the landscape and visual impact of the site on its surroundings.

8.7 The impacts of the development have been as assessed above and in considering the planning balance, the identified economic and social benefits of the scheme therefore provide a basis to support this application.

8.8 It is therefore concluded the proposals are in conformity with national and local planning policy. Therefore, in accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004 it is respectfully requested that this application be supported.

Knights plc
August 2022

Appendix 1

Site accessibility

- Map and table of services and facilities

LAND OFF WATERFOLD LANE, HEYWOOD, BL9 7JY



BASIC KEY

- DINING & HOSPITALITY**

 - 1. Waterfold Farm Dining
 - 2. Village Public House
 - 3. Village Hotel Bury
 - 4. Peel Hotel/ Public House
- EDUCATION**

 - 1. St Thomas's Primary School
 - 2. Heap Bridge Primary School
 - 3. Broad Oak Secondary School
 - 4. East Ward Primary School
 - 5. Hindie's School of Excellence
 - 6. St Pauls Primary School
 - 7. Building Blocks Day Nursery
 - 8. St Maries RC Primary School
 - 9. Bury College
- COMMUNITY FACILITY**

 - 1. Openshaw Park
 - 2. Bury Active Women Centre
 - 3. The Mosses Centre
 - 4. Bury Athletics Club
 - 5. Playtime
 - 6. Heyside Way Play Area
 - 7. PureGym Bury
 - 8. Saint George's Church
 - 9. Parish Church of St Thomas
- HEALTH FACILITY**

 - 1. Moorgate Primary Centre
- GROCERIES**

 - 1. Esso EG Motorway PFS, SPAR Convenience Store
 - 2. Best One Convenience Store
 - 3. Kashmir Superstore
 - 4. BP PFS
 - 5. Asda Bury Marketside Superstore
 - 6. SPAR Convenience Store
 - 7. First Choice Cash & Carry
- SITE BOUNDARY**
- BUS STOP**

SERVICES WITHIN THE VICINITY OF LAND AT WATERFOLD LANE, HEYWOOD

SERVICE/ FACILITY		NAME	ADDRESS	KEY/ NUMBER	DISTANCE FROM SITE (km)
DINING & HOSPITALITY	Dining	Waterfold Farm - Dining & Carvery	Waterfold Business Park, Bury, BL9 7BR	Dining & Hospitality/ 1	1.2
		Village Hotel Bury	Waterfold Business Park, Rochdale Road, Bury, BL9 7BQ	Dining & Hospitality/ 2	1.1
		Peel Hotel	Peel Hotel, 181 Rochdale Road, Bury, BL9 7BB	Dining & Hospitality/ 4	1.4
	Hospitality	Village Hotel Bury	Waterfold Business Park, Rochdale Road, Bury, BL9 7BQ	Dining & Hospitality/ 3	1.1
		Peel Hotel	Peel Hotel, 181 Rochdale Road, Bury, BL9 7BB	Dining & Hospitality/ 4	1.4
EDUCATION	Nursery	Building Blocks Day Nursery	70 Sutherland Road, Heywood, OL10 3PN	Education/ 7	1.9
	Primary School	St Thomas C of E Primary School	Pimhole Road, Bury, BL9 7EY	Education/ 1	1.6
		Heap Bridge Village Primary School	1 Heap Brow, Heywood, Bury BL9 7JP	Education/ 2	0.8
		East Ward Community Primary School	Willow Street, Bury, BL9 7QZ	Education/ 4	1.2
		Our Lady & St Pauls R C Primary School	Sutherland Road, Heywood, OL10 3PD	Education/ 6	1.7
		St Maries R C Primary School	Edward Street, Bury, BL9 0RZ	Education/ 8	2.2
	Secondary School	Hazel Wood High School	Hazel Avenue, Bury, BL9 7QT	Education/ 3	1.3
	College	Broad Oak Sports College	Hazel Avenue, Bury, BL9 7QT	Education/ 3	1.3
		Bury College	Market Street, Bury, BL9 0BG	Education/ 9	2.7
	Tuition	Hindie's School of Excellence	115 Rochdale Road, Bury, BL9 7BA	Education/ 5	1.6
COMMUNITY FACILITY	Parks	Openshaw Park	33 Deal Street, Bury, BL9 7PZ	Community Facility/ 1	1.2
	Fitness	Bury Active Women Centre	90 South Cross Street, Bury, BL9 0RS	Community Facility/ 2	1.9
		Bury Athletics Club	Market Street, Bury, BL9 9FX	Community Facility/ 4	2.8
		PureGym Bury	Rochdale Road, Bury, BL9 0ND	Community Facility/ 7	1.9
	Community Centre	The Mosses Centre	48 Cecil Street, Bury, BL9 0SB	Community Facility/ 3	2.1
	Children	Playtime	Loughery House, Fountain Street North, Bury, BL9 7AN	Community Facility/ 5	1.8
		Heyside Way Play Area	Townside Row, Bury, BL9 0SG	Community Facility/ 6	2.4
	Place of Worship	Saint George's Church	12 Gore Close, Heap Bridge, Heywood, Bury, BL9 7JU	Community Facility/ 8	0.8
		Parish Church of St Thomas	Pimhole Road, Bury, BL9 7EY	Community Facility/ 9	1.4
HEALTH FACILITY	Health Centre	Moorgate Primary Care Centre	Derby Way, Bury, BL9 0NJ	Health Facility/ 1	2.0
GROCERIES	Convenience Store	SPAR Euro Garage Manchester New Road	Sudden Service Station Manchester, New Road, Rochdale, OL11 3PB	Groceries/ 1	0.9
		Best One Convenience Store	Rochdale Road, Bury, BL9 7BB	Groceries/ 2	1.4
		SPAR Euro Garage Bury	Rochdale Road, Bury, BL9 7BD	Groceries/ 6	1.4
	Petrol Filling Station	Esso EG Motorway	Rochdale Road, Bury, BL9 7BD	Groceries/ 1	0.9
		BP	Bury New Road, Prettywood, Heap Bridge, Heywood, Bury, BL9 7HY	Groceries/ 4	0.5
	Grocery Store	Kashmir Superstore	134 Rochdale Road, Bury, BL9 7BD	Groceries/ 3	1.5
		Asda Bury Marketside Superstore	Spring Street, Bury, BL9 0RN	Groceries/ 5	2.1
		First Choice Continental Food Cash & Carry	2 Cook Street, Bury, BL9 0RP	Groceries/ 7	1.9

DINING & HOSPITALITY	Dining	Waterfold Farm - Dining & Carvery	Waterfold Business Park, Bury, BL9 7BR	Dining & Hospitality/ 1	1.2
		Village Hotel Bury	Waterfold Business Park, Rochdale Road, Bury, BL9 7BQ	Dining & Hospitality/ 2	1.1
		Peel Hotel	Peel Hotel, 181 Rochdale Road, Bury, BL9 7BB	Dining & Hospitality/ 4	1.4
	Hospitality	Village Hotel Bury	Waterfold Business Park, Rochdale Road, Bury, BL9 7BQ	Dining & Hospitality/ 3	1.1
		Peel Hotel	Peel Hotel, 181 Rochdale Road, Bury, BL9 7BB	Dining & Hospitality/ 4	1.4

* Distance measured via fastest walking route

Appendix 2

Evidence of previously developed land status -

Site history and site photographs

Appendix 2 – Evidence of previously developed land status

The application site

The application site is a triangular area of land enclosed by the river Roch to the north, Waterfold Lane to the south and the M66 motorway to the west. The site is flat, with limited vegetation and areas of hard surfacing visible on site.

The site is not in any specific use and has the appearance of a, formerly derelict, cleared site.



Site location - outlined in red (source Google maps)

Site History

The land is part of the former site of Water Fold Mill, a woollen mill built in the mid-1800s and producing cloths, blankets and flannels. The mill fell into disuse in the C20 and was eventually demolished around 1970 in order to facilitate the construction of the motorway.

Historic Map 1968 – 70 (Ordnance Survey Crown Copyright 2021. All rights reserved. Landmark Promap Licence number 100022432).

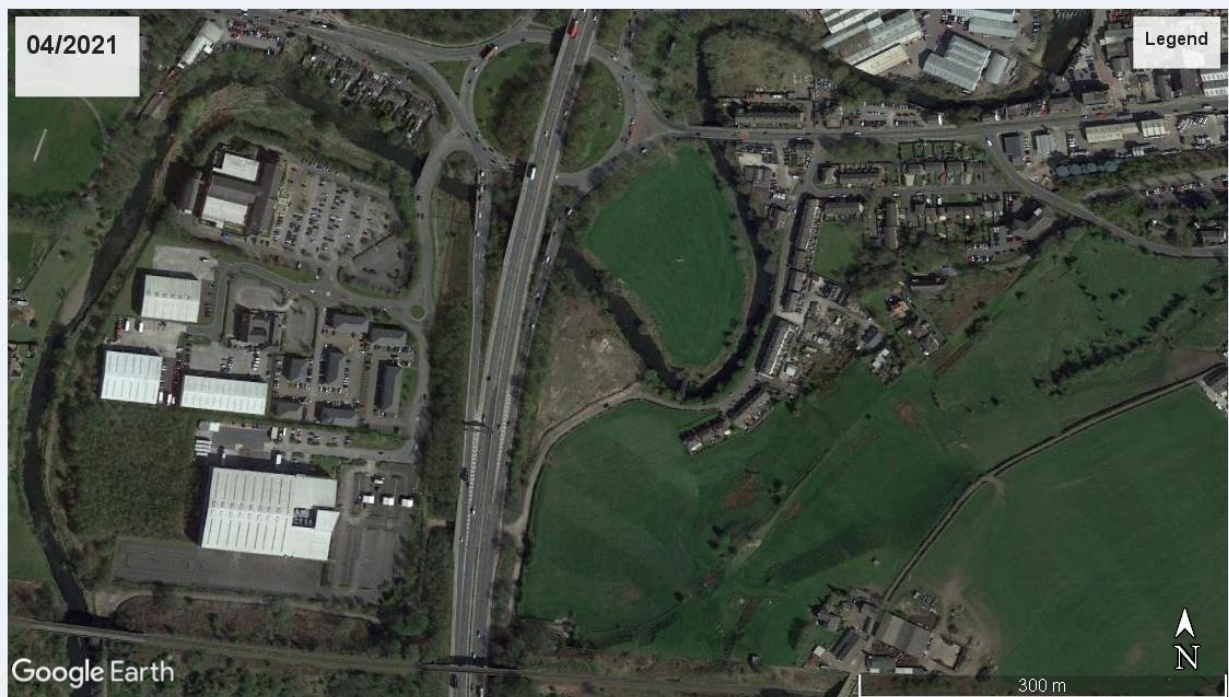
The M66 motorway now occupies the western portion of the former mill site. Below is an extract from a map dated 1888-1913 with a faint outline of the subsequent position of the M66 motorway plotted over it.



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After the demolition of the mill around 1970 it is understood that the land comprising the application site was used as a construction compound for the motorway.

The land has remained unoccupied and is shown on the aerial image below as at April 2021 where it has the appearance of a vacant cleared site.



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Site photographs

On the following pages are a series of photographs of the site taken during May 2021. These images show that the application site remains vacant land.

Issues have been encountered with unauthorised access and as shown in the images bunds have been created alongside Waterfold Lane to prevent this.

Whilst the National Planning Policy Framework states that land should not be considered previously developed where the remains 'have blended into the landscape', as these images show the land has the appearance of a cleared brownfield site, vegetation cover is limited and there are significant areas of hard surfacing present. There is also a substantial retaining wall alongside the river. It is therefore not considered that the remains have 'blended into the landscape' and the site should be considered 'previously developed land'











Appendix 3

Local examples of housing development on previously developed sites

Appendix 3 – Local examples of housing development on previously developed sites

1. Rainshore Mill, Over Town Lane, Rochdale, OL12 7TJ

Application ref: 07/D49036

Proposal: *'Residential Development - 55 Units'*

Decision: Approved with conditions 13 December 2007.

This application site adjoined Greenbooth reservoir, north west of Rochdale. It related to a mill site that had been derelict for some years and was located in the Green Belt

The local planning authority in the officer's report concluded *"the site is previously developed land" and its redevelopment "would satisfy Policies D/6 (Redevelopment and Regeneration of Major, Existing Developed Sites in the Green Belt for other purposes) and H/2 (Land Provided for New Housing), in that the development does not have a greater impact than the existing development on the openness of the Green Belt"*.

Although the determination of the application pre-dates the NPPF and the current development plan policies, national and local policy on Green Belts is essentially unchanged.

The development as eventually constructed was subsequently reduced in number from 55 to 42 homes.

2. The Soccer Village (former Birchinley Manor Equestrian Centre) Wildhouse Lane, Milnrow, OL16 3TW

Application Ref. 20/00639/FUL

Proposal: *'Demolition of the existing buildings, hardstanding areas and sports pitches, and the erection of 47 dwellinghouses including provision of associated roads, footways, public open space, parking areas, drainage, landscaping and boundary treatments along with ground levelling works, works to trees and ponds and other associated works'*.

Decision: Approved with conditions 17 May 2021

This application related to derelict sheet metal and brick buildings and areas of hardsurfacing located in the Green Belt to the east side of Rochdale.

The officer's report concluded 41 of the 46 proposed dwellings were to be located on previously developed land. However, it was also concluded that very special circumstances to outweigh the Green Belt harm existed (relating to the delivery of high quality, architecturally designed homes and their role they play in the financial viability of the scheme as a whole).