



THE
ENVIRONMENT
PARTNERSHIP



BORROWDALE ROAD DEVELOPMENT

LAND AT BORROWDALE ROAD, LANGLEY, ROCHDALE

PLANNING STATEMENT

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CONTENTS	PAGE
1.0 Introduction	1
2.0 Application Site and Surroundings.....	3
3.0 Proposed Development.....	4
4.0 Planning Policy Context.....	6
5.0 Compliance with Planning Policy	11
6.0 Technical Matters	22
7.0 Case for Development.....	25
8.0 Conclusion	27

TABLES	PAGE
Table 1 Relevant Local Plan Policies	Error! Bookmark not defined.

1.0 Introduction

- 1.1 This Planning Statement has been prepared in support of a full planning application for a residential development and new access road ('the Proposed Development') on Borrowdale Park. The site is currently designated in the Rochdale Borough Council Unitary Development Plan (June 2006) as open space.
- 1.2 The application is submitted on behalf of Big Help Langley Development CIC ('the Applicant') with the following description of development being applied for:
- "Residential development of 30 dwellings with a new access road and associated landscaping and infrastructure"*
- 1.3 The Planning Statement provides a background to the Proposed Development, covering the Application Site and its surroundings, the policy context and the technical assessments which have considered the potential effects of the Proposed Development upon the Application Site and its surroundings.
- 1.4 The Planning Statement has been prepared to assist Rochdale Borough Council (RBC) ('the Local Planning Authority') in its determination of the application and should be read in accordance with the suite of supporting material.
- 1.5 The structure of the Planning Statement is as follows:
- Application Site and Surroundings
 - Proposed Development
 - Planning Policy Context
 - Compliance with Planning Policy
 - Technical Matters
 - Case for Development
 - Conclusion
- 1.6 A number of technical reports have been prepared to support this application and should be read in conjunction with the Planning Statement:
- Open Space Assessment (9850.001)
 - Ecological Assessment Report
 - Flood Risk Assessment (AEG0842_M24_Rochdale_07)
 - Residential Noise Assessment (NP-009114)
 - Phase 1 Preliminary Risk Assessment (31479-SUT-ZZ-00-RP-G-701-0001)
 - Sustainable Drainage Design Strategy
- 1.7 The following plans have also been produced to support this planning application:
- Site Location Plan (1917-18)
 - Wide Site Plan showing whole park (1917-19)
 - Proposed Site Plan (1917-20)
 - House Types (1917-21)
 - Apartment Block A Plans (1917-22)
 - Apartment Block A Elevations (1917-23)
 - Apartment Block B Plans and Elevations (1917-24)

- Apartment Block C Plans and Elevations (1917-25)
- Street Context Elevations 1 (1917-26)
- Street Context Elevations 2 (1917-27)

2.0 Application Site and Surroundings

- 2.1 The Application Site red line boundary comprises 0.587ha of land currently designated as recreational open space, within the wider Borrowdale Park (1.857ha).
- 2.2 The site comprises the northern section of Borrowdale Park, with Borrowdale Road adjacent to the north. The site is located within the wider Langley estate, in the town of Middleton, Rochdale.
- 2.3 The development area takes up a small portion of the open space, with housing arranged along the northern edge of Borrowdale Park. The southern portion of the park is unaffected by the development. St Mary's Primary School is located to the south west of the site.
- 2.4 The surrounding area is predominantly residential, largely comprising a mix of flats, terraced and semi-detached houses.
- 2.5 There is currently no vehicular access to the site. Pedestrian access is from a range of points, including: three on Borrowdale Road, one off Wood Street and several off local side roads.
- 2.6 The Environment Agency Flood Map for Planning shows that the Application Site lies entirely within Flood Zone 1, where development should seek to be located, and is therefore at low risk of flooding.
- 2.7 There are no Public Rights of Way within or adjacent to the Site.
- 2.8 The Application Site is not subject to any statutory designations in relation to ecology, landscape, or the historic environment.

Planning History

- 2.9 Relevant planning history relating to the Application Site is provided in Table 2.1 below:

Table 2.1: Planning history

Reference	Description	Decision
87/D20726	Outline application for a residential development	Grant subject to conditions (15/10/1987)

3.0 Proposed Development

Proposed Development

- 3.1 The Proposed Development comprises the construction of 30 residential dwellings with an access road and associated landscaping.
- 3.2 Housing will be arranged along a single road in the north of Borrowdale Park. The development will provide a range of housing types, as shown in Table 3.1, which will fit in with the existing surrounding housing mix.

Table 3.1: Housing types in the proposed development.

Housing type	Quantity
2 bed house	4
3 bed house	2
4 bed house	2
1 bed apartment (3 storey block)	18
1 bed apartment (2 storey block)	4
Total	30

- 3.3 The dwellings will all be on the north side of the road, facing across the road and into the open space through a new avenue of trees.
- 3.4 The rear of the new dwellings will face the existing apartments at 25-71 Borrowdale Road. There will be parking courts across the site, at a ratio of one space per dwelling.
- 3.5 Access to the Site will be from a new road off Borrowdale Road to the north. Extensive landscaping will be provided throughout the site.

Pre-Application Advice

- 3.6 Pre-application advice was sought from RBC with a written response provided in May 2022 (ref PREAPP/00131/21).
- 3.7 The comments received by RBC were taken into account and the design and layout of the proposed development updated to address the pre-application comments.
- 3.8 The pre-application advice identified the loss of protected open land as a key issue against developing the site, the advice suggested that there could potentially be support for the development provided that evidence was provided to demonstrate that the development is needed and no preferable sites are available. The benefits of the scheme would have to outweigh the harm caused by losing open space. This planning statement demonstrates that this is the case.

- 3.9 Need must also be demonstrated for affordable housing in this area.
- 3.10 The advice also sought the development to aim for good quality design, which fits in with the local character and surrounding house types. There should be no adverse effect on neighbouring development. This has been taken into account in the design and positioning of the residential units.
- 3.11 The advice stated that the scheme should result in biodiversity net gain. Landscaping and tree planting should also be considered. Biodiversity enhancement of the remaining open space would be required. The scheme's contribution to climate change should also be minimised. The scheme includes a comprehensive landscaping plan which will address these requirements.

4.0 Planning Policy Context

- 4.1 Section 38 (6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications are determined in accordance with the Development Plan, unless material considerations indicated otherwise.
- 4.2 The National Planning Policy Framework ('the Framework') and Planning Practice Guidance (PPG) are material considerations in the determination of this planning application.

Adopted Development Plan

Rochdale Borough Council

- 4.3 The Development Plan for RBC consists of the following relevant documentation:
- Rochdale Core Strategy (Adopted 2016)
 - Rochdale Borough Unitary Development Plan (Adopted 2006)
- 4.4 The Rochdale Core Strategy was adopted by RBC in October 2016. It provides an overview of the objectives for the whole of the borough.
- 4.5 The Rochdale Borough Unitary Development Plan remains in place until the adoption of the Allocations Development Plan. It provides an overview of RBC's objectives for the whole of the borough.
- 4.6 The emerging Allocations Plan is currently in draft form. Once adopted, it will identify preferred sites and areas for growth up to 2028. The Allocations Plan will support our Core Strategy and together will replace the Unitary Development Plan documents from our previous Local Plan.
- 4.7 Rochdale is also covered by the emerging Greater Manchester 'Places for Everyone' plan, which is due to be adopted in 2023.
- 4.8 Table 4.1 identifies the key policies from the Development Plan that the proposed development will be assessed against. Table 4.2 identifies key emerging policies (which have not yet been adopted).

Table 4.1 Relevant Adopted Development Plan Policies

Policy	Description
Rochdale Core Strategy	
SD1	Delivering sustainable development
SO2	To create successful and healthy communities
SP2	The spatial strategy for the borough
SP3/M	The strategy for Middleton
C1	Delivering the right amount of housing in the right places

Policy	Description
C2	Focusing on regeneration areas and economic growth corridors / areas
C3	Delivering the right type of housing
C4	Providing affordable homes
C6	Improving health and wellbeing
C8	Improving community, sport, leisure and cultural facilities
SO3	To improve design, image and quality of place (see "P" policies)
P1	Improving image
P2	Protecting and enhancing character, landscape and heritage
P3	Improving design of new development
SO4	Promoting a greener environment (See "G" policies)
G1	Tackling and adapting to climate change
G2	Energy and new development
G6	Enhancing green infrastructure
G7	Increasing the value of biodiversity and geodiversity
G8	Managing water resources and flood risk
G9	Reducing the impact of pollution, contamination and land instability
SO5	Improving accessibility and delivering sustainable transport (See policy T2)
T2	Improving accessibility
DM1	General development requirements
DM2	Delivering planning contributions and infrastructure
Rochdale Borough Unitary Development Plan	
G/SP/3	Meeting the Needs of Local Communities
D/10	Protected Open Land

Policy	Description
G/H/1	Housing
H/3	Residential Developments Outside Allocated Areas
H/6	Provision of Recreational Open Space in New Housing Development
H/7	Affordable Housing
R/2	Langley Physical Regeneration Area, Middleton
G/G/1	Greenspace
G/3	Protection of Existing Recreational Open Space
G/10	Protection of Urban Amenity Open Space
NE/3	Biodiversity and Development

Table 4.2 Relevant Emerging Policies

Policy	Description
Allocations Plan	
Local Urban Open Spaces	Urban open space - Borrowdale Park
AL/HOU/31	Borrowdale Park (site off Borrowdale Road), Langley. 0.32 hectares, 10 capacity, Middleton.
Greater Manchester: Places for Everyone	
JP-H 1	Scale, Distribution and Phasing of New Housing Development
JP-H 2	Affordability of New Housing
JP-H 3	Type, Size and Design of New Housing
JP-G 6	Urban Green Space
JP-G 8	Standards for Greener Places
JP-G 9	A Net Enhancement of Biodiversity and Geodiversity

Material Considerations

National Planning Policy Framework

- 4.9 The National Planning Policy Framework ('the Framework') sets out the Government's definition of sustainable development and identifies how planning policies for England are expected to be applied. The Framework is a significant material consideration.
- 4.10 The Framework is purposefully positive, opportunity focused and pro-growth in seeking to facilitate development which will contribute to meeting the wider Government objectives.
- 4.11 Paragraph 7 of the Framework explains that the purpose of the planning system is to contribute to the achievement of sustainable development' which can be summarised as "meeting the needs of the present without compromising the ability of future generations to meet their own needs".
- 4.12 Paragraph 8 of the Framework states 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 (so that opportunities can be taken to secure net gains across each of the different objectives):
- a) economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;*
 - b) social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and*
 - c) environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.*
- 4.13 Within the Framework paragraph 11, the presumption in favour of sustainable development is set out, which states that for decision-taking, proposals that accord with an up-to-date Local Plan should be approved, and where there are no relevant development plan policies or the policies are out-of-date (Framework footnote 7), permission should be granted 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."*

- 4.14 Chapter 4 of the Framework is focused on decision-making. It states that local planning authorities should approach decisions on proposed development in a positive and creative way with decision-makers seeking to approve applications which are in line with sustainable development where possible.

Planning Practice Guidance

- 4.15 The Planning Practice Guidance (PPG) is a web-based resource which brings together planning guidance on various topics into one place. It was launched in March 2014 and coincided with the cancelling of the majority of Government Circulars which had previously given guidance on many aspects of planning. It is important to note that the guidance is guidance and does not provide additional policy. Notwithstanding this, it does provide a useful resource on interpreting policy.

5.0 Compliance with Planning Policy

Rochdale Core Strategy

- 5.1 Policy SD1 (Delivering sustainable development) states that planning applications that accord with the policies in the Local Plan will be approved without delay unless material considerations indicate otherwise.
- 5.2 The following policy analysis demonstrates that the Proposed Development complies with the adopted development plan.
- 5.3 Policy SO2 (To create successful and healthy communities) states that sufficient housing must be delivered to meet demand. A range of housing must be provided, including affordable housing. Additionally, housing growth should be focused where it helps deliver regeneration and economic growth, for example in deprived housing estates. Housing should be well designed and desirable and should improve access to facilities and services, including open space.
- 5.4 The proposed development introduces affordable housing into the deprived Langley estate, a focus area for regeneration. The site ensures easy access to improved open space (Borrowdale Park).
- 5.5 The proposed development complies with Policy SP2 (The spatial strategy for the borough), which states that most new housing should be delivered in the Manchester fringe, in the south of the borough, including in central Middleton and regeneration areas (such as Langley).
- 5.6 Policy SP3/M (The strategy for Middleton) sets priorities for Middleton. These include regenerating Langley by continuing the development of high-quality homes and creating a high-quality green space network. The proposed development will provide high quality affordable housing and deliver improvements to open space.
- 5.7 The proposed development also delivers on Policies C1 (Delivering the right amount of housing in the right places), C2 (Focusing on regeneration areas and economic growth corridors/areas) and C3 (Delivering the right type of housing).
- 5.8 Rochdale has a goal to deliver at least 460 net additional dwellings per year up to 2028, this development will help the council to reach this goal. The development will also contribute to the delivery of affordable homes; the Greater Manchester Strategic Housing Market Assessment (SHMA) (2019) identifies a current net annual housing need of 307 affordable dwellings. The proposed development of 30 dwellings will contribute towards RBC meeting its goal of at least 460 net additional dwellings, which is a requirement, not an upper limit.
- 5.9 Additionally, paragraph 69 of the NPPF states that "*small and medium sized sites can make an important contribution to meeting the housing requirement of an area*". Local planning authorities should accommodate at least 10% of their housing target on sites no larger than one hectare and should "*support the development of windfall sites through their policies and decisions - giving great weight to the benefits of using suitable sites within existing settlements for homes*".

- 5.10 The proposed development is on a small, deliverable site within an existing settlement. The site is identified as open space but is of poor quality and could be more effectively used to help meet housing demand, alongside delivering improvements to remaining open space.
- 5.11 Langley, Middleton is identified as a regeneration focus area where the council will deliver a range of high-quality housing mainly for sale and will "maximise opportunities on other development sites within the estate including... underused, poor quality open space"¹. Borrowdale Park is a poor-quality open space, this development could make better use of this space, while conserving the majority of the area as open space and delivering improvements in overall open space quality.
- 5.12 BYA Architects considered 30 sites and created 9 masterplans to determine the best, most suitable site for this development. The chosen site was deemed the most suitable and therefore taken forward. It was important that the site was within the Langley Estate, a focus area for regeneration and a location where residents have expressed a desire for additional affordable housing.
- 5.13 In terms of delivering the right type of housing, the proposed development will provide 100% affordable housing, taking account of the deprived nature of the surrounding Langley estate. Policy C3 states that developments in Langley should deliver a mixture of housing with an emphasis on good quality family housing, which the proposed development will achieve.
- 5.14 The proposed development complies with Policy C4 (Providing affordable homes), which states that RBC will seek affordable housing on all developments of 15 dwellings or more, affordable housing should make up at least 7.5% of the sales value of the overall scheme. The proposed development will be entirely affordable housing, therefore meeting and exceeding the aims set in this policy.
- 5.15 The need for development in this area has been demonstrated in a 2020 survey carried out by Rochdale Council². This found that 96% of respondents agreed that there was a need for more social housing on the Langley estate. This was due to the loss of existing social housing. 44% of respondents wanted to find a new property in Langley.
- 5.16 The draft emerging Allocations Plan does identify the site as suitable for housing (AL/HOU/31). The site can help to deliver regeneration and will not undermine other sites in Langley, which are limited in number. The development on the site would only be in addition to the development of other sites, not instead of them. Furthermore, the development can be integrated in the landscape and will leave a large area as open space, which can be enhanced to protect biodiversity and improve green infrastructure. The development is of a scale which is physically suitable for the site and is deliverable within a reasonable timescale.

¹ Policy C2, Rochdale Core Strategy (2016)

² The full report arising from this survey is included as a submitted document.

- 5.17 Policy C6 (Improving health and wellbeing) aims for the improvement of people's health and wellbeing by creating an environment where healthy lifestyles are supported and promoted, especially in areas of deprivation and poor health. Providing good quality and affordable homes in areas of greatest need, as the proposed development does, can help to achieve this.
- 5.18 Policy C8 (Improving community, sport, leisure and cultural facilities) states that the provision of better community, sport, leisure and cultural facilities will be supported. Where development increases demand and there is a recognised deficiency, financial contributions may be sought. The proposed development will provide the community with access to an improved quality recreational open space, with landscaping improvements increasing people's desire to use the space for leisure purposes.
- 5.19 Policy P1 (Improving image) requires high quality design in all new developments. The new houses and apartments in the proposed development have been designed to fit into the existing building style, whilst also incorporating contemporary design.
- 5.20 The scheme also complies with Policy P2 (Protecting and enhancing character, landscape and heritage), which states that the council will protect and enhance the borough's character and the distinctiveness of its housing areas, for example by requiring new development to integrate successfully into the landscape and conserving townscape character. The proposed development does this through sensitive design which will integrate with the character of the surrounding Langley estate.
- 5.21 Policy P3 (Improving design of new development) states that all new developments, including associated landscaping should adhere to high design standards. Development should: enhance sense of place and townscape, design out crime, provide a mix of uses, ensure ease of access for public and active transport, ensure buildings meet the needs of occupants, minimise environmental impact and reduce the visual impact of car parking areas. Developments should also consider the relevant design SPDs (Residential Design Guide SPD, 2007).
- 5.22 The new buildings will introduce a contemporary take on the existing surrounding building style. Built forms in the surrounding area are dominated by apartment blocks and short terraces, the new development will also use this mix of forms. In terms of landscaping, native species will be used to increase biodiversity, bird and bat boxes and hedgehog highways will also form part of the enhancements. An element of 'rewilding' will form a new access gateway into the public open space. Parking courts will be provided between buildings, reducing their visual prominence.
- 5.23 In accordance with the Rochdale Borough Council Residential Design Guide SPD, the proposed development is sensitive to the site and surrounding area. Its design does not replicate exactly the surrounding development, but considers it and responds thoughtfully, so that the development fits in with the local area, but also introduces something slightly different and new.

- 5.24 Policy G1 (Tackling and adapting to climate change) seeks to mitigate climate change by reducing CO₂ emissions associated with new development. This can be done through locating development in areas well served by public transport, services and infrastructure and making use of open space to contribute to climate change mitigation and adaptation. New developments should adhere to the energy hierarchy, use renewable or low carbon decentralised energy technologies where possible and incorporate climate change adaptation measures (such as urban greening, planting trees and incorporating SuDS).
- 5.25 The above policy is met in a number of ways. Firstly, public transport is available from three bus routes on Wood Street and Windermere Road, with services to Bury and central Manchester and multiple stops within walking distance of the site. There will be significant enhancement of the landscape within the site boundary (for example, through tree planting), as well as improvements to the wider Borrowdale Park, ensuring that it can function to climate change mitigation and adaptation (for example, through acting as a carbon sink through increased tree planting and contributing to sustainable drainage). Within the site, a biodiversity net gain of at least 10% will be aimed for, this will help with climate change mitigation (through capturing some carbon) and adaption (through urban greening). Furthermore, a Sustainable Drainage Strategy will be implemented to ensure that the development does not lead to an increase in flood risk.
- 5.26 Policy G2 (Energy and new development) expects that new development should follow the energy hierarchy. First, through reducing energy demand, then by implementing energy efficiency and low/zero carbon technologies and networks and finally using 'allowable solutions' (wider energy efficiency measures which could include developer contributions, to compensate for residual emissions).
- 5.27 Policy G6 (Enhancing Green Infrastructure) is also relevant, it concerns the protection and enhancement of Rochdale's green infrastructure network, which provides value economically, socially and environmentally. In local urban open spaces, the focus will be on improving the quality of accessible greenspace close to where people live and work. Tree planting and urban greening will be prioritised. Although the proposed development will result in the loss of a small area of urban open space, the remaining area will be enhanced, leading to improvements in the quality of green infrastructure and ensuring that people living in the surrounding area can access a high-quality open space. The landscaping associated with the scheme will provide a more pleasant environment for site users and encourage greater use of the open space. Currently, the open space is of poor quality by Green Flag standards (as demonstrated by the Open Space Assessment) and has limited natural surveillance, it is therefore underused. The scheme will provide the passive surveillance and improved landscaping required to make this a usable space for the local community. Landscaping will improve the quality of the open space and allow for the provision of additional facilities, so that the space becomes an attractive, safe and useful open space for a range of people.

- 5.28 There are 17 alternative open spaces within 480m of the site (within the national accessibility standard to amenity open space). An open space assessment has been completed which demonstrates that the loss of open space caused by the development will not be unacceptable, due to the proximity of suitable alternative provision (including amenity greenspace, outdoor sports facilities, natural and semi-natural greenspace and provision for young children). Borrowdale Park is poor-quality against Green Flag criteria and is therefore appropriate for small scale residential development which will help to regenerate the area. The remaining open space will be improved in quality through a landscaping plan, creating a high-quality space which will be beneficial for a range of users. The development also provides an opportunity to increase biodiversity on the open space (as demonstrated by the Biodiversity Net Gain Assessment).
- 5.29 Policy G7 (Increasing the value of biodiversity and geodiversity) ensures that sites and features of biodiversity and geodiversity importance are given full and appropriate recognition and protection. The policy states that opportunities to enhance biodiversity will be supported, development in the borough should result in a biodiversity net gain. The proposed development will enhance biodiversity, aiming for a net gain of 10%, through the enhancement of Borrowdale Park, which is currently of low value for biodiversity.
- 5.30 Policy G8 (Managing water resources and flood risk) states that new development must not lead to increased flooding elsewhere, should not be detrimental to flood risk management and that development should be well protected from flood risk. Furthermore, the development will be safe from flooding, being located in Flood Zone 1 (low risk), where development should seek to be located.
- 5.31 In accordance with Policy G9 (Reducing the impact of pollution, contamination and land instability), the residential noise assessment identifies that the site is in an acoustic environment deemed to be low to moderate in level and does not identify any noise concerns arising from the development. Furthermore, the Phase 1 Preliminary Risk Assessment identifies that the site is low risk, contamination and land instability are not of particular concern.
- 5.32 In accordance with Policy T2 (Improving accessibility), development should be located where good access to public transport is available or can be provided. Provision should be made for cyclists, pedestrians and people with impaired mobility. The proposed development is within an existing residential area, which has access to the appropriate transport facilities. Bus stops for route numbers 18, 162 and 163 are located within walking distance of the site, along Wood Street and Windermere Road, with services operating to Bury and Central Manchester. Walking routes across Borrowdale Park provide access to other areas of Langley.
- 5.33 Policy DM1 (General Development Requirements) states a range of requirements that developments must demonstrate compliance with (see below table).

Table 5.1: Compliance with Policy DM1 (General Development Requirements)

Development Requirements	How the proposed development complies
High quality design	The dwellings will introduce a contemporary take on existing surrounding designs. The scale of the housing has been designed to match that of the surrounding area (short terraces and small apartment blocks).
Compatible with surrounding land uses	The proposed development is solely for residential units. The surrounding area is a large residential estate. The scale of the housing has been designed to match that of the surrounding area (short terraces and small apartment blocks).
Does not adversely affect the amenity of residents (for example, through loss of privacy)	Separation distances are in accordance with guidance in the Residential Design Guide SPD including suitable allowances for levels and topography.
Mitigates against pollution	A programme of landscaping improvements will be implemented.
Does not have an adverse impact on health	As a residential development, the proposal is unlikely to cause significant harmful pollution. The site will provide access to easily accessible, high quality open space which can be beneficial to health.
Provides or demonstrates the availability of local services and community infrastructure	Three bus routes are available in the vicinity of the site, with multiple accessible nearby bus stops. The development will also be within easy reach of adjacent open space. A range of shops and facilities are available along Wood Street, within walking distance of the site.
Minimise opportunities for crime	The layout has regard for the principles of Secured by Design. The development will also increase natural surveillance over the open space, encouraging use and reducing the opportunity for crime.

Development Requirements	How the proposed development complies
Take account of ground conditions, incorporate high quality landscape scheme	A Phase 1 Preliminary Risk Assessment has been carried out which demonstrated that the site is low risk. Landscaping is proposed to improve both the quality of the site and the wider park.
Assess whether the development may be affected by ground instability	A Phase 1 Preliminary Risk Assessment has been carried out which demonstrated that the site is low risk.
Consider the availability of water and wastewater infrastructure	The proposed development will be connected to local infrastructure.
Not cause detrimental impacts on European protected sites	There are no European protected sites on the proposed development site. The closest such designation is the Rochdale Canal SAC, approximately 2.2km from the site.

- 5.34 This policy analysis has demonstrated that the proposed development addresses the issues raised in and complies with Policy DM1.
- 5.35 Policy DM2 (Delivering planning contributions and infrastructure) requires developers to provide or contribute to the cost of physical and social infrastructure that is needed because of the development and/or mitigate the impact of the development through planning obligations and agreements. In terms of residential development, unless on site or other provision is made, contributions will be required for: affordable housing, open space provision and maintenance, health and wellbeing, education facilities and community facilities.
- 5.36 The proposed development will provide 100% affordable housing and will contribute to the enhancement of open space. A Section 106 agreement will be entered into where applicable or appropriate to help deliver further infrastructure and improvements.

Rochdale Borough Unitary Development Plan

- 5.37 Policy G/SP/3 (Meeting the Needs of Local Communities) states that the identification of suitable locations for new development will take into account the needs of the local community, the extent to which the proposed development meets these needs, whether there are more appropriate uses for the site, whether the proposal is contributing to regeneration and the accessibility of the location through sustainable means of transport.

- 5.38 Currently, the site is poor quality open space, the proposed development will use this space to provide much needed housing, the remaining open space (outside of the application red line boundary) will be enhanced and improved open space for the local community. The proposal will help the regeneration of the Langley estate, where development in Rochdale is focused (as a regeneration area). Furthermore, the site is relatively central and accessible.
- 5.39 Policy D/10 (Protected Open Land) states that development proposals on protected open land will be permitted where they fall in at least one of the following categories:
- Development which would be acceptable were it in the Green Belt;
 - limited infilling within an established pocket of housing or industry where this is in scale with the area and will not adversely affect its character or surroundings;
 - a limited extension to an existing building which:
 - forms part of an existing source of employment; or
 - is necessary for the establishment of a new enterprise or business which satisfies other policies of the Plan; and
 - is sited within the existing curtilage of the business concerned, and will not adversely affect the character of the surrounding land and its openness.
- 5.40 New buildings should be sited to form a group with existing buildings or be well screened.
- 5.41 The proposed development amounts to the second category, limited infilling which will have a limited effect on surrounding character. The application boundary and development occupies a small portion in the north of the larger area of open space, a significant area of open space will remain outside the red line boundary.
- 5.42 The UDP aimed for an adequate supply of housing (Policy G/H/1, Housing), amounting to a net increase of 240 dwellings per year between 2002 and 2016. Any housing development helps to contribute to this target.
- 5.43 Residential developments outside allocated areas are discussed in Policy H/3. Such developments will be permitted provided that:
- The site is on previously developed land;
 - The site is well located in terms of access to jobs, shops and services by modes of transport other than the car;
 - The development provides a mix of dwellings in terms of type and size;
 - The proposed development is compatible with the Plan's policies dealing with flood risk, unstable land, contaminated land and landfill gas; and
 - The proposed development is compatible with surrounding uses, including highways, both in terms of its impact upon those uses and the impact of surrounding uses upon the amenity of future residents.

- 5.44 Whilst the development is not on previously developed land, it complies with the other criteria. The site is well located towards the centre of Langley. It is within walking distance of local shops off Wood Street as well as being close to a number of schools. Public transport is available from three bus routes on Wood Street and Windermere Road, with services to Bury and central Manchester and multiple stops within walking distance of the site. The proposed development will provide apartment blocks and short terraces which match the character of the surrounding area; dwellings will be a range of sizes, from one-bed apartment to four-bed houses. The site is suitable for development, being in Flood Zone 1 (where development should seek to be located) and is not unstable or contaminated. As a relatively small residential development within a primarily residential area, the development is compatible with surrounding uses.
- 5.45 Policy H/6 (Provision of recreational open space in new housing development) states that new housing developments must make adequate provision for recreational open space, applying a standard of 2.1 hectares per 1000 population. Proposals comprising fewer than 100 bedrooms will be required to make a financial contribution to off-site provision. This may not be required if there is already sufficient open space in the local area. The Open Space Assessment found that there are 17 alternative open spaces within 480m (walking distance) of the site, 5.16ha of this is amenity greenspace (other types also present include outdoor sports facilities and natural and semi-natural green space). There is therefore sufficient alternative open space such that the loss to development is acceptable. Additionally, the proposed development is only on the northern portion of Borrowdale Park, with the southern portion remaining and being enhanced through landscaping. This will ensure that the development has excellent access to open space. A Section 106 agreement will be entered into where applicable or appropriate to help deliver further infrastructure and improvements.
- 5.46 Policy H/7 (Affordable Housing) requires all new private housing developments to provide an element of affordable housing on site. The proposed development complies with this policy as it is a development of 100% affordable housing.
- 5.47 The proposed development site is within the Langley Physical Regeneration Area, Middleton (Policy R/2), proposals for the regeneration of the area will be supported, in accordance with an approved masterplan. A wide range of quality housing should be provided. Development within the estate should lead to the diversification of the housing stock, bring underused and neglected land into beneficial use, create safe, attractive public areas and provide a linked network and hierarchy of open space.
- 5.48 The proposed development will add to the availability of quality, affordable housing. It will also bring improvements to the poor quality, underused Borrowdale Park, bringing it into more beneficial use and delivering improvements to the remaining open space.

- 5.49 Policy G/G/1 (Greenspace) states that the council will protect and enhance existing public open space. Sites with an existing or potential value will be protected from inappropriate development and the quality of open spaces which have the potential to meet deficiencies for sport and recreation will be improved. The proposed development will lead to some loss of open space, however this is currently of poor quality and landscaping work will deliver significant improvements in quality to the remaining open space, making it a more desirable space to use for recreation.
- 5.50 Policy G/3 (Protection of Existing Recreational Open Space) states that development of public recreational open space for any other purpose will not be permitted unless one or more of the following exceptions applies:
- The development is for a non-commercial community use.
 - Alternative provision is made of at least the equivalent quantity and quality of recreational open space, in a satisfactory location.
 - The development funds improvements to existing outdoor sports facilities within the site or elsewhere.
 - The development comprises a built recreational facility of greater benefit to the wider community than the open space being lost and does not result in a serious deficiency in open space in the area.
- 5.51 The proposed development will improve the quality of existing open space at Borrowdale Park through landscaping plans.
- 5.52 Policy G/10 (Protection of Urban Amenity Open Space) states that the council will not permit development proposals for the development of incidental urban greenspace unless the benefits outweigh the loss, the value of existing greenspace will be based on: its structural value, its visual amenity value, its contribution to the setting of buildings, its value for passive recreation and whether it comprises an area of nature conservation interest.
- 5.53 Borrowdale Park is currently a low quality greenspace, with limited facilities and low biodiversity value, it contributes little to visual amenity and is of limited use for recreation. The proposed development would result in the loss of only a small area of the park and significant landscaping improvements to the remainder, so that it provides better value for visual amenity, recreation and biodiversity.
- 5.54 In accordance with Policy NE/3 (Biodiversity and Development), development should seek to retain existing features, species and habitats of ecological value and incorporate them into the development. Compensatory features may also be required or be more appropriate. Developments which establish new landscaping and open spaces which contribute to nature conservation will be supported and encouraged, especially where they address local habitat deficiencies or provide accessible, high quality natural greenspace.

5.55 There is an aspiration to improve biodiversity on site by introducing an area of rewilding, which will connect the development to the public open space. This area will include a mix of native species to provide food sources and habitat for birds and insects. Trees will be planted across the site as part of landscaping plans. Bird and bat boxes will also be introduced, along with improvements allowing for the movement of hedgehogs through the space. The open space which the development will occupy is currently of little value for biodiversity, with limited habitats. Proposed changes can therefore be effective in creating a significant improvement which will allow for a biodiversity net gain target of 10% to be attainable.

5.56 The above analysis demonstrates that the proposed development complies with local adopted planning policy.

Draft Allocations Plan

5.57 The Draft Allocations plan proposes some land at Borrowdale Park for allocation for residential development (AL/HOU/31). This shows an indicative capacity of 10 dwellings on 0.32 hectares of land. The proposed site layout is different to this draft allocation. However, as the Allocations Plan is in draft form, only limited weight can be afforded to it. Furthermore, the plan demonstrates that Rochdale Borough Council is open to the principle of using some land in Borrowdale Park for housing and therefore that a development of this type is accessible and that a portion of this open land is considered surplus to requirements.

6.0 Technical Assessment

Ecology

- 6.1 An ecological assessment has been undertaken by Mulberry Tree Management.
- 6.2 The majority of the site area is regularly mowed amenity grassland habitat, which is relatively species-poor and of low ecological value. Dandelion and creeping buttercup are found extensively across the site, but it is largely grass dominated.
- 6.3 Bands of young plantation woodland, scrub and hedgerow occur around the site boundaries, these habitats are mostly artificial in origin. However, some areas of semi-natural habitat have developed, including areas of marshy grassland and rank grasses and tall herbs around the woodland blocks.
- 6.4 The habitats present are of limited biodiversity value, containing comprising habitats and plant species which occur frequently across the UK. The areas of young woodland, hedgerow and scrub are considered to be of minor biodiversity value and likely offer foraging and refuge habitat to common invertebrates, mammals and birds. It is considered unlikely that any bat roosts are present, small numbers of bats may use the woodland edge habitats for foraging.
- 6.5 The proposed development would be located at the northern part of the site, with a large area remaining undeveloped. The proposals will potentially result in the loss of plantation woodland, scrub, hedgerow and grassland habitats.
- 6.6 There is a small stand of invasive *Monbretia* on site, which should be removed as it can dominate and exclude native species where it grows.
- 6.7 Tree removal should, where possible, avoid the breeding bird season.
- 6.8 Bat and bird boxes can be installed to enhance the site for these species.
- 6.9 New hedgerows could be planted to help increase biodiversity. Landscaping proposals should also maximise biodiversity. For example, providing planting suitable for pollinators and birds.
- 6.10 There is also opportunity to enhance the biodiversity of the retained parkland to the south of the site. For example, wildflower seed could be sown.

Flood Risk Assessment

- 6.11 The proposed development site is currently undeveloped open space (a greenfield site).
- 6.12 The site is located in Flood Zone 1 and has a low risk of flooding from all sources. Therefore, ground floor levels are above extreme flood levels, a flood resilient design is not required and a flood warning and evacuation plan is not required.
- 6.13 The Environment Agency's Flood Risk from Surface Water mapping identifies a flow route through the south-eastern part of the site. However, the proposed development is located outside of modelled extent of flooding, the area is at 'very low' risk of surface water flooding. Even under the most extreme flood event, there would be no development in the area affected.

6.14 As the proposal involves developing a greenfield site, there will necessarily be an increase in impermeable area. A Sustainable Drainage System should therefore be included in proposals to mitigate the impact of an increase in surface run-off generation.

6.15 There are no nearby watercourses or rivers, so there will be no impact on the hydraulic performance of channels.

Residential Noise Assessment

6.16 A noise survey has been undertaken by Nova Acoustics to establish sound levels at the proposed development, these have been used to assess the suitability for residential use.

6.17 The acoustic environment of the site is low to moderate in level, noise is dominated by road traffic noise emissions from Borrowdale Road and the primary school. The noise levels from school activities are insubstantial, the assessment therefore focuses on requirements for properties affected by traffic noise from Borrowdale Road.

6.18 The noise profile is dominated by "anonymous" steady state noise sources such as transport.

6.19 Acceptable indoor noise levels can be achieved with the implementation of appropriate glazing and insulation.

Phase 1 Preliminary Risk Assessment

6.20 The phase 1 Preliminary Risk Assessment was carried out by Sutcliffe.

6.21 The earliest available historical maps (1848-1851) indicate that the site comprised field land. From the 1920s, two clay pits were visible on the south western boundary, these had been infilled by 1956. No major changes were evident from historical mapping.

6.22 The potential for significant contamination having arisen on site as a result of current and former uses is considered to be low to moderate. Furthermore, the site has not been subject to previous development, the potential for relic foundations and obstructions can therefore be discounted.

6.23 There are no records of any artificial ground on site. The bedrock geology is part of the Pennine Lower Coal Measures (mudstone, siltstone and sandstone) while a superficial geology of Devensian Hummocky Glacial Deposits is noted. No faults have been identified within the site boundary.

6.24 The bedrock is classified as a Secondary A Aquifer.

- 6.25 The site is within a coal mining area. However, the site is not within the zone of likely physical influence from past, present or future underground coal mining. There are no known mine entries within 20m of the site. There is no evidence of the site being affected by any damage arising due to geological faults or other weaknesses that have been affected by coal mining. The site is not within the boundary of an opencast site from which coal has been removed by opencast methods. Finally, there is no record of mine gas emissions requiring action by the Coal Authority.
- 6.26 The nearest surface water feature is 545m south of the site, with no surface abstractions within 1000m of the site.
- 6.27 No significant areas of concern have been identified, the site is therefore deemed to be Low Risk (Class 3).

7.0 Case for Development

- 7.1 Section 38 (6) of the Planning and Compulsory Purchase Act 2004 states that decisions on planning applications must be made in accordance with the Development Plan. The Planning Policy Assessment in Chapter 5.0 demonstrates that the Proposed Development accords with the relevant policies in the Development Plan for Rochdale Borough Council.
- 7.2 The Langley estate is identified as an area where regeneration is desirable, therefore various forms of development will be beneficial to the area. Offering a mix of affordable housing will allow established communities to remain in Langley as new generations seek housing within the area.
- 7.3 There is evidence of a desire for this type of development in this area. A 2020 survey carried out by Rochdale Borough Council³ found that 96% of respondents agreed that there was a need for more social housing on the Langley estate. This was due to the loss of existing social housing. 44% of respondents wanted to find a new property in Langley.
- 7.4 The proposed development will introduce affordable housing via a mix of houses and flats, helping to meet the needs and desires of local residents.
- 7.5 The Affordable Homes Programme since 2015 report⁴ was published by the House of Commons Committee of Public Accounts in November 2022.
- 7.6 The Department for Levelling Up, Housing and Communities (the Department) aims to increase the supply of new homes in England through the Affordable Homes Programme. The government is committed to building 300,000 new homes overall every year by the mid-2020s. For the Affordable Homes Programme, the Department secures funding from HM Treasury and then gives this to Homes England (outside London) and to the Greater London Authority (GLA) in London to achieve set targets.
- 7.7 The Department forecasts it will spend £20.7 billion (2021–22 prices) on the 2015, 2016 and 2021 programmes to deliver 363,000 grant-funded homes. Under the 2016 programme, the Department forecasts that housing providers will build 241,000 new homes, against a target of 250,000. Under the 2021 programme, the Department forecasts considerable shortfalls against its targets. The Department's central forecast is that housing providers will build 157,00 new homes, against a target of up to 180,000 should economic conditions allow.
- 7.8 Significant risks, such as cost inflation and labour shortages could mean that housing providers build even fewer homes than current forecasts.
- 7.9 The report moves on to state that there is huge demand for social rent homes which is the only real, affordable option for many people. Despite this, the Department has a target for just 33,550 homes for social rent under the 2021 programme.

³ The full report arising from this survey is included as a submitted document.

⁴ The Affordable Homes Programme since 2015 (parliament.uk)

- 7.10 The report highlights the human impact that a lack of homes for social rent has "A lack of homes forces people to live in hostels or private accommodation in which they move around every few years; leading to children having to move school or travel long distances".
- 7.11 The proposed development will contribute to increasing the supply of affordable homes and assist in addressing the forecasted shortfall. The proposed dwellings will be affordable, helping to meet demand for this tenure of home.
- 7.12 According to Shelter, a UK housing and homelessness charity, there was a net loss of 14,100 social homes in 2022, despite over 1 million households sitting on the waiting list; in the last decade (since 2012/13), there has been a total net loss of 165,000 social homes in England⁵. This clearly demonstrates that there is a crisis within the social housing sector, with very demand and decreasing supply. Any schemes that provide exclusively affordable housing should therefore be looked on favourably, as they respond to this clear need and demand.
- 7.13 Although currently designated as open space, in the draft Allocations Plan, part of Borrowdale Park (the northern section where the development is proposed) is shown as being allocated for a residential development of up to 10 dwellings (AL/HOU/31). Although the proposed development goes above the suggested capacity, it does this in a relatively small amount of space (similar to the proposed allocation) and offers dwellings in a similar style to that of the surrounding area (small apartment blocks and short terraces). The draft allocation demonstrates that Rochdale Borough Council is open to the idea of using current open space for residential development.
- 7.14 Borrowdale Park is a poor-quality open space. The proposed development will make better use of the space. A relatively small portion of the open space will be lost to built development, the remainder will be improved in quality through landscaping, so that it is better able to meet the needs of the local community. The proposed development will create high quality housing with excellent access to improved open space.
- 7.15 An Open Space Assessment found that there are 17 alternative open spaces within 480m of the site (within the national accessibility standard to amenity open space). The loss of open space caused by the development will not be unacceptable, due to the proximity of suitable alternative provision including amenity greenspace, outdoor sports facilities, natural and semi-natural greenspace and provision for young children. Borrowdale Park is poor-quality against Green Flag criteria and is therefore appropriate for small scale residential development which will help to regenerate the area. The development also provides an opportunity to increase biodiversity on the open space, with the scheme committing to at least a 10% net gain in biodiversity (as demonstrated by the Biodiversity Net Gain Assessment).

⁵ Shelter (2023)

8.0 Conclusion

- 8.1 This Planning Statement has been prepared in support of a full planning application for the construction 30 residential dwellings with associated landscaping.
- 8.2 The application is supported by a Site Plan (1917-20).
- 8.3 Section 38 (6) of the Planning and Compulsory Purchase Act states that decisions on planning applications must be made in accordance with the Local Development Plan, in this case for Rochdale Borough Council and this has been demonstrated through the policy analysis which supports the proposals.
- 8.4 It is acknowledged that the proposed development involves building on designated open space. However, this harm will be mitigated. The proposed development will only be on a small portion of the open space, which is of poor quality and underused. A comprehensive landscaping plan will improve the development site and wider open space, creating a high-quality open space which is of benefit to the wider community.
- 8.5 We believe that the benefits of the scheme outweigh any harm caused, which will be sufficiently mitigated and that the Proposed Development is not otherwise in conflict with the development plan and should therefore be approved without delay.



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