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Planning Statement

Proposed Residential Development

at Land at Sutherland Road and
Lennox Walk / Argyle Street, Heywood

for Built Developments Ltd

June 2024

Land at Sutherland Road and Lennox Walk / Argyle Street, Heywood

Full planning application for demolition of existing structures and erection of 28 affordable dwellinghouses (Use Class C3) with associated access, landscaping and parking.

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1. INTRODUCTION

- 1.1 This Planning Statement has been prepared on behalf of the applicant, Built Developments Ltd, to support an application seeking full planning consent for the demolition of existing structures and erection of 28 affordable dwellinghouses (Use Class C3) with associated landscaping and parking.

THE PROPOSALS AND CONTEXT

- 1.2 The site is comprised of two parcels. The first is at Sutherland Road, north of Our Lady and St Paul's RC Primary School. The land is vacant, having been formerly occupied by school buildings which were demolished in 2010. The second plot is located on land at the junction of Lennox Walk and Argyle Street. It is a leftover grassed area with a slight slope down to the pavement.

- 1.3 The description of development is as follows:

"Full planning application for demolition of existing structures and erection of 28 affordable dwellinghouses (Use Class C3) with associated access, landscaping and parking."

PURPOSE OF THE STATEMENT

- 1.4 This statement describes the proposals and examines the planning considerations which they raise. In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004, determination of the planning application must be made in accordance with the development plan, unless material considerations indicate otherwise.
- 1.5 This statement should be read in conjunction with the other documents submitted with the planning application.

CONTENT OF THE PLANNING APPLICATION

- 1.6 This planning submission includes supporting documents which demonstrate how the scheme responds appropriately to best practice in design and sustainability, as well

as planning policy objectives. The documents submitted as part of this application are:

- Design and Access Statement, prepared by BTP Architects;
- Planning Statement, prepared by Zerum;
- Affordable Housing Statement, prepared by Zerum;
- Crime Impact Statement, prepared by Dobson Owens;
- Acoustic Assessment, prepared by Braiden Acoustics;
- Energy Standards Statement, prepared by Watt;
- Preliminary Ecological Appraisal, prepared by Ostara Ecological Services;
- Biodiversity Impact Assessment and Metric, prepared by Ostara Ecological Services;
- LCRM Stage 1 Risk Assessment, prepared by Groundsmiths;
- Flood Risk Assessment and Drainage Strategy, prepared by Inspire Design;
- Arboricultural Impact Assessment and Tree Survey, prepared by ACS; and
- Transport Statement, prepared by Roberts Highway Consultants.

- 1.7 The application is supported by a full set of plans and elevations, prepared by the scheme architect, BTP Architects, and landscaping plan prepared by TBA.

CONSULTATION

- 1.8 The general approach to, and content of, this application has been discussed with officers of Rochdale Borough Council prior to its submission. These discussions have influenced the evolution of the scheme into its final form. A letter drop to local residents has informed them of the development proposals and sought their views.

STATEMENT STRUCTURE

- 1.9 The remainder of this statement is as follows:

Section 2 – Provides context and describes the site and its surroundings alongside details of any relevant planning history and details of consultation;

Section 3 – Describes the development proposals in detail;

Section 4 – Outlines the development plan framework, relevant national policy guidance and any material considerations;

Section 5 – Comprises the Open Space Assessment;

Section 6 - Sets out a detailed analysis of the relevant planning considerations; and

Section 7 - Concludes by summarising the main points raised in this document.

2. DEVELOPMENT CONTEXT

- 2.1 This section briefly describes the site, its surroundings and local setting, and outlines the relevant planning history and designations of the site.

SITE AND SURROUNDINGS

- 2.2 The site is comprised of two parcels. The first is at Sutherland Road, north of Our Lady and St Paul's RC Primary School. It formerly accommodated school buildings, which were demolished in 2010. The site is now comprised of areas of hardstanding with grass edged by wire fencing. To the south is the primary school. To the east, the land rises to form a bank, beyond which is the school playing field set on higher ground. The surroundings are predominantly residential in nature.
- 2.3 The second parcel is located on Argyle Street, and is edged to the east by the footpath known as Lennox Walk. It is a leftover piece of ground which is grassed and slopes slightly down to the pavement. It is largely surrounded by residential dwellings with the school playing fields to the north. Land to the west is unused and overgrown, although it formerly accommodated the concrete Our Lady and St Paul church and a residential block.
- 2.4 Details of the site location and strategic context can be found in the Design and Access Statement, produced by BTP Architects.

SITE ACCESSIBILITY

- 2.5 The site is well located in relation to local amenities. There is a convenience store with post office and a takeaway on the corner of Argyle Street and Sutherland Road, and a day nursery just beyond. These facilities are roughly 130m from both sites, a walk of only 1-2 minutes. There are bus stops on both roads within metres of the site, as well as on Bury Old Road. They provide services to Bury and Manchester city centre, as well as local destinations.
- 2.6 There is a playground on Kilmarnock Grove, 350m from both sites, a walk of a few minutes. To the south-east, off Sutherland Road, is an extensive greenspace offering pitches and informal recreation space. The library and various amenities are located at the western end of Sutherland Road. Together these comprise the local centre.

They are a distance of 1km from the furthest point of the larger site, equating to a 14 minute walk, or less if pedestrians use the pathways alongside the intervening greenspace.

- 2.7 The accompanying Design and Access Statement and Transport Statement provide more detail in terms of the site's connections and accessibility.

PLANNING HISTORY

- 2.8 A search of the Council's online applications database reveals three applications relating to the former school site, albeit as part of the wider campus. These include an extension for classroom and store, covered play area and entrance canopy (ref 79/D09801); security fencing (ref 99/D37027); and entrance canopy (ref 14/01519/FUL). The latter two applications were granted in November 1999 and February 2015. No information is available on the earlier application.
- 2.9 There is one application relating to the Argyle Road plot. This is for a headquarters building for scout troop (ref 77/D05907). No information is available for this application due to its age.

STATEMENT OF CONSULTATION

- 2.10 Consistent with the Council's Adopted Statement of Community Involvement (2021), the applicant has undertaken pre-application discussions with the local planning authority. Both the applicant and their professional advisors have sought to adopt a 'best practice' approach to both design and delivery.
- 2.11 Pre-application discussions with the Council commenced in advance of the submission of the application and have informed the proposals. The design response is set out in the submitted Design and Access Statement.
- 2.12 While the proposal's importance is limited to the local level, the applicant was keen to keep residents updated on proposals, and to give them the opportunity to comment. Local properties along Sutherland Street, Argyle Street and Lennox Way, including the school, were therefore notified by a letter drop prior to the application being submitted.

- 2.13 Given the scale of the scheme and its compliance with plan policy, we are satisfied that an appropriately comprehensive process of pre-application consultation has been undertaken.

STATUTORY DEVELOPMENT PLAN

- 2.14 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that when determining a planning application, local planning authorities must make the determination in accordance with the development plan unless material considerations indicate otherwise. The Local Plan is comprised of the Rochdale Core Strategy (2016) and Saved Policies of the Unitary Development Plan (2006).

SITE DESIGNATIONS

- 2.15 The Local Plan identifies the site as being within the defined urban area (Policy G/D/1). The school playing fields adjacent to the plots are identified under Policy G/3 Protection of Existing Recreational Open Space (Schools).
- 2.16 The site does not contain any designated heritage assets, nor is it within a Conservation Area. It is in Flood Zone 1.
- 2.17 The scheme's response to all relevant policies is considered in Section 6.

3. PROPOSED DEVELOPMENT

- 3.1 The preliminary sections of this statement have touched on the context and content of the application. More detail is provided as part of the submitted Design and Access Statement, prepared by BTP Architects.
- 3.2 The application seeks full planning consent for the demolition of the existing structures and erection of 28 dwellinghouses (Use Class C3) with associated access, landscaping and parking.
- 3.3 The proposed layout plans show the extent of the proposed development on each plot in relation to the nearest roads, surrounding land uses and wider area. Careful thought has been given to ensure that the proposed scheme conforms to the surrounding land uses and respects both wider views of the development and its more immediate surroundings.

ACCOMMODATION AND LAYOUT

- 3.4 The larger plot will accommodate 22 dwellinghouses in a cul de sac format with a single access point off Sutherland Road. This allows for the provision of 10x two-bedroom dwellings and 12x three-bedroom properties. They are semi-detached with one detached house. Each three-bedroom property has two off-road parking spaces and the two-bedroom houses have one.
- 3.5 The smaller plot will provide six dwellinghouses along the road frontage, each being semi-detached. Three are two-bedroom units with a single parking space each; and three are three-bedroom with two parking spaces.
- 3.6 All properties are two storeys. They benefit from a generous rear garden. Front gardens and landscaping are maximised across both plots. A total of 32 trees are incorporated within the proposals. All dwellings meet Nationally Described Space Standards and have scope to meet M4(2) if required by the end user.
- 3.7 The layout of the site ensures that privacy is upheld for residents of the proposed dwellings and existing properties. Suitable interface distances are achieved.

- 3.8 Further detail is provided in the Design and Access Statement and accompanying plans.

DESIGN AND MATERIALS

- 3.9 The aim of the scheme is to create a modern, high quality development that relates to and respects the character of the surrounding area whilst generating its own sense of place. The design approach seeks to respond to the local pattern whilst making the best use of the land resource.
- 3.10 Materials and design language reflect the local context, including red brick with decorative elements and grey roof tiles. The proposed materials are of high quality, durable and low maintenance.
- 3.11 The proposals have been developed following a detailed analysis of the site and local context whilst taking into consideration national and local requirements. The accompanying Design and Access Statement sets out how the design concept for the scheme has developed in terms of both form and function.
- 3.12 The proposals have been developed through careful consideration of the site including:
- Analysis of the local character and context;
 - Evaluation of use requirements of the local area;
 - Detailed analysis of the site itself including orientation, topography, access, proximity to neighbours and connection with the streetscape;
 - Local movement networks and how they can be enhanced; and
 - Review with planning officers during the pre-application process.
- 3.13 The accompanying DAS provides further details on the choice of materials, elevational details and the care which has been taken to complement existing character whilst creating a distinctive sense of place.

REFUSE STRATEGY AND SERVICING

- 3.14 Semi-detached dwellings facilitate the convenient storage of bins away from the street in rear gardens, whilst enabling them to be brought out for collection easily.

- 3.15 Each property has waste storage within the rear gardens, to allow for easy movement of bins to the frontage collection points on the relevant days. The bin stores have space for the required 4x 240l bins (one each for general waste; cans and bottles; paper and cardboard; and food and garden waste).
- 3.16 The submitted Transport Statement, prepared by Roberts Highway Consultants, includes swept path analysis which confirms that a refuse collection vehicle and fire service vehicle can access, manoeuvre within and leave the northern plot appropriately.

4. PLANNING POLICY CONTEXT

PLANNING AND COMPULSORY PURCHASE ACT 2004

- 4.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that when determining a planning application, the decision maker must make their determination in accordance with the development plan unless material considerations indicate otherwise.
- 4.2 This chapter therefore considers the relevant national planning policy and guidance which form a material consideration in the determination of this application, followed by the development plan which currently consists of the Rochdale Core Strategy (2016) and Saved Policies of the Unitary Development Plan (2006).

NATIONAL PLANNING POLICY FRAMEWORK

- 4.3 The National Planning Policy Framework (NPPF) is a material consideration in planning decisions.
- 4.4 The NPPF has a clear presumption in favour of sustainable development at its heart (para 10). Sustainable development means that the planning system pursues economic, social and environmental objectives (para 8), although they are not criteria against which every decision can or should be judged (para 9). Local planning authorities should approach decisions on proposed development in a positive and creative way, with decision-makers at every level required to seek to approve applications for sustainable development where possible (para 38).
- 4.5 The presumption in favour of sustainable development means that local planning authorities should, without delay, approve development plans that accord with an up-to-date development plan, and where the relevant policies are out-of-date, granting permission unless other policies provide a clear reason for refusal or if any adverse impacts of doing so would significantly and demonstrably outweigh the benefits (para 11).
- 4.6 Section 5 seeks to significantly boost the supply of homes with an appropriate mix of housing types to address the needs of groups with specific housing requirements (para 60). Planning policy should reflect the need for homes of sizes, types and tenures to

address different groups in the community including those who require affordable housing (para 63). Where major development involving the provision of housing is proposed, planning policies and decisions should expect at least 10% of the total number of homes to be available for affordable home ownership (para 66).

- 4.7 The NPPF recognises the important contribution towards housing need made by small and medium sites: the development of windfall sites should be supported and great weight given to the benefits of using suitable sites within existing settlements for homes (para 70).
- 4.8 Section 8 seeks inclusive and safe places which promote social interaction; are safe and accessible; and encourage healthy lifestyles (para 96). Existing open space, sports and recreational buildings and land should not be built on unless an assessment has confirmed the space is surplus to requirements; or the loss would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or the development is for alternative sports and recreational provision (para 103).
- 4.9 Section 9 of the NPPF seeks sustainable transport, with promotion of walking, cycling and public transport, environmental impacts taken into account, and well-considered patterns of movement which relate to the design (para 108). The NPPF states that development should only be prevented on highway grounds if there would be an unacceptable impact on highway safety or severe cumulative highway impacts (para 115). Applications should prioritise pedestrian and cycle movements, address the needs of those with disabilities and allow for efficient servicing (para 116).
- 4.10 Section 11 requires planning decisions to promote an effective use of land, with as much use of previously-developed land as possible (para 123). Substantial weight should be given to the use of suitable brownfield land within settlements and to the development of underutilised land (para 124). The development of under-utilised land and buildings should be promoted and supported, especially if this would meet identified needs for housing (para 124).
- 4.11 Section 12 of the NPPF identifies good design as 'a key aspect of sustainable development' (para 131). Developments must function well over their lifetimes, be visually attractive with good architecture and layout, effective landscaping, sympathetic to local character whilst not discouraging appropriate innovation or change such as increased densities, and providing a high standard of amenity (para

135). Development of poor design should be refused (para 139). Significant weight should be given to innovative designs which raise the standard of design more generally in an area, as long as they fit in with the overall form and layout of their surroundings (para 139).

- 4.12 Decisions should ensure that a site is suitable for its use in terms of ground conditions, land instability and contamination (para 189).

ROCHDALE CORE STRATEGY (2016)

- 4.13 Relevant policies from the Core Strategy are as follows.

Policy SP1	Rochdale Borough's Role in the City Region
Policy SP2	The Spatial Strategy for the Borough
Policy SP3/H	The Strategy for Heywood
Policy C1	Delivering the Right Amount of Housing in the Right Places
Policy C2	Focusing on Regeneration Areas and Economic Growth Corridors/ Areas
Policy C3	Delivering the Right Type of Housing
Policy C4	Providing Affordable Homes
Policy C6	Improving Health and Wellbeing
Policy P1	Improving Image
Policy P2	Protecting and Enhancing Character, Landscape and Heritage
Policy P3	Improving Design of New Development
Policy G1	Tackling and adapting to climate change
Policy G2	Energy and new development
Policy G6	Enhancing green infrastructure
Policy G7	Increasing the value of biodiversity and geodiversity
Policy G8	Managing water resources and flood risk
Policy G9	Reducing the impact of pollution, contamination and land instability
Policy T2	Improving accessibility
Policy DM1	General development requirements
Policy DM2	Delivering planning contributions and infrastructure

- 4.14 Of the above policies, those summarised below are considered the most pertinent to this application.
- 4.15 Policy SP1 states that the borough will provide improved housing quality and choice by working with private and public sector partners. Policy SP2 confirms that most new housing will be delivered in the south of the borough. Supporting paragraph 6.4 explains that the focus is on regeneration and the use of previously developed sites.
- 4.16 Policy C1 seeks to provide sufficient land to deliver at least 460 net additional dwellings per year to 2028 to assist in the creation of successful, inclusive and mixed communities and meet the housing needs of the borough. The borough will therefore maximise the potential of previously developed sites to achieve 80% housing on previously developed land. In the south, they will deliver a majority of new homes to reflect its accessibility to the city region by maximising the opportunities to provide new housing in sustainable locations and deliver new homes in regeneration areas.
- 4.17 Supporting paragraph 8.5 explains the aims of regeneration, and of providing more quality in terms of housing choice to promote economic growth and broaden the appeal of areas currently suffering from poor image and where the existing housing fails to meet local needs and aspirations. It notes the need to reuse and regenerate vacant and underused previously developed sites especially those which detract from the quality of the residential environment. It clarifies that the housing target is not a ceiling.
- 4.18 Policy C2 identifies regeneration areas including Central Heywood where additional dwellings are to be delivered for sale and rent to widen housing choice in the area; and where vacant sites are to be redeveloped. New housing is encouraged which is well related to the South Heywood employment area. Supporting text notes that the delivery of new housing can play an important role in delivering regeneration and supporting economic growth, thereby improving area quality, tackling deprivation and creating more sustainable patterns of development (para 8.14).
- 4.19 Policy C3 seeks to deliver the right types of homes, well designed and to appropriate densities, to meet the overall needs and aspirations of the borough, by ensuring that new development provides housing types that take account of local needs and aspirations; and require a high standard of design and layout; make efficient use of land while delivering a range of housing to widen choice and reflect local character.

Within Heywood but outside its central area, lower density housing will be supported where it delivers higher value dwellings which are of a type and size currently in short supply across the borough.

- 4.20 Supporting paragraph 8.22 confirms that the Rochdale Strategic Housing Market Assessment (SHMA) found a preference for detached or semi-detached properties and found that there was a mismatch between supply and demand. For this reason, a good choice of housing is to be sought. Paragraph 8.25 explains the overall need for larger homes and more detached and semi-detached properties, which may lead to some lower density development on appropriate sites.
- 4.21 Policy C4 requires affordable housing provision on developments of 15 dwellings or more. It seeks a contribution to affordable housing of 7.5% of the development sales value of the overall scheme. Provision should be onsite and used to deliver a type, size and tenure of homes agreed with the local authority on the basis of evidence. Suitable levels of provision will be based on the type of affordable housing required; the availability of grant funding; the need to deliver other planning objectives with a higher priority; and the economic viability of the development.
- 4.22 Policy C6 seeks to improve health and wellbeing through ensuring development is well served by shops and jobs; that affordable housing is provided; seeking high quality development; managing the effects of climate change; reducing traffic movements and congestion; and encouraging development that promotes active living by making places accessible by alternative modes of transport.
- 4.23 Policy P1 requires high quality design in order to improve local image. The urban environment should be greened through planting; and the development of underused land and buildings will be promoted. Policy P2 requires new development to integrate successfully; to protect and open up important views; and to enhance townscape character.
- 4.24 Policy P3 requires all new developments to adhere to high standards of design. It includes principles relating to enhancing a sense of place; respecting positive context; having regard to the scale, density, massing, height, layout, landscape, materials and access of the local area; ensuring buildings contribute positively to townscape; designing out crime; providing accessibility to all modes of transport; providing a hierarchy of spaces; ensuring spaces are easily understood; ensuring buildings can be

easily adapted by future occupants; minimising environmental impact and helping adapt to the impacts of climate change; designing so that quality and appearance can be maintained over time; and reducing visual impact of car parking through substantial, well integrated landscaping.

- 4.25 Policy G1 seeks to address climate change by locating growth in areas likely to reduce the need to travel and which are well served by public transport; promoting sustainable waste management; adhere to the energy hierarchy, requiring the minimum energy for buildings to function; incorporating comprehensive adaptation measures such as urban greening, sustainable drainage and retaining trees where possible.
- 4.26 All new development is required by Policy G2 to adhere to the energy hierarchy by reducing demand; using energy efficient and low/zero carbon technologies; and allowable solutions to compensate for remaining residual emissions.
- 4.27 Policy G6 seeks to sustain and enhance a green network across the borough. It seeks to incorporate green infrastructure and sustainable urban drainage into new development. It states that local and national planning policy requirements will be taken into account when considering the appropriateness of development proposals that may affect sports, recreation and open space provision. The loss of existing urban greenspace or features is to be avoided unless alternative provision is made, it has limited value and its development of change of use will help to meet other sustainability or local regeneration objectives. Residential development should include or contribute towards recreational open space.
- 4.28 Policy G7 requires development to protect and enhance any existing biodiversity interests and take opportunities to create new habitats. New development should not lead to any form of increased flooding locally or further downstream (Policy G8). All forms of pollution including contamination and noise, will be reduced (Policy G9).
- 4.29 Policy T2 seeks to improve accessibility by locating development where good access to public transport is available; reducing the need to travel; and ensuring effective provision for cyclists, pedestrians and those with impaired mobility. Parking is expected in compliance with the parking standards of Appendix 5. These set a maximum parking provision of two spaces for 2-bedroom houses outside town centres, not including garage. No standard is set for cycle storage.

- 4.30 Policy DM1 requires development to be of high quality design and to take the opportunity to enhance the quality of the area; be compatible in terms of impact on local uses and amenity, including the amenity of existing residents through overshadowing or loss of privacy; mitigate against any impacts due to traffic generation or inadequate access; provide satisfactory vehicular access with adequate parking, manoeuvring and servicing arrangements; provide or demonstrate availability of services such as shops; minimise opportunities for crime; take account of ground conditions including contamination; and incorporate high quality landscaping. Policy DM2 confirms that unless onsite provision is made, obligations will be sought for affordable housing; open space provision and maintenance; health and wellbeing; education facilities; and/or community facilities, and any infrastructure which is necessary to mitigate impacts from the development.

SAVED POLICIES OF THE UNITARY DEVELOPMENT PLAN (2006)

- 4.31 Relevant policies are as follows.

Policy G/D/1	Defined Urban Area
Policy EM/7	Development and Flood Risk
Policy EM/8	Protection of Surface and Ground Water

- 4.32 Policy G/D/1 identifies the boundary of the urban area. It envisages new development being concentrated within the urban area to support urban regeneration and protect the countryside. Policy EM/7 deals with flood risk; and Policy EM/8 requires development to pose no unacceptable risk to surface water and ground water quality.

OTHER MATERIAL CONSIDERATIONS

- 4.33 Other material considerations include:

- National Planning Practice Guidance;
- Places for Everyone Plan (2024)
- Affordable Housing SPD (2008)
- Provision of Recreational Open Space in Housing SPD (2017)
- Guidelines and Standards for Residential Developments SPD (2016)
- Biodiversity and Development SPD (2017)

- Climate Change Adaptation SPD (2012)
- Heywood Green Infrastructure Action Plan (2010)
- Design and Planning Process – Good Practice Guide SPD (2007)
- Residential Design Guide SPD (2007)
- Urban Design Guide SPD (2007)

NATIONAL PLANNING PRACTICE GUIDANCE

- 4.34 The NPPG is a material consideration in the determination of planning applications. It states that good design is integral to sustainable development, and requires the creation of places that work well for everyone and are adaptable for the long term. It identifies key design issues including local character, safe efficient streets, crime prevention, access and inclusion, and cohesive and vibrant neighbourhoods.

PLACES FOR EVERYONE PLAN (2024)

- 4.35 The Plan forms part of the statutory development plan for nine Greater Manchester authorities including Rochdale. It is a joint plan setting out the strategic long-term direction of the region in relation to jobs, new homes and sustainable growth.

AFFORDABLE HOUSING SPD (2008)

- 4.36 The SPD is dated, but remains live. It sets out evidence of local need for affordable housing and sets out how it will be calculated, albeit in relation to the now-deleted UDP policy. It identifies the need to maximise the supply of affordable housing across the borough, and states that the type and mix of properties will be dependent upon local needs. It finds that the involvement of a registered social landlord is the preferred way to ensure affordability. The document identifies the various types of affordable housing, ie social rent, shared ownership and discounted/subsidised market housing. It requires a high standard of design and no compromise on open space provision, privacy or other aspects in order to deliver affordable properties. Affordable homes should usually be pepper potted amongst the market homes on individual schemes.

PROVISION OF RECREATIONAL OPEN SPACE IN HOUSING SPD (2017)

- 4.37 The SPD was adopted in 2008 and updated in 2017. All developments of more than 10 dwellings are expected to make contributions in respect of offsite provision of, or

improvements to, recreational open space. Those with at least 100 bedrooms are expected to provide an onsite recreational open space. Those with less than this should also provide amenity open space where properties do not have private gardens. It describes the various types of open space and the method of calculating commuted sums.

GUIDELINES AND STANDARDS FOR RESIDENTIAL DEVELOPMENTS SPD (2016)

4.38 The document seeks to assist in the process of ensuring high quality design. It focuses on specific design issues. Bin storage is required per dwellinghouse, to be located away from the street frontage within the garden and of sufficient size to accommodate four bins. Specifically, the storage space should be a minimum height of 1700mm and with a minimum floor space of 2320mm x 3220mm.

4.39 Car parking should be designed to prevent parked cars dominating the streetscene. Spaces must be at least 2.4m by 4.8m in length. Separation distances are sought as follows:

- 21m between directly facing principal windows of habitable rooms, at an upper floor level AND 10.5m between a principal window at an upper floor level and a directly facing boundary of the curtilage;
- 14m between a principal window and any directly facing two storey elevation which does not contain a principal window to a habitable room;
- 10m between a principal window and any directly facing single storey elevation which does not contain a principal window to a habitable room.

4.40 It is acknowledged that reductions in separation distances may be acceptable in certain circumstances.

BIODIVERSITY AND DEVELOPMENT SPD (2017)

4.41 The document was prepared in 2008 and updated in 2017. It sets out the local landscape character and the various ecological site types. It reiterates policy at the local and national level. It seeks that biodiversity is properly considered at all stages of the planning and development process and explains how this can be achieved.

CLIMATE CHANGE ADAPTATION SPD (2012)

- 4.42 The SPD explains the components and consequences of climate change, such as the urban heat island effect, and the need to change our approach to built development. Risks can be reduced through increased urban greening; altered design approaches to orientation and layout; use of materials; and drainage options.

HEYWOOD GREEN INFRASTRUCTURE ACTION PLAN (2010)

- 4.43 The Heywood Green Infrastructure Action Plan will help ensure green infrastructure achieves its full potential to support Heywood's objectives for growth, regeneration and wellbeing. It defines green infrastructure; sets out Heywood's characteristics; and explains the aim of improving Heywood's image while reaping the benefits of green infrastructure. It seeks green infrastructure which will provide a sense of place; encourage active travel; manage flood risk; support biodiversity; and help Heywood adapt to climate change. Aims for the Darnhill area include street greening and maximising the impact of private gardens.

DESIGN AND PLANNING PROCESS – GOOD PRACTICE GUIDE SPD (2007)

- 4.44 The SPD seeks to assist those involved in design to create good quality places. It provides guidance on the preparation of Design and Access Statements. It takes designers through site analysis; options, consultation and development; preparation of a planning application; and the decision-making process.

RESIDENTIAL DESIGN GUIDE SPD (2007)

- 4.45 The document seeks to provide clear guidance on the quality of design expected by the Council. It sets out general design principles and covers the response to site and context; layout; public realm design; building design; and 'bringing it all together'.

URBAN DESIGN GUIDE SPD (2007)

- 4.46 The SPD sets out ten principles of good design and identifies what development should do to achieve design quality. It aims to encourage high quality design across the borough.

5. OPEN SPACE ASSESSMENT

- 5.1 This chapter constitutes the open space assessment. This was requested in the pre-application feedback, and is included for completeness.
- 5.2 However, the assessment is not required. The planning response stated that 'the eastern part of plot 1 [the larger plot to Sutherland Road / Bury Old Road] incorporates areas which form part of the 'whole' playing field land used by the adjacent school'.
- 5.3 This is not the case. The site is comprised of land at the same level as the street, which formerly comprised a school building, and is currently occupied by the remains of the built form. It has no current use, and is in no way associated with the playing field. The site does not include the bank to its eastern edge; nor the school playing field; nor any of the associated open land.
- 5.4 The relationship is shown on the plan below. The site is separated from the playing field by the grassed bank. The grassed bank is incapable of forming a functional or useful area of the pitch, nor is it located within the playing field allocation. It has no functional association with the pitch. The pitch has sufficient flat grassed land adjacent to serve its needs.

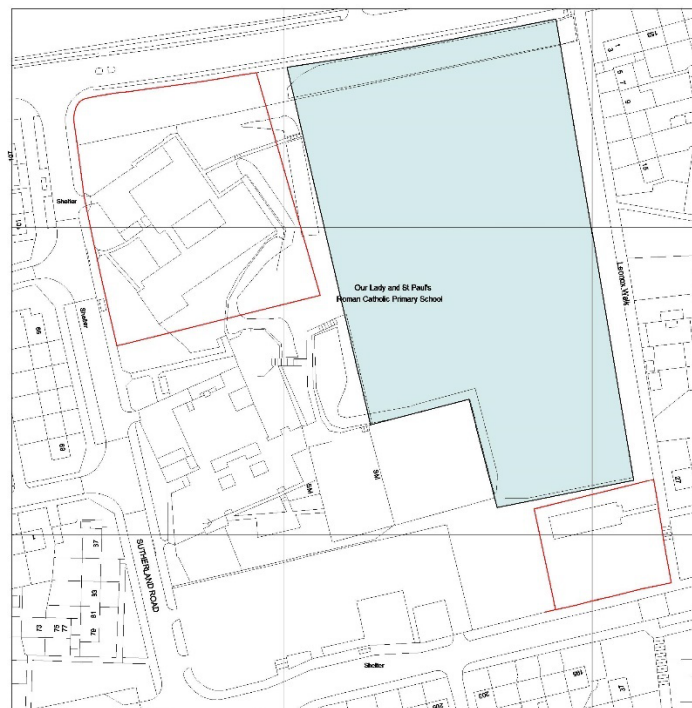


Figure 1: Site boundaries in red; greenspace shown in green.

5.5 Nevertheless, for completion, we have undertaken this Open Space Assessment.

POLICY

5.6 The NPPF states at paragraph 103 that existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:

a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or

b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or

c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.

5.7 Policy G6 states that local and national planning policy requirements will be taken into account when considering the appropriateness of development proposals that may affect sports, recreation and open space provision. The loss of existing urban greenspace or features is to be avoided unless alternative provision is made, it has limited value and its development or change of use will help to meet other sustainability or local regeneration objectives.

SPORT ENGLAND PLAYING FIELDS POLICY AND GUIDANCE (2018)

5.8 The guidance states that Sport England will oppose the granting of planning permission for any development which would lead to the loss of, or would prejudice the use of land allocated for playing field use unless the development meets one or more of five specific exceptions. These include a local excess of playing field provision; and replacement with equivalent or better provision. Exception 3 states that Sport England will not oppose applications where 'the proposed development affects only land incapable of forming part of a playing pitch.'

5.9 At page 6, the Sport England guidance confirms which playing field related applications they need to be consulted upon. This is limited to proposals which are likely to prejudice the use, or lead to the loss of use, of land being used as a playing field;

land which has been used as a playing field over the last five years; is allocated for use as a playing field; involves replacement of the grass surface of a playing pitch with an artificial surface.

ASSESSMENT

- 5.10 Having set out the various tests required by policy, these will now be reviewed in relation to the site.
- 5.11 National policy states that existing open space, sports and recreation land should not be built on unless at least one of three tests are met. The first test is that the space is shown to be surplus to requirements.
- 5.12 It has been demonstrated that the land which constitutes the site has had no sports use at any time. Therefore no open space, sports or recreation land is to be built on.
- 5.13 The adjacent bank, which does not form part of the site nor the playing field, is clearly surplus to requirements for sports use. It is a grass bank with a limited visual relationship with the pitch. It has not formed part of the functional pitch nor part of associated activities. It is clearly surplus to the pitch requirements in this regard. Even if the grass bank were included within the development site, which it is not, its loss would also have no impact. This element of the policy test is met.
- 5.14 Turning to the local level, Policy G6 states that the loss of existing greenspace or features is to be avoided unless alternative provision is made; it has limited value; and its development or change of use will help to meet other sustainability or local regeneration objectives.
- 5.15 **Unless alternative provision is made.** The site does not form part of the greenspace nor has it had any recreational or sporting use at any time. The adjacent grassed bank acts as a retaining wall on a privately owned site. It is not part of the playing pitch site nor is it an amenity resource available to local people. This will not change as a result of the development. No alternative provision is therefore required.
- 5.16 The land will continue to play its existing role. The closest part of the site, which does not form part of the playing field nor the intervening bank, will have the additional role of forming part of the gardens and landscaped amenity buffer associated with the

proposed houses. It will thereby make a modest contribution to the objectives of local policy in the form of urban greening, habitat enhancement and providing a sense of place. While this is not 'alternative provision', it is an enhancement of the existing land resource which is considered to align with the objective of this part of the policy, insofar as it applies.

- 5.17 **It has limited value.** The land has a very limited value, in that it is a derelict site with the remains of a demolished building. It is set at a lower level than the adjacent, wider greenspace. This greenspace includes a playing pitch and adjacent open land. Neither the site, nor the adjacent bank have any functional relationship with the pitch. Aerial imagery clearly shows that the pitch benefits from a wide strip to the west, which provides sufficient associated space to serve its needs. Development of the site next to the greenspace will have no impact in this regard.
- 5.18 **Its development or change of use will help meet other sustainability or local regeneration objectives.** The land will change its use from an unused element within a vacant brownfield site, to part of a housing development. It will include private gardens and landscaped amenity provision. It will thereby contribute towards revitalising part of an area which is in acknowledged need of regeneration. It will form part of a much-needed affordable housing development. It has the added benefits of modestly enhancing biodiversity and sense of place. Additionally, it currently plays no recreational or sporting role. The policy test is met.
- 5.19 Sport England guidance states that the loss of any land will be opposed where it would prejudice the use of land allocated for playing field use. The above has demonstrated that the site is separated from the playing field by the intervening bank and has had no recreational or sporting role. Its alternative use will in no way prejudice the playing pitch nor the generous strip of land adjacent to it. The site has no functional relationship with the pitch.
- 5.20 Exception 3 states that Sport England will not oppose applications where the development affects only land incapable of forming part of a playing pitch. This is clearly the case here. The site is set at a lower level than the pitch, separated from it by a grassed slope. It has a very limited visual relationship with the wider greenspace. It offers nothing functional to the pitch. The proposal thereby meets the exceptions of Sport England guidance.

- 5.21 It has been demonstrated that the site does not form part of the adjacent playing pitches or wider greenspace, and its alternative use will have no impact on them. Policy is therefore satisfied in this regard.

6. PLANNING ASSESSMENT

6.1 This chapter considers the key issues that are relevant to the application:

- Principle of Development including impact on open space;
- Design;
- Amenity;
- Trees;
- Highways;
- Technical Matters including drainage and flood risk, ecology, biodiversity net gain and ground conditions.

PRINCIPLE OF DEVELOPMENT

Open Space Impact

- 6.2 Section 5 of this report constitutes the Open Space Assessment in relation to the larger of the two plots. It is considered that this is not required, as the site does not overlap with the greenspace, being separated from it by a grass bank. However, the assessment is included for completeness.
- 6.3 It considers the proposals against national and local policy and finds it satisfactory in this regard. The land has not been used as a recreation or sports resource, and is clearly surplus to requirements for sports use. It forms no part of the functional pitch nor part of associated activities. There will be no tangible impact on the pitch caused by the development of this land.
- 6.4 The proposals are demonstrated to meet the local policy tests. No alternative provision is required, as the site will have the same limited relationship to the pitch as currently. The site will be enhanced through its modest contribution to the objectives of local policy in the form of urban greening, habitat enhancement and providing a sense of place, as part of the regeneration of a vacant site. This is considered to align with the objective of this part of the policy, and with the third limb of the policy which states that development of the land should help meet other sustainability of local regeneration objectives.

- 6.5 The site also meets the policy test of having limited value. The pitch is shown to benefit from a generous strip of associated space located directly adjacent to it, and not on a lower level, like the site and intervening bank.
- 6.6 The proposals align with Sport England guidance in that there will be no impact on the adjacent playing pitches, and that the land is incapable of forming part of a playing pitch. The proposals are therefore fully acceptable in terms of loss of open space.

Residential Use

- 6.7 The sites are located within the defined urban area, to which development is to be directed in line with Policy G/D/1. The surrounding area is residential in character, and as such, the principle of residential development is wholly in line with policy.
- 6.8 The larger plot has been vacant for some time and is at risk of dereliction and of attracting anti-social behaviour. The smaller plot is underutilised. Redevelopment of both with dwellinghouses aligns with the NPPF requirement to optimise the use of land, and to significantly boost the supply of housing. The NPPF requires substantial weight to be given to the use of suitable brownfield land within settlements and to the development of underutilised land. Similarly, Policy C1 seeks to deliver 80% of housing needs on previously developed land.
- 6.9 The proposals align with the aim of delivering more homes. This is a clear aim of the NPPF and local Policy C1. It aligns further with Policy C1 which encourages the delivery of homes in the south of the borough, recognising the area's sustainability and the advantages of its proximity to the city region. In line with Policy C6, the sites are sustainably located close to shops and local amenities, including public transport options.
- 6.10 The development will contribute towards the regeneration aims of local policy by providing high quality homes which widen choice and provide an improved sense of place. Policy P1 identifies development as a means of improving local image and providing something to aspire to. The proposed affordable family homes in well-landscaped settings respond to this policy aim.
- 6.11 The larger plot particularly responds to the identified need to reuse and regenerate vacant plots, which risk detracting from the quality of the residential environment. While

the site is not within the Central Heywood regeneration area, it responds to the regeneration objectives of Policy C2.

- 6.12 The delivery of housing on the sites is fully in line with the character of the local area; and with the regeneration aims of local policy which seeks to deliver high quality housing in Heywood, in the south of the borough and on brownfield land within the settlement.

Dwelling Mix

- 6.13 The proposals include two and three bedroom family homes which are detached and semi-detached. The need for this mix of property types and sizes has arisen directly from dialogue with registered providers. It aligns with Policy C3 by providing the right type of homes in response to local needs and aspirations. It aligns with the findings of the Rochdale SHMA which identified a preference for homes of this type including detached and semi-detached properties.

Affordable Housing

- 6.14 The proposals greatly exceed the policy requirement for affordable housing by aiming to provide a 100% affordable proposal. The applicant is in dialogue with registered providers to identify the optimal tenure mix for the site.
- 6.15 The proposal is fully in accordance with national and local policy and the Affordable Housing SPD in this regard and will deliver significant benefits.

DESIGN

- 6.16 The sites are largely flat. The larger plot has been designed as a cul-de-sac, whilst retaining strong frontages to Bury Old Road and Sutherland Road. Plot 19 is dual frontage and faces Sutherland Road and the internal access road. All opportunities have been taken to maximise interaction with the adjacent road frontages. The smaller plot lends itself to a run of houses facing Argyle Road.
- 6.17 There is sufficient space to provide all properties with a generous rear garden, in line with the SPD on provision of recreational open space in housing. Frontage gardens and incidental planting and landscaping are maximised across both plots. The application

includes a detailed landscaping strategy. The proposals thereby respond to Policy P1 and P3 which seek planting schemes, including where these are harnessed to reduce the impact of parking.

- 6.18 Pre-application feedback suggested parking courts should be considered. However, registered providers specifically require in-curtilage parking so that it can be clearly allocated to particular users, and easily managed.
- 6.19 The dwellings are at two storeys. This responds to the preferences of local registered providers, and is fully appropriate for the location. While there are some properties with three-storey bays, this is not characteristic of the wider area.
- 6.20 The selected house types are detached and semi-detached houses. These are present in the area on Galloway Close, south of Stirling Place, on Father Ryan Drive, Kinross Avenue, Kirkwall Way and Kilmarnock Grove.
- 6.21 Other property types common in the area are short to medium runs of terraced properties. However, while this property type was common from the 1960s to the 1980s on particular estates, they are now recognised as being difficult to service. This is particularly acute given the number of bins that residents are now required to manage.
- 6.22 Mid to later c20th terraces often involve convoluted rear access or pedestrian-only passages which can be challenging from a security perspective. Semi-detached and detached properties do not have this issue as they have their own curtilage. This allows for ease of movement from rear garden to front garden. Convenient storage and movement arrangements are shown to have the best impact on streetscene, as residents are more likely to return their bins to the store after collection. This aligns with those policies seeking to improve area image.
- 6.23 Detached and semi-detached properties are an aspirational product which the Rochdale SHMA reports are in demand across the borough, whilst they are in short supply. Their provision aligns with Policies C1, C3 and P1 which seek to contribute to regeneration, broaden the appeal of particular areas and create change where the existing housing offer does not meet local needs and aspirations.
- 6.24 Interface distances have been carefully designed in order to uphold privacy and outlook for existing and future residents, in response to the Council's Guidelines and

Standards for Residential Developments SPD. The dwellings meet Nationally Described Space Standards and will provide comfortable, high quality homes.

- 6.25 The proposals will make use of contemporary, durable materials which respond to their surroundings and create a sense of place. Overall, the existing appearance of both plots will be enhanced through the provision of well-designed, contextual dwellings.
- 6.26 The proposals have been demonstrated to achieve the balance required in Policy C3, which is the optimisation of the land resource whilst providing high quality housing which meets local needs and aspirations and delivers a range of dwellings. They will provide an enhancement to the streetscape through the introduction of high quality built form with supporting gardens, parking and planting on sites which are otherwise underused, and in the case of the larger plot, at risk of falling into dereliction. They thereby align with Policies P3 and DM1 which set a high bar for design, in addition to the relevant SPDs.

Refuse arrangements

- 6.27 Waste storage provision for each dwelling is provided in line with requirements, constituting 4x 240l waste bins to be stored within the rear gardens. This is fully sufficient and complies with local policy. Swept path analysis included within the submitted Transport Statement confirms that refuse vehicles can access and manoeuvre as required.

Crime Impact

- 6.28 The application includes a Crime Impact Statement undertaken by Dobson Owens. It analyses the existing crime and disorder in the surrounding areas and any potential impacting factors. The report considers the proposed development against the principles of Crime Prevention through Environment Design to offer ways in which opportunities for and fear of crime could be reduced. It provides recommendations to reduce vulnerability to crime, in relation to the proposed development and the surrounding area. Physical security standards are based upon the Secured by Design test standards and British Standards/PAS.
- 6.29 It finds no enhanced crime risks presented in the local area. Given the vacant condition of the larger proposed site in particular, the provision of properties will likely have a

positive influence on the neighbourhood and reduce fear of crime. The report welcomes the surveillance provided by the layout and the clear demarcation of public and private spaces. It makes recommendation for boundary types, landscaping, door types, locks and landscaping. The proposals are found to have an overall benefit in terms of contributing to regeneration, having a positive influence on the local area and reducing fear of and opportunities for crime.

AMENITY

Noise

- 6.30 The application includes an Acoustic Assessment prepared by Braiden Acoustics. It sets out the methodology that has been used and the relevant policy and guidance. It finds that all habitable rooms can achieve suitable internal noise levels with standard 4mm double glazing. No additional ventilation system is required. Gardens are reviewed and it is found that 1.8m fencing will achieve suitable noise levels in relation to road noise from Bury Old Road. The sites are fully capable of providing a suitable living environment with no unsuitable noise impacts.

Ball Strike Assessment

- 6.31 The pre-application stage requested a ball strike assessment in relation to the larger plot to investigate any relationship it might have with the school playing field. However, the Open Space Assessment section of this report makes clear that the site is not closely associated with the playing field.
- 6.32 The field is used by the adjacent primary school. The area closest to the site is a field with football goals to each end. It is a distance of approximately 30m from the site edge at its closest point. There is a fenced-in court further south, a distance of approximately 36m at its closest point.
- 6.33 It is extremely unlikely that sports played on these facilities could impact the proposed dwellings. As such, and in line with Sport England guidance, the proposals have been demonstrated not to prejudice use of the adjacent playing fields.

Energy

- 6.34 The application includes an Energy Standards Statement prepared by Watt. It assesses the development in the context of the current Building Regulations (Part L 2021). The statement details how the development will incorporate sustainable design and resource efficiency in line with the Energy Hierarchy, to meet the policy requirements and Council targets whilst reducing its overall environmental impact.
- 6.35 Following the feasibility assessment of low and zero carbon technologies, it is proposed that the development will benefit from an air source heat pump system that will be implemented to each dwelling. The predicted scheme-wide reduction in CO2 over Part L 2013 of the Building Regulations is 60.5% with SAP 10.2 carbon factors. This is a significant betterment which satisfies the Council's low carbon and energy policies and the 2012 SPD.

TREES

- 6.36 The application is accompanied by a tree survey and Arboricultural Impact Assessment, both prepared by ACS Consulting. It relates to the larger site and considers 12 trees. The reporting comprises a full tree survey and an assessment of the arboricultural implications of development detailing trees to be retained / removed and appropriate protection measures.
- 6.37 The report sets out the methodology used. It confirms that the loss of the trees is required in order to facilitate the development. It concludes that the losses can be mitigated through a strong landscaping plan. The proposals involve the planting of 29 trees, plus a further three trees on the smaller site. This represents a replacement ratio of greater than 2 for one. The new trees will be extra heavy standard types. The site will also benefit from further planting in the form of hedges, shrubs and an area of wildflower meadow.
- 6.38 On balance, and alongside the delivery of 22 affordable family homes, this is considered to align with policy requirements.

HIGHWAYS

- 6.39 A Transport Statement has been prepared by Roberts Highway Consultants and forms part of this application. It sets out the baseline position at the two sites currently including access and public transport availability. It demonstrates the proximity of

facilities and amenities within reasonable walking and travel distances, and concludes that the area is considered a 'walkable neighbourhood' as defined by the Manual for Streets.

- 6.40 The report sets out the access arrangements that will be put in place to facilitate the development of each of the two sites. The accompanying drawings identify the visibility splays and confirm the safety and suitability of the access.
- 6.41 Car parking provision is found suitable when measured against the maximum standards identified by policy. It is also a suitable quantum to ensure that the development will cater for the parking demand that it generates, and that there is not likely to be any overspill parking onto nearby streets. Each dwelling will have sufficient enclosed garden space for the storage of bicycles. Tracking of a large refuse vehicle into the larger site is demonstrated in the plan appended to the report. Refuse collection for the smaller site would be via kerbside collection.
- 6.42 The Transport Statement finds that the development would generate approximately 24 vehicle movements during the generic AM peak hour, with 23 movements likely to occur during the generic PM peak hour during a typical weekday. This would equate to an average of one vehicle movement every two and a half minutes during the busiest peak hour (AM peak), which would likely result in negligible impacts upon the wider highway network. Any impact on the existing road network would be imperceptible and would not create additional congestion or extended journey times. It is therefore concluded that the proposal will not have a severe impact on the highway network and is therefore acceptable in terms of the NPPF test.
- 6.43 The proposals have been demonstrated to be fully in line with the NPPF and the requirements and objectives of local policy in relation to highway matters.

TECHNICAL MATTERS

Drainage and Flood Risk

- 6.44 The application is supported by a Flood Risk Assessment and Drainage Strategy prepared by Inspire Design Group. It identifies the nearest watercourses and sets out findings on sewer records and geology. The total impermeable area of the

development is found to be approximately 60% of the total area of the two plots, with the remaining 40% being public open space and private gardens.

- 6.45 The site is found to be in Flood Zone 1. It identifies a small area of low risk surface water flooding in the centre of the larger plot. The proposed drainage system, described within the report, will utilise sustainable drainage techniques to attenuate runoff to a low discharge rate, thereby reducing any potential for surface water flooding.
- 6.46 The proposed drainage system will be based on SUDS principles for the attenuation and treatment of the surface water runoff. Drawings are provided as part of the application. Infiltration is found unlikely to be feasible due to ground conditions.
- 6.47 Commencing with the largest plot. As the nearest watercourse is approximately 650m to the northwest of the site, and crossing third-party land, discharge to watercourse is not considered to be a feasible option. The third consideration in the SUDS hierarchy is disposal to the public sewer. This is considered to be the only option available. Consequently, the drainage strategy is based on discharge to the sewer.
- 6.48 The proposed surface water drainage system will collect future runoff from the site and discharge the attenuated flow to the 225mm diameter public combined sewer under Sutherland Road. A total surface water storage volume of 197m³ is provided by the proposed 900mm pipes located under the access road and attenuation crates as shown on the drawing BDL-1763-01-DR-001 Drainage Strategy. Permeable paving located on the proposed driveways and private roads will provide additional attenuation capacity and provide appropriate treatment of surface water runoff.
- 6.49 This will be sufficient to cater for the 1 in 100 year rainfall event with 40% climate change allowance as required. Hydraulic calculations are included within the report's appendix in relation to both plots. Surface water will be discharged at the greenfield runoff rate of 5.1l/s. The areas of open space and private gardens will be soft landscaped and offer a measure of bioretention through shallow infiltration into topsoil and the evapotranspiration of the vegetation. The proposed drainage system will ensure that there will be no significant flooding caused either within the site, or in the surrounding area by future site surface water runoff. Foul sewerage will be conveyed via a new foul sewer under the proposed access road to the existing combined sewer under Sutherland Road, as per the submitted drainage drawings.

- 6.50 Moving on to the smaller plot, the proposed surface water drainage system will collect future runoff from the site and discharge the attenuated flow to the 225mm diameter public combined sewer under Argyle Street. A total surface water storage volume of 40m³ is provided by the CGA located underneath the permeable paving. The proposed attenuation will be sufficient to cater for the 1 in 100-year rainfall event with 40% climate change allowance. Surface water will be discharged at the greenfield runoff rate of 2.43l/s. Areas of open space and private gardens will be landscaped to provide a measure of bioretention through shallow infiltration into topsoil and the evapotranspiration of the vegetation. Foul sewerage will be conveyed via a new foul sewer under the proposed access road before discharging to the existing combined sewer under Argyle Street.
- 6.51 In relation to maintenance and management, surface water will be collected via permeable paving and trapped gullies which will provide adequate treatment prior to discharge.
- 6.52 The proposal therefore complies with all relevant national and local policies, including Policy G8.

Ecology

- 6.53 The submission includes a Preliminary Ecological Appraisal carried out by Ostara Ecological Services. It identifies the habitats present and sets out the methodology. No statutory protected sites or SSSI Impact Risk Zones were identified within 2km. There is a deciduous woodland priority habitat 320m to the north and open mosaic habitat on previously developed land 640m to the east. None of these habitats are present on the site nor are there any green linkages from the site to priority habitats. These are therefore not required to be considered further.
- 6.54 The baseline field survey results are set out in detail. The site is not allocated for nature conservation under local planning policy, nor is the site subject to any statutory or non-statutory nature conservation designations. The majority of habitats on site were generally of limited botanical interest. No protected or priority plant species were observed and all plant species encountered were common, widespread and characteristic of the common habitat types they represent. All habitats were assessed as having a Low Strategic Significance.

- 6.55 A daytime bat assessment was carried out. There is a structure onsite with brick walls and a flat concrete roof which is believed to house pipework. It has no doors, windows or gaps which could accommodate bats. It therefore has negligible potential for roosting bats and needs no further consideration. No trees were found to contain roost features. The site is unlikely to be of any specific value to bats and is unlikely to support anything other than occasional foraging by the most disturbance resistant bat species.
- 6.56 As such, the proposal complies with national and local ecology requirements.

Biodiversity Net Gain

- 6.57 The application is accompanied by a Biodiversity Impact Assessment, Metric Condition Assessments and Metric Calculation Tool, all undertaken by Ostara Ecological Services. The accompanying ecological report explains that the biodiversity metric tool was used to calculate the change in biodiversity units and the overall percentage of gain/loss. Pre-development baseline habitats were calculated using measurements from the baseline habitat plan. Post-development habitats are areas were calculated and based on the proposed site layout plans.
- 6.58 The proposals involve the loss of bramble scrub, trees and neutral grassland. Despite the generous landscaping proposed which includes the planting of 32 trees, the metric calculations result in a net biodiversity loss of 57%, a deficit of 2.55 habitat units. Given the nature of the site, it is found unlikely that the site could accommodate this, even with redesign.
- 6.59 The proposed design achieves the best possible outcome for biodiversity on the site.

Ground Conditions

- 6.60 The submission includes a LCRM Stage 1 Risk Assessment undertaken by Groundsmiths. It includes a preliminary engineering appraisal and a preliminary environmental appraisal. It recommends intrusive ground investigation in order to investigate the general nature of the underlying soils, the thickness of any made ground, the geotechnical parameters of the underlying natural strata, nature and concentration of any contamination and too provide general advice in relation to any further issues.

- 6.61 It has been demonstrated that the site is capable of remediation and is suitable for the proposed development.

7. CONCLUSIONS

- 7.1 This Statement has described the proposal and set out the planning policy framework against which it will be assessed. The scheme represents the optimum development approach for the sites. It has been subject to pre-application discussion with officers.
- 7.2 The application has been considered against the policies of the development plan and national government policies and guidance. The proposal will bring the following benefits:

Social Benefits

- The creation of high-quality affordable residential accommodation of varied types will serve to enhance choice and diversity;
- Meets the needs identified in the SHMA including for larger family homes which are detached and semi-detached;
- Constitutes an enhancement of the local urban environment; and
- Brings into active use a plot that has no active use and might otherwise fall derelict and attract anti-social behaviour.

Environmental Benefits

- Delivers the redevelopment of two sustainably-located sites within the settlement which are currently underutilised;
- Delivers contextual, well-designed development which makes best use of the land resource while providing a range of residential dwellings with the necessary supporting infrastructure; and
- Enhances the local streetscene and area image.

Economic Benefits

- Will generate increased spending in the local area;
- Generates construction jobs;
- Provides a range of accommodation types which will contribute to efforts to welcome in and retain a range of people to contribute to the local economy; and

- Encourages further local investment leading to an improved urban environment and vibrancy.

- 7.3 This report clearly demonstrates that the proposed development has local policy support and is aligned with national policy objectives. Overall, the principle of development is acceptable.
- 7.4 The NPPF makes it clear that there is a presumption in favour of sustainable development running through the decision-taking process. The proposed development is consistent with the NPPF's core principles. The scheme has been designed to a high standard and makes use of sustainably-located land within the settlement to deliver housing types which have been demonstrated to be required locally.
- 7.5 The proposal is entirely suitable and will generate economic, social and environmental benefits.
- 7.6 Statute requires that this application be determined in accordance with the development plan unless material considerations dictate otherwise. This proposal satisfies all relevant national and local policy considerations.