



ROMAN SUMMER



PLANNING STATEMENT

HANSON SPRINGS, HANSON PLACE, GORRELLS WAY, ROCHDALE, OL11 2PX

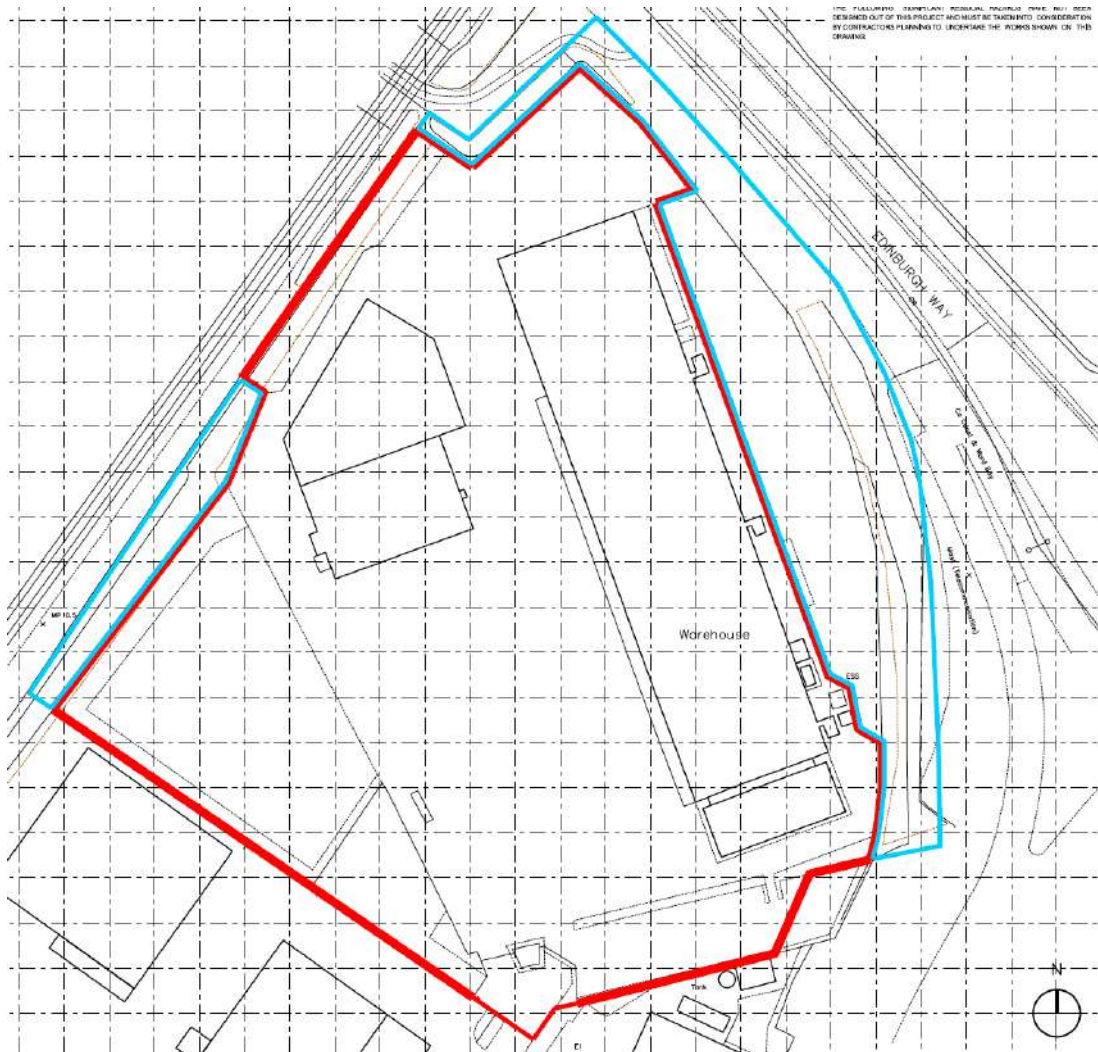
OCTOBER 2024

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Appendix 1 – Pre-application feedback of the Local Planning Authority

1.0 Introduction

- 1.1 This Planning Statement supports a full planning application submitted by Hanson Springs Ltd at its UK headquarters site at Hanson Place, Gorrells Way, Rochdale, which proposes the erection of a 743.7 sqm GIA [775.9 sqm GEA] extension of an existing Class B2 building; the erection of a 1,219.5 sqm GIA [1,339.4 sqm GEA] detached Class B8 warehouse with ancillary offices / staff welfare facilities; the reconfiguration of existing car parking and internal vehicular / pedestrian access arrangements; and associated hard and soft landscaping. The application site is marked in red below.



- 1.2 The application site currently comprises a large concrete hardstanding and parking / manoeuvring space associated with Hanson Springs' operation.
- 1.3 The building to be extended currently functions as the company's 'hot coil' spring-making operation. The proposed extension will create an additional area for 'cold coil' operations. No fumes or excessive noise will be created from this operation.
- 1.4 The proposed warehouse will contain high racking to enable the storage of manufactured springs awaiting dispatch. This new facility will improve the company's turnaround time for orders and in turn improve its efficiency.
- 1.5 The site is designated in Rochdale's development plan for employment development, including the type promoted by this application (ie Class B2 and B8). That said, it is our case that the principle of the employment development proposed is entirely consistent with the Local Plan policy designation.
- 1.6 This Planning Statement summarises the content of the planning application and the proposal in what we hope is a clear and informative way. It assesses the merits of the planning application against relevant planning policies at both the national and local level, and discusses other material factors that call for consideration as part of the overall planning balance.

Application Content

- 1.7 The application paperwork as a whole comprises:
- Application form (completed by Roman Summer Associates Ltd as agent)
 - This Planning Statement (Roman Summer Associates Ltd)
 - Design and Access Statement (Hawthorn Design)

- The following architectural drawings (Hawthorn Design):
 - L16A – Location Plan
 - L10 B – Proposed Block Plan
 - L11 A – Existing Site Plan
 - L15 D – Proposed Site Plan
 - P03 B – Proposed New Build Plan
 - P04 – Existing Plan
 - P05 A – Proposed Extension Plan
 - P06 - Existing Roof Plan
 - P07 – Proposed Roof Plan
 - E02 A – Proposed New Build Elevations
 - E03 B – Proposed Extension Elevations
 - E04 – Existing Elevations
- Preliminary Ecological Appraisal (Pennine Ecology) – **nb This report contains sensitive information relating to protected species and must not be shared with any individual / organisation not directly involved in the planning application submission**
- Preliminary Roost Assessment (Pennine Ecology)
- Badger Survey (Pearce Environment) – **nb The contents of this document contains information regarding protected species of a sensitive nature, and as such we suggest that the LPA does not upload it or make it publicly accessible.**
- Biodiversity Net Gain Assessment Summary Report (Pennine Ecology)

- Figure 1: UKHab Baseline Map (Pennine Ecology)
- Biodiversity Gain Plan (Pennine Ecology)
- Statutory Biodiversity Metric Condition Assessments (Pennine Ecology)
- Statutory Biodiversity Metric Calculation Tool (Pennine Ecology)
- Transport Statement – Focus Transport
- Noise Assessment – Clement Acoustics
- Phase 1 Geo-Environmental Desk Study – Ian Farmer Associates
- Flood Risk Assessment – Betts Hydro
- Drainage Strategy Report – SWF Consulting
- Crime Impact Assessment - Design for Security

1.8 For the purposes of calculating the application fee, it has been based on the GEA floorspace of the proposed warehouse (1,339.4 sqm) plus the floorspace of the proposed extension (775.9 sqm) – ie an overall total of 2,115.3 sqm GEA = **£18,096**.

1.9 The remainder of this Planning Statement is structured as below:

- Section 2.0 describes the applicant, site and local context.
- Section 3.0 summarises pre-application feedback that has helped to shape the proposal.
- Section 4.0 describes the proposal.
- Section 5.0 assesses the proposal against the provisions of the development plan.
- Section 6.0 explains why we consider the proposal to be sustainable development and assesses it against the NPPF.
- Section 7.0 sets out the overall planning balance and conclusions.

2.0 The Applicant, Site and Context

The Applicant and its Business Requirements

- 2.1 Hanson Springs Ltd is an independent Rochdale-based spring manufacturing company, established in 1963. It operates two factories in Rochdale and employs a total of 220 local people. It also operates a US distribution facility and a European office in Milan.

<https://www.hanson-springs.co.uk/>

- 2.2 Its headquarters is based at the application site at Hanson Place, Gorrells Way, on the southern outskirts of Rochdale.
- 2.3 The Company has established itself as the leading manufacturer of compression springs to the global Flow Control Industry, exporting over 85% of sales with its major markets being the U.S.A, Italy, Germany, China and India. Its springs are supplied in wire sizes of 0.1mm to 80mm bar, and can be ordered in quantities from one-offs to tens of thousands, in carbon steels, stainless steels, nickel alloys, cobalt alloys and tungsten alloys.
- 2.4 In-house heat treatment, powder coating and non-destructive testing are supplied by 24-hour production facilities for fast turnaround. The company is ISO 9001:2008 certified.
- 2.5 Continual investment in technology has enabled Hanson Springs to develop into one of the largest and most reputable spring manufacturers in Europe.
- 2.6 Such is the success of the business that two new buildings are required in order to service the business growth. One of these will be an extension of the existing building that is referred to as 'the garage' (reflecting its historic use). This extension will be used predominantly for Class B2 purposes, namely 'hot and coil' processing and ancillary storage space.

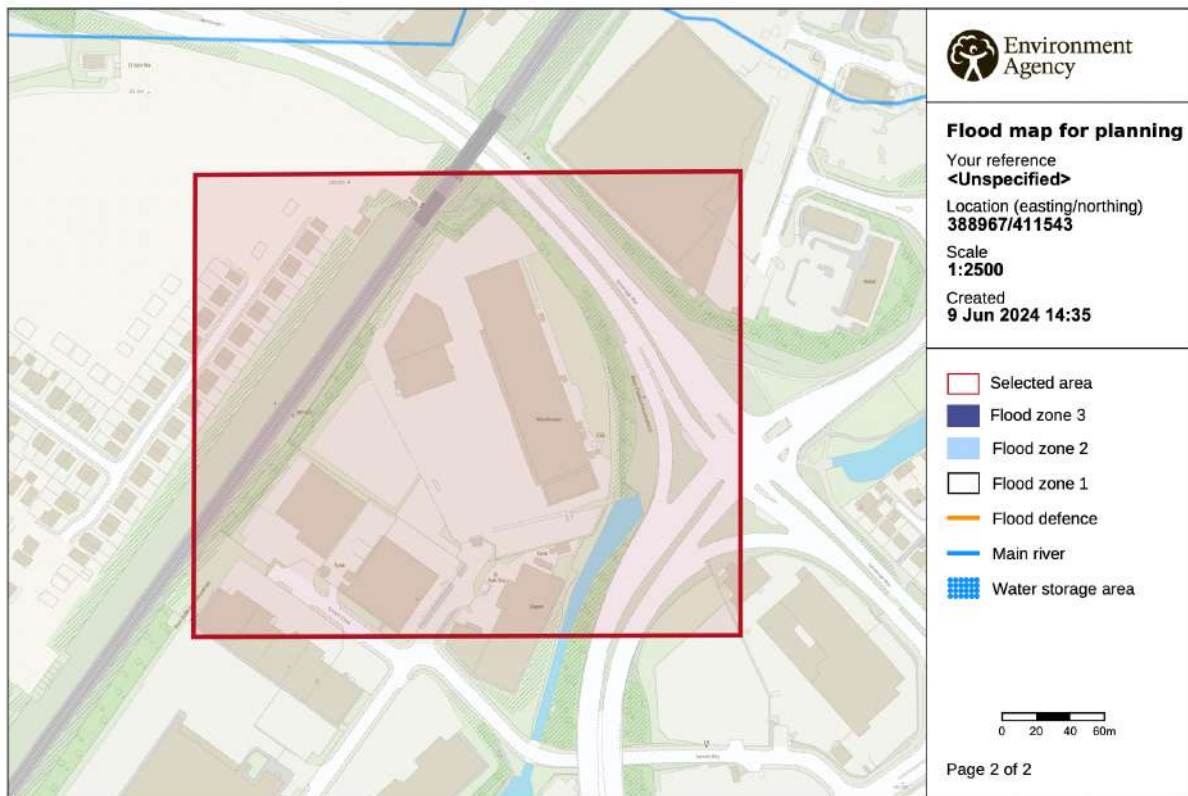
- 2.7 The second building will be a detached Class B8 warehouse to cater for the Company's growing storage requirements.

The Application Site and its Context

- 2.8 The application site is 2.24 hectares.
- 2.9 It sits centrally within an established industrial park, flanked on its north western edge by the railway line / embankment, with new housing development beyond that.
- 2.10 The site comprises flat, brownfield land in the guise of a large car park and servicing manoeuvring space. While trees and other vegetation form the periphery of the applicant's land, the main development site is overwhelmingly devoid of vegetation.
- 2.10 This application follows approval of planning application ref: 16/00640/FUL in September 2016. That permission has since lapsed, but approved a 1,682sqm manufacturing / finishing and storage building in the same location (and approximately the same scale) as the new building proposed by this application.
- 2.11 The application site forms part of a wider employment area served by Gorrells Way / Corporation Road located between the Rochdale Canal & alignment of the Rochdale – Manchester railway line. It is in close proximity to the key local distributor road routes of A664 Queensway, A664 Edinburgh Way and the A627(M) link road.
- 2.12 Vehicle access to the site is via a security gated connection to Hanson Place, which links directly into the local access road of Gorrells Way. Gorrells Way is a cul-de-sac industrial access road route serving a local employment area and ultimately provides a connection to A664 Queensway via a route which passes over the Rochdale Canal and under the A627(M).

- 2.13 As noted, the site is currently utilised for the manufacturing of industrial spring products, the majority of which are exported overseas. The site therefore operates as a secure air freight business, with all imports and exports logged at entry / exit to the site via security staff based at the single gated site access point. This access point is also used by all staff / visitor movements (vehicle or pedestrian based). In addition to the core spring manufacturing activities, the site also includes for ancillary offices and staff welfare areas, including for a large staff canteen.
- 2.14 The site is currently operated by circa 180 staff, with operating hours as follows:
- Monday – Thursday: 06:00 – 18:00
 - Friday: 06:00 – 14:30
 - Saturday / Sunday: Site Closed
- 2.15 In practice, staff work a variety of hours across the above identified core working periods, meaning that the site does not exhibit clear 'shift start / shift end' surges in staff travel demand, albeit the majority of arrival movements at the site take place before 08:00 and most departures by 17:00 - thereby being generally concentrated during periods outside of traditional weekday network 'rush hours'.
- 2.16 Notwithstanding the above operational hours, it is understood that there are no formal restrictions on operating times associated with the site.
- 2.17 The site is not located within or close to a Conservation Area. It contains no listed buildings or structures (and none are close by), and as such we suggest that there are no heritage constraints that would influence a decision.

2.18 The site falls within Flood Zone 1, and is not therefore at serious risk of flooding [see extract from Environment Agency Flood Map below].



3.0 Pre-Application Feedback

- 3.1 In June 2024 we sought formal pre-application feedback from Rochdale Local Planning Authority (ref: PREAPP/00067/24).
- 3.2 The original scheme did not include an extension to the existing 'garage' building, but was based closely on the new building approved in 2016 (referred to earlier).
- 3.3 During the course of the pre-application process, Hanson Springs adjusted its strategy by introducing the extension.
- 3.4 On 22nd August 2024, the case officer provided consultation comments (based on the original pre-app submission). Those included the following:

Highways Feedback:

'In principle we have no objection to the proposals but will require the following to be demonstrated before we would offer future planning apps our support.

A Parking strategy should demonstrate that adequate parking is available for the existing and proposed units.

A swept path analysis should be provided for HGVs and a 25m turning circle marked onsite.

We would require a contribution of £4000 for the revision of traffic regulation orders in the vicinity.

The rest of the application would appear to be acceptable.'

Network Rail feedback:

Lengthy 'standard' comments were provided, seemingly on the assumption that works might take place close to the railway, such as the following comment:

*'The developer is to submit directly to Network Rail asset protection, a Risk Assessment and Method Statement (RAMS) for all works to be undertaken **within 10m** of the operational railway under Construction (Design and Management) Regulations.*

Here it is important to highlight that no works will occur close to the railway. The closest works will be 20 metres away (refer to drawing ref: L15 D), and as such we are hopeful that NR will not raise concerns during the course of the planning application.

Drainage & Flooding Feedback:

'There is a Site Drainage System drg 3351.100. However existing drainage regime (if any) for the current hardstanding is not clear.

A Drainage Strategy would be required incorporating assessment of the SuDS hierarchy.

If infiltration is found not to be viable then I would expect discharge to the adjacent UU SW sewer.

This may need to be attenuated to greenfield (min 5l/s) of 50% brownfield depending on what the existing regime is.

The application should incorporate green surface based SuDS source control components such as detention basins, swale, tree pits, raingardens etc'

Environmental Health (Noise) feedback:

'This section would be supportive of the proposal in principle, if brought forward we would require a noise impact assessment to ensure the development does not have an adverse impact on existing noise sensitive receptors.'

Environmental Protection feedback:

'A Preliminary Risk Assessment would be required if a planning application were submitted.'

Greater Manchester Ecology Unit / Trees feedback:

'The development is located on hardstanding, I am satisfied that no ecological survey information is required.'

Based on the proposed location of the new build the development will be exempt from 10% BNG, under the de minimis rule. If however more than 25sqm of vegetated habitat are removed, then a biodiversity net gain assessment will be required.'

Proximity to Rochdale Canal SAC and SSSI. Given the close proximity to this statutory protected site, Natural England should be consulted.'

The only risk however would be run off from the site in to the canal and dust and air pollution during and post development, risk which I would regard as very low. I advise however that an assessment of the risk to the Rochdale Canal SAC and SSSI is provided as part of any application in order to remove any delays, should Natural England request such an assessment.'

I would advise that a Tree Protection Plan is designed and implemented to protect the existing tree line along the adjacent railway.'

National Highways feedback:

'We have gone through the planning application and the documents provided. The proposed development is in close proximity on the SRN and will have a demonstrable impact on the hence, we would like to see a transport assessment with the full planning application and an understanding of the impact to the A627(M) and if their traffic distribution is heading towards M62 J20 then an assessment of impact on J20 as well. We would welcome a pre-app discussion with the applicant if would like to discuss it.'

GMAAS feedback:

'Just as with a previous application at this site (16/00640/FUL) our records show that there is no archaeological interest within the proposal footprint. GMAAS will not be seeking archaeological mitigation for this scheme and no further archaeological assessment will be required with any forthcoming application.'

Environment Agency feedback:

'Please be advised that we no longer want to be consulted on pre-application enquiries via councils.'

Greater Manchester Police feedback:

'As the original CIS report was prepared some 6 years ago, we would recommend that a new CIS is prepared to accompany the proposed planning submission.'

- 3.5 A site meeting was held on 5th September 2024, and the case officer provided helpful and positive feedback. It was at that stage that we explained the change in Hanson Spring's strategy and the introduction of the proposed extension the 'the garage' building.

- 3.6 We received the LPA's formal pre-application letter on 4th November 2024 (see *Appendix 1*). That included the above consultee commentary, and also made the following observations.

The Principal

- The pre-application site is located within the defined urban area and a primary employment zone as allocated under the saved UDP allocations plan.
- Saved Policy EC/2 establishes that within primary employment zones development and change of use for industrial, business and warehouse uses will be permitted where the proposals:
 - are of an appropriate scale and character to the area;
 - will cause no unacceptable environmental or amenity problems; and
 - will cause no unacceptable traffic problems.
- Policy E2 of the adopted Core Strategy also ensures that there will be a sufficient supply of suitable land, buildings and infrastructure to support the creation and retention of successful businesses.
- Policy JP-J2 of PfE states '*a diverse range of employment sites and accessible premises, both new and second-hand, will be made available across the Plan area in terms of location, scale, type and cost*' whilst Policy JP-J4 states '*industrial and warehousing accommodation is essential to a wide range of businesses across many economic sectors.....At least 3,513,000sqm of new, accessible, industrial and warehousing floorspace will be provided in the Plan area over the period 2022-2039*'.
- The site is located within an existing industrial/commercial area where there are a mixture of larger and smaller industrial units in close proximity. The site has also been previously granted planning permission for a similar development albeit this was only for a new building. Given the surrounding land uses and land allocation, it is considered that the principle of development is acceptable.

Visual Amenity

- Policy P1 of the Council's adopted Core Strategy seeks to require design which is of a high standard, demonstrating innovation and originality, and maximising the potential for heritage assets to provide a sense of place and image. Policies DM1 and P3 of the Council's adopted Core Strategy requires development proposals to adhere to high quality design and enhance the borough's identity and sense of place.
- The pre-application proposes a new industrial building to the west of the site and an extension to an existing building in the centre of the site. The new building has now been amended in size and therefore this reduces the overall scale of the building although it is expected to be approximately 1m higher than the building previously approved. The proposed extension will increase the size of Building 2 however, this is set within the site and would offer opportunity for an improvement on the visual appearance of the existing building.
- Details of the amendments to the south of the site to improve the access to the main entrance have not been provided and details of these will need to be submitted at application stage however, it is not envisaged that these changes would be harmful to the character and appearance of the site or the surrounding area.
- Any future planning application would need to provide a proposed section showing the new building in context with the neighbouring buildings however, an increase in height of 1m is unlikely to be detrimental to the existing character and appearance of the industrial area.
- The proposed buildings would be of typical industrial construction with materials to reflect/match existing adjacent buildings with standard profile sheeting for the roof and external walls with lower facing brickwork. No specific details on colours/specification have been provided but officers consider these can be secured by way of a condition at application stage.
- It is noted that at the time of the previous permission a new residential development to the west/north-west of the site on the opposite side of the railway line was not under construction. The development is now under construction. As the railway line is located on an embankment, the increase in height and the existing tree cover is

likely to screen the majority of the proposed building however, any future planning application will need to show these new dwellings on the Location Plan and the Proposed Block Plan.

Residential Amenity

- Paragraph 135 of the National Planning Policy Framework advises that planning decisions should always seek to secure a good standard of amenity for all existing and future occupants of land and buildings.
- Policy DM1 of the Core Strategy requires that proposals do not adversely affect the amenity of residents or users through visual intrusion, overbearing impact, overshadowing or loss of privacy. Also, impacts including noise, air, dust, light and odour pollution are required to be mitigated where necessary. Further to the above are the considerations of the Councils Supplementary Planning Document (SPD) 'Guidelines and Standards for Residential Development' which states that new developments '*should be carefully designed to protect the amenity of the occupants of adjoining properties.*'
- Although the pre-application site is located within an allocated employment zone there are residential properties to the west/north-west. There seems to be approximately 50m between these dwellings and the proposed buildings which officers consider is a sufficient distance to ensure there is no loss of privacy, overshadowing or overbearing effects from the development.
- The neighbouring sites within the industrial estate will notice the additional height and depth of the proposed buildings however, due to the existing industrial nature of the site, this is considered to be an acceptable relationship.
- The Council's Environmental Health Officer has reviewed the pre-application enquiry and raised no objection subject to the submission of a Noise Impact Assessment at the application stage to ensure the development does not have an adverse impact on existing noise sensitive receptors which would now include the neighbouring residential properties.

Highways, Access and Parking

- Policy T2 of the adopted Core Strategy is regarding improved accessibility and parking. Policy JP-C8 of PfE states ‘we will require new development to be located and designed to enable and encourage walking, cycling and public transport use, to reduce the negative effects of car dependency, and help deliver high quality, attractive, liveable and sustainable environments’.
- The Council’s Highways Officer has reviewed the pre-application enquiry and raised no objection to the proposal subject to a parking strategy and a swept path analysis being submitted at the application stage.
- The Highways Officer has not been re-consulted on the amended scheme as it is felt that the above requirements would remain the same.
- The Highways Officer has also requested a financial contribution of £4,000 for the revision of traffic regulation orders (TRO) in the vicinity. Highways Officers have confirmed that there is currently parking issues on Gorrells Way which need addressing to ensure access remains clear. If the fee for the TRO is not required this will be refunded.
- The amendments to the pre-application enquiry will require changes to the parking layout and any future planning application should demonstrate existing and proposed parking arrangements on Existing and Proposed Site Plans. It may be necessary to impose a condition restricting the use of the new building as ancillary to the main existing building, unless the additional information submitted with the full application clarifies there would be no highways safety impacts from the new building as a separate, individual use.
- National Highways have also provided comments on the pre-application enquiry and have advised that the proposed development is in close proximity on the strategic road network (SRN) and will have a demonstrable impact on it. They have advised that any future planning application would be required to provide a Transport Assessment detailing the impact to the A627(M) and if traffic distribution is heading towards M62 J20, then an assessment of impact on J20 as well. It is noted that this was not required for the lapsed permission for the site and that National Highways

did not object to the proposals as they accepted there would not be any significant impact. Any application should be supported by sufficient highways information to demonstrate the level of impact on the SRN.

Impact on Network Rail

- Network Rail have provided detailed comments on the proposal and these have been sent to you under separate cover. Due to the proximity of the railway line to the proposed development contact should be made with Network Rail and any future planning application should provide the requested details. It is noted that Network Rail included a number of conditions which, if a planning application were submitted may be reasonably required. It is however noted that the revised proposals have now incorporated a stand-off distance from the Network Rail Assets and as such Network Rail may have reduced requirements subject to further detail in any supporting application.

Landscaping, Ecology and Impact upon Rochdale Canal

- Policy LT/7 of the saved UDP states that development proposals will not be permitted that would adversely affect:
 - a) The recreational value of the canal watercourse and towpath;
 - b) The setting and visual amenity of the canal and its environs;
 - c) The nature conservation value of the Canal (as a SSSI and SAC) consistent with policies NE/2 and NE/4; or
 - d) The conservation of features of historic or archaeological importance within the canal setting.
- The Rochdale Canal runs beyond the south of the site, close to the southern corner of the existing industrial building to the east of the site. Consultations have been carried out with the Council's Ecologist and the Environment Agency.

- The Council's Ecologist has advised that given the proximity to the Rochdale Canal SAC and SSSI, Natural England should be consulted. Following our meeting I note that Ecological Surveys have been undertaken as a badger sett has been identified to the north of the site and these surveys should be provided at application stage. The Environment Agency and Natural England do not comment on pre-application enquiries from Local Planning Authorities and it is recommended that the applicant contact them directly.
- However, given the proposed buildings would be located in the centre and far corner of the site and some distance away from the Canal, officers consider the impact on the Rochdale Canal would be minimised. Any application should set out mitigation measures such as the use of Construction Environmental Management Plans etc. to ensure impacts to the SAC/SSSI are negated and to remove any concerns that Natural England may raise through an application.
- The amendments have introduced tree planting to the east of the site which is welcome and any future planning application should provide a Tree Protection Plan to protect the existing trees along the adjacent railway line along with a Landscaping Plan.

Flood Risk & Drainage

- Policy G8 of the Core Strategy sets out the Council's strategy for managing water resources and flood risk more effectively in the interests of public safety, protecting property and infrastructure and the conservation of the natural environment. Policy JP-S4 of PfE states 'an integrated catchment-based approach will be taken to protect the quantity and quality of water bodies with reference to the North West River Basin Management Plan and managing flood risk, by: 2) Working with natural processes and adopting a natural flood management approach to slow the speed of water drainage and intercept water pollutants'.
- Any future planning application would need to provide a Drainage Strategy incorporating an assessment of the SuDS hierarchy and green surface based SuDS

source control components such as detention basins, swale, tree pits, raingardens etc.

Land Contamination and Stability

- The NPPF and Policy G9 of the Rochdale Core Strategy states that the Council will ensure that any risks arising from contaminated land or land instability are identified, and that any appropriate actions to address these risks are taken, prior to development taking place.
- The Council's Environmental Protection officer has been consulted and advised that a Preliminary Risk Assessment would be required should a planning application be submitted.

Crime and Disorder

- A Crime Impact Statement has been submitted with the pre-application enquiry which has been reviewed by Greater Manchester Police. As the CIS is dated from 8 years ago, GMP have recommended that a new CIS is prepared.

Planning Obligations

- Taking the Council's Highway Officers comments above into consideration, development contributions in relation to the revision of traffic regulation orders would likely be required. Draft S106 Agreement Heads of Terms should be submitted with the application if this is the case.

Summary and Making an Application

- The principle of development on the site is considered acceptable subject to any future planning application taking into consideration the comments and consultation responses noted above. It is acknowledged that additional information is required

from that in the previous planning application however, as the application was approved 8 years ago, policy, guidance and regulations have changed over this time, and this is reflected in some of the consultee responses received.

4.0 The Proposal

- 4.1 The application has been prepared having regard to the fact that the site is designated for employment development in the development plan, and as such is clearly deemed by the Council as an appropriate employment destination for the Borough.
- 4.2 The application is submitted in full detail and, in summary, seeks permission for:
- Erection of a 775.9sqm GEA extension of the existing Class B2 factory building referred to by Hanson Springs as 'the garage' (reflecting what is understood to be its historic use);
 - Erection of a 1339.4sqm GEA detached B8 storage / warehousing building (including ancillary staff offices and welfare facilities).
 - Reconfiguration and formalising of existing central car parking area and internal vehicular / pedestrian arrangements.
 - Associated hard and soft landscaping.
- 4.3 The proposed Class B2 extension will facilitate additional manufacturing processes to be carried out at the site, to allow the business to offer an improved range of products. The building currently functions as the 'hot-coil' spring making operation, and the proposed extension will create space for an additional area for 'cold coil' processes. No fumes or excessive noise will be created by these additional process options.
- 4.4 The proposed new Class B8 warehouse will contain high racking to enable the storage of manufactured springs awaiting dispatch and will allow for a stockpile of popular products at the site, thereby improving the company's turn-around time in responding to client orders and to allow more efficient use of site resources.

- 4.5 Both the new build warehouse and extension have been designed to offer a homogeneous appearance, utilising the same colour palette, detailing, materials and height / scale, reflective of the existing buildings, introducing the yellow accent colour from Hansons Springs' corporate logo.
- 4.6 The height of both the new warehouse and the extension will be 8.253 metres, designed to accommodate the operational requirements of the business. The parapet at eaves level will provide a safe maintenance environment for operatives.
- 4.7 The proposed extension has been designed to conceal the current shabby garage-like façade that is readily visible on the entrance approach (see below).



- 4.8 Beyond the new buildings, it is proposed to enhance and better 'waymark' the entrance into Hanson Springs' main offices. Currently, that 'arrival space' is of poor, bland quality and lacks clarity, resulting in confusion for visitors who often struggle to locate the entrance. The application proposes to introduce enhanced hard landscaping with feature 'springs' (manufactured by the Company) and planters as indicated on the submitted landscape drawings, whilst providing for emergency vehicles.



- 4.9 It is proposed that the existing vehicle and pedestrian access to the site will continue to be taken from the existing security gate access point to Hanson Place / Gorrells Way. No changes are proposed to these security gate arrangements.
- 4.10 HGV service and delivery traffic will continue to utilise the main internal site service road to access the core manufacturing buildings (including the extension building) and the proposed new storage / warehouse building. The submitted vehicle swept path exercise demonstrates that vehicle servicing for the new buildings will be undertaken 'off-line' from the main looped service route through the site, with loading / unloading able to be carried out in safe designated areas.
- 4.11 On completion of loading / unloading, all HGV vehicles servicing the new buildings will be required to follow the one-way looped route through the site and return to the main security gate for processing and exit.
- 4.12 The application proposes the upgrading of the internal site layout to provide improved staff / visitor parking arrangements. These improvements will include for rationalisation and formal marking of the main central car parking area, to provide up to 119 marked car parking spaces. The majority of these spaces will be provided at 2.75m by 5.5m dimension, served by standard 6m central manoeuvring aisle widths. The re-arranged car parking area will also include for three designated disabled standard spaces close to the main building access points and two EV charging points (close to the main security hub). Suitable internal site signage will be installed at the entry to the site to direct staff and visitor traffic into the car park. This signage will reinforce the security protocols for site visitors, who are already advised as to parking arrangements by staff on arrival to the site security lodge.
- 4.13 The proposed internal car park will also include improved pedestrian arrangements in the vicinity of the existing main site administration building access points, and an enhanced area of landscaping / pedestrian circulation space to the side of the buildings.

This enhanced area will include covered secure cycle parking and a motor-cycle parking area.

- 4.14 Hanson Springs requires the flexibility to operate on a 24/7 basis. In practice, weekend operation of the site will be none or very limited and night time operation (if any) will be of a very low intensity, with little to no operational HGV movements.
- 4.15 The proposal has been assessed in respect of its biodiversity impact, and the assessment is set out in the submitted Biodiversity Net Gain Assessment Summary Report (Pennine Ecology). This confirms that the proposal will result in the loss of small areas of other neutral grassland and ruderal / ephemeral habitat to the southwest and southeast of the proposed new building.
- 4.16 It is suggested that, in order to compensate for this loss and deliver a 10% net gain in habitat units, an area of modified grassland at the site's northern boundary will be enhanced from poor condition modified grassland to good condition other neutral grassland. Furthermore, two young native trees will be planted in this area. These habitats will deliver 0.41 and 0.03 habitat units.
- 4.17 To deliver good condition other neutral grassland, the area (currently supporting poor condition modified grassland) will be scarified, rotivated, and covered with opaque tarpaulin to prevent regrowth of modified grassland species. The area will then be sown with an appropriately diverse wildflower seed mix. Sufficient quantities of seed will be used to establish in excess of 10 species per square metre. Sufficiently regular mowing will take place to maintain a varied sward height throughout spring and summer. At the end of the growing season, the entire grassland will be mown and arisings removed. Presence of scrub, bracken, and invasive species will be controlled.
- 4.18 The small gains required to meet the hedgerow units target can be accomplished through new tree planting within the poor condition line of trees, reducing extent of the gaps, and thereby elevating its condition to at least moderate.

- 4.19 In overall terms, the report suggests that there will be a 12.28% gain in habitat units.
- 4.17 Careful consideration has been paid to how the development will be drained. The application is supported by both a Flood Risk Assessment and Drainage Strategy with associated technical drawings. The precise construction drainage details have not yet been prepared, but will be finalised during the course of the application.
- 4.18 As noted earlier, the Environment Agency maps confirm that the site as a whole falls with Flood Zone 1. This means the site has a low probability of flooding having a less than 1 in 1,000 annual probability of river or sea flooding.
- 4.19 The online mapping also indicates that the site is within an area of very low risk of surface water flooding.

5.0 Compliance with the Development Plan

5.1 In determining this planning application, regard must be had to section 38(6) of the Planning and Compulsory Purchase Act 2004, which requires that proposals be determined in accordance with the development plan unless material considerations indicate otherwise.

5.2 The development plan comprises the following documents:

- Rochdale Unitary Development Plan (Saved Policies)
- Rochdale Core Strategy
- Places for Everyone Joint Development Plan

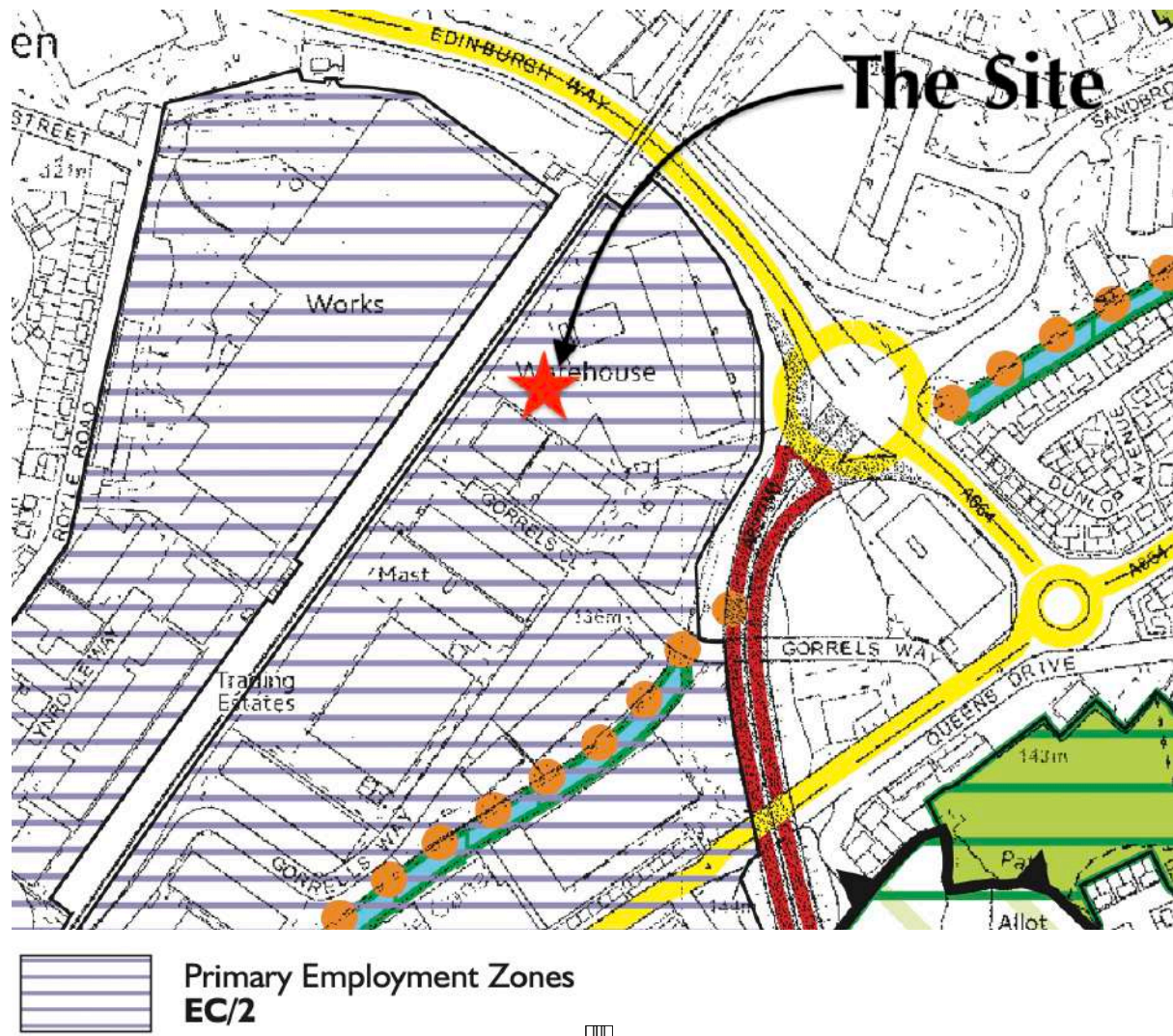
Rochdale Unitary Development Plan (Saved Policies)

5.3 The relevant extract from the Rochdale Local Plan Policies Map is presented on the following page.

5.5 It will be seen that the site falls within a wider 'Primary Employment Zone' designation.

5.6 A large number of UDP policies were replaced by the Core Strategy, but we review the saved policies of relevance to this proposal below.

Extract from Policies Map:



- 5.7 The Rochdale Unitary Development Plan was adopted in June 2006.
- 5.8 Policy G/D/1 'Defined Urban Area' explains that the aim of the policy is to focus development within the Urban Area, stating that, outside this Area, only development that is compatible with other policies in this chapter will be acceptable.
- 5.9 Given that the application site is located inside the Defined Urban Area, it is consistent with this policy.

- 5.10 Key Objective KO/1 is *“to strengthen the local economy”*. It explains that Rochdale Borough has an economy that has, for many years, under performed, and that a healthy economy is fundamental to maintaining and improving all aspects of the quality of life of the Borough's residents and workforce. §4.6 states that the UDP seeks to expand, modernise and diversify the local economy in a manner that improves the range and quality of employment opportunities, reduces local unemployment, generates wealth locally, assists urban and rural regeneration, does not damage the environment, and benefits the local population.
- 5.11 Policy EC/2 ‘Primary Employment Zones’ states that, within those Zones, development for industrial, business and warehouse uses (Use Classes B1 [now Class E], B2 and B8) will be permitted.
- 5.12 In the case of this proposal, both Class B2 and B8 employment development is proposed with a defined Primary Employment Zone, which is clearly in line with the above policy requirements.
- 5.13 Policy EM/7 ‘Development and Flood Risk’ states that development will not be permitted in areas identified as flood plains, or other areas where development could contribute to increased flood risk, unless an appropriate flood risk assessment has been carried out.
- 5.14 The application is supported by both a Flood Risk Assessment (FRA) and drainage details. The FRA confirms that the site falls within Flood Zone 1 and that the proposal is classified as ‘Less Vulnerable’ in Annex 3: Flood Risk Vulnerability Classification, within the National Planning Practice Framework.
- 5.15 It notes that the Planning Practice Guidance confirms that ‘Less Vulnerable’ development is appropriate when located within Flood Zone 1 providing there is no increase in flood risk elsewhere.

- 5.16 It confirms that consultation with the Environment Agency, United Utilities, Canal and River Trust, and Rochdale Metropolitan Borough Council has not identified any historical flooding to the site at this stage.
- 5.17 The FRA has reviewed all sources of flood risk both to and resulting from the proposed development site. The nearest Main River to the site is Sudden Brook, which is a culverted watercourse located around 100m to the north. The fluvial flood risk to the site from Sudden Brook is 'low' given the topographical characteristics, its proximity to the site and that it is a culverted stretch where it runs nearest to the site.
- 5.18 In terms of other sources of flood risk, the site is at predominantly 'very low' and 'low' risk of surface water flooding. There are isolated areas at higher risk, but these correspond with existing flat areas of hardstanding where ponding could naturally occur during extreme and prolonged rainfall events. Potential residual flood risk from surface water will be managed, post-development through the implementation of a sustainable surface water management regime, to manage surface water run-off generated by the new proposed buildings.
- 5.19 The FRA notes that the nearest canal to the site is the Rochdale Canal, which is located immediately south-east of the site. Review of the Strategic Flood Risk Assessment mapping has identified that the site is located in the 'Direct Canal Hazard Zone', which indicates indicatively areas that may be at risk of flooding if a canal were to overtop, or in the event of an embankment failure.
- 5.20 It notes that canals do not pose a direct flood risk as these are controlled water bodies, and the residual risk is limited by continued maintenance by British Waterways, along with the controlled volume of water within an impounded length. Review of the topographic survey has identified that should exceedance or a failure of the embankment occur south-east of the site, flows would likely route toward the site given the falls. The proposal has been located on the western half of the site, approximately 120m from the canal top of bank. The levels in the locations of the proposed extension and new build

are elevated slightly relative to the levels of the car parking to the east. It is advised that external levels fall away from the proposed building and extension, to minimise the flood risk from a variety of sources. By keeping the Finished Floor Levels elevated relative to the externals, this should help create a safe overland flood flow route externally in the event of a flooding associated with a variety of sources, including residual canal and surface water flooding.

- 5.21 To summarise, the FRA concludes that the proposal is at 'low' flood risk from the key flood sources reviewed as part of the assessment, and that appropriate mitigation will be put in place to ensure that there is no increase in flood risk because of the proposals.
- 5.22 The Drainage Strategy explains that the development will not increase the hard standings or drained area, as the proposed works are within existing macadam or concrete areas.
- 5.23 It notes that the existing surface water on the site is controlled by a series of gullies with below ground pipework, working as a gravity system.
- 5.24 It notes that previous site investigations suggest that sand/ gravel measures are found at suitable levels for infiltration techniques to be used on the scheme. However, no specific testing has yet been carried out to determine infiltration rates.
- 5.25 It is suggested that, if infiltration methods are not suitable, then consideration needs to be given to discharge to a surface water body. There is no watercourse in the immediate vicinity of the site, although there is the Rochdale Canal. Canals are generally closed systems and struggle to facilitate the addition of additional flows without upsetting the balance of the system. It is therefore presumed that discharge to the canal would only be considered by the Canal & River Trust if there is no alternative option.
- 5.26 Subject to infiltration testing, it is suggested that the scheme will require 3,600m² of service yard to be drained via new soakaways. It is therefore suggested that some of the parking areas are drained to the proposed soakaway alongside the extended building.

- 5.27 However, the Drainage Strategy suggests that, should discharge via infiltration be unfeasible, the proposed soakaway tanks would need to become attenuation tanks, most likely with a pump to control the rate of discharge.
- 5.28 In terms of foul drainage, the Strategy notes that there are two potential points of connection for any new foul drainage using existing pipework to reach the adopted sewers. Only the new building is expected to require new foul drainage as the extension does not include additional drainage.
- 5.29 The Strategy suggests that the most suitable point of connection would appear to be the existing private foul manhole behind the building to be extended. This would then drain via the private network before ultimately discharging to UU manhole reference 9608. The discharge will be from approximately 4 WC's, 6 wash hand basins, 3 urinals and a domestic kitchen.
- 5.30 Having regard to the above, we suggest that – subject to drainage-related conditions – the proposal does not conflict with Policy EM/7 'Development and Flood Risk'.
- 5.31 Policy EM/8 'Protection of Surface and Ground Water' states that development likely to pose an unacceptable risk to surface water and ground water quality, or to water supply will not be permitted.
- 5.32 The application is supported by a Preliminary Investigation Report which has identified evidence of potential sources of contamination on, or which may impact on, the site, with plausible pathways to the likely receptors. It is recommended that further work be carried out to confirm the presence, nature or extent of any contamination which is anticipated to impact on the site. It recommends that an intrusive investigation be undertaken to address the geological hazards and / or potential pollutant linkages identified, and suggests the following scope of works:

- The sinking of boreholes for the recovery of samples for geotechnical and chemical contamination analysis. Exploratory locations should be located to target the areas of new development and undertaken to sufficient depth to facilitate pile design.
- The installation and monitoring of standpipes within the Made Ground and Glaciofluvial Deposits for ground gas and groundwater levels.
- The installation and monitoring of standpipes within the Made Ground and Glaciofluvial Deposits to monitor groundwater. Should sources of contamination be identified within the soil and leachate analysis, samples of groundwater should be obtained for chemical contamination analysis.

5.33 Having regard to the above, we suggest that – subject to drainage-related conditions – the proposal does not conflict with Policy EM/8 ‘Protection of Surface and Ground Water’.

5.34 On the above basis, we conclude that the proposal is consistent with all relevant saved UDP policies.

Rochdale Core Strategy

5.35 The Rochdale Core Strategy was adopted in October 2016.

5.36 Its ‘Spatial Portrait’ explains that, in the past, Rochdale’s local economy has under performed in comparison to Greater Manchester and the rest of the North West, with low levels of employment and high levels of unemployment. Rochdale is therefore looking to widen its employment base, with an increase in the range and quality of jobs in the borough and improved access to jobs outside the borough.

5.37 It notes the key challenges as, *inter alia*:

- Continuing to improve the quality of jobs, wage levels and workforce skills; and
 - Improving the range of jobs
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- 5.38 Strategic Objective SO1 is *'to deliver a more prosperous economy'*. To achieve this, the Core Strategy focuses on, *inter alia*, identifying quality employment sites and areas to increase the number and range of jobs and employment levels.
- 5.39 The above aspirations / objectives spill into Policy SP1 – 'Rochdale Borough's Role in the City Region', which states that the Borough will contribute to the success of the Manchester city region and the North West by playing its part in the delivery of sustainable development and investment that meets national and sub regional objectives for housing and employment growth. To achieve this, the policy pledges to:
- Promote the borough as an attractive location in terms of jobs, housing, shopping, the environment, image, tourism and quality of life; and
 - Focus employment development so that it supports the overall economic growth of the sub region.
- 5.40 Policy SP2 'The Spatial Strategy for the Borough' takes that forward, stating that, in the Manchester fringe in the south of the borough (where there is good access to existing facilities and infrastructure, the motorway corridor, public transport facilities and the wider Greater Manchester city region) *'we will deliver most new housing, employment and commercial development'*.
- 5.41 Policy SP3/R – 'The Strategy for Rochdale' states that the priorities are to *'improve the quality of employment areas and access to jobs.'*
- 5.42 Policy E2 'Increasing jobs and prosperity' states that the Plan will ensure a sufficient supply of suitable land, buildings and infrastructure in the right places to support the creation and retention of successful businesses and increase the number and quality of jobs to create a more prosperous lower carbon economy.
- 5.43 It is evident that the application is consistent with the above objectives and policies. It is promoting the correct type of employment development in accordance with the site's
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employment designation, which will enable a successful local company to thrive and grow, with obvious positive implications for local jobs and the local economy.

- 5.44 Policy SD1 – ‘Delivering sustainable development’ states that, when considering development proposals, the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework, to secure development that improves the economic, social and environmental conditions in the area.
- 5.45 In response to the above policy we consider the sustainability credentials of the proposal in Section 6.0.
- 5.46 Policy P1 ‘Improving image’ states that the Council will require high quality design in all new developments, and this will be particularly important at ‘key gateways’ into the borough.
- 5.47 Policy P3 ‘Improving design of new development’ requires all new developments to adhere to high standards of design.
- 5.48 Whilst much of the application site is not readily visible from the wider public demise, it is located adjacent to Rochdale Bypass as what we suggest is a key gateway into the town. The extension has been designed to improve the currently unattractive façade of the ‘garage’ building, and the scheme as a whole seeks to create a unified and uniform set of buildings and hard and soft landscaped areas.
- 5.49 Policy G1 ‘Tackling and adapting to climate change’ seeks to address climate change and ensure that growth does not increase CO2 emissions by locating growth in areas which are likely to minimise the need for travel and which are well served by public transport, services and infrastructure. New developments will be expected to be zero carbon in line with national targets and definitions; adhere to the ‘energy hierarchy’ as

outlined in policy G2, being designed in such a way that ensures that buildings require the minimum amount of energy to function over their lifetime.

- 5.50 Policy G2 'Energy and new development' states that all new development will be expected to adhere to the energy hierarchy.
- 5.51 In response to the above policies, the new building and extension will be constructed in robust, sustainable materials and accord with Building Control standards.
- 5.52 Policy G6 'Enhancing green infrastructure' seeks to sustain and enhance a green network to support growth and regeneration in the borough and provide a high quality environment. In this case, the site sits within an established employment park where employment development is encouraged. The site is overwhelming brownfield land and not perceptible from most public vantage points. Nevertheless, hard and soft landscaping (and BNG) enhancements are proposed in line with policy G6.
- 5.53 Policy G7 'Increasing the value of biodiversity and geodiversity' states that opportunities for enhancing biodiversity and geodiversity will be supported and that no development should result in a net loss of biodiversity or geodiversity and instead a net gain. The submitted BNG information confirms that there will be a net gain in excess of the mandatory 10% requirement.
- 5.54 Policy G8 'Managing water resources and flood risk' seeks to ensure that new development does not lead to any form of increased flooding locally or further downstream, does not impede natural water and flood risk management, is not detrimental to existing or potential flood storage areas, contributes where possible to alleviating existing flood risk, is itself well protected from flood risk and ensures prudent use of water resources. We drew attention to the conclusions of the submitted Flood Risk Assessment and Drainage Strategy earlier, and suggest that there is no conflict with Policy G8.

5.55 Policy G9 'Reducing the impact of pollution, contamination and land instability' seeks to reduce all forms of pollution, contamination and land instability in the borough. We drew attention to the conclusions of the submitted Ground Report earlier, and suggest that there is no conflict with Policy G9.

5.56 Policy T2 'Improving accessibility' seeks to improve accessibility by locating development where good access to public transport is available or can be provided, backed by measures to reduce the need for travel and effective provision for cyclists, pedestrians and people with impaired mobility.

5.57 The submitted Transport Statement explains that:

- Main walking connections from the application site to the wider area are via the Gorrells Way link to A664 Queensway, with a continuous footway available to the northern side of that corridor. This link also provides a stepped connection to the Rochdale Canal towpath, which is a signed walk / cycle route (NCR 66).
- Further walk / cycle connections are also available via connections under the Manchester – Rochdale railway line from Gorrells Way / Corporation Road to the south west, linking to Gipsy Lane and Bow Street respectively.
- The local residential areas of Marland, Castleton, Kirkholt & Stoneyfield are all located within a reasonable walk commute catchment (2km) of the site.
- This good pedestrian accessibility is reflected by the good levels of walk trips already observed taking place to / from the Hanson Springs site. A 5km cycle catchment includes for the majority of the built up extents of Rochdale and surrounding suburbs.
- The nearest bus stops to the application site are located on A664 Queensway, a circa 375m walk from the application site security gates. These stops are of good quality and are served by a Rochdale – Middleton (via Castleton) hourly service, with service operating times that would support commuter use to access the application site.
- It is anticipated that the proposal will effectively consolidate and improve existing on-site manufacturing activities at the site and allow for improved business response to customers via the stockpiling of popular products within the new storage /

warehouse facility. It is not anticipated that these additional site elements, in particular the storage facility, will generate a significant demand for new staff. Discussions with site management have identified that it is not anticipated that staffing levels at the site would increase by more than 10 – 20 staff within the future business forecasted periods.

- Similar to existing operating practice at the site, it is not anticipated that many of these new staff positions would require journeys to / from the site during traditional network AM & PM ‘rush hour’ peak periods.
- Furthermore even in the unlikely situation of an additional 20 staff vehicles being required to be parked on site, the proposed site car parking arrangements (119 spaces) would still provide sufficient capacity to cater for such demand, given that maximum existing observed parking levels at the site are typically of the order of 80 – 85 spaces.
- Given the overall low volumes of predicted traffic associated with the application scheme, particularly during key network peak periods – relating to a change in baseline traffic volumes on A664 Queensway of well below 1% - it is concluded that there is no evidence to suggest that the proposals would result in a severe impact on local highway network operational performance or highway safety. No off-site highway improvements would be required to accommodate such low traffic volumes.

5.58 Based on the review of the above issues set out in this report, we suggest that there is no conflict with policy T2.

5.59 Policy DM1 ‘General development requirements’ states that all development proposals, will be expected to demonstrate that they are of high quality design and take the opportunity to enhance the quality of the area; are compatible with surrounding land uses, both in terms of its impact upon those uses and the impact of the surrounding land uses upon the amenities of future residents users; do not adversely affect the amenity of residents or users through visual intrusion, overbearing impact, overshadowing or loss of privacy; mitigate against any impacts due to noise, air, dust, light and odour pollution,

traffic generation or inadequate access, where such mitigation is identified as being necessary; and provide satisfactory vehicular access with adequate parking, manoeuvring, and servicing arrangements taking into account of the proposed use and location.

- 5.60 We suggest that there is no conflict with the above policy. The proposal will deliver design enhancements and good quality, contextual buildings in the heart of the employment park. It will not harm amenity of neighbours or create material noise or traffic, or have an otherwise overbearing impact.
- 5.61 The application is supported by a Noise Impact Assessment (NIA). This is based on a background noise survey in order to determine an appropriate noise emission criterion for loading and unloading operations, in accordance with the requirements of British Standard 4142: 2014 +A1: 2019 'Methods for rating and assessing industrial and commercial sound'.
- 5.62 Calculations have been undertaken for the nearest receiver, identified as a row of the recently constructed residential houses on Broadbent Street to the northwest of the industrial site.
- 5.63 Calculations show that noise emissions from the proposed relocation of operations would result in noise level that is classed as a low impact according to the relevant standard, even when considering a worst case scenario.
- 5.64 Maximum noise levels from the loudest anticipated noise events are not expected to reach the recommended limits stipulated by the World Health Organisation.

5.65 The NIA has demonstrated that noise emissions from loading and unloading operations can be controlled to a level where a low impact assessment is achieved, based on the following material considerations:

- Proposed operations in terms of activities and durations are as stated in the assessment; and
- Operation and receiver locations are as established in the assessment; and
- A noise management plan is adopted, as specified in the NIA.

Places for Everyone Joint Development Plan

5.66 The *Places for Everyone Plan* was adopted as part of Rochdale's statutory development plan in March 2024.

5.67 Contextually, §1.28 states that the Plan seeks to deliver sustainable, inclusive growth. It has 4 key spatial elements, including:

'Boosting the competitiveness of the northern districts – addressing the disparities by the provision of significant new employment opportunities'

5.68 Under the heading 'Good Jobs', §1.29 states that:

'In extremely challenging times, the need for bold ambitious plans for good quality employment is critical. We are striving to define our new 'normal' however we know that we need to continue to invest in our city and town centres to drive our recovery ... Opportunities for 're-shoring', that is bringing manufacturing activity back to the UK, and the increasing demand for logistics and warehousing, could lead to opportunities to provide good employment opportunities across the Plan area.'

5.69 Under the heading 'Brownfield Preference', §1.42 states that:

'The majority of development between 2022 and 2039 (the "plan period") will be on land within the urban area, most of which is brownfield land.'

5.70 Under the heading 'A Top Global City', §2.17 states that:

'By the end of the Plan period, Greater Manchester aims to be a top global city. To do this it will require a range of attributes, including a strong economy, skilled residents, a high quality of place and the environment, and a diverse portfolio of investment and development opportunities.'

5.71 The above ambitions are reflected in Strategic Objective 3 'Playing our part in ensuring a thriving and productive economy in all parts of Greater Manchester', pledging to:

- Ensure there is adequate development land to meet our employment needs; and
- Prioritise the use of brownfield land; and
- Ensure there is a diverse range of employment sites and premises.

5.72 **Policy JP-Strat6: Northern Areas** seeks 'a significant increase in the competitiveness of the northern areas' (which includes Rochdale).

5.73 **Policy JP-J1: Supporting Long-Term Economic Growth** promotes a thriving, inclusive and productive economy with emphasis on maintaining a very high level of economic diversity across the boroughs.

5.74 **Policy JP-J2: Employment Sites and Premises** states that a diverse range of employment sites and accessible premises, both new and second-hand, will be made available across the Plan area in terms of location, scale, type and cost. This will offer opportunities for all kinds and sizes of businesses, including start-ups, firms seeking to expand, and large-scale inward investment, which will help to tackle inequalities.

- 5.75 **Policy JP-J4: Industry and Warehousing Development** states that at least 3,513,000 sqm of new, accessible, industrial and warehousing floorspace will be provided in the Plan area over the period 2022-2039. To achieve this, a high level of choice and flexibility will be provided in the supply of sites for new industrial and warehousing floorspace.
- 5.76 In response to the above policies, this proposal will play an important part in improving the efficiencies and growth of a longstanding major employer in *'the Northern Area'*, in turn assisting the company's competitiveness and longevity going forward.
- 5.77 **Policy JP-P1 'Sustainable Places'** states that all development, wherever appropriate, should conserve and enhance the natural environment, landscape features, historic environment and local history and culture; enable a clear understanding of how the place has developed; and respect and acknowledge the character and identity of the locality in terms of design, siting, size, scale and materials used.
- 5.78 We suggest that there is no conflict with the above policy. Ultimately this is a relatively simple and discrete planning proposal, proposing an extension to an existing manufacturing building and a new warehouse on land that is designated for such use and development. Crucially, the development will assist in sustaining a successful, longstanding local business, and in turn sustaining the 180 local jobs that rely on it, with scope to create circa 20 additional jobs.
- 5.79 **Policy JP-G8: 'A Net Enhancement of Biodiversity and Geodiversity'** states that a net enhancement of biodiversity resources will be sought. Development will be expected to follow the mitigation hierarchy of avoiding significant harm to biodiversity; adequately mitigating any harm to biodiversity; and then adequately compensating for any remaining harm to biodiversity, to achieve a measurable net gain in biodiversity of no less than 10%.

- 5.80 In response to the above policy, we have explained elsewhere that no material harm will arise to biodiversity and that a net gain in excess of 10% will be delivered.
- 5.81 **Policy JP-S4: Flood Risk and the Water Environment** explains that an integrated catchment-based approach will be taken to protect the quantity and quality of water bodies with reference to the North West River Basin Management Plan and managing flood risk, by *inter alia* locating and designing development so as to minimise the impacts of current and future flood risk, and expecting developments to manage surface water run-off through sustainable drainage systems and as close to source as possible.
- 5.82 The above policy is satisfied by the submitted FRA and Drainage Strategy.
- 5.83 **Policy JP-C8: Transport Requirements of New Development** states that new development is to be located and designed to enable and encourage walking, cycling and public transport use, to reduce the negative effects of car dependency, and help deliver high quality, attractive, liveable and sustainable environments.
- 5.84 The above policy is satisfied by the submitted Transport Statement.
- 5.85 Having regard to the above assessment, we contend that the proposal is consistent with all relevant policies of the adopted development plan, and should be approved accordingly.

6.0 Sustainability and Compliance with the National Planning Policy Framework

- 6.1 The National Planning Policy Framework (NPPF) was most recently updated / published in December 2023 confirms that is an important material consideration.
- 6.2 We are aware that, at the point of preparing / submitting this planning application, the Government has signalled its intention to prepare a revised version of NPPF, a draft of which has been subject to consultation. However, that new version has not yet been adopted, and our reading of the draft changes is that – in respect of this particular development – no material changes are likely to arise. If a new version of NPPF is published during the course of the application (as seems likely), and if that introduces relevant / material policy changes, we will review it at that point in time. But in the absence of the new version, the remainder of this section focuses on the current (December 2023) version of NPPF.
- 6.3 At its heart, the NPPF promotes sustainable development, suggesting that there are three core strands / roles relating to sustainable development: ***economic, social and environmental***. We consider each in turn below.
- 6.4 The proposal seeks to deliver sustainable economic development and both retain and increase associated jobs on land that is designated in the development plan as an employment site.
- 6.5 The site is overwhelmingly previously developed.
- 6.6 It is self evident that regeneration needs to secure investment over the long-term if it is to transform communities and reverse decades of decline, tackle perceptions, and create opportunities and the environment for local people to succeed.

- 6.7 This development will play an important ***economic role***, contributing to local job opportunities and economic growth. The provision of employment within the local area is of course an integral part of regeneration and delivering the NPPF's vision of sustainable development.
- 6.8 NPPF §85 states that planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt, and that '*significant weight*' should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. It states that the approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. This, it suggests, is particularly important where Britain can be a global leader in driving innovation, and in areas with high levels of productivity, which should be able to capitalise on their performance and potential.
- 6.9 Hanson Springs is one of Rochdale's largest, successful and most important employers. Its business is booming and in urgent need of this expansion facility to service. This application will therefore enable this local business to grow and flourish, in turn sustaining and increasing local employment opportunities.
- 6.10 It will secure wages from both permanent and full time jobs in the local area.
- 6.11 It will also provide local jobs through the construction phase of the development.
- 6.12 It will generate new Business Rates, directly payable to Rochdale and retained by Rochdale to support local services.
- 6.13 In simple terms, this application proposes a viable, deliverable, high quality, sustainable development scheme in ongoing difficult economic times. Not only will the proposal expand an existing business, but it will also create long term and secure job opportunities that will facilitate local economic growth and the creation of sustainable communities.

- 6.14 It will therefore deliver indisputable economic benefits.
- 6.15 In **Environmental** terms, much of the site is brownfield land that possesses little in terms of environmental quality. Trees and vegetation will be retained along its boundaries, to be supplemented by new planting, which will assist in the development's contribution to both ecology / biodiversity and visual appearance / softening. In line with NPPF policy, which seeks to secure environmental improvements, the application proposes the retention and enhancement of landscape features possessing visual and biodiversity benefit, and – combining both on-site and off-site commitments – will deliver the correct net gain of biodiversity.
- 6.16 The development will also play an important **social role** as it will secure and create long term, secure and accessible jobs for the communities surrounding Rochdale. The provision of jobs and income is of course a critical social need, and this proposal will contribute positively to that.
- 6.17 For the above reasons, we contend that the proposal represents sustainable development, which will contribute economically, socially and environmentally.
- 6.18 There is also consistency with other aspects of the NPPF, most of which links to our assessment of the proposal against relevant provisions of the development plan. We will not repeat all of those points here, but would briefly highlight the scheme's compliance with NPPF's policies below.
- 6.19 §108 states that transport issues should be considered from the earliest stages of plan-making and development proposals, so that the potential impacts of development on transport networks can be addressed; opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised; and opportunities to promote walking, cycling and public transport use are identified and pursued.

- 6.20 §109 explains that the planning system should actively manage patterns of growth and that significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.
- 6.21 §115 states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be ‘severe’.
- 6.22 In response to those transport-related provisions of NPPF, the submitted Transport Statement demonstrate that the scheme can / will be safely and efficiently accessed and will not have anywhere close to a ‘severe’ impact on the road network.
- 6.23 A series of statements in the NPPF relate to the efficient use of land. For example:
- §123 states that decisions should ‘*promote an **effective use of land** in meeting the need for homes and other uses*’
 - §128 states that decisions should support development that makes ‘**efficient use of land**’
 - §129 states that local planning authorities should refuse applications which they consider fail to **make efficient use of land**
- 6.24 We suggest that the proposed development does constitute the efficient use of land. It has been designed precisely to accommodate the business needs of Hanson Springs.
- 6.25 The application is also consistent with §124 which states that planning decisions should give ‘*substantial weight*’ to the value of using suitable brownfield land; support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land; and promote and support the development of under-utilised land and buildings.
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- 6.26 NPPF §131 seeks the creation of *'high quality, beautiful and sustainable buildings'*, suggesting that this is fundamental to what the planning and development process should achieve. It states that good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.
- 6.27 That is carried forward by §135, which promotes developments that will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development; and are visually attractive as a result of good architecture, layout and appropriate and effective landscaping.
- 6.28 *'Beautiful'* is a subjective concept and it might be argued that it is challenging to design a genuinely beautiful large warehouse, whose form must inevitably reflect its function. We note that the proposed draft version of NPPF removes the word *'beautiful'*. Notwithstanding that, while it is difficult to claim that the proposed warehouse – no matter how well designed - will be truly *'beautiful'*, Hawthorn Design has made a concerted effort, guided by Hanson Springs which wishes to provide *'statement buildings'* for the company, to deliver excellent and thoughtful architecture, sensitive to its urban context.
- 6.29 §157 states that the planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to shape places in ways that contribute to radical reductions in greenhouse gas emissions; minimise vulnerability and improve resilience; encourage the reuse of existing resources; and support renewable and low carbon energy and associated infrastructure.
- 6.30 In response to that, this will be an energy efficient, low carbon development.
- 6.31 §165 of NPPF states that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). The submitted Flood Risk Assessment and drainage details demonstrate that
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none of the proposed development (will correspond with higher flood risk zones or cause flooding / drainage issues.

- 6.32 NPPF 180 states that planning policies and decisions should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan); and minimise impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.
- 6.33 As noted earlier, the application is supported by a surfeit of ecological reports and will deliver the correct extent of biodiversity net gain.
- 6.34 §189 states that decisions should ensure that sites are suitable for the proposed use taking account of ground conditions and any risks arising from land instability and contamination. This includes risks arising from natural hazards or former activities such as mining, and any proposals for mitigation including land remediation. As noted earlier, the submitted ground reports indicates that there is no reason why the development ought to be resisted on such grounds.
- 6.35 Crucially, §47 of NPPF confirms that planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise. We have explained in this Statement the extent of consistency with the development plan, and we do not consider that there are any material considerations that would weigh in the balance of refusal.
- 6.36 Having regard to all of the above, NPPF §11 states that, for decision-taking:

‘this means ... approving development proposals that accord with an up-to-date development plan without delay.’

6.37 We therefore anticipate that this application will be welcomed by the Council in respect of its deliverance of sustainable economic growth and associated regeneration, and its overall compliance with the NPPF as an important material consideration.

7.0 Conclusions

- 7.1 This Planning Statement has considered the proposal against relevant policies at all levels and explains why we consider it to be a sustainable form of development and compliant with all key / relevant policies of the development plan and NPPF.
- 7.2 An important starting point is that the application site is an existing employment designation in Rochdale's development plan, which confirms that both Class B2 and B8 development is appropriate. That is exactly what this application is proposing.
- 7.3 In designating the site for such development, the Council clearly recognises the site for its locational and sustainability credentials and its ability to accommodate that type of employment development. The site is therefore a critical part of Rochdale's employment land portfolio.
- 7.4 It is also of fundamental importance that the development will serve the business needs of one of Rochdale's largest and most successful companies – Hanson Springs. Such has been the recent success of the company, which supplies its products across the world, that it urgently requires additional floorspace to both relieve pressure and to more effectively and efficiently service its growing customer demands.
- 7.5 Having regard to the above factors, we suggest that this planning application is very much a 'good news story' for Rochdale, not only developing one of its employment designations, but also enabling a major local business to flourish and grow, in turn sustaining existing jobs and creating new jobs for local people.
- 7.6 Economic growth and regeneration in Rochdale relies on securing investment over the long term if it is to succeed in supporting its communities. This development will sustain / deliver employment opportunities and associated wages to the local area. It will generate additional Business Rates directly payable to Rochdale, and retained by Rochdale to support local services. It will provide employment and wages to local people, and will help to redress the acknowledged and long-term problems of deprivation within Rochdale.

- 7.7 This proposal responds to the economic ambitions of Rochdale and wider Greater Manchester. A viable, deliverable, high quality, sustainable economic development scheme is being promoted in ongoing difficult economic times.
- 7.8 In addition to its compliance with the site's designation for employment, we contend that there is no conflict with any other relevant policies, including those relating to design, landscaping, flood risk, drainage, ecology, biodiversity and access / transportation. The application is supported by comprehensive information that interrogates all of those issues (and more), which jointly demonstrate that all relevant Local Plan policies are being adhered to.
- 7.9 The siting, layout, massing, scale, design, materials, lighting, building to plot ratio and landscaping have been formulated to reflect the business requirements of Hanson Springs as the end user. The scale, height and massing reflects those needs and will successfully deliver the aspirations of the development plan as an important employment designation.
- 7.10 Notwithstanding its scale (which is clearly appropriate having regard to the allocation), Hawthorn Architects have sought to design a scheme that is sympathetic to local context (notwithstanding that the site is within the defined urban boundary, substantially brownfield and of course an employment designation) through the employment of quality materials. The scheme reflects the industrial / commercial use of the site, and will not we suggest result in any demonstrable harm to the amenities of the local area or on neighbouring uses by virtue of it being over-bearing or oppressive, overlooking, or resulting in an unacceptable loss of light.
- 7.11 The application is supported by ecological / biodiversity reports, which in the round confirm that all reasonable measures have been taken to survey and assess / minimise ecological impacts and that no material harm will arise.
- 7.12 In respect of BNG (Biodiversity Net Gain), in excess of 10% net gain will be delivered.
- 7.13 The submitted Transport Statement has reviewed the highways and transportation issues associated with the proposal and has concluded that the development is unlikely to result in harm to the safe and efficient operation of the local highway network.
-

- 7.14 Having regard to the assessment in this Planning Statement (when read alongside the remainder of the application documentation), we conclude that the proposal is compliant with relevant policies of both the development plan and the NPPF, and that there are no material considerations to suggest that the application should not be approved in line with those policies.
- 7.15 As such, we commend the proposal to the Council and urge the positive determination of this planning application.

Appendix 1

Formal pre-application feedback of the Local Planning Authority



Mr R Gee
Director
Roman Summer Associates Ltd
Unit A2 Haweswater House
Waterfold Business Park
Heywood
BL9 7BR

BY EMAIL ONLY
richard@romansummer.com

ECONOMY & PLACE DIRECTORATE

PLANNING AND DEVELOPMENT

Melanie Hale
Head of Planning Services

Number One Riverside, Smith Street,
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Enquiries to: Claire Ringwood
Web: www.rochdale.gov.uk
Email: claire.ringwood@rochdale.gov.uk
Direct Line: 01706 925844

Reference: PREAPP/00067/24
Date: 4th November 2024

Dear Mr Gee,

Reference No:	PREAPP/00067/24
Proposal:	Pre-application advice for the erection of a Class B2 industrial building (with ancillary storage space) of 1,682 sqm (18,100 sqft) floorspace
Location:	Hanson Springs Ltd, Trans Pennine Trading Estate, Gorrells Way, Rochdale, OL11 2PX

Further to your pre-application request validated on 13th June 2024 here is my advice in relation to your proposal. Apologies for the delay in responding to this request.

The following information has been submitted:

Site Location Plan

Drawing No: 3351.100 – Site Location Plan / Site Drainage Plan

Drawing No: 3351.20A – Proposed Ground Floor Plan

Drawing No: 3351.21 – Site Location Plan / Proposed Site Plan

Drawing No: 3351.22 – Proposed Elevations

Crime Impact Statement by Greater Manchester Police Design for Security, version A: 17th June 2016, ref: 2016/0432/CIS/01

Drawing No: 188/PLN/L/08 – Sketch Block Masterplan

Received 5th September 2024

SITE

The pre-application site consists of Hanson Springs Ltd headquarters which is a spring manufacturing company located within the Trans Pennine Trading Estate. The existing building occupies a large site and currently comprises of a large warehouse building, a smaller 'hot coil' building and ancillary parking and yard areas. The buildings within the site are of a typical industrial style with a construction of brick and corrugated steel with large metal service access doors.

To the north-west, the site borders onto an active railway line and the site is set within an industrial site. The railway line is set above a large embankment, screening the

majority of the site from public vantage points to the north, with trees screening the site to the east.

The site is within the Defined Urban Area (Policy G/D/1), a Primary Employment Zone (EC/2) and the Rochdale Canal SSSI (LT/7) as identified in the Proposals Map of the saved UDP.

PROPOSAL

A site meeting was held on 5th September 2024 where an amended proposal was presented (Drawing No: 188/PLN/L/08 – Sketch Block Masterplan). The amended proposal reduced the size of the originally proposed new building, introduced a new extension to Building 2 (located centrally in the site) along with amendments to the general layout to provide a clearer pathway for visitors to the main entrance, staff parking and improved outdoor amenity space for employees along with additional planting. These amendments have been introduced following the pre-application consultee responses and as part of a wider masterplan for the overall site.

The original pre-application enquiry was for the erection of a Class B2 industrial building (with ancillary storage space) consisting of 1,682sqm of floorspace. This building has now been reduced in size to 1,338.4sqm with a further extension proposed to Building 2 in the centre of the site. This second extension measures 771.2sqm.

It would be helpful if the type of operations proposed in the new units could be explained in more detail at application stage to enable officers to understand what each of the buildings would be used for in order to allow for a clearer understanding of the potential impacts arising from each.

The pre-application enquiry seeks to resurrect in part, a planning permission that was approved in 2016 under application 16/00640/FUL. This permission however, was only for the new building. Following the amendments, no elevations or floor plans have been provided at this stage, although based on the original pre-application documents it is likely that the eaves level of the proposed building would be 1m higher than previously approved. The proposed building will be positioned in a similar location to that previously approved and the design is likely to be of typical industrial construction to reflect the existing adjacent buildings with standard profile sheeting for the roof and external walls, with lower facing brickwork.

The proposed extension to Building 2 would be to the front of this building which currently has 6 large roller shutter doors.

The amendments also include changes to the general parking layout to enable a safer and clearer access for visitors and staff using the main entrance. This will involve removing a raised area to the south of the site. The existing parking layout will need to be reconfigured.

RELEVANT PLANNING POLICY

National Guidance

National Planning Policy Framework (NPPF)
National Planning Practice Guidance (NPPG)

Sub-Regional

Places for Everyone Joint Development Plan (PfE)

The Places for Everyone Joint Development Plan was adopted and became part of the statutory development plan for each of the 9 authorities covered by the plan on 21st March 2024. The following policies are relevant:

JP-Strat6: Northern Areas
JP-S1 Sustainable Development
JP-S4 Flood Risk and the Water Environment
JP-J1 Supporting Long-Term Economic Growth
JP-J2 Employment Sites and Premises
JP-J4 Industry and Warehousing Development
JP-G7 Trees and Woodland
JP-G8 A Net Enhancement of Biodiversity and Geodiversity
JP-C8 Transport Requirements of New Development

Rochdale Core Strategy:

The following policies of the adopted Rochdale Core Strategy are relevant:-

SO1	Delivering a more prosperous economy
E2	Increasing jobs and prosperity
SO3	Improving design, image and quality of place
P1	Improving image
P2	Protecting and enhancing character, landscape and heritage
P3	Improving design of new development
SO4	Promoting a greener environment
G5	Managing protected open land
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 stability
SO5	Improving accessibility and delivering sustainable transport
T2	Improving accessibility
DM1	General development requirements

Relevant saved Rochdale Unitary Development Plan (UDP):

G/D/1	Defined Urban Area
EC/2	Primary Employment Zone
LT/7	Rochdale Canal

Supplementary Planning Documents (SPD):

Guidelines and Standards for Residential Development (June 2016).

RELEVANT SITE HISTORY

07/D50112 - Erection Of Smoking Shelter. Approved 08/01/2008.

12/55906/FUL - Change of use to general industrial (Use Class B2). Approved 28/09/2012.

15/00542/FUL - Extension to existing industrial building. Approved 15/07/2015.

16/00464/DOC - Submission of details to comply with conditions 5 and 6 of planning permission 15/00542/FUL. Request completed 06/03/2017.

16/00573/DOC - Submission of details to comply with condition 4 of planning permission 15/00542/FUL. Request completed 07/11/2016.

16/00640/FUL - Erection of finishing building. Approved 02/09/2016.

17/01231/DOC - Submission of details to comply with conditions 3 (materials) and 5 (foul and surface water drainage) of planning permission 16/00640/FUL. Request completed 05/12/2017.

SUMMARY OF CONSULTATION RESPONSES

Highways

Summary: No objection in principle subject to a parking strategy and swept path analysis being submitted. A contribution of £4,000 would likely be requested for the revision of traffic regulation orders in the vicinity.

Network Rail

An interface with Network Rail is REQUIRED for this proposal – the outside party is advised that Network Rail will need to agree and supervise this proposal & that no works are to take place until agreed with Network Rail.

[A full copy of Network Rails comments has been sent separately]

Drainage & Flooding

There are no drainage proposals for the new development. There is a Site Drainage System Drawing No: 3351.100. However existing drainage regime (if any) for the current hardstanding is not clear. A Drainage Strategy would be required incorporating assessment of the SuDS hierarchy. If infiltration is found not to be viable then I would expect discharge to the adjacent UU SW sewer. This may need to be attenuated to greenfield (min 5l/s) of 50% brownfield depending on what the existing regime is.

Any future planning application should incorporate green surface based SuDS source control components such as detention basins, swale, tree pits, raingardens etc.

Environmental Health (Noise)

This section would be supportive of the proposal in principle, if brought forward we would require a noise impact assessment to ensure the development does not have an adverse impact on existing noise sensitive receptors.

Environmental Protection

A Preliminary Risk Assessment would be required if a planning application were submitted.

GMEU / Trees

The only theoretical issue is the proximity to the Rochdale Canal SAC and SSSI.

Ecological Assessment Requirements

The development is located on hardstanding, I am satisfied that no ecological survey information is required.

Biodiversity Net Gain

Based on the proposed location of the new build the development will be exempt from 10% BNG, under the de minimis rule. If however more than 25sqm of vegetated habitat are removed, then a biodiversity net gain assessment will be required.

Proximity to Rochdale Canal SAC and SSSI.

Given the close proximity to this statutory protected site, Natural England should be consulted.

The only risk however would be run off from the site in to the canal and dust and air pollution during and post development, risk which I would regard as very low. I advise however that an assessment of the risk to the Rochdale Canal SAC and SSSI is provided as part of any application in order to remove any delays, should Natural England request such an assessment.

I would advise that a Tree Protection Plan is designed and implemented to protect the existing tree line along the adjacent railway.

United Utilities

No comments at the time of writing.

National Highways

The proposed development is in close proximity on the SRN and will have a demonstrable impact hence, we would like to see a transport assessment with the full planning application and an understanding of the impact to the A627(M) and if their traffic distribution is heading towards M62 J20 then an assessment of impact on J20 as well. We would welcome a pre-app discussion with the applicant if they would like to discuss it.

Greater Manchester Archaeological Advisory Service

Just as with a previous application at this site (16/00640/FUL) our records show that there is no archaeological interest within the proposal footprint. GMAAS will not be seeking archaeological mitigation for this scheme and no further archaeological assessment will be required with any forthcoming application.

Strategic Planning

No comments at the time of writing.

Environment Agency

We have identified constraints on this site that fall within the Environment Agency's remit. The Environment Agency now operates a chargeable service for planning advice and we would advise that you contact them to discuss.

Alternatively, the applicant/agent is welcome to contact us directly should they wish to request a free preliminary opinion.

Greater Manchester Police

As the original CIS report was prepared some 6 years ago, we would recommend that a new CIS is prepared to accompany the proposed planning submission. The applicant should visit www.designforsecurity.org or contact this office on 0161 856 1259 for more information regarding applying for CIS, fees and timescales

ANALYSIS

Principle of Development

The pre-application site is located within the defined urban area and a primary employment zone as allocated under the saved UDP allocations plan. Saved Policy EC/2 establishes that within primary employment zones development and change of use for industrial, business and warehouse uses will be permitted where the proposals:

- are of an appropriate scale and character to the area;
- will cause no unacceptable environmental or amenity problems; and
- will cause no unacceptable traffic problems.

Policy E2 of the adopted Core Strategy also ensures that there will be a sufficient supply of suitable land, buildings and infrastructure to support the creation and retention of successful businesses. Policy JP-J2 of PFE states 'a diverse range of employment sites and accessible premises, both new and second-hand, will be made available across the Plan area in terms of location, scale, type and cost' whilst Policy JP-J4 states 'industrial and warehousing accommodation is essential to a wide range of businesses across many economic sectors.....At least 3,513,000sqm of new, accessible, industrial and warehousing floorspace will be provided in the Plan area over the period 2022-2039'.

The site is located within an existing industrial/commercial area where there are a mixture of larger and smaller industrial units in close proximity. The site has also been previously granted planning permission for a similar development albeit this was only for a new building. Given the surrounding land uses and land allocation, it is considered that the principle of development is acceptable.

Policy EC/2 of the saved UDP, Policy E2 of the Core Strategy and Policies JP-J2 and JP-J4 of PFE and the NPPF apply.

Visual Amenity

Policy P1 of the Council's adopted Core Strategy seeks to require design which is of a high standard, demonstrating innovation and originality, and maximising the potential for heritage assets to provide a sense of place and image. Policies DM1 and P3 of the Council's adopted Core Strategy requires development proposals to adhere to high quality design and enhance the borough's identity and sense of place.

The pre-application proposes a new industrial building to the west of the site and an extension to an existing building in the centre of the site. The new building has now been amended in size and therefore this reduces the overall scale of the building although it is expected to be approximately 1m higher than the building previously approved. The proposed extension will increase the size of Building 2 however, this is set within the site and would offer opportunity for an improvement on the visual appearance of the existing building.

Details of the amendments to the south of the site to improve the access to the main entrance have not been provided and details of these will need to be submitted at

application stage however, it is not envisaged that these changes would be harmful to the character and appearance of the site or the surrounding area.

Any future planning application would need to provide a proposed section showing the new building in context with the neighbouring buildings however, an increase in height of 1m is unlikely to be detrimental to the existing character and appearance of the industrial area. The proposed buildings would be of typical industrial construction with materials to reflect/match existing adjacent buildings with standard profile sheeting for the roof and external walls with lower facing brickwork. No specific details on colours/specification have been provided but officers consider these can be secured by way of a condition at application stage.

It is noted that at the time of the previous permission a new residential development to the west/north-west of the site on the opposite side of the railway line was not under construction. The development is now under construction. As the railway line is located on an embankment, the increase in height and the existing tree cover is likely to screen the majority of the proposed building however, any future planning application will need to show these new dwellings on the Location Plan and the Proposed Block Plan.

Policies DM1, P1 and P3 of the Rochdale Core Strategy, Policies G/D/1 and EC/2 of the saved UDP and the NPPF apply.

Residential Amenity

Paragraph 135 of the National Planning Policy Framework advises that planning decisions should always seek to secure a good standard of amenity for all existing and future occupants of land and buildings. Policy DM1 of the Core Strategy requires that proposals do not adversely affect the amenity of residents or users through visual intrusion, overbearing impact, overshadowing or loss of privacy. Also, impacts including noise, air, dust, light and odour pollution are required to be mitigated where necessary. Further to the above are the considerations of the Councils Supplementary Planning Document (SPD) 'Guidelines and Standards for Residential Development' which states that new developments *'should be carefully designed to protect the amenity of the occupants of adjoining properties.'*

Although the pre-application site is located within an allocated employment zone there are residential properties to the west/north-west. There seems to be approximately 50m between these dwellings and the proposed buildings which officers consider is a sufficient distance to ensure there is no loss of privacy, overshadowing or overbearing effects from the development.

The neighbouring sites within the industrial estate will notice the additional height and depth of the proposed buildings however, due to the existing industrial nature of the site, this is considered to be an acceptable relationship.

The Council's Environmental Health Officer has reviewed the pre-application enquiry and raised no objection subject to the submission of a Noise Impact Assessment at the application stage to ensure the development does not have an adverse impact on existing noise sensitive receptors which would now include the neighbouring residential properties.

Policies G9 and DM1 of the adopted Core Strategy apply, the SPD and the NPPF apply.

Highways, Access and Parking

Policy T2 of the adopted Core Strategy is regarding improved accessibility and parking. Policy JP-C8 of PfE states 'we will require new development to be located and designed to enable and encourage walking, cycling and public transport use, to reduce the negative effects of car dependency, and help deliver high quality, attractive, liveable and sustainable environments'.

The Council's Highways Officer has reviewed the pre-application enquiry and raised no objection to the proposal subject to a parking strategy and a swept path analysis being submitted at the application stage. The Highways Officer has not been re-consulted on the amended scheme as it is felt that the above requirements would remain the same. The Highways Officer has also requested a financial contribution of £4,000 for the revision of traffic regulation orders (TRO) in the vicinity. Highways Officers have confirmed that there is currently parking issues on Gorrells Way which need addressing to ensure access remains clear. If the fee for the TRO is not required this will be refunded.

The amendments to the pre-application enquiry will require changes to the parking layout and any future planning application should demonstrate existing and proposed parking arrangements on Existing and Proposed Site Plans. It may be necessary to impose a condition restricting the use of the new building as ancillary to the main existing building, unless the additional information submitted with the full application clarifies there would be no highways safety impacts from the new building as a separate, individual use.

National Highways have also provided comments on the pre-application enquiry and have advised that the proposed development is in close proximity on the strategic road network (SRN) and will have a demonstrable impact on it. They have advised that any future planning application would be required to provide a Transport Assessment detailing the impact to the A627(M) and if traffic distribution is heading towards M62 J20, then an assessment of impact on J20 as well. It is noted that this was not required for the lapsed permission for the site and that National Highways did not object to the proposals as they accepted there would not be any significant impact. Any application should be supported by sufficient highways information to demonstrate the level of impact on the SRN.

Policies DM1 and T2 of the Rochdale Core Strategy and the NPPF apply.

Impact on Network Rail

Network Rail have provided detailed comments on the proposal and these have been sent to you under separate cover. Due to the proximity of the railway line to the proposed development contact should be made with Network Rail and any future planning application should provide the requested details. It is noted that Network Rail included a number of conditions which, if a planning application were submitted may be reasonably required. It is however noted that the revised proposals have now incorporated a stand-off distance from the Network Rail Assets and as such Network Rail may have reduced requirements subject to further detail in any supporting application.

Landscaping, Ecology and Impact upon Rochdale Canal

Policy LT/7 of the saved UDP states that development proposals will not be permitted that would adversely affect:

- a) The recreational value of the canal watercourse and towpath;
- b) The setting and visual amenity of the canal and its environs;
- c) The nature conservation value of the Canal (as a SSSI and SAC) consistent with policies NE/2 and NE/4; or

- d) The conservation of features of historic or archaeological importance within the canal setting.

The Rochdale Canal runs beyond the south of the site, close to the southern corner of the existing industrial building to the east of the site. Consultations have been carried out with the Council's Ecologist and the Environment Agency.

The Council's Ecologist has advised that given the proximity to the Rochdale Canal SAC and SSSI, Natural England should be consulted. Following our meeting I note that Ecological Surveys have been undertaken as a badger sett has been identified to the north of the site and these surveys should be provided at application stage. The Environment Agency and Natural England do not comment on pre-application enquiries from Local Planning Authorities and it is recommended that the applicant contact them directly.

However, given the proposed buildings would be located in the centre and far corner of the site and some distance away from the Canal, officers consider the impact on the Rochdale Canal would be minimised. Any application should set out mitigation measures such as the use of Construction Environmental Management Plans etc. to ensure impacts to the SAC/SSSI are negated and to remove any concerns that Natural England may raise through an application.

The amendments have introduced tree planting to the east of the site which is welcome and any future planning application should provide a Tree Protection Plan to protect the existing trees along the adjacent railway line along with a Landscaping Plan.

Policies DM1, G6 and G7 of the Core Strategy, Policy LT/7 of the saved UDP, Policies JP-G6, JP-G7 and JP-G8 of PfE and the NPPF apply.

Flood Risk & Drainage

Policy G8 of the Core Strategy sets out the Council's strategy for managing water resources and flood risk more effectively in the interests of public safety, protecting property and infrastructure and the conservation of the natural environment. Policy JP-S4 of PfE states 'an integrated catchment-based approach will be taken to protect the quantity and quality of water bodies with reference to the North West River Basin Management Plan and managing flood risk, by: 2) Working with natural processes and adopting a natural flood management approach to slow the speed of water drainage and intercept water pollutants'.

Any future planning application would need to provide a Drainage Strategy incorporating an assessment of the SuDS hierarchy and green surface based SuDS source control components such as detention basins, swale, tree pits, raingardens etc.

Policy G8 of the Rochdale Core Strategy, Policy EM/7 of the UDP, Policy JP-S4 of PfE and the NPPF apply.

Land Contamination and Stability

The NPPF and Policy G9 of the Rochdale Core Strategy states that the Council will ensure that any risks arising from contaminated land or land instability are identified, and that any appropriate actions to address these risks are taken, prior to development taking place.

The Council's Environmental Protection officer has been consulted and advised that a Preliminary Risk Assessment would be required should a planning application be submitted.

Policy G9 of the Rochdale Core Strategy and the NPPF apply.

Crime and Disorder

A Crime Impact Statement has been submitted with the pre-application enquiry which has been reviewed by Greater Manchester Police. As the CIS is dated from 8 years ago, GMP have recommended that a new CIS is prepared.

Planning Obligations

Taking the Council's Highway Officers comments above into consideration, development contributions in relation to the revision of traffic regulation orders would likely be required. Draft S106 Agreement Heads of Terms should be submitted with the application if this is the case.

Viability

The Council is mindful of the need to ensure that planning obligations do not undermine the viability and deliverability of any scheme, having regard to site specific requirements, whilst ensuring that the impacts of the development are adequately mitigated. In the event that the development is considered not to be viable in light of contribution requirements, the developer should provide a viability appraisal (which meets the requirements set out in the National Planning Practice Guidance) at application stage. The Council requires an independent review of viability appraisals, with the cost to be met by the applicant – if you require further information on this process or a fee quote please let me know.

Summary and Making an Application

The principle of development on the site is considered acceptable subject to any future planning application taking into consideration the comments and consultation responses noted above. It is acknowledged that additional information is required from that in the previous planning application however, as the application was approved 8 years ago, policy, guidance and regulations have changed over this time, and this is reflected in some of the consultee responses received.

Validation Requirements

The Council has adopted a [Local List | Rochdale Borough Council](#) which sets out the expectations of what supporting information should be submitted with a planning application. In respect of the proposed development, the following supporting information should be provided, at a minimum (scale bars on all drawings would be helpful and Do Not Scale disclaimers removed):

- Location Plan to scale 1:1250 showing the direction of north, with the application site clearly edged in red (and the new residential development to the west/north-west);
- Existing and Proposed site plans to scale 1:200/1:500 (showing car parking, bin and cycle storage and the new residential development to the west/north-west);
- Proposed Elevations in full to scale 1:100/1:50;
- Proposed Floor Plans in full to scale 1:100/1:50;

- Existing and Proposed Sections showing existing and proposed to scale 1:100/1:50;
- Compliance with National Information Requirements;
- Planning/Design & Access Statement;
- Transport Assessment/Statement to clarify anticipated traffic movements from the proposals and if/where significant movements/impacts are identified, this shall include the impact on the A627(M) and if traffic distribution is heading towards M62 J20 then an assessment of impact on J20 as well;
- Parking Strategy to demonstrate that adequate parking is available for the existing and proposed units;
- Swept path analysis for HGVs and a 25m turning circle marked onsite;
- Drainage Strategy incorporating assessment of the SuDS hierarchy;
- Details of the proposals impact on Network Rail assets in line with the provided consultation response;
- Noise Impact Assessment;
- Preliminary Risk Assessment;
- BNG Assessment and metric (if applicable);
- Assessment of the risk to the Rochdale Canal SAC and SSSI;
- Tree Protection Plan;
- Updated Crime Impact Statement;
-

Please note that any advice provided above is an informal opinion only and is made without prejudice to any formal determination which may be given in the event of an application being submitted. In particular, it does not constitute a formal decision of the Council with regard to any future planning applications, which will be subject to wider consultation and publicity, and provides no guarantee of a future decision.

I hope this is of assistance. However, if you have any questions or wish to discuss more detailed proposals prior to formal submission of an application then please do not hesitate to contact me using the details contained at the top of this letter.

Yours Sincerely,

C. Ringwood

**Claire Ringwood
Senior Planning Officer**