



PLANNING AND DESIGN & ACCESS STATEMENT (INCORPORATING PROTECTED OPEN LAND ASSESSMENT)

**In support of a planning application for the demolition of existing
buildings and the erection of 9 no. dwellings, including associated
landscaping and access**

at

**Ginnell Farm,
Broad Lane,
Rochdale,
OL16 4PU**

NORTHERN PLANNERS

APRIL 2025

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1 INTRODUCTION

1.1 This Statement has been prepared by Northern Planners in support of a full planning application for the demolition of existing buildings and the erection of 9 no. dwellings, including associated landscaping and access at Ginnell Farm, Broad Lane, Rochdale, OL16 4PU. It explains the proposal and its merits in relation to the premises and material planning issues.

1.2 This Statement should be read in conjunction with the following documents which support this Application:

- ✚ Planning Application Form;
- ✚ Location Plan;
- ✚ Existing Site Plan;
- ✚ Proposed Site Layout Plan (Block Plan)
- ✚ Proposed Site Layout Plan (Plot Layouts and Boundaries);
- ✚ Existing & Proposed Elevations;
- ✚ Existing & Proposed Floor Plans;
- ✚ Landscape Plan;
- ✚ Topographical Survey;
- ✚ Arboricultural Survey and Impact Assessment (including Tree Constraints Plan and Tree Protection Plan);
- ✚ Preliminary Ecological Assessment;
- ✚ Biodiversity Metric Report (including Statutory Metric Calculation Tool);
- ✚ Noise Assessment;
- ✚ Noise Technical Note;
- ✚ Air Quality Assessment;
- ✚ Contaminated Land Screening Assessment Form;
- ✚ Preliminary Environmental Risk Assessment submitted alongside LPA ref: 12/55581/OUT);
- ✚ Drainage Strategy; and
- ✚ Highway Access Appraisal.

2 THE SITE, ITS CONTEXT AND PLANNING HISTORY

The Site and its Context

- 2.1 Figure 1 below displays the site's location, whilst Appendix A provides photographs of the site and its immediate setting.
- 2.2 The application site, which is roughly rectangular in shape and 0.33ha in area, gently slopes downwards from south to north. The site comprises an existing residential property, which was a former agricultural holding. This includes six buildings.
- 2.3 The easternmost of these buildings is a residential bungalow, with an 'L-shape' layout and constructed from brick under a tile roof. To the south west of the bungalow is a single storey triple garage constructed from brick under a tile roof. To the north of the garage, and the west of the bungalow is a dilapidated outbuilding constructed from brick and timber under a corrugated roof (which once formed part of a larger agricultural building). To the south west corner of the site is a redundant (and dilapidated) agricultural building constructed from blockwork under a corrugated roof. There is a shed and greenhouse to the north west of the site.



Figure 1: Aerial View with Site Demarcated in Red

- 2.4 The site has an existing access from Broad Lane to the east of the site, and this access runs along the southern boundary of the site.
- 2.5 The site benefits from a generous garden area. The garden is overgrown at the time of writing and there are a number of trees on the site, with the majority of these being located towards

the north west of the site. A low post and rail fence borders the site along the eastern boundary, whilst a mixture of low post and rail fencing and close board fencing borders the northern boundary of the site.

- 2.6 Broad Lane (B6194) runs parallel to the eastern boundary of the site. A wooded Motorway (M62) embankment is located directly to the south of the site.
- 2.7 There are relatively new residential estates directly to the north, north west and west of the site. Ginnell Farm Avenue, which runs adjacent to the northern boundary of the site, serves the residential properties to the north west and west of the site, which mainly comprise of two storey detached and semi-detached dwellings, finished in brick under tile roofs.
- 2.8 The site is located to the south of Rochdale Town Centre. There are bus stops within very close proximity to the site on Broad Lane, which serve frequent services to Rochdale Town Centre, as well as the centre of Shaw.
- 2.9 The site is within land allocated as 'protected open land' within the Rochdale Borough Unitary Development Plan Proposals Map (see figure 2 below).



Figure 2: Extract of Rochdale Borough Unitary Development Plan Proposals Map with Site Roughly Demarcated in Red

- 2.10 The site is not within a conservation area, nor does it accommodate any listed buildings. The site is also not within close proximity to any conservation areas or listed buildings, with the nearest listed building being approximately 250 metres to the east, on the other side of the M62 Motorway (Brick-Built House at Chadwick Fold).

- 2.11 In terms of flood risk, Environment Agency flood risk mapping indicates that the entire site lies within Flood Zone 1 which represents a chance of flooding less than 0.1% in any given year. The site is at very low risk from surface water too. The site is also not within a 'Development High Risk Area' in relation to coal mining.

Planning History

- 2.12 Based on the information available online via Rochdale Borough Council planning application database, the following applications at the site have been identified below, with an analysis of the most noteworthy applications made further below:

- 90/D25146 – Residential Development – Withdrawn on 16th October 1992.
- 11/D54325 – Single Storey Rear Extension To Dwelling Including Formation Of Raised Decking And Access Ramp To West Side Of Extension – Withdrawn on 3rd June 2011.
- 11/D54765 – Single Storey Rear Extension To Dwelling Including Formation Of Raised Decking And Access Ramp To West Side Of Extension (Resubmission D54325) – Refused on 16th November 2011.
- 12/55581/OUT – Outline application for residential development including the construction of the access from Broad Lane. Appearance and landscaping, layout and scale reserved for subsequent approval (all matters reserved apart from access) – Refused by LPA, but Appeal Allowed on 29th May 2013.
- 13/01219/HOUS – Demolition of existing outbuilding and erection of detached garage block – Refused on 8th April 2014.
- 13/01220/HOUS – Single storey extension to north facing elevation of dwelling – Refused on 8th April 2014.
- 13/01261/ANM – Non material amendment under S96A of the Town and Country Planning Act 1990 to make a minor amendment to the approved parameters plan (ref: 473A-13C) (Condition 5) pursuant to planning permission 12/55581/OUT – Approved on 6th January 2014.
- 13/01339/REM – Application for reserved matters following outline permission 12/55581/OUT (for means of appearance, landscaping, layout and scale) for the erection of 110 dwellings and the diversion of footpaths MILFP 330 – Approved on 11th April 2014.
- 14/00903/VRCON – Application to vary condition 9 of planning permission 12/55581/OUT in respect of noise levels within gardens or outside space – Withdrawn on 30th September 2015.
- 14/01013/HOUS – Demolition of existing outbuilding and erection of detached garage block – resubmission – Approved on 7th October 2014.
- 14/01014/HOUS – Single storey extension to north facing elevation of dwelling (resubmission of 13/01220/HOUS) – Approved on 7th October 2014.
- 15/00571/AM – Minor material amendment to planning permission 13/01339/REM to facilitate the relocation of the electricity substation and amended layout of plots 29-34 – Withdrawn on 30th September 2015.

- 15/00714/ANM – Non-material amendment to planning permission 13/01339/REM to facilitate the relocation of the electricity substation – Approved on 1st July 2015.
- 16/00080/S106 – Application to modify the terms of the planning obligations contained within the Section 106 Agreement pursuant to outline planning permission 12/55581/OUT – Approved on 5th October 2016.

2.13 In 2014, two planning applications were submitted for householder development at Ginnell Farm (these being 13/01219/HOUS for the erection of a detached garage, and 13/01220/HOUS for a single storey extension to the bungalow). However, both applications were refused by the LPA on 8th April 2014. The reasons for refusal in both instances refer to the Protected Open Land allocation within the Rochdale Unitary Development Plan Proposals Map and that the proposals were contrary to the Unitary Development Plan policy relating to Protected Open Land (Policy D/10). This policy stipulates that development proposals will only be permitted where they would be acceptable in the Green Belt, and the LPA considered that the development would not meet such criteria.

2.14 These applications were refused after an outline application for residential development (12/55581/OUT), which included the planning application site, was allowed at appeal. The indicative layout displayed housing on the Ginnell Farm site as displayed in Figure 3 overleaf, as did the approved parameters plan under this application (see Figure 4). Whilst the LPA initially refused the application, the Protected Open Land allocation did not constitute part of the reasoning. This was due to a number of factors, including the lack of a five year housing land supply at the time, the site previously constituting allocated land, that such Protected Open Land is not intended to prevent development of land in perpetuity and that the land does not have any agricultural or recreational value, no wildlife interest or public access.

2.15 The Planning Inspector concurred with this conclusion regarding Protected Open Land, and stated the following:

“Where relevant policies are out of date (as I consider to be the case here) planning permission should be granted unless any adverse effects of doing so would significantly and demonstrably outweigh the benefits...”



Figure 3: Indicative Layout Plan submitted alongside LPA Ref: 12/55581/OUT



Figure 4: Approved Parameters Plan Under LPA Ref: 12/55581/OUT

2.16 Whilst a subsequent Non-Material Amendment application was submitted (13/01261/ANM) altering the parameter plan approved under 12/55581/OUT (resulting in the retention of Ginnell Farm), it is clear from the above that residential development at the site was considered acceptable in principle. Given the short timeframe since this outline planning permission, it is considered that this is a material planning consideration of significant weight in relation to the proposed residential development at this site.

- 2.17 Two further householder planning applications were submitted in 2014 (14/01013/HOUS and 14/01014/HOUS), following the refused applications for a garage and extension at Ginnell Farm. These householder applications were re-submissions of the aforementioned refused applications at the site (see paragraph 2.13), and in this instance were approved. Under these applications, the LPA gave consideration to the approved residential development referred to above (12/55581/OUT and the reserved matters application which followed, LPA Ref: 13/01339/REM) in their delegated reports. The delegated reports also outlined that consideration needed to be given to the intention/objectives of Policy D/10 (Protected Open Land) of the Unitary Development Plan. In addition, the delegated reports detailed that the Ginnell Farm site is entirely enclosed by development, and that the former open character that the property once had has been entirely lost. As a consequence, both delegated reports concluded the following:

“It is considered that the application site no longer achieves the roles (objectives) set down in the supporting text for policy D/10 and its intentions in protecting the countryside. Therefore, it is not considered that the proposed development would be at odds with policy D/10 which is recognised as being out-of-date in some respects.”

- 2.18 Following the approval of the above discussed applications, the Core Strategy was adopted (in October 2016). However, the site is still within allocated Protected Open Land, as the Unitary Development Plan still forms part of the Development Plan. Whilst Policy D/10 of the Unitary Development Plan has been saved, the Core Strategy introduced a further policy in relation to Protected Open Land, this being Policy G5 (Managing Protected Open Land). The wording of this policy and the text supporting it has some differences to that contained within saved Policy D/10 of the Unitary Development Plan. However, there are still considerable similarities in terms of the purpose/intention of both these policies when analysing the supporting text (i.e. to safeguard land for development, to preserve the open character, and a green infrastructure resource). Given this, it is considered that the aforementioned applications are material considerations of great weight when considering residential development on this site.
- 2.19 The following developments approved after the adoption of the Core Strategy and located within Protected Open Land allocations are also considered relevant to the assessment of this planning application request:
- 17/00968/FUL – Land At Dean Farm, Badger Lane, Rochdale, OL16 4RQ – Erection of 58 residential dwellings including access, landscaping and associated works – Approved on 21st December 2021.
 - 18/00869/FUL – Land South Of Langley Lane And West Of Silver Birch Stables, Birch, Middleton – Residential development: erection of 23 dwellings and provision of access from Langley Lane, with associated hard and soft landscaping; retaining walls; pumping station; and, other associated works – Approved on 20th September 2022.
- 2.20 Furthermore, pre-application advice has recently been sought for residential development at this site (LPA reference: PREAPP/00015/24) and the LPA provided a written response on 6th

August 2024 (see Appendix B). Where relevant, the responses contained in the LPA's pre-application letter are referenced further in the Assessment section of this Statement. Nonetheless, the pre-application response from the LPA provides the following summary:

"Overall the proposals would appear to be acceptable in principle, and subject to further detailed design work and some relatively minor changes to the layout, alongside submission of the identified package of supporting documents, it is not considered that there would be technical barriers to the development of the site."

2.21 Thus, the LPA considers that the principle of residential development at the site is acceptable.

3 THE PROPOSAL (DETAILING MATTERS OF DESIGN AND ACCESS)

- 3.1 The proposed development comprises the demolition of the existing buildings and the erection of 9 no. dwellings, including associated landscaping and access. The proposal is illustrated in detail on the plans submitted with the application.
- 3.2 The application comprises two rows of dwellings, following a relatively similar building line to the dwellings to the west of the site. 3 no. dwellings are proposed on the northern row (Plots 1-3), which front Ginnell Farm Avenue, whilst 6 no. dwellings are proposed on the southern row (Plots 4-9) and will face a reconfigured and widened access track running adjacent to the south of the site, which is to be accessed via an existing access off Broad Lane to the east. The access off Broad Lane is proposed to be widened.
- 3.3 8 no. semi-detached dwellings are proposed overall, whilst the other dwelling will be detached. All dwellings will be 2 storey in height.
- 3.4 Plot 1 comprises the most north westerly dwelling, which is proposed to be detached. This 4 no. bedroom dwelling will be set back from Ginnell Farm Avenue. The dwelling will have an 'L' shape footprint, with a gable projecting to the front. A one and a half storey element will extend from the west side of the main body of the building, and will accommodate a garage at ground floor level. A flat canopy roof will be sited over the main entrance of this dwelling.
- 3.5 Plots 2 and 3, and 4 and 5, will consist of a semi-detached building of similar design. Plots 2 and 3 will be to the north of the site (directly to the east of Plot 1), whilst Plots 4 and 5 will be the most south easterly of the dwellings on the site. Each of these dwellings will comprise of 3 no. bedrooms. The dwellings at Plots 2 and 5 will have gable frontages, but will be accessed externally from the side elevations, whilst the dwellings at Plots 3 and 4 will be set slightly back from the front wall of the neighbouring dwellings they will be attached to and will have a gable side elevation. Flat canopy roofs will be sited over the main entrances of these dwellings.
- 3.6 Plots 6 and 7, to the south of the site, will comprise a semi-detached building with a rectangular footprint and a gabled roof (with gabled side elevations). Both dwellings will comprise 3 no. bedrooms. Flat canopy roofs will be sited over the main entrances to these dwellings (at the front).
- 3.7 Plots 8 and 9, which are the most south westerly on the site, will also consist of a semi-detached building with a rectangular footprint and a gabled roof (with gabled side elevations). Both dwellings will comprise 3 no. bedrooms. Flat canopy roofs will be sited over the main entrances to the front dwellings (at the front).
- 3.8 The dwellings are all proposed to be constructed from red brick under concrete tile roofs. As per the elevations, brick detailing will be incorporated into the design of the dwellings. The windows are proposed to be uPVC, in a dark grey colour.

- 3.9 The 3 no. proposed properties to the north of the site will have their own private driveways, all being accessible off Ginnell Farm Avenue. Plots 4-6 and 8-9 to the south of the site will have private parking areas to the side of these respective dwellings, which will be accessed off the reconfigured access road to the south of the site. Parking for Plot 7 will be beyond the rear wall of Plot 7 and accessible from the refuse turning aspect of the southern access road into the site. Each driveway will be able to serve off-street parking for two cars (and as noted, the dwelling at Plot 1 also includes a garage for vehicles). At the south west of the site, on the south side of the proposed access road into site, 2 no. visitor parking spaces are also proposed. As alluded to above, a turning head for a refuse vehicle is proposed to the south of the site.
- 3.10 Each property will benefit from a good-sized private rear garden. All properties will benefit from soft landscaped amenity areas to the front too, apart from Plots 8-9, which will front a pavement.
- 3.11 Appropriate boundary treatment is to be utilised, with low means of enclosure to the front of dwellings and fencing at a height of 1.8m between the properties at the rear. Areas to store bins are proposed at accessible locations away from site frontages, and bins can be easily moved by occupiers at the day of collection. A 3.5 metre high acoustic barrier is proposed along the southern boundary of the site, whilst 2.4 metre high fencing is proposed to the eastern side of Plot 4.
- 3.12 A landscaping plan has been submitted alongside the application. Mixed scrub planting and individual tree planting is proposed to the north east and south of the site. Proposed native hedgerow planting to the east of the site will soften the development, including fencing from Broad Lane. Proposed native hedgerow planting along the southern boundary of the site, along with individual trees, will help to screen the proposed acoustic barrier to the south of the site. It is also proposed to plant trees within the private gardens.

4 PLANNING POLICY

4.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that all applications are to be determined in accordance with the Development Plan unless there are material considerations that indicate otherwise. Rochdale Borough Council's Development Plan comprises the following:

- Adopted Rochdale Core Strategy (adopted 2016).
- Rochdale Borough Unitary Development Plan (UDP) and Policies (including Maps) (adopted 2006).
- Places for Everyone Joint Development Plan (adopted on 21st March 2024).

4.2 An Allocations Plan Development Plan Document (DPD) was to replace the UDP when adopted, but the Allocations Plan DPD was not fully progressed due to the adoption of the Place for Everyone Joint Development Plan on March 2024.

4.3 The NPPF and the associated national Planning Practice Guidance (PPG) are material considerations.

4.4 In addition to the above, Rochdale Borough Council has a number of adopted Supplementary Planning Documents (SPDs) which are material considerations, including:

- Guidelines and Standards for Residential Development (June 2016);
- Provision of Recreational Open Space in New Housing SPD (Updated January 2017);
- Oldham and Rochdale Residential Design Guide (September 2007);
- Biodiversity and Development SPD;
- Climate Change Adaptation SPD;
- Design & Planning Process SPD;
- Residential Design Guide SPD; and
- Urban Design Guide SPD.

4.5 The Development Plan documents and policies considered relevant to this application are outlined below:

Adopted Rochdale Core Strategy (CS)

- SP2 – The Spatial Strategy for the borough.
- C1 – Delivering the right amount of housing in the right places.
- C3 – Delivering the right type of housing.
- C4 – Providing affordable housing.
- C6 – Improving health and well-being.

- C8 – Improving community, sport, leisure and cultural facilities.
- P1 – Improving image.
- P2 – Protecting and enhancing character, landscape and heritage.
- P3 – Improving design of new development.
- 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.
- G10 – Managing mineral resources.
- G11 – Managing waste.
- T2 – Improving accessibility.
- DM1 – General development requirements.
- DM2 – Delivering planning contributions and infrastructure.
- SD1 – Delivering sustainable development.

Rochdale Borough Unitary Development Plan (UDP) and Policies (including Maps)

- G/D/1 – Defined Urban Area.
- D/10 – Protected Open Land.
- EM/7 – Development and Flood Risk.
- EM/8 – Protection of Surface and Ground Water.
- G/M/1 – Protection and Prudent Use of Resources.

Places for Everyone (PfE)

- JP-Strat6 – Northern Competitiveness.
- JP-S1 – Sustainable Development.
- JP-S2 – Carbon and Energy.
- JP-S4 – Flood Risk and the Water Environment.
- JP-S5 – Clean Air.
- JP-S6 – Resource Efficiency.
- JP-H1 – Scale, Distribution and Phasing of New Housing Development.
- JP-H2 – Affordability of New Housing.
- JP-H3 – Type, Size and Design of New Housing.

- JP-H4 – Density of New Housing.
- JP-P1 – Sustainable Places.
- JP-P2 – Heritage.
- JP-G7 – Trees and Woodland.
- JP-G8 – A New Enhancement of Biodiversity and Geodiversity.
- JP-C8 – Transport Requirements of New Development.

- 4.6 In national policy terms, the latest NPPF was published in December 2024. It sets out the Government's planning policies for England and how these are expected to be applied. At its heart is a presumption in favour of sustainable development.
- 4.7 Paragraph 11 of the NPPF states that decisions should apply a presumption in favour of sustainable development and development proposals should be approved if they accord with the local Development Plan.
- 4.8 Section 5 of the NPPF relates to 'delivering a sufficient supply of homes'. Of note, Paragraph 61 states that to support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay. Paragraph 70 of the NPPF recognises that: *'small and medium sized sites can make an important contribution to meeting the housing requirement of an area'*. Paragraph 73 goes on to outline small and medium sites can make an important contribution to meeting the housing requirement of an area, are essential for Small and Medium Enterprise housebuilders to deliver new homes, and are often built-out relatively quickly. Paragraph 73 then states that to promote the development of a good mix of sites, LPAs should support the development of windfall sites through their policies and decisions, giving great weight to the benefits of using suitable sites within existing settlements for homes.
- 4.9 Section 9 of the NPPF relates to promoting sustainable transport. Paragraph 116 outlines that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highways safety, or the residual cumulative impacts on the road network would be severe.
- 4.10 Section 11 of the NPPF sets out that planning decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Paragraph 125 states that planning decisions should promote and support the development of under-utilised land.
- 4.11 The Government also seeks to secure well-designed places in Section 12 of the NPPF. Paragraph 131 of the NPPF emphasises how good design is a key aspect of sustainable

development. Paragraph 135 makes clear that developments should be sympathetic to the local character and history, function well and add to the overall quality of an area. Paragraph 139 goes on to state that development that is not well designed should be refused, especially where it fails to reflect local design policies and Government guidance on design (i.e. the National Design Guide and the National Model Design Code).

- 4.12 Section 14 of the NPPF details that the planning system should support the transition to net zero by 2050 and take full account of all climate impacts including overheating, water scarcity, storm and flood risks and coastal change. Paragraph 164 notes that new development should be planned in ways that can help reduce greenhouse gas emissions, such through its location, orientation and design. Paragraphs 170-182 of the NPPF set out guidance on the location of development with respect to areas at risk of flooding. The Framework outlines 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).
- 4.13 Section 15 of the NPPF seeks to conserve and enhance the natural environment. Paragraph 180 states that planning decisions should, amongst other things, protect and enhance valued landscapes and minimise impacts on and provide net gains for biodiversity.
- 4.14 The PPG supports the NPPF with regards to how the NPPF should be implemented in practice and is a material consideration in the decision-making process.

5 PLANNING APPRAISAL

The Principle of Development/Protected Open Land Assessment

- 5.1 Policy C1 of the adopted Rochdale CS states that at least 460 additional dwellings per annum are to be delivered in the Borough in the period 2012-2028. The text supporting this policy outlines that this is a challenging target and *'not a ceiling and therefore may be exceeded provided that it is sustainable, it can be supported by existing or new infrastructure and it meets the Council's priorities'*.
- 5.2 This CS policy sets out that the plan seeks to ensure the focus is on maximising the use of brownfield sites, but that the development of greenfield sites may be necessary and accepted, specifically where it is demonstrated that the development would have a limited adverse impact on green infrastructure or amenity value in and around the site; and green infrastructure is, wherever possible, incorporated into the scheme.
- 5.3 Policy C1 also outlines that it should be ensured that sites are sustainable with good access to local services, facilities, green infrastructure, shops, jobs, schools and public transport.
- 5.4 However, the housing supply requirement set out in Policy C1 of the CS is now out of date. This has been superseded by the adopted PfE document. Therefore, regard needs to be given to the more recent housing need figures contained within the PfE document which was adopted on 21st March 2024. This indicates a housing requirement in the Rochdale Borough of 616 dwellings per annum over the period 2022-2039. This annual requirement is notably higher than the Core Strategy requirement (460 dpa), as well as the current local housing needs figure (520 dpa) as outlined in the latest Strategic Housing Land Availability Assessment (March 2024). Given this, it is considered that a significant uplift in housing delivery is required on sustainable sites in the Borough in order to make an important contribution to the Borough's deliverable housing supply and meet the needs identified within the PfE document.
- 5.5 Saved UDP Policy G/D/1 establishes that new development, wherever possible and appropriate, should be concentrated within the urban area in order to support urban regeneration and to protect the countryside.
- 5.6 The site is identified as being within the 'Northern Areas' of Greater Manchester in the PfE document. Policy JP-Strat6 states that a significant increase in the competitiveness of the northern areas will be sought. There will be a strong focus on making as much use as possible of suitable previously developed (brownfield) land through urban regeneration, enhancing the role of the town centres and diversifying the residential offer.
- 5.7 Policy C3 of the CS relates to delivering the right type of housing, and states that new development must take into account local needs and aspirations of the Borough. It outlines a number of measures to do this, including ensuring that the supply of larger, high value housing is improved.

- 5.8 As alluded to, the site is within land allocated as 'Protected Open Land'. Together, Core Strategy Policy G5 and saved UDP Policy D/10 provide the policy context for considering proposals which involve development on Protected Open Land. Neither policy explicitly prevents the development of Protected Open Land; however, they do set out a number of criteria that must be met. The LPA pre-application response for residential development at this site (PREAPP/00015/24) stated Policy G5 remains relatively consistent with the NPPF but it is considered that elements go further in their restriction of development which may somewhat limit the full weight being given to such policies.
- 5.9 Policy G5 of the Core Strategy sets out that in relation to development on Protected Open Land:

"2. Development in Protected Open Land

- a) "Development on open land outside the urban area and not in the green belt will be resisted unless: it is limited development that would be acceptable were it in the green belt; or*
- b) it is small scale development which is consistent with other detailed policies and site allocations in the Local Development Plan; or*
- c) it satisfies 3 below.*

3. Release of Protected Open Land

Protected Open Land will not be released for development unless all the following apply:

- a) there is evidence that the development is needed and that 'urban' brownfied and greenfield sites are not available to meet those needs;*
- b) the location of the site is sustainable and is in accordance with the overall Spatial Strategy;*
- c) the development does not undermine the delivery of other currently allocated sites or key regeneration priorities and can help to deliver wider regeneration;*
- d) development could be accommodated without an unacceptable impact on the area's landscape, biodiversity or wider green infrastructure value;*
- e) there is evidence that the land is physically suitable for the scale and type of development proposed; and*
- f) the development and supporting infrastructure is capable of being delivered.*

Where the release of protected open land can be justified, the Council will seek to identify it as an allocation in a future DPD. Any proposals that come forward would need to:

- g) involve a comprehensive scheme for the delivery of the development, transport and other necessary infrastructure to serve the development; and*

h) identify measures to address environmental impacts and where possible provide local benefits.”

5.10 The text supporting Policy G5 of the Core Strategy outlines that such sites are protected for their amenity value and in recognition of the need to focus development and regeneration within the urban area and on brownfield sites. The text notes that whilst some protected areas have intrinsic open land value, not all provide a vital green infrastructure resource. Some therefore provide a potential resource and flexibility to meet future development needs which cannot be met in urban areas or on previously developed land. It goes on to state that Protected Open Land should not be released for development unless the need to do so can be justified, that the site is in a sustainable location, and that it does not harm important landscapes or green features or local residential amenity.

5.11 Further to this, and as noted, saved Policy D/10 of the UDP relates to Protected Open Land. This is a permissive policy rather than framed to specify the form of development that will be restricted. It states that development will be permitted if it falls within one or more of the following categories:

- a) Development which would be acceptable were it in the Green Belt; or
- b) Limited infilling within an established pocket of housing or industry where this is in scale with the area and will not adversely affect its character or surroundings; or
- c) A limited extension to an existing building which:
 - (i) Forms part of an existing source of employment; or
 - (ii) Is necessary for the establishment of a new enterprise or business which satisfies other policies of the Plan; and
 - (iii) Is sited within the existing curtilage of the business concerned and will not adversely affect the character of the surrounding land and its openness.

5.12 Saved Policy D/10 goes on to state:

“Where new buildings are permitted, they should be sited to form a group with existing buildings. Where this is not possible, buildings, car parking areas and other new structures, should be sited where they will be well screened and unobtrusive in the landscape. All buildings and extensions should be of a high standard of design, using materials that are compatible with the landscape, and should not detract from the visual amenity and environment of adjacent Green Belt.”

5.13 The text supporting this saved policy outlines the purpose of such a policy, and this is very similar to the objectives of Policy G5 of the Core Strategy.

5.14 As referred to above in the planning history section, outline planning permission has been granted for housing on this site, as part of a larger housing development under LPA Ref: 12/55581/OUT. Whilst this section of land was not developed, this previous permission for residential development is a material consideration of significant weight. It is worth noting

that this application for residential development was considered acceptable only 10 years ago and that the policy context is not considered to have materially changed given the similarities between Policy G5 of the Core Strategy and saved Policy D/10 of the UDP (especially with regard to their purposes). As such, the principle of residential development at the site is considered acceptable.

- 5.15 In addition to this, CS Policy G5 sets out the broad areas where Protected Open Land will continue to protect land from development, which does not include the area in which the site lies.
- 5.16 It is also important to consider the intentions/objectives of these policies relating to Protected Open Land. The Ginnell Farm site once comprised part of a much larger Protected Open Land allocation, but this open space substantially decreased with the construction of residential development directly to the north, north west and west of the site. In other words, the development of the surrounding residential area in the years since the UDP boundaries were drawn has clearly altered the character of the site in a substantial and permanent manner. This has ultimately left a small parcel of land on the north side of the M62, this being Ginnell Farm, as Protected Open Land. This is virtually fully enclosed by development now, and therefore no longer fulfils the role of acting as Protected Open Land between the settlement and the Green Belt.
- 5.17 Further to this, the site itself includes residential development with dilapidated buildings (it is no longer an agricultural holding) and does not provide a vital green infrastructure resource. Given this, it is considered that the site no longer achieves the roles set down in the supporting text for these policies and their intentions in protecting the countryside. As stated in the pre-application response from the LPA relating to this site (PREAPP/00015/24):
- “This enclosure [of the site], combined with the existing development onsite, means that the site is read entirely as forming part of the existing urban area.”*
- 5.18 Permitted development rights are also intact at the site which means further development could be constructed without the requirement of planning permission.
- 5.19 Given the above factors, the principle of residential development at the site is considered acceptable.
- 5.20 In their pre-application response (PREAPP/00015/24), the LPA concluded that the Protected Open Land designation at this site can be afforded very limited weight in relation to this specific site. As a consequence, the LPA noted that it would be disproportionate to apply the full criteria of Policy G5 of the CS in assessing the proposal. Nonetheless, the LPA stated in their pre-application response that it is still considered that residential development within the site would be capable of demonstrating compliance with the criteria set out within section 3 of Policy G5 of the CS (and by virtue of being compliant with criteria in section 3, it is compliant with Section 2 of Policy G5).

- 5.21 The Statement will briefly assess the proposal against criteria 3 of Policy G5 of the CS below, and this demonstrates that the LPA are correct in their pre-application response that there is compliance with criteria in section 3 within Policy G5 in this case.

Criteria A – There is evidence the development is needed and urban brownfield land and greenfield sites are unavailable

- 5.22 It is acknowledged that the latest published information by Rochdale Council suggests that the Council can demonstrate a five-year supply of housing land based on the Core Strategy target. However, a five-year housing land supply does not preclude the delivery of additional housing, particularly on small-medium sized windfall sites such as this, which were not considered for allocations within PfE. National Policy also outlines the need for boosting housing in urban areas.
- 5.23 The latest version of the NPPF places even greater emphasis on delivering housing. Of note, it contains revisions with regard to protecting Green Belt land from development where it does not contribute to the purposes of the Green Belt. Whilst the site is not within the Green Belt, the wording and objectives of Policy G5 of the CS and Policy C/10 of the UDP clearly demonstrate the changes to the NPPF are a significant material consideration. This was a point raised by the LPA in their pre-application response.
- 5.24 In addition, regard needs be given to the more recent housing need figures contained within the adopted PfE document which indicates a housing requirement in the Rochdale Borough of 616 dwellings per annum over the period 2021-2037. This annual requirement is notably higher than the previous Core Strategy requirement (460 dpa). Given this, it is considered that a significant uplift in housing delivery is required on sustainable sites in the Borough (such as this) in order to make an important contribution to the Borough's deliverable housing supply and meet the needs identified within the PfE document.
- 5.25 In terms of the availability of other brownfield sites, viability on such sites is likely to be marginal at best especially with regard to the additional constraints of such land (for example, they may have high clearance and remediation costs). Given this, it is likely that additional greenfield sites beyond the existing urban area will be required to help meet identified needs.
- 5.26 In addition, regard is had to LPA Ref: 18/00869/FUL, where residential development was approved in 2022 on Protected Open Land. The committee report outlined that the Council is actively trying to increase the number of higher value homes in the Borough (referencing Policy C3 of the CS), and that such a site was more capable to deliver such housing than 'more challenging' urban sites. The committee report concluded that:

"Given the Council objective of increasing the amount of higher value homes and the fact that this site may be capable of delivering such housing it is considered that criterion (a) of policy G5 has been met since 'urban' brownfield and greenfield sites are not available to meet those needs."

- 5.27 This proposal at Ginnell Farm will accommodate higher value homes to address these housing needs of the Council.

Criteria B – The location of the site is sustainable and is in accordance with the overall Spatial Strategy

- 5.28 The principle of residential development at the site has already been accepted with the approval of LPA Ref: 12/55581/OUT. This outlines the site is considered to be within a sustainable location. Of particular note, the committee report for this application stated the following: ‘*the site is in a sustainable location with good access to shops, services and public transport*’. It is the case that the site is adjacent to an existing housing development and is within extremely close proximity to bus stops with frequent services to Rochdale Town Centre and Shaw.
- 5.29 With regard to the overall Spatial Strategy, Policy SP2 of the Core Strategy seeks to focus the majority of new development (including housing) over the plan period in the south of the Borough (the Manchester Fringe) as there is good access to existing facilities and infrastructure, the motorway corridor, public transport facilities and the wider Greater Manchester city region. As the site is located to the South of the Borough (in the Manchester Fringe) and adjacent to a growth corridor, it is considered that the proposal is in accordance with the overall Spatial Strategy.

Criteria C – The development does not undermine the delivery of other currently allocated sites or key regeneration priorities and can help to deliver wider regeneration

- 5.30 The Core Strategy did not allocate sites for residential development. The UDP did allocate a number of small sites which were expected to provide approximately 480 dwellings. Given that this plan was adopted in 2006, if these allocated sites have not been developed by now then it is unlikely they will be in the near future. Saved Policy H/2 of the UDP outlines key regeneration priorities, but these will be unaffected by the proposed development given their aims. The PfE document includes a number of allocated sites within the Rochdale Borough, but these are some distance away from the site itself. Further to this, the quantum of development proposed is low, therefore this will not undermine the delivery of allocated sites or existing regeneration priorities.
- 5.31 Additional housing, which is proposed, will also help support and sustain the local economy.

Criteria D – Development could be accommodated without an unacceptable impact on the area’s landscape, biodiversity or wider green infrastructure value

- 5.32 The site is virtually fully enclosed by development, with housing to the north, north west and west, the M62 Motorway to the south, and housing and Kingsway Business Centre Park to the north east. The site is relatively small and also accommodates development, including a number of dilapidated structures. Given this, it is considered and development on the site will have a negligible impact upon the landscape.

- 5.33 In terms of biodiversity, the site is not within close proximity to any designated sites and as noted in the Preliminary Ecological Appraisal (PEA), these are not anticipated to be directly impacted by the proposed development. As outlined in the PEA, all habitats of principal importance are situated upwards of 300m from the site, with no direct impacts anticipated. Whilst habitats are proposed to be removed as a result of the development, the PEA states that most habitats on site are considered to be of 'low' distinctiveness. Whilst mixed scrub and other broadleaved woodland on the site is of 'medium' distinctiveness, this is proposed to be compensated for and biodiversity net gain will be secured (with units secured on and off site). Given the above, and the surrounding land uses, it is considered that the impacts on biodiversity and the wider green infrastructure value will be negligible.

Criteria E – There is evidence that the land is physically suitable for the scale and type of development proposed

- 5.34 This site already accommodates built development, including residential buildings. It is also surrounded by residential development and permission has been granted for residential development at this site under LPA Ref: 12/55581/OUT. In addition, it is important to stress that the site was part of a larger site that was considered suitable and appropriate for residential development through its allocation for residential development in the 1999 UDP. It is therefore considered that the site is clearly capable of accommodating residential development. The density of the development will be very much in keeping with the residential development directly to the west of the site.

Criteria F – The development and supporting infrastructure is capable of being delivered

- 5.35 There are no site constraints which mean that residential development could not be delivered at the site. As noted, the site already accommodates residential development, it has been previously permitted for residential development (LPA: 12/55581/OUT), it has been allocated for residential development previously and it is adjacent to residential development to the north, north west and west.
- 5.36 Given the above, the proposed development is in accordance with each of the six criteria under Policy G5 of the Core Strategy. The principle of residential development at the site is therefore acceptable. However, it is acknowledged that the acceptability of the proposal is also dependent on a number of other considerations, which the Statement will go on to discuss below.

Affordable Housing

- 5.37 Policy C4 of the CS states that the Council will seek affordable housing on all developments of 15 dwellings or more. It is sought to develop 9 no. dwellings at the site therefore there is no requirement for affordable housing in this instance.

Housing Mix & Density

- 5.38 Policy C3 of the CS states that the Council will deliver the right type of homes, well designed and built to appropriate densities, to meet the overall needs and aspirations of the Borough. Policy JP-H3 of the PfE document also states that development across the plan area should seek to incorporate a range of dwelling types and sizes, and that residential developments should provide an appropriate mix of dwelling types and sizes reflecting local plan policies.
- 5.39 Of particular note, Policy C3 of the CS states in the Manchester fringe, in the south of the Borough, (which this site is identified as being within in the CS), there will be a focus on widening housing choice and delivering housing that better suits the needs of existing and future residents. Policy C3 also states that to meet the overall needs and aspirations of the Borough the Council will ensure that the supply of larger and higher value housing in the Borough is improved.
- 5.40 Policy JP-H3 of the PfE document states that development across the plan area should seek to incorporate a range of dwelling types and sizes. It goes on to state that residential developments should provide an appropriate mix of dwelling types and sizes reflecting local plan policies.
- 5.41 Policy JP-H4 of the PfE document notes that new housing should be delivered at a density appropriate to the location, reflecting the relative accessibility of the site by walking, cycling and public transport and the need to achieve efficient use of land and high-quality design. Policy JP-H4 also outlines that development in this location should seek to achieve a minimum net residential density of 35 dwellings per hectare, unless there are site specific issues as to why this cannot be provided (e.g. design context) or there are local housing market issues as to why this cannot be delivered.
- 5.42 The application site is 0.33 hectare, and with reference to the PfE density figures contained in Policy JP-H4, the starting point should be to achieve at least 10-11 dwellings on this site. 9.no dwellings are proposed on this site, which will be slightly under the desired density levels set out in Policy JP-H3 of the PfE document. However, given the site circumstances, it is considered that further dwellings at the site would result in a contrived development. For instance:
- Regard is required to achieving acceptable separation distances from existing dwellings, as well as achieving acceptable separation distances between proposed dwellings on the site, to ensure a good standard of amenity for existing and future occupiers.
 - Compliance with the Nationally Described Space Standards are required.
 - Space is required to ensure that each property benefits from a good standard of private external amenity space.
 - As tree removal and loss of habitat is unavoidable, space is required on site to provide compensatory planting and habitat in line with national and local policy.

- Noise mitigation measures are required on site to achieve the acceptable levels as set out by the Council's Environmental Health Officer, and this includes acoustic fencing, whilst also ensuring that such measures do not appear visually obtrusive.
 - Adequate space is required on site to achieve suitable on-site parking for each property, as well as space for turning and manoeuvring to the south of the site for a refuse vehicle.
 - There is adequate space on site to allow for a workable surface water drainage solution in accordance with the SuDS hierarchy.
- 5.43 In line with Policy C3 of the CS, and as alluded to above, the proposal will provide high value housing thereby meeting local needs, and as discussed in greater detail below in the residential amenity subsection, the development will comfortably comply with the NDSS.
- 5.44 Given the above, the development is in accordance with Policy C3 of the CS and Policies JP-H3 and JP-H4 of the PfE document.

Design and Impact on the Character and Appearance of the Area

- 5.45 Policy DM1 of the CS 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, as well as incorporate high quality landscape schemes (where appropriate).
- 5.46 Policy P1 of the CS also outlines that the Council will require high quality design in all new developments. This policy states the Council will ensure new development improves the image of the Borough by:
- Requiring design which is of a high standard, demonstrating innovation and originality.
 - Helping to 'green' the urban environment, for example by securing trees on sites.
 - Promoting the development and re-use of under-used land and buildings.
- 5.47 Policy P2 of the CS notes that the Council will protect and enhance the Borough's character, the distinctiveness of its town centres, housing areas and countryside, and the qualities of its landscapes, utilising the considerable potential of these assets in development and regeneration schemes.
- 5.48 In addition, Policy P3 of the CS outlines that the Council will require all new developments, including associated landscaping, regardless of location in the Borough, to adhere to high standards of design. This policy then goes on to list design principles to adhere to (where relevant), including:

- Enhance the Borough’s identity and sense of place, by respecting context where it is positive and having regard to the scale, density, massing, height, layout, landscape, materials and access of surrounding buildings and areas in general.
 - Ensure that buildings contribute positively to the townscape, and are well proportioned.
 - Reduce the monotony and visual impact of car parking areas by using substantial and well-integrated landscaping.
- 5.49 Policy JP-P1 of the PfE document states development should, wherever appropriate, be consistent with distinctive places with a clear identity that respects and acknowledges the character and identity of the locality in terms of design, siting, size, scale and materials used.
- 5.50 In terms of the proposed layout of the proposed development, this recognises the existing residential development immediately to the west of the site by virtue of continuing the two rows of dwellings with a relatively similar building line. Such a layout is considered to sympathetically integrate with existing built development. It is noted that at the pre-application stage (LPA ref: PREAPP/00015/25), a fairly similar concept for the layout was proposed and the LPA advised that this was acceptable and a continuation of a block form was a logical extension of the adjacent site.
- 5.51 The layout of the development allows for each dwelling to benefit from good sized rear gardens and sufficient parking, whilst not being over-dominated by hard-landscaping therefore the development will sit within the site comfortably.
- 5.52 In terms of the scale of the dwellings, the dwellings are to be two storeys in height to respect the scale of the housing adjacent the site to the north, north west and west. The footprint of these dwellings will also be relatively similar to the existing dwellings immediately to the west of the site.
- 5.53 Different house types are proposed to add visual interest, but the buildings will clearly read as part of the same development, and will not appear substantially different to the dwellings to the west of the site so as to sympathetically integrate with this development. The form of each building will also not be overly-complicated and will be broadly in-keeping with the form of the existing residential buildings in the immediate vicinity.
- 5.54 In terms of finishing materials, the red brick and concrete roof tiles proposed will respond to the materials used within the immediate locality (noting that red and orange brick are the predominant finishing materials used for external walls and concrete tiles are the predominant roofing material). Brick detailing and uPVC glazed paneling is proposed to add further visual interest to these dwellings.
- 5.55 A detailed Landscaping plan has been submitted alongside this application.
- 5.56 As outlined above, each dwelling will benefit from good sized private gardens. Gardens are also proposed to the front of the northerly dwellings (Plots 1-3), which will be in keeping with the neighbouring dwellings to the west on Ginnell Farm Avenue, and this will provide a soft

frontage to these buildings along this main road into a housing estate. Soft landscaping is also proposed to the fronts of Plots 4-7 at the south.

- 5.57 Means of enclosure at 1.8m in height and bin storage areas will be sited away from site frontages so they are unobtrusive elements of the development. In addition, there is suitable access from bin storage areas to allow for bin collection.
- 5.58 A 2.4m high acoustic fence is proposed to the east of Plot 4, but this fence and other fencing to the east of the site is set back from Broad Lane and will be softened with planting, including a proposed native hedgerow.
- 5.59 A 3.5m high acoustic fence is also proposed along the southern boundary of the site. However, this will be screened from dwellings within the application site by proposed planting, including a native hedgerow (in accordance with pre-application advice).
- 5.60 Tree planting is proposed throughout the site. The undeveloped north eastern part and the undeveloped south strip of the site will see proposed mixed scrub planting and individual trees.
- 5.61 Whilst the access off Broad Lane is to be widened and the access lane from this to the south of the site is to be reconfigured to accommodate the development, the overall development will not appear as one which is over-dominated by hard-surfacing and this arrangement is considered acceptable.
- 5.62 Overall, the proposal is considered to sympathetically integrate with existing development in the locality, and will prevent detrimental harm to the visual amenities of the locality, in accordance with Policies DM1, P1, P2 and P3 of the CS, Policy JP-P1 of the PfE document, the Guidelines and Standards for Residential Development SPD and Section 12 of the NPPF.

Residential Amenity

- 5.63 Policy DM1 of the CS states that all development proposals will be expected to demonstrate that they do not adversely affect the amenity of residents or users through visual intrusion, overbearing impact, overshadowing or loss of privacy.
- 5.64 PfE Policy JP-P1 requires all new development to be comfortable and inviting, with indoor and outdoor environments, offering a high level of amenity that minimises exposure to pollution; and addressing microclimate issues such as sunlight, indoor air quality, overheating, shade, wind and shelter.
- 5.65 PfE Policy JP-H3 also establishes the requirement for new dwellings to be compliant with the Nationally Described Space Standards (NDDS).

5.66 Section 4 of the Guidelines and Standards for Residential Development SPD relates to 'New Residential Development'. Section 4, contains a subsection relating to 'space standards' and it outlines minimum space standards for all new residential development so as to prevent undue harm to residential amenity, these being:

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

5.67 However, this SPD also states that exceptions to these minimum space standards may be acceptable in some circumstances and applications will be considered on their individual merits.

5.68 In terms of the amenity of the occupiers of existing properties:

Strawberry Close

5.69 Strawberry Close is within the residential development to the west of the site, and runs south from Ginnell Farm Avenue. The closest property at Strawberry Close is adjacent to the western boundary of the site.

5.70 The proposed dwelling at Plot 9 will be the closest to the nearest dwelling at Strawberry Close. Whilst the side wall of this dwelling at Strawberry Closes faces towards the site, the existing dwelling has no windows in this elevation. The proposed dwelling at Plot 9 will be set off from this existing dwelling and will follow a relatively similar building line. No first floor windows are proposed in the side elevation of the dwelling at Plot 9 and views from the rear windows of No.9 will not achieve clear views over the rear garden of this closest property at Strawberry Close. The dwelling at Plot 1 will be over 21 metres away from this closest dwelling at Strawberry Close, and will be set at an oblique angle to it. Given the above factors, it is considered that the proposal will not cause undue harm to the amenities of this closest property at Strawberry Close in terms of loss of light, loss of outlook, overlooking or loss of privacy.

Ginnell Farm Avenue

5.71 The nearest residential property belonging to Ginnell Farm Avenue is No.1, which is a two storey detached property adjacent to the west boundary of the site. No.1 has 4 windows facing towards the application site (2 x ground floor windows, and 2 x first floor windows), with 3 of these windows appearing to serve habitable rooms with reference to the approved plans for 13/01339/REM.

- 5.72 The closest proposed dwelling to No.1 will be the dwelling at Plot.1. However, this proposed dwelling will be approximately 14 metres away from No.1 and will not include any windows in the side elevation facing towards No.1. In addition, the element of the dwelling at Plot 1 closest to No.1 will only be 1 ½ storey in height. Further to this, vegetation on the boundary shared with No.1 will help to screen views of the proposed dwelling from the side windows of No.1. The rear elevation of the dwelling at Plot 9 will also be at an oblique angle to the rear elevation of the dwelling at No. 1.
- 5.73 Given the above factors, it is considered that the proposal will not cause undue harm to the amenities of No.1 Ginnell Farm Avenue in terms of loss of light, loss of outlook, overlooking or loss of privacy.

Another other existing properties

- 5.74 The proposed dwellings will be sufficiently sited so as to prevent any other existing residential properties not referred to above so as to prevent undue harm to these properties in terms of loss of light, loss of privacy or overlooking, loss of outlook, or an overbearing effect.

Amenity of Proposed Dwellings

- 5.75 In terms of the amenity of the future occupiers of the proposed development, the properties will all benefit from generous external amenity space, whilst the internal accommodation of each dwelling will comply with the guidance contained within the NDSS (please see table 1 below which demonstrates that each dwelling will comply with the minimum gross internal areas as set out in the NDSS). The proposed dwellings will also benefit from suitable back-to-back separation distances to ensure that the proposed occupiers benefit from a good level of privacy.

Table 1: Compliance with NDSS			
Dwelling	Type	NDSS Minimum GIA	GIA of Dwelling (m²)
Plot 1	2 storeys. 4 bedrooms	115m ²	138m ²
Plot 2	2 storeys. 3 bedrooms	93m ²	94m ²
Plot 3	2 storeys. 3 bedrooms	93m ²	98m ²
Plot 4	2 storeys. 3 bedrooms	93m ²	98m ²
Plot 5	2 storeys. 3 bedrooms	93m ²	94m ²
Plot 6	2 storeys. 3 bedrooms	93m ²	96m ²
Plot 7	2 storeys. 3 bedrooms	93m ²	96m ²
Plot 8	2 storeys. 3 bedrooms	93m ²	96m ²
Plot 9	2 storeys. 3 bedrooms	93m ²	96m ²

- 5.76 As the M62 Motorway is located to the south of the site, it is acknowledged that noise from this motorway has the potential to impact upon the living environment of the future occupiers of these proposed properties. As a consequence, a Noise Impact Assessment (NIA) has been undertaken and is submitted alongside the application.

- 5.77 In relation to the NIA, environmental noise monitoring has been undertaken at the site, with the noise monitoring location to the south of the site.
- 5.78 In terms of internal noise levels, this NIA outlines that internal noise levels have been calculated to demonstrate that the proposed dwellings can achieve the desired design criteria when appropriate glazing and ventilation systems are utilised. Should permission be granted, it is considered that such measures could be conditioned.
- 5.79 In terms of external noise, the NIA outlines that external noise levels measured on the site are at 77dB (but this does not factor in any development at the site or mitigation measures), which is 19dB over what the Council's Environmental Health Officer (EHO) has previously stated is acceptable (i.e. 58dB). Of note, on 19th November 2024, the Council's EHO stated by e-mail the following:
- "Since the publication of BS8233 2014 Rochdale BC has recognized the context base flexibility of the outdoor noise criteria and has accepted an absolute maximum level of 58dB(A). This level has been applied to all developments submitted following BS8233 2014, to maintain a consistency of approach and to protect amenity space we would recommend that the same is applied to this development, i.e 58dB(A)."*
- 5.80 As outlined, the NIA did not formally assess external amenity spaces. As a consequence of this, modelling was instructed (which is provided within the Noise Technical Note by Dragonfly Consulting) which assesses the likely noise climate in external amenity spaces associated with the development.
- 5.81 As set out in the Technical Note, to enhance the acoustic environment within the external amenity spaces of the proposed development, a comprehensive noise mitigation strategy is proposed. This includes an acoustic barrier of 3.5m in height along the southern boundary of the site, as well as barrier of 2.4m in height partly to the east of the site. These barriers have been located to provide maximum shielding from road traffic noise. In addition, the layout of the site helps to further shield the amenity spaces.
- 5.82 The Technical Note outlines that with this layout, all private external amenity areas serving the properties are expected to fall below 58dB. Thus, noise levels in the gardens are expected to meet the Rochdale Borough Council assessment criteria for external amenity spaces, set at 58dB. Noise is therefore not considered to be a barrier to this proposed development.
- 5.83 Given the above, the proposed occupiers will benefit from a good standard of amenity.
- 5.84 In conclusion, it is considered that the proposed development will not cause undue harm to the amenities of existing and future neighbouring occupiers and that future occupiers of the proposed residential properties will experience good levels of amenity, in accordance with Policy DM1 of the CS, PFE Policies JP-P1 and JP-H3 and Section 12 of the NPPF.

Highways, Accessibility and Parking

- 5.85 Policy DM1 of the CS outlines that all development proposals will be expected to demonstrate that they provide vehicular access with adequate parking, manoeuvring, and servicing arrangements taking into account the proposed use and location.
- 5.86 Policy T2 of the CS states that the Council will improve accessibility by locating development where good access to public transport is available or can be provided, backed by measures to reduce the need to travel and effective provision for cyclists, pedestrians and people with impaired mobility. It goes on to state that development will need to be appropriately located to minimise the need to travel by car and the number and length of car trips to access local amenities.
- 5.87 Policy T2 of the CS also states that the Council will require development to provide parking in compliance with the Council's Car Parking Standards. These standards are provided within Appendix 5 of the CS.
- 5.88 Policy JP-C8 of the PfE states that new development should 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.
- 5.89 The response from the Council at the pre-application stage (LPA Ref: PREAPP/00015/24) outlined that the application proposals 'do not raise any significant highways concerns'. The pre-application response went on to state that the existing access off Broad Lane is acceptable subject to demonstration of sufficient visibility splays, but that the shared drive would be unlikely to be adopted (although it should be designed to adoptable standards with turning head facilities which allow for any emergency or servicing vehicles to access the site safely). The pre-application response also states that it should be demonstrated that the properties can be adequately served by refuse vehicles. As will be discussed below, these comments were taken into consideration when designing the proposed development.
- 5.90 Vehicular access to the site is to be provided via Broad Lane to the east of the site, utilising the existing access which will be widened slightly. The access road from Broad Lane is to be reconfigured and will serve six dwellings. A refuse vehicle turning area is also proposed along this access road. Vehicular access to the properties fronting Ginnell Farm Avenue on the northern boundary will be provided via dedicated driveways.
- 5.91 A Highways Access Appraisal (HAA) has been submitted alongside the application.
- 5.92 The HAA highlights that no collisions occurred within the immediate vicinity of the site on Broad Lane or Ginnell Farm Avenue within the most recent available 5 year study period, and the HAA concludes that there are no existing road safety issues pertinent to the development of the site.

- 5.93 Given that only 9 dwellings are proposed, the development is unlikely to generate a significant amount of movements (projected vehicle trip generation is further detailed in Section 4 of the HAA).
- 5.94 In terms of the access off Broad Lane serving the southern dwellings, the HAA contains a desktop visibility splay assessment of this access. The HAA concludes that suitable visibility splays are achievable to the left and right of the junction.
- 5.95 In addition, vehicular tracking and commentary within the HAA demonstrates that the access road from Broad Lane is able to accommodate refuse vehicle movements.
- 5.96 In terms of the proposed northern properties, the HAA outlines that the direct driveways associated with the with these three plots of the site are consistent with the existing properties served via Ginnell Farm Avenue. The HAA states that the nearest driveway to the Broad Lane mini-roundabout is located approximately 11m to the west and is therefore consistent with the spacing between the nearest driveway on Apple Tree Way and its junction with Broad Lane.
- 5.97 The proposed dwellings all have driveways which can accommodate at least two parking spaces, which is in line with parking standards set out in Appendix 5 of the Core Strategy. Two visitor parking spaces are also proposed to the south of the site.
- 5.98 Each property will have a bin storage area, sited away from site frontages to avoid visual clutter. Areas to store bins are also proposed at accessible locations, therefore bins can be easily moved by occupiers at the day of collection.
- 5.99 Given the above, the proposal will provide suitable parking provision and it will not lead to an adverse impact on highway safety. The proposal will also be located in a sustainable location, enabling and encouraging walking, cycling and public transport use. The proposal is therefore in accordance with Policies DM1 and T2 of the CS, Policy JP-C8 of PpE and Section 9 of the NPPF.

Biodiversity

- 5.100 Policy G7 of the CS states that the Council will ensure that sites and features of biodiversity importance are given full and appropriate recognition and protection. It goes on to note that opportunities for enhancing biodiversity and geodiversity will be supported. Policy G7 outlines that no development should result in a net loss of biodiversity or geodiversity interest in the Borough and overall development in the Borough should result in a net gain.
- 5.101 Policy G7 of the CS states that proposals should protect and include biodiversity within new developments, protect and enhance existing features and take opportunities to promote biodiversity and create new habitats through new development using landscaping and building and construction features wherever possible.

- 5.102 A Preliminary Ecological Appraisal Report (PEA), by a qualified ecologist, has been submitted alongside the application.
- 5.103 This PEA outlines that the proposal is not anticipated to have any direct impacts on any designated sites or habitats of principal importance given the nature of the development and the distance of the application site from these designated sites and habitats of principal importance.
- 5.104 The PEA outlines that most habitats on site are considered to be of 'low' distinctiveness, but it is noted that mixed scrub and other broadleaved woodland is of 'medium' distinctiveness. Whilst the proposal will result in the loss of some of these habitats, as per the landscaping plan, compensatory mixed scrub is proposed to the east and south of the site, and this will result in an increase of this habitat type on the site.
- 5.105 The PEA outlines the possibility of roosting bats, badgers, hedgehogs and birds on the site. Section 5 of the PEA recommends a number of precautionary working methods for badgers, hedgehogs and birds which can be conditioned. The PEA notes that in relation to bats there are multiple buildings on site which may offer potential to support roosting bats (albeit this appearing to be low) and that a preliminary roost assessment (PRA) is to be carried out. A PRA is in the process of being undertaken and will be submitted to the LPA immediately when available (during the processing of this application). Following the PRA, if the buildings continue to have 'low' potential for roosting bat, then a single bat emergence survey during the bat active season will need to be undertaken. Nonetheless, any impacts upon bats will be able to be mitigated and the PEA recommends precautionary working methods in relation to bats.
- 5.106 The Environment Act 2021 introduced a new requirement for the delivery of mandatory Biodiversity Net Gain (BNG) (at least 10% biodiversity net gain) under the Town and Country Planning Act 1990. For 'small sites' such as this particular site, this came into effect on 2nd April 2024.
- 5.107 The PEA addresses biodiversity net gain and a completed biodiversity metric calculation tool has been submitted alongside this application. Biodiversity Metric 4.0 has been utilised to calculate the pre-development and post-development biodiversity habitat units of the site for the proposed development.
- 5.108 The Biodiversity Metric and PEA outline that the number of habitat units at the site is 0.90. Primarily, the site will see post development units delivered through the retention and planting of individual trees and creation of scrub throughout the site. Nonetheless, the number of habitat units could decrease from 0.90 to 0.74 (a percentage loss of 17.57%), thereby totaling a requirement for 0.25 habitat units to achieve a 10% gain. The PEA outlines that trading rules require the implementation of 0.16 units of woodland habitat of medium distinctiveness within these 0.25 units.
- 5.109 Due to the availability of space within this development site, it is likely that these units and trading rules will be satisfied at an off-site location as all efforts have already been made to

maximise the habitat availability in the post development scenario. Should off-site compensation not be possible, as a last resort, statutory units may be purchased, or a financial compensation package can be discussed with the local council.

- 5.110 Given the above, subject to conditions, the proposal is unlikely to cause harm to protected species and is therefore in accordance with Policy G6 of the CS and Section 15 of the NPPF.

Trees

- 5.111 Policy G6 of the CS states that the Council will expect development proposals affecting green infrastructure to protect ancient woodlands and hedgerows, support new woodland and tree planting in new developments, and replace removed trees from a site.
- 5.112 Policy JP-G7 of the PfE also requests that where development would result in the loss of existing trees, there should be a replacement on the basis of two new trees for each tree lost, or other measures that would result in a net enhancement in the character and quality of the treescape and biodiversity value in the local area, with a preference for on-site provision.
- 5.113 An Arboricultural Impact Assessment (AIA) has been submitted alongside the application. Of note the survey identified 21 individual trees, four groups of trees and one woodland on and adjacent to the site. These included seven individual trees and one woodland graded Category B (trees of moderate value), as well as 10 individual trees and three groups of trees graded Category C (trees of low value). Four individual trees and one group of trees have been graded Category U (trees unsuitable for retention). No category A trees have been identified on site.
- 5.114 The construction of the proposed development will require the removal of two individual trees graded 'B' category, nine individual trees and two groups of trees graded 'C' category. Four individual trees and one group graded 'U' category will also require removal. Thus, the vast majority of trees to be removed as a result of the proposed development are of poor quality or trees unsuitable for retention. The removal of these trees will therefore have a negligible impact upon the character of the area.
- 5.115 In relation to trees that are to be retained, the AIA contains a Tree Protection Plan and outlines working and protection methods in accordance with current government guidance. The AIA also contains an Arboricultural Method Statement. Development will be carried out in accordance with the measures outlined within this AIA, so as to prevent damage to the retained trees (and this can be secured by means of a suitably worded compliance condition).
- 5.116 In relation to trees that are to be removed, these are to be adequately replaced as displayed in the landscape plan submitted alongside this application. This displays replacement trees throughout the site. These trees will have a suitable relationship with proposed and existing development so as to safeguard the future health of the trees, as well as prevent harm to residential amenity.

- 5.117 Given the above, it is considered that the development will not cause harm to important trees and any trees that have been lost are to be adequately replaced in accordance with development plan policies.

Flooding Risk and Drainage

- 5.118 Policy G8 of the CS states that the Council will 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 flooding risk, is itself protected from flood risk and ensures prudent use of water resources.
- 5.119 Policy JP-S4 of the PfE document states that development should be located and designed so as to minimise the impacts of current and future flood risk. This policy also notes that developments will be expected to manage surface water runoff through sustainable drainage systems.
- 5.120 The pre-application response (PREAPP/00015/24) states that drainage should be considered through the design process, with the SuDS hierarchy followed and any form of less sustainable drainage systems being fully justified.
- 5.121 As noted in the Drainage Strategy submitted alongside the application, the site is within Flood Zone 1 (land having a less than 1 in 1,000 annual probability of river or sea flooding) and is therefore at low risk of fluvial flooding, and it is considered that the development will not increase the fluvial flooding risk on the site or elsewhere. The risk of flooding from surface water is also very low with reference to Environment Agency flood risk mapping.
- 5.122 In terms of surface water disposal, the Drainage Strategy outlines that infiltration methods will not be viable. The Drainage Strategy also states there is not a suitable watercourse in the vicinity of the site which could be utilised to dispose of surface water from the site. Therefore, the primary option for surface water disposal is to use a connection into the public sewer system, and it is proposed that surface water will discharge through a connection into the United Utilities surface water sewer located within the vicinity of the site. An attenuation tank will be proposed to the north east of the site so as to restrict the discharge rate from the site into the sewer in line with the requirements of United Utilities.
- 5.123 Subject to the development being carried out in accordance with the Drainage Strategy submitted alongside this application, the proposal will not increase flood risk elsewhere and will comply with Policy G8 of the CS, Policy JP-S4 of the PfE document and Section 14 of the NPPF.

Sustainability & Climate Change

- 5.124 Policy JP-S2 of the PfE sets out that the aim of delivering a carbon neutral Greater Manchester no later than 2038, with a dramatic reduction in greenhouse gas emissions, will be supported through a range of measures. One such measure is an expectation that new development will be net zero carbon and should follow the energy hierarchy. This policy also outlines that it is expected new development will incorporate adequate electric vehicle charging points.
- 5.125 The site is situated within a sustainable urban location. Of note, the site is adjacent to an existing housing development and is within extremely close proximity to bus stops with frequent services to Rochdale Town Centre and Shaw.
- 5.126 Electric Vehicle charging points will be included for each property. In addition, the proposed dwellings will be designed to reduce the extent and the impacts of climate change. For instance, the dwellings will comply with current building regulations. Further details can be conditioned should this be deemed necessary.
- 5.127 For these reasons, the proposal is considered to address the carbon neutral agenda, in compliance with Policies JP-S2 and JP-S6 of the PfE document and Section 14 of the NPPF.

Land Contamination

- 5.128 Policy G9 of the CS outlines that the Council will reduce all forms of contamination and land stability in the Borough by requiring that any risks arising from contaminated land or land instability, and appropriate actions to address these risks, are identified prior to any development taking place on that land and the identified actions taken.
- 5.129 The recent pre-application response from the LPA relating to this site (PREAPP/00015/24) outlines that a future application should include details of site investigations to account for any impacts from previous buildings and land uses, with any application needing to be supported by at least a Preliminary Risk Assessment.
- 5.130 Whilst the pre-application response is acknowledged, it is considered that it is not necessary to submit this information in this instance prior to the determination of the application. It is pertinent to note that the site is already used as a residential garden and it is therefore considered that the site is suited to residential use. In addition, the site previously formed part of a larger approved residential development (see 12/55581/OUT). Nonetheless, a completed contaminated land screening assessment form has been submitted alongside this application (with the preliminary risk assessment which supported 12/55581/OUT being submitted with this application too). Should it be considered that a preliminary risk assessment is required, this could be dealt with by a suitably worded condition.
- 5.131 In terms of land instability, the site is not located within a Coal Mining Development High Risk Area with reference to The Coal Authority mapping.

Air Quality

- 5.132 Policy G9 of the CS states that Rochdale Borough Council will reduce all forms of pollution, contamination and land instability in the borough, by focusing on measures that reduce air pollution in Air Quality Management Areas, and other areas where pollution levels are unacceptable, particularly around motorways and main roads. Policy JP-S5 of the PfE document also echoes Policy G9 in this regard.
- 5.133 The site is recognised as being partially within Rochdale Air Quality Management Area (AQMA), therefore an Air Quality Assessment has been undertaken and is submitted alongside this application. This considers road traffic emissions and their associated impacts on both existing and proposed sensitive receptors, taking into account the vehicles that are already on the surrounding road network, and those additional vehicle trips generated by the development during both the construction and operational phases. In summary, the Air Quality Assessment concludes that air quality does not pose a constraint to the development of the Site for the proposed residential use and the proposal meets the requirements of both national and local air quality planning policy. The proposal is therefore in accordance with Policy G9 of the CS.

Planning Obligations

- 5.134 The recent pre-application response from the LPA relating to this site (PREAPP/00015/24) outlines that the application, depending on its scale, may require contributions made towards open space provision.
- 5.135 Regard is had to the 'New Housing and the Provision of Recreation Facilities SPD', which is applicable for new housing developments of more than 10 dwellings. This specifies that developments of more than 10 residential units, but under 100 bedrooms, will normally be expected to make a financial contribution towards the provision/improvement of an area of informal recreation open space in the locality. It also outlines that that a financial contribution towards the improvement of nearby children's play facilities may be sought if the development is for more than 10 dwellings and less than 400 bedrooms. Further to this, the SPD states that developments of more than 10 dwellings will normally be expected to make a financial contribution towards the provision/improvement of sports facilities.
- 5.136 This proposed development relates to 9 no. dwellings and as outlined above in this assessment section of the Statement, any further dwellings at the site would result in a contrived form of development. Based on this, there is no requirement to provide planning obligations in relation to this development.

6 CONCLUSION

- 6.1 This application seeks planning permission for the demolition of the existing buildings and the erection of 9 no. dwellings, including associated landscaping and access at Ginnell Farm, Broad Lane, Rochdale. This Statement explains the proposal and its merits in relation to the premises and material planning issues.
- 6.2 The principle of the residential development at the site is considered acceptable. The development is proposed at a sustainable location within Rochdale.
- 6.3 The proposed development will integrate sympathetically with the existing development within the locality and will not cause detrimental harm to the character and appearance of the area. The proposal is not considered to have an undue impact upon the amenity of neighbouring occupiers and will provide an good standard of amenity for proposed occupiers. In addition, the proposal is not considered to have any significant detrimental impacts upon highways safety, flooding risk, human health, biodiversity, trees or climate change. Further to this, the proposal will not cause any harm to heritage assets.
- 6.4 There are considered to be a number of public benefits with the proposal which are material to the consideration of the application. Of note, the proposal will make a modest contribution to local housing need and growth, and it will better utilise this land which is supported by Government guidance contained within Paragraph 124 of the NPPF. The housing will also be provided in a sustainable urban location which has good access to public transport and services. In addition to this, the proposal will provide high value housing in the north of the Borough, which is supported by Policy C3 of the CS given there is a need for such development.
- 6.5 In summary, the proposal is considered to constitute sustainable development and comply with the relevant Policies within the Development Plan, supplementary planning documents and the Government guidance contained in the NPPF. There are no other material considerations that would suggest permission ought not to be granted.

7 APPENDICES

Appendix A: Site Photographs



View from Existing Site Access of Dwelling and Garage (Facing West)



View of Dilapidated Outbuilding (Facing North East)



View of Dilapidated Outbuilding with Dwelling and Garage in Background (Facing South East)



View of Dilapidated Former Agricultural Building (Facing North West)



View of Dilapidated Former Agricultural Building (Facing West)



View of Garage and Dilapidated Former Agricultural Building (Facing South)



View of Dwelling (Facing South East)



View of Garden Including Shed and Greenhouse (Facing North West)



View of Site Access and Nearby Bus Stops from Broad Lane (Facing South)



View of Site from Ginnell Farm Avenue (Facing South)



Nearby Corner Plot Development (Semi-Detached Building at Ginnell Farm Avenue/Strawberry Close)



Nearby Corner Plot Development (Semi-Detached Building at South of Strawberry Close)



Nearby Corner Plot Development

Appendix B: Formal Pre-Application Response from Rochdale Borough Council (LPA Ref: PREAPP/00015/24) and the Submission Supporting this Pre-Advice Request

PLANNING AND DEVELOPMENT

Melanie Hale
Head of Planning Services

Number One Riverside, Smith Street,
Rochdale, OL16 1XU

Enquiries to: Ryan Grant
Web: www.rochdale.gov.uk
Email: Ryan.Grant@rochdale.gov.uk
Direct Line: 01706 925858

Reference: PREAPP/00015/24

Date: 6th August 2024

Stuart Howden
Northern Planners
Jubilee Court
Waith Lane
Copgrove
HG3 3TB

BY EMAIL ONLY

stuart.howden@northernplanners.co.uk

Dear Mr Howden,

Reference No:	PREAPP/00015/24
Proposal:	Demolition of existing buildings and residential development of 11 dwellings
Location:	Ginnell Farm, Broad Lane, Rochdale, OL16 4PU

Further to your pre-application request, this letter sets out my advice in relation to your proposal. Apologies for the delay in responding to this request.

The following information has been submitted:

Covering Letter dated 5th February 2024 (ref.24NP498)
Location Plan (24NP498/01/001 Rev A)
Indicative Proposed Layout Option (24NP498/01/003 Rev A)

SITE

The pre-application site relates to land to the south of Rochdale, within the Balderstone adjacent Kingsway Business Park to the east and bound by the M62 to the south. The site is a regular shaped parcel of approximately 0.3ha with a gradual gradient dropping south-north. The site is accessed off an existing vehicular access on Broad Lane.

The site comprises a former agricultural holding, with the buildings onsite reflecting this former use, with associated residential dwellings, garages, and small scale agricultural storage.

Importantly the site is surrounded to the north and west by recent residential development.

PROPOSAL

The pre-application scheme is for 11 dwellings, comprising 10 semi-detached properties and a single detached property. The dwellings are arranged in a standard block form with half of the properties fronting Ginnell Farm Avenue to the north and the



other half facing south onto an extended internal access road which would act as a shared drive. The corner plot to Broad Lane and Ginnel Farm Avenue is displayed a large feature detached property in an L-shape configuration.

In terms of design the covering letter sets out that the properties would be 2 storeys in height and would have a material palette which is reflective of the surrounding residential development. The covering letter also sets out that a small number of different houstypes could be used to provide varying features of interest across the streetscene.

It is advised that landscaping would include appropriate garden space and concealed bin storage, as well as retention of existing hedgerow planting to the eastern site boundary.

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-S1 Sustainable Development
JP-S2 Carbon and Energy
JP-S4 Flood Risk and the Water Environment
JP-S5 Clean Air
JP-H2 Affordability of New Housing
JP-H3 Type, Size and Design of New Housing
JP-H4 Density of new Housing
JP-G7 Trees and Woodland
JP-G8 A Net Enhancement of Biodiversity and Geodiversity
JP-C8 Transport Requirements of New Development

Adopted Rochdale Core Strategy (CS):

SO2	Creating successful and healthy communities
C1	Delivering the right amount of housing in the right places
C3	Delivering the right type of housing
C4	Providing affordable homes
C6	Improving health and wellbeing
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 instability
G10	Managing mineral resources
G11	Managing waste
SO5	Improving accessibility and delivering sustainable transport
T2	Improving accessibility
DM1	General development requirements
SD1	Delivering sustainable development

Unitary Development Plan (UDP):

EM/7 Development and Flood Risk
EM/8 Protection of Surface and Ground Water
G/M/1 Protection and Prudent Use of Resources

Supplementary Planning Documents (SPD):

Supplementary Planning Guidance note 'Guidelines and Standards for Residential Development' (June 2016).

Provision of Recreational Open Space in New Housing (Updated Jan 2017)

RELEVANT SITE HISTORY

The covering letter in support of the pre-application proposals provides a comprehensive summary of the relevant planning history of the site. This response does not seek to repeat all of this in detail but will instead focus on the key matters which are considered of relevance to the proposals brought forward through this pre-application request.

Of greatest significance for these proposals is the outline permission 12/55581/OUT which was granted permission following an allowed appeal for the large housing development which now encloses the site. This outline permission included the pre-app site within its boundary, with indicative plans showing new residential development on this parcel. The rest of the site was subsequently built out under 13/01339/REM (alongside a number of minor material and non-material amendments) but did not bring forward the pre-application parcel during this time. As such the site no longer benefits from the outline consent as an extant permission as no reserved matters permission have been granted for this part of the wider site. Nonetheless the former consents clearly represent a significant material consideration as is considered further in the following section of this advice letter.

ANALYSIS

Principle of Development

Development Plan Policies

Rochdale Council's Development Plan comprises the Core Strategy (2016) and the saved policies of the Unitary Development Plan. The Core Strategy was adopted in



October 2016 and as such has recently exceeded the 5 years in which the NPPF expects a Local Plan Review to have taken place. It is therefore necessary to consider the policies of Rochdale Council's Core Strategy against the latest NPPF policies for consistency.

With regards to housing policies it is noted that the Core Strategy housing supply requirement set out in C1 is now out-of-date. This has been superseded by the adoption of PfE. The remainder of the housing policies are however considered to remain in date given their consistency with NPPF.

In considering Policy G5 and D/10, it is considered that Policy G5 remains relatively consistent with the NPPF but it is considered that elements go further in their restriction of development which may somewhat limit the full weight being given to these policies. It is also acknowledged that the Protected Open Land policy was to be supplemented by the former Allocations DPD which was not fully progressed due to PfE which may have redrawn boundaries to reflect changes over time since the adoption of the UDP and to consider whether any further POL sites would be justified for release. As such where material considerations demonstrate that specific areas of this designation are out-of-date, proposals should be assessed in line with the NPPF advice.

The remainder of relevant Development Plan policies as listed out previously in this report are considered consistent with the policy wording and objectives of the related sections of NPPF. Whilst amendments to the NPPF since the adoption of the Core Strategy have assigned greater weight to certain matters such as design, biodiversity net gain, making effective use of land, amongst others, these policies can still be read alongside the Core Strategy policies without inconsistency. I would draw your attention to the CS Policies which have been replaced by PfE which are set out within 'Table A.5 Replaced Rochdale Local Plan Policies' of Appendix A of PfE.

Protected Open Land and Housing

The application site lies within land designated as Protected Open Land under the Unitary Development Plan and saved policy D/10 which is further supplemented by the later Core Strategy policy G5. For the reasons set out above, alongside the assessments made by previous officers for applications within the site, it is considered that the Protected Open Land designation at this site can be afforded very limited weight in relation to this specific site.

CS Policy G5 sets out the broad areas where POL will continue to protect land from development, which does not include the area in which the site lies. The development of the surrounding residential area in the years since the UDP boundaries were drawn has clearly altered the character of the site in a substantial and permanent manner. The enclosure of the site by this residential development, alongside the existing outer boundary to the south which is strongly separated from the Green Belt by the M62 corridor, prevents the site from being seen as part of any larger open area. Instead, this enclosure, combined with the existing development onsite, means that the site is read entirely as forming part of the existing urban area.

On the basis of the above it would appear disproportionate to apply the full criteria of policy G5 in assessing the proposals. Nonetheless, in such a case it is still considered that residential development within the site would be capable of demonstrating compliance with the criteria set out at sections 2 and 3 of this policy.



Whilst Rochdale can presently demonstrate a 5 year housing land supply, this does not preclude the delivery of additional housing, particularly on small-medium sized windfall sites which were not considered for allocations within PfE. The need for boosting housing in urban areas is clearly set out in National Policy. Furthermore, it is noted that a consultation has now begun on a revised NPPF which places even greater emphasis on this housing delivery and which makes significant changes in regards to protecting Green Belt land from development where it does not contribute to the purposes of Green Belt. Whilst this site does not lie within the Green Belt the wording and objectives of G5 and D/10 clearly demonstrate such changes to NPPF would be a significant material consideration. The revised NPPF remains at consultation stage so cannot be given significant weight presently, however it is noted here due to the potential for these or other changes to come into effect prior to submission or determination of any scheme for the site.

In conclusion, the principle of development is justified as being acceptable having had full regard to local and national policy, the weight to be attributed to each, and having considered all material considerations.

Design, Appearance and Layout

Paragraphs 131 and 135 of the NPPF state that good design is a key aspect of sustainable development and that planning policies and decisions should ensure that developments function well and add to the overall quality of the area and are visually attractive as a result of good architecture, layout and appropriate and effective landscaping, which is largely reflected within Policies DM1 and P3 of the Council's adopted Core Strategy, which requires development proposals to demonstrate high quality design.

Policy JP-H3 of PfE requires development 'to incorporate a range of dwelling types and sizes' and a key aim of the Plan is to boost the supply of well designed, adaptable new homes with appropriate access to private space.'

The submitted documents provide limited information on the proposals in terms of design but do indicate a general layout, heights of buildings, and general form. The form of the proposals is acceptable in principle and the continuation of a block form is a logical extension of the adjacent site. It is noted in the covering letter that separation distances as specified in the council's residential standards SPD will be considered although it is noted the plans appear to fall short of these in some instances. It is however considered relatively easily rectified by specific plotting, including the moving of the northern homes closer to the highway which would also have the benefit of screening more of the car parking provision from the streetscene.

The change in levels across the site would also need to be considered in terms of how this impacts overlooking between properties, the ability to facilitate compliance with building regulations Part M4(2) as now required by PfE Policy JP-H3, and any impact on noise attenuation measures required. With regards to noise impact mitigation, a continuation of acoustic fencing will be required however measures should be taken to screen this fencing when viewed from the properties by way of substantive landscaping, which also restricts access to the fence for graffiti which has been an existing issue in the area.

The homes should also be designed to provide sufficient indoor and outdoor amenity, with all homes complying with and exceeding the Nationally Described Space Standards, whilst providing suitable garden spaces and concealed bin storage areas.



The properties themselves should be designed with robust materials which reflect the local vernacular. Any future application would be supported by a Design and Access Statement which should undertake a site context appraisal and consider which elements of the local character make the most positive contributions and avoid repeating local features which have detracted from the area. The inclusion of a corner plot(s) at the most prominent location is strongly supported and the elevation treatment should emphasise activity to both Broad Lane and Ginnell Farm Avenue.

The site and its layout would not appear to a barrier to achieving any of these design aspirations. Subject to these being achieved it is considered the site could successfully be designed to integrate with the surrounding local area and make a valuable contribution to its character.

Landscaping and Ecology

Core Strategy Policy DM1 requires new developments to incorporate, where appropriate, high quality landscape schemes. It is acknowledged that the proposed dwellings are located on spacious plots adjacent to playing fields and open space which is a benefit of the scheme.

Policy G6 of the adopted Core Strategy expects development proposals affecting green infrastructure to avoid the loss of existing features such as trees unless suitable alternative provision is made or they have limited value and where trees are to be removed they should be replaced at a ratio of 2:1. This is reinforced in Policy JP-G7 of PpE which states 'where development would result in the loss of existing trees, requiring replacement on the basis of two new trees for each tree lost, or other measures that would also result in a net enhancement in the character and quality of the treescape and biodiversity value in the local area, with a preference for on-site provision'. Core Strategy policy G7 requires that no development should result in a net loss of biodiversity and geodiversity and any removed trees shall be replaced at a ratio of 2:1.

The key areas within the site for landscaping will be the Broad Lane boundary and M62 boundary, both of which should see planting used to soften and screen views in and out from Broad Lane and out towards the M62 and its necessary noise attenuation measures. The retention of existing planting would be supported and any removals shall be compensated for in line with the above policies. The application documents suggested within the covering letter are all correct and required, with the only addition being a site plan that shows the landscape proposals. Whilst this may be provided at a high level initially, it should be noted that greater detail would avoid the need for early stage planning conditions and would also assist in quickly assessing and dealing with matters of BNG.

With respect of ecology, the site would require a BNG assessment and plan which should be undertaken in accordance with the Greater Manchester guidelines prepared by GMCA and GMEU. The identified survey requirements are all agreeable and it is again noted that where additional surveys are recommended by your ecologists that these are undertaken prior to submission in order to avoid delays during the determination of the application. BNG should be provided in line with the hierarchy set out by Natural England, following an expectation that all measures should be focused onsite unless there is clear justification provided for delivering offsite compensation. Please also be aware that the identification of offsite compensation opportunities are very limited for the council and so if required, the applicant should seek to secure a



delivery mechanism prior to submission so that the delivery plan can be assessed at the earliest stage and avoid delays in any Section 106 or other requirements for securing the BNG. Should the preliminary ecological appraisal identify invasive species, a scheme for their removal would be required as pre-commencement condition unless provided upfront as part of an initial application.

Policies DM1, G6 and G7 of the Core Strategy, Policies JP-G6, JP-G7 and JP-G8 of PfE 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 application proposals do not raise any significant highways concerns. The existing access of Broad Lane is acceptable subject to demonstration of sufficient visibility splays although it should be noted that the shared drive would be unlikely to be adopted. This drive should nonetheless be designed to adoptable standards with turning head facilities which allow any emergency or servicing vehicles to access the site safely. Any proposals should demonstrate that the properties can be adequately served by refuse vehicles.

The proposed dwellings all have driveways which can accommodate at least two parking spaces which is in line with parking standards set out in Appendix 5 of the Core Strategy.

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

Other Material Considerations

Officers would agree with the analysis in the covering letter submitted with regards to the other material considerations to be assessed under any detailed application and would add to that list that site investigations would also be required to account for any impacts from previous buildings and land uses, with any application needing to be supported by at least a Preliminary Risk Assessment.

Subject to the proposed supporting documents, including those noted in this advice letter, the proposed approach would be appropriate and allow for a full consideration of the application proposals. At this time and with the information provided, there would not appear to be any technical barriers to development of the site. Noise and Air Quality will be key considerations that should be outlined in the supporting reports and mitigation should be clearly set out and incorporated in the detailed design. Similarly Drainage should be considered through the design process, with the SUDS hierarchy followed and any forms of less sustainable drainage systems being fully justified in the supporting documentation.

Finally, the application depending on its scale, may require contributions made towards open space provision as is set out on the council's website here <https://www.rochdale.gov.uk/planning-permission/section-106-planning-application-obligations>.



Public and Stakeholder Consultation

The Council has an adopted Statement of Community Involvement. Whilst not a mandatory requirement, we encourage that developers seek to engage with surrounding residents and, where appropriate, undertake consultation with ward councillors.

The method of any consultation undertaken, detail of where any consultation event was held and details of how the development has been presented to the local community should be outlined within a Statement of Community Involvement where this has occurred. This statement should also include details of the feedback received, including if any amendments have been made as a result of comments received.

Summary and Making an Application

Overall the proposals would appear to be acceptable in principle, and subject to further detailed design work and some relatively minor changes to the layout, alongside submission of the identified package of supporting documents, it is not considered that there would be technical barriers to the development of the site.

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, this letter has confirmed the suggested submission package, with any additional documentation identified within this response. We have also sought to identify documents which may prevent the need for pre-commencement conditions in the event of any permission being granted.

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 trust that this letter has provided the necessary information you sought from the pre-application process as requested in your covering letter. We do apologise again for the delay in providing this response. Please do not hesitate to get in touch, should you have any further questions.

Yours Sincerely,

Ryan Grant
Assistant Development Manager



Our Ref: 24NP498

Your ref: N/A

Jubilee Court
Copgrove
North Yorkshire
HG3 3TB
T: 01423 799950
E: stuart.howden@energyline.ltd.uk

5th February 2024

Planning and Development
Rochdale Borough Council
Number One Riverside
Smith Street
Rochdale
OL16 1XU

By email only

Dear Sir/Madam,

Demolition of existing buildings and residential development at Ginnell Farm, Broad Lane, Rochdale, OL16 4PU

Pre-application advice enquiry

I write to you on behalf of the Applicant, who is seeking pre-application advice for the demolition of existing buildings and residential development at Ginnell Farm, Broad Lane, Rochdale.

This Letter explains the Proposal in further detail with reference to available information and asks for guidance on specific issues as far as a future planning application is concerned.

However, in summary, we would very much appreciate your thoughts on the principle of residential development at the site, as well as the LPA's opinion on the acceptability of the sketched indicative layouts submitted alongside the application. The indicative layouts provided have been submitted to allow us to have a worthwhile discussion with you regarding the design of the proposal as well as assist you in providing constructive advice.

Site Context and Description

Figure 1 overleaf displays the site's location. Supporting plans can be found in Appendix A, whilst Appendix B provides photographs of the site and its immediate setting.

The application site, which is roughly rectangular in shape and approximately 0.3 hectare in area, gently slopes downwards from South to North. The site comprises an existing residential property, which was a former agricultural holding. This includes six buildings. The Easternmost of these buildings is a bungalow, with an 'L-shape' layout and constructed from brick under a tile roof. To the South West of the bungalow is a single storey triple garage constructed from brick under a tile roof. To the North of the garage, and the West of the bungalow is a dilapidated outbuilding constructed from brick and timber under a corrugated roof (which once formed part of a larger agricultural building). To the South West corner of the site is a redundant (and dilapidate) agricultural building constructed from blockwork under a corrugated roof. There is a shed and greenhouse to the North West of the site.

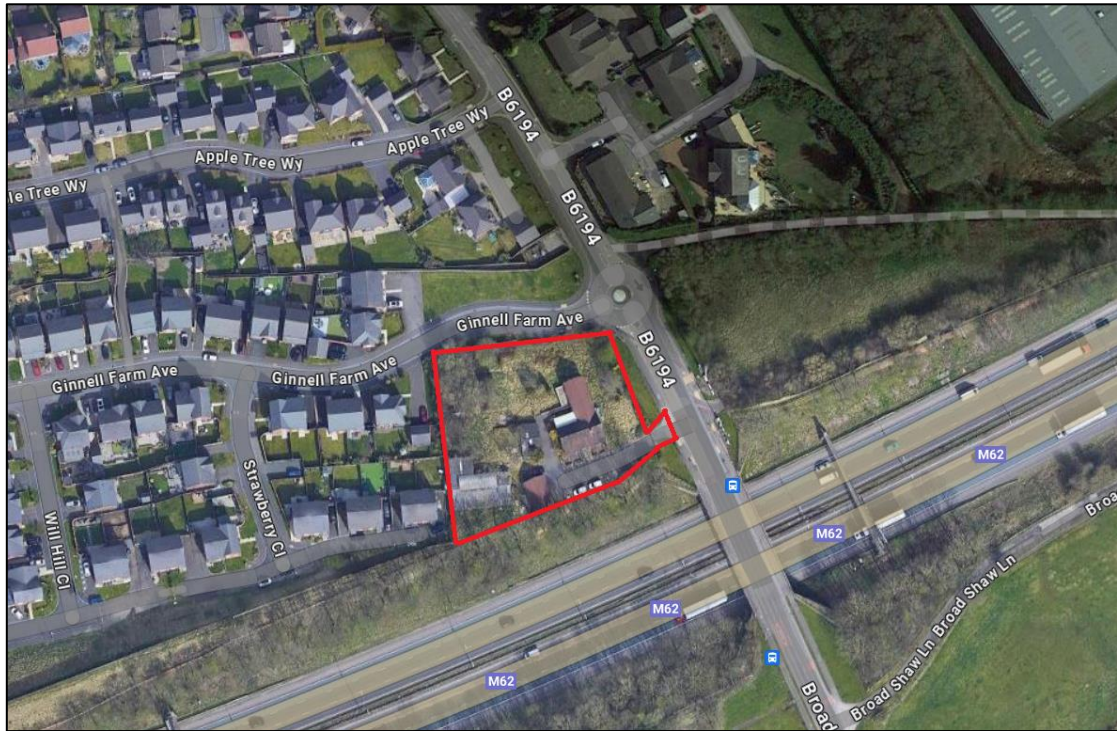


Figure 1: Aerial View with Site Demarcated in Red

The site has an existing access from Broad Lane to the East of the site, and this access runs along the Southern boundary of the site.

The site benefits from a generous garden area. The garden is overgrown at the time of writing and there are a number of trees on the site, with the majority of these being located towards the North West of the site. A low post and rail fencing borders the site along the Eastern boundary, whilst a mixture of low post and rail fencing and close board fencing borders the Northern boundary of the site.

Broad Lane (B6194) runs parallel to the Eastern boundary of the site. A wooded Motorway (M62) embankment is located directly to the South of the site.

There is an existing residential estate directly to the North, North West and West of the site (which was constructed after 2013). Ginnell Farm Avenue, which runs adjacent to the Northern boundary of the site, serves the residential properties to the North West and West of the site. This neighbouring residential development comprises detached and semi-detached dwellings, the majority of which are two storeys in height and finished in brick under tiles roofs.

The site is located to the South of Rochdale Town Centre. There are bus stops within very close proximity to the site on Broad Lane, which serve frequent services to Rochdale Town Centre, as well as the centre of Shaw.

The site is within land allocated as 'protected open land' within the Rochdale Borough Unitary Development Plan Proposals Map (see figure 2 below).



Figure 2: Extract of Rochdale Borough Unitary Development Plan Proposals Map with Site Demarcated in Red

The site is not within a conservation area, nor does it accommodate any listed buildings. The site is also not within close proximity to any conservation areas or listed buildings, with the nearest listed building being approximately 250 metres to the East, on the other side of the M62 Motorway (Brick-Built House at Chadwick Fold).

In terms of flood risk, Environment Agency flood risk mapping indicates that the entire site lies within Flood Zone 1 which represents a chance of flooding less than 0.1% in any given year. The site is at very low risk from surface water too. The site is also not within a 'Development High Risk Area' in relation to coal mining.

The Proposed Development

Pre-application advice is sought in relation to the demolition of the existing buildings and their replacement with residential development.

An indicative layout has been submitted alongside this pre-application request which allow us to have a worthwhile discussion with you regarding the design of the proposal as well as assist you in providing constructive advice.

This indicative drawing displays 11 dwellings, with 10 no. semi-detached properties and 1 no. detached property. However, it is envisaged that the detached property could be substituted with a semi-detached building and that the site could accommodate 12 dwellings.

The indicative plan displays a layout which recognises the existing residential development immediately to the West of the site, with two rows of dwellings following a relatively similar building line, so as to sympathetically integrate with built development.

It is anticipated that the existing access off Broad Lane would be utilised to serve the dwellings to the South of the site, with the existing access lane modified. Whilst the indicative plan displays access to the dwellings to the North of the site from Ginnell Farm Avenue, it is possible that an access lane stemming from the Broad Lane access could also potentially accommodate a few of the Easternmost dwellings to the North.

The Northern dwellings could address Ginnell Farm Avenue and the Southern dwellings could face the access lane at the South of the site. In addition, the Easternmost dwellings in each row could address Broad Lane (a relatively similar concept has been adopted in the adjacent residential development in relation to corner plots (please see Appendix B containing photographs for examples)).

Consideration would be given to separation distances as outlined within Rochdale's Residential Design Guide, whilst also bearing in mind the existing separation distances within the immediate locality.

In terms of scale, it is anticipated that the dwellings are to be no more than two storeys in height to respect the scale of the housing adjacent the site to the North, North West and West. Materials for the buildings would respond to the materials used within the immediate locality (noting that red and orange brick are the predominant finishing materials used for external walls and concrete tiles are the predominant roofing material). A small number of different house types with varying features of interest could be provided within the site.

Each property would be provided with adequate off-street parking.

In terms of landscaping, properties are to be provided with good sized private gardens as well as space to store bins. Care will be taken so that the public realm is not dominated by hardstanding. Of note hedging could be maintained along the Eastern boundary of the site to soften the development from Broad Lane.

Planning History

Based on the information available online via Rochdale Borough Council planning application database, the following applications at the site have been identified below, with an analysis of the most noteworthy applications made further below:

- 90/D25146 – Residential Development – Withdrawn on 16th October 1992.
- 11/D54325 – Single Storey Rear Extension To Dwelling Including Formation Of Raised Decking And Access Ramp To West Side Of Extension – Withdrawn on 3rd June 2011.
- 11/D54765 – Single Storey Rear Extension To Dwelling Including Formation Of Raised Decking And Access Ramp To West Side Of Extension (Resubmission D54325) – Refused on 16th November 2011.
- 12/55581/OUT – Outline application for residential development including the construction of the access from Broad Lane. Appearance and landscaping, layout and scale reserved for subsequent approval (all matters reserved apart from access) – Refused by LPA, but Appeal Allowed on 29th May 2013.
- 13/01219/HOUS – Demolition of existing outbuilding and erection of detached garage block – Refused on 8th April 2014.
- 13/01220/HOUS – Single storey extension to north facing elevation of dwelling – Refused on 8th April 2014.
- 13/01261/ANM – Non material amendment under S96A of the Town and Country Planning Act 1990 to make a minor amendment to the approved parameters plan (ref: 473A-13C) (Condition 5) pursuant to planning permission 12/55581/OUT – Approved on 6th January 2014.
- 13/01339/REM – Application for reserved matters following outline permission 12/55581/OUT (for means of appearance, landscaping, layout and scale) for the erection of 110 dwellings and the diversion of footpaths MILFP 330 – Approved on 11th April 2014.

- 14/00903/VRCON – Application to vary condition 9 of planning permission 12/55581/OUT in respect of noise levels within gardens or outside space – Withdrawn on 30th September 2015
- 14/01013/HOUS – Demolition of existing outbuilding and erection of detached garage block – resubmission – Approved on 7th October 2014.
- 14/01014/HOUS – Single storey extension to north facing elevation of dwelling (resubmission of 13/01220/HOUS) – Approved on 7th October 2014.
- 15/00571/AM – Minor material amendment to planning permission 13/01339/REM to facilitate the relocation of the electricity substation and amended layout of plots 29-34 – Withdrawn on 30th September 2015.
- 15/00714/ANM – Non-material amendment to planning permission 13/01339/REM to facilitate the relocation of the electricity substation – Approved on 1st July 2015.
- 16/00080/S106 – Application to modify the terms of the planning obligations contained within the Section 106 Agreement pursuant to outline planning permission 12/55581/OUT – Approved on 5th October 2016.

In 2014, two planning applications were submitted for householder development at Ginnell Farm (these being a 13/01219/HOUS for the erection of a detached garage, and 13/01220/HOUS for a single storey extension to the bungalow). However, both applications were refused by the LPA on 8th April 2014. The reasons for refusal in both instances refer to the protected open land allocation within the Rochdale Unitary Development Plan Proposals Map and that the proposals were contrary to the Unitary Development Plan policy relating to Protected Open Plan (Policy D/10). This policy stipulates that development proposals will only be permitted where they would be acceptable in the Green Belt, and the LPA considered that such development would not meet such criteria.

These applications were refused after an outline application for residential development (12/55581/OUT), which included the pre-application site, was allowed at appeal. The indicative layout displayed housing on the Ginnell Farm site as displayed in Figure 3 below as did the approved parameters plan under this application (Figure 4). Whilst the LPA initially refused the application, the protected open land allocation did not constitute part of the reasoning. This was due to a number of factors, including the lack of a five year housing land supply at the time, it previously constituting allocated land, that such protected open land is not intended to prevent development of land in perpetuity and that the land does not have any agricultural or recreational value, no wildlife interest or public access.

The Planning Inspector concurred with this conclusion regarding protected open land, and stated:

“Where relevant policies are out of date (as I consider to be the case here) planning permission should be granted unless any adverse effects of doing so would significantly and demonstrably outweigh the benefits...”



Figure 3: Indicative Layout Plan submitted alongside LPA Ref: 12/55581/OUT



Figure 4: Approved Parameters Plan Under LPA Ref: 12/55581/OUT

Whilst a subsequent Non-Material Amendment application was submitted (LPA REF: 13/01261/ANM) altering the parameter plan approved under 12/55581/OUT (resulting in the retention of Ginnell Farm), it is clear from the above that residential development at the site was considered acceptable in principle. Given the short time frame since this outline planning permission, it is considered that this is a material planning consideration of significant weight in relation to the proposed residential development at this site.

Two further applications were submitted in 2014 (14/01013/HOUS and 14/01014/HOUS), following the refused outline applications for a garage and extension at Ginnell Farm. These householder applications were re-submissions of the aforementioned refused applications at the site and were approved. Under these applications, the LPA gave more consideration to the approved residential

development referred to above (12/55581/OUT and the reserved matters application which followed, LPA Ref: 13/01339/REM) in their delegated reports. The delegated reports also outlined that consideration needed to be given to the intention/objectives of Policy D/10 (Protected Open Land) of the Unitary Development Plan. In addition, the delegated reports detailed that Ginnell Farm site is entirely enclosed by development, and that the former open character that the property once had has been entirely lost. As a consequence, both delegated reports concluded the following:

“It is considered that the application site no longer achieves the roles (objectives) set down in the supporting text for policy D/10 and its intentions in protecting the countryside. Therefore, it is not considered that the proposed development would be at odds with policy D/10 which is recognised as being out-of-date in some respects.”

Following the approval of the above discussed applications, the Core Strategy was adopted (in October 2016). However, the site is still within allocated protected open land, as the Unitary Development Plan is still in place until the LPA adopt the Allocations Development Plan. Whilst Policy D/10 of the Unitary Development Plan has been saved, the Core Strategy introduced a further policy in relation to protected open land, this being Policy G5 (Managing Protected Open Land). The wording of this policy and the text supporting it has some differences to that contained within saved Policy D/10 of the Unitary Development Plan, but there are still considerable similarities in terms of the purpose/intention of both these policies when analysing the supporting text (i.e. to safeguard land for development, to preserve the open character, and a green infrastructure resource). Given this, it is considered that the aforementioned applications are material considerations of great weight when considering residential development on this site,

The following developments approved after the adoption of the Core Strategy and located within protected open land allocations are also considered relevant to the assessment of this pre-application advice request:

- 17/00968/FUL – Land At Dean Farm, Badger Lane, Rochdale, OL16 4RQ – Erection of 58 residential dwellings including access, landscaping and associated works – Approved on 21st December 2021.
- 18/00869/FUL – Land South Of Langley Lane And West Of Silver Birch Stables, Birch, Middleton – Residential development: erection of 23 dwellings and provision of access from Langley Lane, with associated hard and soft landscaping; retaining walls; pumping station; and, other associated works – Approved on 20th September 2022.

Planning Policy and Initial Planning Assessment of Main Issues

Section 38(6) of the Planning and Compulsory Purchase Act states that for the purpose of any determination to be made under the Planning Acts, the determination must be made in accordance with the plan, unless material considerations indicate otherwise.

Rochdale Borough Council's Development Plan comprises the Adopted Core Strategy (adopted 2016) and Rochdale Borough Unitary Development Plan (UDP) and Policies (including Maps) (adopted 2006).

The Allocations Plan is to replace the Unitary Development Plan when adopted, but the Allocations Plan is currently an emerging development plan document. The emerging development plan

document, Places for Everyone Plan, which would cover nine council areas in Greater Manchester, including Manchester City Council is also acknowledged.

The National Planning Policy Framework (NPPF) and the associated National Planning Practice Guidance (PPG) are material considerations.

In addition to the above, Rochdale Borough Council has a number of adopted Supplementary Planning Documents, including: Guidelines and Standards for Residential Development (June 2016); Oldham and Rochdale Residential Design Guide (September 2007); Provision of Recreational Open Space in New Housing (March 2008) [Updated January 2017] Affordable Housing (March 2008); Biodiversity and Development SPD; Climate Change Adaptation SPD; Design & Planning Process SPD; Residential Design Guide SPD; Public Realm SPD; and Urban Design Guide SPD.

The following sub-headings provide an initial assessment of the Main Issues considered relevant to the proposed residential development. It is acknowledged that further material considerations are relevant to the site, but these have not been discussed in detail as we are seeking to establish the acceptability of the principle of the development at this stage, as well as comments regarding the design and layout illustrated in Appendix A. However, these will be taken into consideration in any formal planning application on this site.

Principle of the development

Policy C1 of the Core Strategy states that at least 460 additional dwellings per annum are to be delivered in the Borough in the period 2012-2028. The text supporting this policy outlines that this is a challenging target and *'not a ceiling and therefore may be exceeded provided that it is sustainable, it can be supported by existing or new infrastructure and it meets the Council's priorities'*. Based on this, the policy sets out that whilst the plan seeks to ensure the focus is on maximising the use of brownfield sites, the development of greenfield sites may be necessary and accepted, specifically where it is demonstrated that the development would have limited adverse impact on green infrastructure or amenity value in and around the site; and green infrastructure is, wherever possible, incorporated into the scheme.

Policy C1 also outlines that it should be ensured that sites are sustainable with good access to local services, facilities, green infrastructure, shops, jobs, schools and public transport.

Saved UDP Policy G/D/1 establishes that new development, wherever possible and appropriate should be concentrated within the urban area in order to support urban regenerations and to protect the countryside.

Policy C3 of the Core Strategy relates to delivering the right type of housing, and states that new development must take into account local needs and aspirations of the Borough. It states a number of measures in order to do this, including ensuring that the supply of larger, high value housing is improved.

As alluded to, the site is within land allocated as 'protected open land'. Together, Core Strategy Policy G5 and saved UDP Policy D/10 provide the policy context for considering proposals which involve development on protected open land (until such time as the emerging Allocations Plan is adopted).

Neither policy explicitly prevents the development of protected open land; however, they do set out a number of criteria that must be met.

Policy G5 of the Core Strategy sets out that in relation to development in protected open land:

- a. "Development on open land outside the urban area and not in the green belt will be resisted unless: it is limited development that would be acceptable were it in the green belt; or*
- b. it is small scale development which is consistent with other detailed policies and site allocations in the Local Development Plan; or*
- c. it satisfies 3 below.*

3. Release of Protected Open Land

Protected Open Land will not be released for development unless all the following apply:

- a. there is evidence that the development is needed and that 'urban' brownfied and greenfield sites are not available to meet those needs;*
- b. the location of the site is sustainable and is in accordance with the overall Spatial Strategy;*
- c. the development does not undermine the delivery of other currently allocated sites or key regeneration priorities and can help to deliver wider regeneration;*
- d. development could be accommodated without an unacceptable impact on the area's landscape, biodiversity or wider green infrastructure value;*
- e. there is evidence that the land is physically suitable for the scale and type of development proposed; and*
- f. the development and supporting infrastructure is capable of being delivered.*

Where the release of protected open land can be justified, the Council will seek to identify it as an allocation in a future DPD. Any proposals that come forward would need to:

- g. involve a comprehensive scheme for the delivery of the development, transport and other necessary infrastructure to serve the development; and*
- h. identify measures to address environmental impacts and where possible provide local benefits."*

The text supporting Policy G5 of the Core Strategy outlines that sites are protected for their amenity value and in recognition of the need to focus development and regeneration within the urban area and on brownfield sites. The text notes that whilst some protected areas have intrinsic open land value, not all provide a vital green infrastructure resource. Some therefore provide a potential resource and flexibility to meet future development needs which cannot be met in urban areas or on previously development plan. It goes on to state that protected open land should not be released for development unless the need to do so can be justified, that the site is in a sustainable location, and that it does not have harm important landscapes or green features or local residential amenity.

Further to this, as noted, saved Policy D/10 of the UDP relates to protected open land. This is a permissive policy rather than framed to specify the form of development that will be restricted. It states that development will be permitted if it falls within one or more of the following categories:

- (a) Development which would be acceptable were it in the Green Belt; or
- (b) Limited infilling within an established pocket of housing or industry where this is in scale with the area and will not adversely affect its character or surroundings; or
- (c) A limited extension to an existing building which:
 - (i) Forms part of an existing source of employment; or
 - (ii) Is necessary for the establishment of a new enterprise or business which satisfies other policies of the Plan; and
 - (iii) Is sited within the existing curtilage of the business concerned and will not adversely affect the character of the surrounding land and its openness.

Saved Policy D/10 goes on to state: *“Where new buildings are permitted, they should be sited to form a group with existing buildings. Where this is not possible, buildings, car parking areas and other new structures, should be sited where they will be well screened and unobtrusive in the landscape. All buildings and extensions should be of a high standard of design, using materials that are compatible with the landscape, and should not detract from the visual amenity and environment of adjacent Green Belt.”*

The text supporting this saved policy outlines the purpose of such a policy and this is very similar to the objectives of Policy G5 of the Core Strategy.

As referred to above in the planning history section, outline planning permission has been granted for housing on this site, as part of a larger housing development under LPA Ref: 12/55581/OUT. Whilst this section of land was not developed, this previous permission for residential development is a material consideration of significant weight. It is worth noting that this application for residential development was considered acceptable only 10 years ago and that the policy context is not considered to have materially changed given the similarities between Policy G5 of the Core Strategy and saved Policy D/10 of the UDP (especially with regard to their purposes). As such, the principle of residential development at the site is considered acceptable.

In addition to the above, it is important to consider the intentions/objectives of these policies relating to protected open land. The Ginnell Farm site once comprised part of a much larger protected open land allocation, but this open space substantially decreased with the construction of residential development directly to the North, North West and West of the site. This has ultimately left a small parcel of land, this being Ginnell Farm, as protected open space on the North side of the M62. This is virtually fully enclosed by development now, and therefore no longer fulfils the role of acting as protected open space between the settlement and the green belt. Further to this, the site itself includes residential development with dilapidated buildings (it is no longer an agricultural holding) and does not provide a vital green infrastructure resource. Given this, it is considered that the site no longer achieves the roles set down in the supporting text for these policies and their intentions in protecting the countryside.

Permitted development rights are also intact at the site which means further development could be constructed without the requirement of planning permission.

Whilst it is appreciated that the Allocation Plans is an emerging document, it is also considered relevant to stress that the site is not displayed as protected open land within the draft maps.

Given the above factors, the principle of residential development at the site is considered acceptable.

Notwithstanding the above, consideration will be briefly given to criteria 3 of Policy G5 of the Core Strategy below:

- A) There is evidence that the development is needed and that ‘urban’ brownfield and greenfield sites are not available to meet those needs – It is acknowledged that the latest published information by Rochdale Council suggests that the Council can demonstrate a five year supply of housing land based on the Core Strategy target. However, Policy C1 of the Core Strategy outlines that the 460 dwellings per annum is not a ceiling. In addition, regard needs be given to the more recent housing need figures contained within the draft Places for Everyone document which indicates a housing requirement in the Rochdale Borough of 616 dwellings per annum over the period 2021-2037. This annual requirement is notably higher than the Core Strategy requirement (460 dpa), as well as the current local housing needs figure (520 dpa) as outlined in the latest Strategic Housing Land Availability Assessment. Given this, it is considered that a significant uplift in housing delivery is required on sustainable sites in the Borough (such as this) in order to make an important contribution to the Borough’s deliverable housing supply and meet the needs identified within the Places for Everyone document.

In terms of the availability of other brownfield sites, viability on such sites is likely to be marginal at best especially with regard to the additional constraints of such land (for example, they may have high clearance and remediation costs). Given this, it is likely that additional greenfield sites beyond the existing urban area will be required to help meet identified needs.

In addition, regard is had to LPA Ref: 18/00869/FUL, where residential development was approved in 2022 on protected open land. The committee report outlined that the Council is actively trying to increase the number of higher value homes in the Borough (referencing Policy C3 of the Core Strategy), and that such a site was more capable to deliver such housing than ‘more challenging’ urban sites. The committee report concluded that:

“Given the Council objective of increasing the amount of higher value homes and the fact that this site may be capable of delivering such housing it is considered that criterion (a) of policy G5 has been met since ‘urban’ brownfield and greenfield sites are not available to meet those needs.”

The Ginnell Farm site also opens itself up to accommodate higher value homes to address these housing needs of the Council.

- B) The location of the site is sustainable and is in accordance with the overall Spatial Strategy – The principle of residential development at the site has already been accepted with the approval of LPA Ref: 12/55581/OUT. This outlines the site is considered to be within a sustainable location. Of particular note, the committee report for this application stated the following: ‘the site is in a sustainable location with good access to shops, services and public transport’. It is the case that the site is adjacent to an existing housing development and is within extremely close proximity to bus stops with frequent services to Rochdale Town Centre and Shaw.

With regard to the overall Spatial Strategy, Policy SP2 of the Core Strategy seeks to focus the majority of new development (including housing) over the plan period in the South of the

Borough (the Manchester Fringe) as there is good access to existing facilities and infrastructure, the motorway corridor, public transport facilities and the wider Greater Manchester city region. As the site is located to the South of the Borough (in the Manchester Fringe) and adjacent to a growth corridor, it is considered that the proposal is in accordance with the overall Spatial Strategy.

- C) The development does not undermine the delivery of other currently allocated sites or key regeneration priorities and can help to deliver wider regeneration – The Core Strategy does not allocate sites for residential development. The Allocations Plan, which is emerging, is to do this. The UDP did allocate a number of small sites which were expected to provide approximately 480 dwellings. Given that this plan was adopted in 2006, if these allocated sites have not been developed by now then it is unlikely they will be in the near future. Saved Policy H/2 of the UDP outlines key regeneration priorities, but these will be unaffected by the proposed development given their aims. Further to this, the quantum of development proposed is low, therefore this would not undermine the delivery of allocated sites or existing regeneration priorities.

Additional housing, which is proposed, will also help support and sustain the local economy.

- D) Development could be accommodated without an unacceptable impact on the area's landscape, biodiversity or wider green infrastructure value – The site is virtually fully enclosed by development, with housing to the North, North West and West, the M62 Motorway to the South, and housing and Kingsway Business Centre Park to the North East. The site is relatively small and also accommodates development, including a number of dilapidated structures. Given this, it is considered and development on the site would have a negligible impact upon the landscape. Given the surrounding land uses and the residential nature of the site, the site is anticipated to be of low biodiversity value and it is considered that the impacts on wider green infrastructure value would be very limited.
- E) There is evidence that the land is physically suitable for the scale and type of development proposed – This site already accommodates built development, including residential buildings. It is also surrounded by residential development and permission has been granted for residential development at this site under LPA Ref: 12/55581/OUT. In addition, it is important to stress that the site was part of a larger site that was considered suitable and appropriate for residential development through its allocation for residential development in the 1999 UDP. It is therefore considered that the site is clearly capable of accommodating residential development.
- F) the development and supporting infrastructure is capable of being delivered – There are no site constraints which mean that residential development could not be delivered at the site. As noted, the site already accommodates residential development, it has been previously permitted for residential development (LPA: 12/55581/OUT), it has been allocated for residential development previously and it is adjacent to residential development to the North, North West and West.

Given the above, the proposed development is in accordance with each of the six criteria for under Policy G5 of the Core Strategy.

Affordable Housing

Reference is noted to Policy C4 of the Core Strategy, which states that the Council will seek affordable housing on all developments of 15 dwellings or more. It is not sought to develop 15 dwellings on this site as such a quantity would likely result in a contrived form of development.

Other Material Considerations

In relation to the impact upon the character and appearance of the locality, as well residential amenity and highways safety, should a planning application be submitted consideration will be given to policies contained in the development plan, Council guidance and the National Design Guide. That being said, an indicative layout has been submitted (discussed in more detail in 'the proposed development' section above) to allow us to have a worthwhile discussion with you regarding the design of the proposal as well as assist you in providing constructive advice.

Nonetheless, it is considered that the replacement of some of the dilapidated buildings at the site as well as the stark closeboard fencing facing Ginnell Farm Avenue with a sympathetic residential development would represent an environmental improvement of the site. In addition, safe access to the site is considered achievable, especially given the existence of an access off Broad Lane and that Broad Lane is limited to a 30mph speed limit.

Further to these issues, there are of course several other material planning considerations relating to the proposed development. Such considerations include, but are not limited to: noise, air quality, ecology, trees, adapting to climate change, flooding risk and drainage.

As outlined in the 'Proposed Approach to a Planning Application' section below, a number of surveys and assessments would be prepared to support a formal planning application for the residential development at the site. At this stage, it is not considered that these material considerations would cause unacceptable planning impacts which would warrant a refusal of planning permission. The assessments would identify the impacts of the proposed development and would outline any mitigation measures required to reduce the identified impact.

Summary and Proposed Approach to a Planning Application

The analysis section above outlines that residential development at the site would be acceptable in principle. It is considered that the site could accommodate a residential development which integrates sympathetically and successfully with existing development, prevents detrimental harm to the amenity of any neighbouring properties, whilst ensuring a good quality of amenity for any future residents of the site. In addition, it is not considered that there are any material considerations that would cause unacceptable planning impacts which would warrant the refusal of a planning application for residential development.

Any future formal planning application would be accompanied by detailed elevations, floor plans, layout and landscaping plans etc. as well as surveys and reports required as part of the Council's validation requirements and considered necessary to inform the formal assessment of the proposal. Subject to your comments, we would propose a full planning application and the following description of development: 'demolition of existing buildings and erection of x dwellings at Ginnell Farm.'

The scope of the application would include the following:

- Covering Letter;
- Planning Application Form;
- Location Plan;
- Existing Site Plan;
- Proposed Site Layout/Block Plan;
- Existing Elevations and Floor Plans;
- Proposed Elevations and Floor Plans;
- Proposed Roof Plan;
- Existing and Proposed Site Sections and Finished Floor and Site Levels;
- Planning Statement (including Protected Open Land Assessment and Energy & Climate Change Adaptation Statement);
- Design and Access Statement;
- Sustainable Drainage Assessment;
- Tree Survey and Arboricultural Impact Assessment;
- Arboricultural Method Statement;
- Preliminary Ecological Appraisal, as well as any necessary additional survey work identified within this;
- Biodiversity Net Gain Statement;
- Crime Impact Statement;
- Noise Impact Assessment; and
- Air Quality Assessment.

We would very much appreciate your:

- thoughts on the likelihood that this site might be acceptable to the Council for residential development;
- advice in terms of the layout and design of the development; as well as
- advice on the proposed approach to a planning application as detailed above.

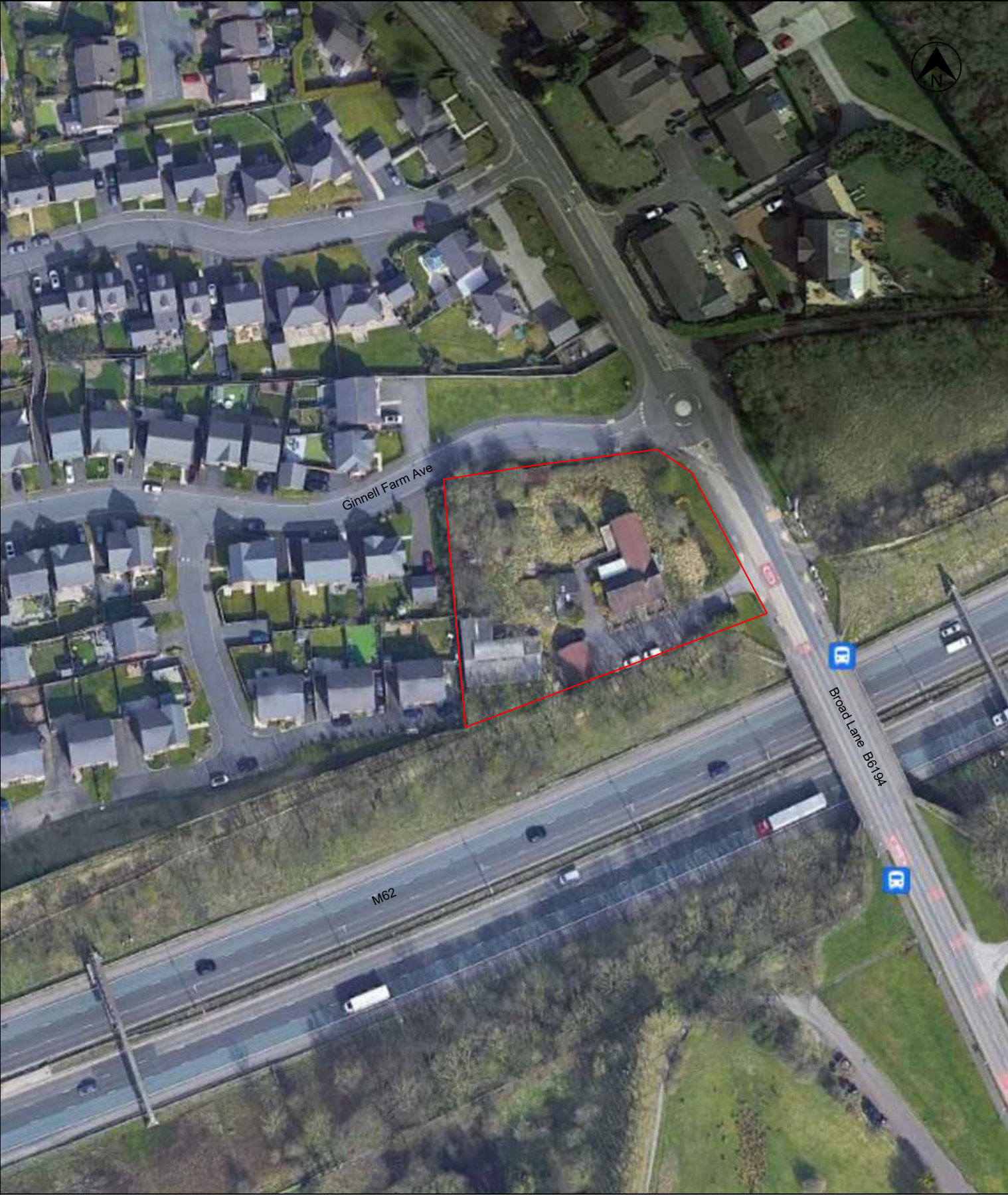
If you have any questions or queries regarding this enquiry, please do not hesitate to get in touch. We would wish to request a meeting with yourselves as soon as possible and look forward to receiving your response in due course.

Yours faithfully

Stuart Howden MRTPI

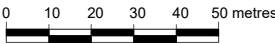
Senior Planner

Energyline Limited



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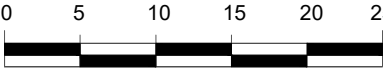
— Site Boundary



Ginnell Farm, Rochdale

Title. Location Plan		Date. Jan 2024	
Drawing No. 24NP498/01/001		Scale. 1:1250	
Size. A3	Format. PDF	Sheet. 1	Rev. A







**northern
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A trading name of Energyline Ltd

Ginnell Farm, Rochdale

Title: Indicative Proposed Layout option		Date: Jan 2024	
Drawing No. 24NP498/01/003		Scale: 1:500	
Size: A3	Format: PDF	Sheet: 1	Rev: A