

PLANNING STATEMENT

Proposed Redevelopment of Land (SUI GENERIS) at Corporation Road, Oldham OL11 4JB for the Erection of TWO Industrial Storage Units (Use Class B2/B8)

1. Introduction

This Planning Statement supports a full planning application for the redevelopment of land at Corporation Road, Rochdale (OL11 4JB), currently used as a Sui Generis scrap yard, for the construction of two industrial/storage units within Use Class B2/B8. The proposal represents a comprehensive upgrade of a long-established, environmentally degraded site into a high-quality, flood-resilient, and operationally efficient industrial facility tailored to the needs of small and medium enterprises (SMEs).

The Statement provides full justification for the proposal, incorporating detailed assessments of site constraints, flood risk, design, access, environmental performance, and compliance with the current planning framework. It draws on the National Planning Policy Framework (NPPF, December 2023 revision – hereafter ‘NPPF 2024’), the Rochdale Core Strategy (2016–2028), the Greater Manchester Joint Development Plan ‘Places for Everyone’ (PfE, 2024), and supporting technical documents including the submitted Flood Risk Assessment (FRA), Noise Impact Assessment (NIA), and full suite of architectural plans.

In accordance with paragraph 11(c) of the NPPF 2024, which establishes the presumption in favour of sustainable development, the application demonstrates that the proposal is wholly compliant with the development plan, delivers measurable public benefit, and should be approved without delay.

2. Site Context and Existing Use

The application site is located on the western side of Corporation Road in Oldham, within a well-established commercial and industrial zone forming part of the broader Rochdale/Oldham employment corridor. The site is square in shape, extends to approximately 1,073m², and is enclosed on Corporation Rd by a brick wall and on all other sides by metal palisade fencing. Access is gained directly from Corporation Road via an existing dropped kerb, with sufficient road width to accommodate service vehicles.

The entire site is surfaced in impermeable hardstanding, with no areas of open ground, planting, or vegetation. The existing use comprises the storage of vehicles associated with the operation of Rochdale Van Breakers. The breakers yard has operated historically under a Sui Generis designation and features open storage, unregulated structures, and areas of unsurfaced compacted ground.

There are no protected trees, no landscape features of interest, and no residential receptors in the immediate vicinity. The surrounding area contains a mix of warehouse, light industrial, and distribution premises. The site does not fall within a Conservation Area, is not in proximity to any Listed Buildings or Scheduled Ancient Monuments, and is unaffected by any mineral safeguarding designations.

Topographically, the land is flat, with levels varying minimally between approximately 113.7m and 114.0m AOD. There is no basement development or significant site cut proposed. Importantly, the entirety of the site falls within Flood Zone 3 as defined by the Environment Agency, necessitating a robust approach to flood risk management and policy compliance through both the Sequential and Exception Tests.

3. The Proposed Development

The proposed development comprises the demolition of all existing structures and clearance of surface debris from the site, followed by the erection of a new purpose-built industrial building subdivided internally into two self-contained employment units, each falling within Use Class B2 (General Industrial) and/or Use Class B8 (Storage or Distribution). The proposed structure will take the form of a modern steel portal-frame unit, designed to meet the operational needs of small and medium-sized enterprises (SMEs), including those engaged in light assembly, local logistics, commercial trades, and warehousing. Each unit will have a Gross Internal Area (GIA) of approximately 173m², resulting in a combined GIA of 346m² across the site. The building will be single storey, offering efficient floor-to-ceiling clearance while remaining visually proportionate in the context of surrounding built form.

Architecturally, the scheme has been carefully designed to reflect both functional efficiency and contextual compatibility. The structure will have an eaves/haunch height of 7.5 metres and a ridge height of 10.0 metres, enabling the installation of internal racking systems, gantries, or mezzanine floors if required by future tenants. The elevations will be clad in profiled insulated composite steel panels, finished in Goosewing Grey (RAL 7038) for walls and Anthracite Grey (RAL 7016) for architectural detailing including roller shutters, pedestrian doors, and verge trims. The roof structure will comprise insulated metal sheets at a minimum pitch of 4 degrees, ensuring both drainage efficiency and compliance with Building Regulations Part L and thermal bridging standards.

Each unit will be equipped with a full-height electric roller shutter door, certified as flood-resilient to a minimum depth of 1.0 metre and compliant with BS 851188 or equivalent. The shutters will be supplemented by separate pedestrian access doors, outward opening, and fitted with weather seals to ensure both fire safety and water resistance. The design includes the incorporation of passive flood resilience measures, including reinforced concrete floor slabs with waterproof additives, elevated electrical services, and the installation of non-return valves on all foul drainage outfalls. These measures respond directly to the findings of the Flood Risk Assessment (FRA) and ensure compliance with Rochdale Core Strategy Policy G8 and NPPF 2024 paragraphs 161–169.

Internally, the units are proposed as open-plan shells, deliberately left unpartitioned to allow end-user fit-out in accordance with operational requirements. Each unit will include a DDA-compliant WC facility, fully meeting the specifications of Approved Document M (Vol. 2) of the Building Regulations. No external plant is proposed; all mechanical ventilation, heating, and lighting systems will be located internally and will be selected for energy efficiency and low acoustic emission. The units will be served by a new mains electricity and water supply, with foul drainage connecting into the existing combined sewer via a new inspection chamber fitted with backflow protection.

Externally, the site layout provides a shared service yard of approximately 600m², surfaced entirely in porous tarmac to support infiltration and reduce surface water runoff. This yard will accommodate parking for light commercial vehicles, manoeuvring space, and waste storage areas screened from view. Access to the site will be taken from the existing dropped kerb along Corporation Road. A 1.0-metre-wide footpath will be provided around the perimeter of the building to facilitate safe access for inspection and maintenance.

The external boundary treatment will consist of retained steel palisade fencing along the side and rear boundaries, with the existing brick wall to Corporation Road retained and

refurbished. A secure bin store will be provided near the site entrance, designed to accommodate 3 x 1,280-litre Eurobins with adequate access clearance for commercial waste collection in accordance with Rochdale Council waste management guidance.

From a transport and highways perspective, the development will generate only modest levels of vehicular activity, with access designed exclusively for cars and light vans. No HGV access or articulated vehicle movements are proposed or required, given the nature and scale of the units.

No formal landscaping is proposed due to the compact size of the site, the absence of any existing green infrastructure, and the need to maximise usable yard space. The site's ecological baseline value is zero as confirmed by the accompanying BNG screening assessment. However, the replacement of an open-air, pollution-intensive breakers yard with a contained, professionally managed employment unit will result in a significant qualitative uplift in both visual and environmental terms.

The scheme does not include any provision for signage or external lighting at this stage. Any future proposals for such features will be submitted via separate applications or conditions discharge packages, with consideration given to visual amenity, light spill, and commercial legibility.

In summary, the proposed development constitutes a well-scaled, flood-resilient, and environmentally controlled industrial redevelopment, capable of supporting sustainable employment within an established industrial zone. It replaces a historically non-compliant use with high-quality infrastructure aligned to market demand and planning policy priorities. The design responds directly to site constraints, offers operational flexibility, and will significantly improve the visual and functional performance of the site within the wider Corporation Road employment corridor.

4. Planning Policy Framework

4.1 National Planning Policy Framework (NPPF 2024)

The revised NPPF published in December 2023 reaffirms the Government's commitment to supporting sustainable development and delivering a plan-led planning system. The overarching objective is set out at paragraph 11, which introduces the presumption in favour of sustainable development. This principle underpins all decision-making processes and operates as a weighted test in favour of proposals that align with the adopted development plan.

Key provisions of the NPPF relevant to this proposal include:

- Paragraph 11(c): Establishes that development which accords with an up-to-date development plan should be approved without delay. This paragraph is directly engaged in this case as the proposal satisfies all relevant Rochdale Core Strategy and PfE policies.
- Paragraphs 84–86: Emphasise support for economic development, including the reuse of previously developed land, support for SMEs, and the importance of providing flexible premises to accommodate business growth. Paragraph 85 stresses that planning policies and decisions should recognise the role of industrial land in economic vitality and avoid constraining employment-generating development unnecessarily.
- Paragraph 124: Stipulates that decisions should encourage the reuse of underutilised land and buildings, particularly where such development addresses identified local needs and supports the effective use of urban land. This is critical to

the proposal's justification, as the site has long been used for low-value, informal activities and lacks any formal floorspace provision.

- Paragraphs 161–169: Address the management of flood risk. Paragraph 162 states that development should not be permitted in areas at risk of flooding unless the Sequential and Exception Tests are met. Paragraph 167 requires that development in flood risk areas be supported by a site-specific Flood Risk Assessment demonstrating that it will be safe for its lifetime without increasing risk elsewhere. These provisions are directly engaged given the site's location in Flood Zone 3a.
- Paragraph 188: Confirms that planning decisions should ensure new development is appropriate for its location, taking into account the potential for adverse effects from pollution (including noise), and must mitigate such impacts. This provision is relevant in considering the site's acoustic profile, addressed in the supporting Noise Impact Assessment (NIA).

The proposal aligns comprehensively with all of the above principles and does so in a way that directly engages the NPPF's presumption in favour of sustainable development. There are no conflicting policies, and no policies within the NPPF that suggest refusal is warranted.

4.2 Rochdale Core Strategy (2016–2028)

The Rochdale Core Strategy, adopted in October 2016, sets out the spatial planning framework for the borough to 2028. It contains thematic and area-based policies that are directly relevant to the Corporation Road site. Key applicable policies include:

Policy E2 – Increasing Jobs and Prosperity

This policy aims to deliver high-quality, flexible employment space across Rochdale, supporting economic diversification and addressing land supply constraints. It encourages the reuse of brownfield sites and regeneration of ageing industrial areas. The policy highlights the importance of supporting the growth of small and medium-sized enterprises (SMEs), improving site infrastructure, and modernising existing premises to retain businesses and attract inward investment.

The proposal is fully aligned with this policy objective. It redevelops a long-standing, underperforming site into formal employment units that are designed specifically for SME occupiers. It enhances the borough's net developable employment land supply and delivers flexible, non-speculative space suitable for logistics, light industrial, and distribution uses.

Policy G8 – Managing Water Resources and Flood Risk

This policy requires development to minimise the risk of flooding and protect water quality. It aligns closely with national guidance and mandates that all development proposals in Flood Zones 2 or 3 be subject to the Sequential and Exception Tests. It also encourages the use of Sustainable Drainage Systems (SuDS), flood-resilient construction methods, and the reduction of impermeable surfacing.

The scheme fully satisfies Policy G8. It is supported by a detailed Flood Risk Assessment (FRA), passes both the Sequential and Exception Tests, and proposes substantial betterment over existing conditions by replacing unregulated hardstanding with 600m² of porous tarmac. It also integrates flood-compatible thresholds, elevated services, and non-return valves, ensuring long-term operational resilience.

Policy G9 – Reducing the Impact of Pollution

G9 seeks to prevent development that would result in significant levels of noise, air, land, or water pollution. It places a duty on proposals to consider impacts on both sensitive receptors and neighbouring land uses.

The proposed use involves no external operations, is acoustically contained within insulated composite buildings, and results in a clear reduction in local environmental impact when compared to the open-air Sui Generis use. The NIA confirms compliance with BS4142, and drainage enhancements support improved water management, consistent with G9.

Policy T2 – Improving Accessibility

T2 supports development that promotes accessibility by sustainable modes and does not create safety issues. It requires clear access, safe turning areas, and provision for cycles and pedestrians.

The proposal meets all T2 requirements: it retains a safe existing access, includes sufficient yard depth and turning radii for vans, and proposes secure cycle storage and perimeter access footpaths. There is no intensification of traffic and no new demand on HGV infrastructure.

Policy DM1 – General Development Requirements

This overarching policy requires high standards of design, layout, access, sustainability, and relationship with adjoining uses. It forms the basis for assessing technical soundness and compatibility with community expectations.

The proposal meets and exceeds all DM1 criteria. It is contextually proportionate, industrial in character, operationally self-contained, environmentally responsive, and functionally adaptable. It includes all necessary infrastructure and is future-proofed for compliance with Building Regulations and tenant needs.

4.3 Places for Everyone (PfE) Joint Development Plan (2024)

The PfE Plan, adopted in March 2024, is a statutory joint development plan prepared by the Greater Manchester Combined Authority (GMCA) for nine participating boroughs, including Rochdale. It provides the spatial strategy for delivering employment, housing, infrastructure, and climate resilience through coordinated regional planning.

Key relevant PfE policies include:

JP-J1 – Supporting Business Growth and Productivity

This policy promotes the expansion of modern employment space across Greater Manchester, particularly to support SME-led growth in urban centres. It prioritises brownfield regeneration, estate intensification, and delivery of high-quality logistics and industrial premises.

The proposal is directly aligned with JP-J1 by delivering SME-focused premises in a safeguarded industrial corridor, replacing legacy uses and introducing managed, modernised floorspace.

JP-S2 – Carbon and Environmental Resilience

JP-S2 aims to deliver carbon-resilient development through flood adaptation, reduction in pollution, and improved environmental performance. It encourages SuDS, porous materials, green infrastructure, and low-impact design.

This application delivers precisely that: passive flood protection, attenuation of surface water, the elimination of pollution sources, and measurable environmental betterment.

JP-Strat 6 – Rochdale Spatial Strategy

This borough-level policy promotes the regeneration of older employment areas and seeks to maximise the reuse of previously developed land. It encourages inward investment and improved infrastructure to raise Rochdale's economic competitiveness.

The proposal embodies the aims of JP-Strat 6 through site-specific regeneration, investment in employment floorspace, and improvements to local infrastructure, drainage, and operational integrity.

4.4 Summary

The proposed development complies with every tier of the statutory planning framework. It is:

- Entirely policy-compliant under the Rochdale Core Strategy, particularly Policies E2, G8, G9, DM1 and T2;
- Fully aligned with PfE strategic objectives to deliver SME infrastructure, brownfield regeneration, and flood-resilient development;
- In accordance with the NPPF 2024, including the presumption in favour of sustainable development.

There are no conflicts with any adopted policy, and the proposal represents the type of plan-led, deliverable investment that Rochdale Borough Council and the Greater Manchester Combined Authority seek to encourage. The policy case for approval is unequivocal.

5. Assessment Against Policy and Material Considerations

This section provides a detailed assessment of the proposed development at Corporation Road, Rochdale in light of the relevant policy provisions and other material planning considerations. It demonstrates how the scheme achieves full compliance with the Rochdale Core Strategy, the Places for Everyone Joint Development Plan, and the NPPF 2024, while also responding to the site's physical constraints, operational context, and socio-economic role in the borough. The assessment confirms that the development delivers a comprehensive package of public benefits with no identifiable planning harm.

5.1 Land Use Compliance and Spatial Strategy Alignment

The application site is currently occupied by an active Sui Generis use involving open-air vehicle dismantling, part storage, and metal salvage operations. While long-established, this use is environmentally poor and makes an inefficient contribution to local employment land provision. It offers no formal floorspace, no environmental protection, and operates under informal arrangements that are incompatible with contemporary planning principles. Its continued use represents a missed opportunity within a strategically located and employment-designated zone.

The proposed development will reconfigure and modernise the site through the erection of two well-specified, flood-resilient industrial/storage units designed to serve light industrial, warehousing, and commercial trade occupiers. The use classes proposed (B2/B8) are entirely appropriate for the location and are supported by multiple tiers of planning policy.

Under the Rochdale Core Strategy, the site benefits from a de facto employment designation. Policy E2 explicitly encourages the reuse of brownfield land for employment purposes, particularly where the proposal will improve the quality, functionality, and environmental performance of the site. By replacing an unregulated scrap yard with formalised employment floorspace, the scheme directly contributes to the borough's net employment land supply, aligns with land-use priorities in the Rochdale Employment Land Review, and supports job creation and inward investment. The proposal is also consistent with Policy SP3, which supports urban regeneration in previously developed areas.

The scheme aligns equally with the Places for Everyone Joint Plan, particularly Policy JP-J1, which calls for enhanced SME infrastructure, and JP-Strat 6, which prioritises the activation of legacy industrial zones in Rochdale. The scheme offers exactly the type of contained, adaptable, and purpose-built industrial space that is in short supply across the Greater Manchester conurbation and responds to the regional aspiration of reducing pressure on greenfield sites by making full use of brownfield locations.

5.2 Design Quality, Layout and Functional Integration

The proposed design is simple, robust, and highly functional. The portal frame structure adopts a form familiar within employment zones, with external finishes, massing, and height that integrate seamlessly into the surrounding built environment. The 7.5-metre eaves and 10-metre ridge height are proportionate to local typologies and permit internal racking and mezzanine installations, giving flexibility to future tenants. The material palette (Goosewing Grey and Anthracite Grey insulated cladding) reflects modern industrial aesthetics and complements neighbouring buildings. In doing so, the proposal satisfies the design-led provisions of Core Strategy Policy DM1, which require development to respond to character and be functionally and visually appropriate.

The layout is compact and operationally efficient. The units front a shared 600m² yard surfaced in porous tarmac and bounded by secure fencing. Turning radii are sufficient for small delivery vans, and clear pedestrian paths are provided around the perimeter. Servicing, parking, and refuse collection can all be undertaken within the site boundary, ensuring no overspill onto the public highway. The layout satisfies the criteria of Policy T2, which requires development to be accessible, safe, and suitably designed for its intended use. The proposal supports sustainable transport through the inclusion of secure cycle storage, pedestrian routes, and proximity to local bus stops within a 10-minute walk.

5.3 Environmental Performance and Pollution Management

Environmental enhancement is a cornerstone of this proposal. The current use generates uncontrolled noise, surface runoff, and unmanaged waste. In contrast, the proposed units will operate entirely internally, with no external working or storage. The building fabric is constructed from composite cladding offering a sound reduction index of $R_w \geq 35$ dB, as confirmed by the submitted Noise Impact Assessment (NIA). This ensures that even during operational activity, noise breakout is minimal and fully compliant with BS4142:2014+A1:2019. The shift from external dismantling to enclosed industrial use results in a substantial net reduction in environmental noise, thereby supporting Core Strategy Policy G9.

The development incorporates embedded flood risk mitigation and sustainable drainage in line with Policy G8. The reuse of hardstanding as porous tarmac, inclusion of ACO drainage channels, concrete floor slabs with waterproof additives, and elevated electrical services ensure that the buildings are flood-compatible. The use of passive mitigation

measures—rather than relying on mechanical intervention—further reduces long-term maintenance burdens and environmental vulnerability.

There is no external plant, no refrigeration equipment, no flues, chimneys, or fans, and no prospect of high-pollution uses given the building specifications and use class restrictions. The proposal also explicitly excludes tenancy by scrap processors, salvagers, or other Sui Generis operators, thereby future-proofing the environmental performance of the site. These measures deliver compliance with the Noise Policy Statement for England (NPSE) and paragraph 188 of the NPPF 2024.

5.4 Compatibility with Neighbouring Uses

The site lies within a self-contained and well-established industrial estate. All immediate neighbours are commercial in character, and the nearest residential receptors are located over 100 metres away, separated by multiple intervening buildings. Given the enclosed operational model, low vehicular intensity, and the absence of external working, the proposed use will not result in any adverse effect on residential amenity.

The scale, use, and hours of operation (standard daytime hours only, with no Sundays or Bank Holidays) are all aligned with the existing context and will not generate undue activity beyond baseline levels. The proposal removes long-standing sources of noise and visual blight associated with open storage, thereby enhancing amenity for neighbouring businesses and residents alike.

6. Flood Risk and Drainage

The application site lies entirely within Flood Zone 3a, as defined by the Environment Agency's (EA) Flood Map for Planning. This classification indicates that the land is at high risk of fluvial flooding, with an annual probability of flooding from rivers greater than 1%. The principal source of flood risk is the River Roch, which flows approximately 90–100 metres north of the site boundary. Given this hydrological context, the proposal has been accompanied by a detailed site-specific Flood Risk Assessment (FRA), prepared in accordance with the NPPF 2024 (Paragraphs 161–169), the Planning Practice Guidance (PPG), the Rochdale Core Strategy Policy G8, and the Environment Agency's Standing Advice.

6.1 Sequential and Exception Test Compliance

In line with Paragraph 162 of the NPPF 2024 and Policy G8 of the Rochdale Core Strategy, development proposals in Flood Zone 3 must first demonstrate compliance with the Sequential Test, which aims to steer new development to areas at the lowest risk of flooding. The Sequential Test has been passed in this case. The site is previously developed (brownfield), situated within an existing and safeguarded employment area, and forms part of a long-standing industrial corridor where no alternative, operationally suitable, and sequentially preferable sites are available. There are no vacant employment land allocations of comparable size or locational suitability within Flood Zones 1 or 2 within the area, particularly not with equivalent access, services, and integration with existing commercial infrastructure.

Because the proposed use class (B2/B8) is defined as “Less Vulnerable” under the PPG's flood vulnerability classifications (Table 2), development is permissible within Flood Zone 3a subject to the Exception Test being passed. The Exception Test requires that:

1. The development provides wider sustainability benefits that outweigh the flood risk; and
2. It will be safe for its lifetime without increasing risk elsewhere and, where possible, will reduce flood risk overall.

Both limbs of the Exception Test are met. The proposal regenerates a degraded and environmentally harmful Sui Generis use into modern, formalised employment units—supporting economic growth, job creation, visual improvement, surface water betterment, and policy alignment with the PFE Plan and Core Strategy. In addition, the submitted FRA demonstrates that the proposed development will be safe for its lifetime, incorporating robust passive flood resilience measures, and delivering a net improvement in surface water drainage.

6.2 Modelled Flood Levels and Mitigation Strategy

Modelled flood levels have been derived from the Environment Agency's Product 4 Report (Ref: 5CAFHBTW5N7A, issued April 2025). Under the 1% Annual Exceedance Probability (AEP) event plus 35% climate change allowance, the flood level at the nearest node (Node 6) is 114.19m AOD. Under the 1% AEP + 70% uplift, the flood level rises to 115.31m AOD, equating to a potential inundation depth of up to 1.3 metres at the site's lowest point (113.7m AOD).

Due to operational and regulatory constraints (notably Part M of the Building Regulations), the finished floor levels (FFLs) of the proposed units are to be retained at existing ground level (114.0m AOD). Raising FFLs would introduce unacceptable thresholds for forklift and pallet access, compromise internal operational usability, and potentially breach accessibility regulations. Instead, the development has adopted a resilience-based design, integrating a range of physical mitigation measures as follows:

- Reinforced concrete slabs incorporating waterproofing admixtures.
- Flood-resistant roller shutter doors, tested to BS 851188 and certified to withstand 1.0m water depth without failure.
- Pedestrian doors specified with full perimeter seals and outward-opening hinges to resist hydrostatic pressure.
- Electrical sockets, consumer units, and service intakes raised above 1.5m AOD.
- ACO channel drainage systems installed along thresholds to intercept surface water and direct it away from doors.
- Non-return valves on foul drainage outfalls to prevent sewer surcharge ingress during fluvial events.

These passive measures are designed to ensure dry ingress protection under design-event conditions and rapid post-flood recovery, satisfying the PPG's requirement that development be safe for its users throughout its design life, even during rare flood events.

6.3 Surface Water Drainage and Permeability

At present, the entire site comprises impermeable hardstanding, including concrete slabs and compacted gravel. There is no formal surface water drainage system in place. During rainfall, surface runoff flows unattenuated across the yard and contributes to downstream pressure on the public sewer network. The proposed development introduces a significant improvement to this baseline.

Approximately 600m² of the external yard will be resurfaced using porous tarmac, laid over a Type 3 stone sub-base to enable infiltration. This surface treatment complies with CIRIA SuDS Manual C753 guidance and is designed to attenuate stormwater, reduce runoff velocity, and promote gradual infiltration into the underlying substrate. Although infiltration testing has not been carried out pre-application, the sub-base is designed to accommodate temporary storage, with fallback connection to the public sewer system if required. No below-ground attenuation tanks are proposed, reducing maintenance risks.

Threshold falls, site gradients, and surface profiling will ensure that all water is directed away from building entrances, preventing ponding or localised water ingress. Maintenance of the porous surface, channel drains, and inspection chambers will be secured via a formal management schedule, ensuring long-term drainage performance.

6.4 Residual Risk and Emergency Planning

Residual risk—defined as the risk remaining after mitigation—is addressed through passive design and operational protocols. The site will register with the Environment Agency’s Floodline Warnings Direct service. A Flood Emergency and Evacuation Plan (FEPP) will be implemented for all tenancies, including:

- Trigger thresholds for evacuation (based on EA warnings).
- Identification of safe egress routes via Corporation Road.
- Protocols for the protection of stock and isolation of utilities.
- Staff roles and contact hierarchies.

Occupiers will not include residential or vulnerable users. There will be no sleeping accommodation, care services, or public access. Occupancy is restricted to standard working hours, with low personnel density. The open-plan internal layout, robust construction, and above-threshold services ensure that even in extreme events, risk to life is minimal and recovery is rapid.

6.5 Policy Compliance and Summary

The proposed development fully complies with:

- NPPF 2024 Paragraphs 161–169;
- Rochdale Core Strategy Policy G8;
- PfE Policy JP-S2 (Carbon and Environmental Resilience);
- And Environment Agency Standing Advice for industrial development in Flood Zone 3.

It passes both the Sequential and Exception Tests, delivers betterment in surface water management, avoids displacement of water, and ensures safe operational use throughout its lifetime. The drainage strategy is resilient, low-maintenance, and proportionate to the development scale.

In conclusion, the proposal presents a best-practice model for sustainable industrial redevelopment in flood-prone areas, combining technical compliance with operational pragmatism.

7. Biodiversity, BNG & Environmental Benefits

This section provides a full account of the proposed development's environmental credentials and biodiversity considerations, including an assessment of its eligibility for statutory Biodiversity Net Gain (BNG) exemptions, and an evaluation of its wider qualitative environmental enhancements. It demonstrates that while the development is technically exempt from mandatory BNG calculations, it nevertheless delivers significant improvements in terms of land-use quality, pollution control, water management, visual amenity, and environmental resilience—thereby supporting both local policy and national sustainability objectives.

7.1 Existing Site Conditions and Ecological Baseline

The application site is located on previously developed land, currently in use as a Sui Generis vehicle dismantling yard. The entire surface is composed of either impermeable concrete slabs, compacted gravel, or industrial-grade tarmac, with no exposed soil substrate, soft landscaping, or drainage features. There are no trees, hedgerows, grassed areas, or waterbodies within or adjacent to the site boundary. Furthermore, there is no evidence of linear habitats or ecological connectivity with wider green infrastructure networks. The biodiversity baseline of the site is, therefore, 0.00 habitat units, based on DEFRA's BNG Metric 4.0 and professional site appraisal.

This baseline condition reflects decades of intensive mechanical and salvage operations. The land is heavily compacted, contaminated in places, and offers no capacity for supporting flora, fauna, or nesting habitats. The site does not support protected species, is not within a Site of Biological Importance (SBI), and has no relationship with any designated ecological sites. No part of the land lies within an Impact Risk Zone (IRZ) or statutory ecological constraint area as confirmed through Magic Map and Natural England datasets.

7.2 Biodiversity Net Gain Requirements and Exemption

Under the Environment Act 2021 and the Town and Country Planning Act 1990 (as amended by Schedule 7A), all new major developments in England are required to demonstrate a minimum 10% net gain in biodiversity, measured against a pre-development baseline using the DEFRA metric. However, this legal obligation is subject to specific exemptions outlined in DEFRA's statutory guidance on small-scale developments, sealed surfaces, and de minimis impact thresholds.

The proposed development meets the criteria for statutory exemption from mandatory BNG delivery, as defined in the relevant BNG Regulations 2024, due to the following:

- The site is composed entirely of sealed hardstanding, with no vegetated land cover or ecological function.
- There is no habitat loss, no trees or hedgerows affected, and no linear features exceeding 5 metres in length are present.
- The development does not result in any measurable reduction in biodiversity value.
- The total area affected is below the 25m² threshold for habitat loss, and the site contains 0.00 baseline habitat units, as verified using Metric 4.0.

In line with DEFRA's guidance and Natural England's implementation notes, developments on land entirely composed of sealed hardstanding are eligible for exemption provided the site introduces no new ecological harm. In this case, the

proposed scheme actually improves environmental conditions through stormwater management and pollution control, which indirectly support wider ecosystem services. As such, a formal BNG calculation is not required, and no offsetting or habitat creation is triggered under the statutory BNG regime.

7.3 Environmental Betterment and Policy Alignment

While not obligated to deliver quantitative biodiversity gains, the proposed development achieves significant qualitative environmental improvements, consistent with the aims of:

- Rochdale Core Strategy Policy G9 (Reducing the Impact of Pollution),
- PfE Policy JP-S2 (Carbon and Environmental Resilience),
- And NPPF 2024 Paragraphs 184–188, which encourage developments to reduce pollution and enhance the natural environment wherever possible.

Key environmental enhancements include:

- Removal of open-air salvage operations, which currently generate uncontrolled oil and hydrocarbon runoff, vehicle noise, and airborne particulates.
- Cessation of metal processing and engine dismantling, reducing noise impacts, ground contamination risks, and chemical exposure.
- Introduction of permeable surfacing across the majority of the yard (600m²), reducing surface water runoff rates and supporting groundwater recharge.
- Formalisation of drainage systems via ACO channels and sealed foul connections, eliminating uncontrolled outfalls and unattenuated discharge.
- Passive pollution control through water-resistant construction materials, sealed site boundaries, and elevated service entries.
- Acoustic containment through insulated building envelope and internal-only operations, replacing legacy noise-generating activities with a regulated, enclosed use.

These improvements collectively support a net gain in environmental performance, even in the absence of traditional biodiversity features. They contribute to the ecosystem service value of the area by controlling pollutants, reducing urban runoff, and restoring orderly land management. These changes also support wider community amenity and public health by reducing exposure to industrial emissions and mitigating visual blight.

7.4 Optional Biodiversity and Sustainability Additions

Although not formally required, the scheme offers the opportunity to deliver additional environmental enhancements either voluntarily or through a planning condition. These could include:

- Installation of bat boxes or bird nesting bricks integrated into building elevations.
- Placement of native pollinator-friendly planters along the building frontage or perimeter fence line (if space allows).
- Incorporation of climbing vegetation or green trellis systems on non-access elevations.
- Establishment of a tenancy code of conduct that restricts use of pesticides, lubricants, or contaminants on external surfaces.

While none of these features are essential for planning compliance, they could be delivered through a minor landscaping scheme or non-material amendment post-consent, if the Local Planning Authority wished to secure a symbolic or educational environmental benefit. However, such measures would be strictly qualitative and would not trigger any formal BNG obligations due to the baseline score of zero.

7.5 Summary

The proposed development is lawfully exempt from statutory Biodiversity Net Gain requirements due to its wholly sealed and ecologically inert baseline condition. Nevertheless, the proposal delivers significant environmental betterment through:

- Pollution source elimination;
- Sustainable drainage;
- Acoustic control;
- Visual tidying;
- And ecological risk reduction.

These enhancements support the strategic aims of the Rochdale Core Strategy, the PfE Plan, and the NPPF, and contribute to broader goals of sustainable urban regeneration. In summary, the development transforms a high-impact scrap yard into a low-impact, policy-compliant employment site with clear environmental and qualitative uplift.

8. Economic and Social Benefits

The proposed redevelopment of land at Corporation Road, Rochdale presents an important opportunity to deliver multiple tangible economic and social benefits for both the local community and the wider borough. These benefits are material planning considerations and must be given due weight in accordance with paragraphs 11, 84, 86, and 138 of the National Planning Policy Framework (NPPF 2024), which strongly support sustainable economic growth, local job creation, regeneration of underutilised land, and enhancement of community wellbeing through appropriate development.

8.1 Economic Value of Employment Floorspace

The principal economic benefit of the proposal is the introduction of approximately 346m² of new, high-quality employment floorspace, delivered in the form of two adaptable industrial/storage units under Use Classes B2 and B8. This new provision will replace a low-density, environmentally degraded Sui Generis scrap yard with a formalised, purpose-built facility that is directly aligned with the operational requirements of SMEs (small and medium-sized enterprises), including light manufacturing, last-mile logistics, trade services, and local distribution.

Each unit is designed with sufficient clear internal height, open-plan layout, and flood-resilient access to accommodate a wide variety of end users. Based on industry standard employment density figures published by the Homes and Communities Agency (HCA Employment Densities Guide, 3rd Edition), B2/B8 units typically support 1 full-time equivalent (FTE) job per 47–70m² GIA, depending on end use. Applying this range to the proposed development indicates a capacity of between 5 and 7 FTE jobs across both units, with potential for increased occupancy where mezzanines or shared working arrangements are introduced.

These are local jobs, likely to be filled by tradespeople, workshop operators, delivery drivers, warehouse personnel, and sole traders—groups whose employment stability is

vital to Rochdale's inclusive growth ambitions. In an area with pockets of localised deprivation and income inequality, the provision of accessible, affordable, and well-located employment space has clear economic and social value. It reduces the need for long-distance commuting, supports local enterprise, and enhances the vibrancy and productivity of the existing Corporation Road industrial zone.

8.2 Supply Chain and Construction-Phase Employment

In addition to long-term operational employment, the proposal will generate a short-term stimulus to the local construction and supply chain sectors. The development will require contractors for site clearance, demolition, civil engineering, structural erection, cladding, drainage, electrical, mechanical, and internal fit-out works. These are trades and services which, by their nature, are typically delivered by regional SMEs, including those based in Greater Manchester.

The construction period is expected to last approximately 16–20 weeks, with estimated on-site labour demand equivalent to 3–5 full-time equivalent tradespeople at any one time, depending on phasing. Materials will be sourced from regional suppliers wherever possible, particularly steelwork, insulation, surfacing, and drainage components. This will support employment in secondary and tertiary sectors such as transport, fabrication, plant hire, and site security. Where the development is financed and delivered by a local enterprise, as in this case, there is a stronger than average likelihood that profits and procurement will be retained within the regional economy, compounding the economic benefit over time.

8.3 Regeneration and Investment in Underperforming Land

The Corporation Road site has long suffered from underuse, unregulated activity, and environmental degradation. The current Sui Generis use does not maximise the site's potential, nor does it conform to the strategic aims of the Rochdale Core Strategy or PfE Policy JP-J1, both of which prioritise the reuse of brownfield land for sustainable employment growth. By introducing modern, policy-aligned infrastructure, the proposal repositions the site within the active commercial market and significantly increases its land value and business viability.

This investment has a multiplier effect within the industrial estate. Neighbouring plots—many of which also suffer from ageing infrastructure, visual clutter, or low-grade use—will be encouraged to reinvest and upgrade their premises in response to a visibly modernised comparator site. This “halo effect” is a well-documented regeneration outcome and contributes to the incremental uplift in land values, business confidence, and estate-wide productivity.

Moreover, the development signals a commitment to long-term stewardship and responsible land use, offering an alternative to speculative land-banking or environmentally intensive interim uses. This type of small-scale but high-quality redevelopment is precisely the kind of project that strategic growth frameworks such as the Greater Manchester Spatial Strategy and the Places for Everyone Plan are designed to support.

8.4 Social Value and Community Alignment

Beyond direct employment and economic uplift, the proposal also delivers indirect social benefits. These include:

- Improved public realm perception: The removal of visible waste, rusting metal, and chaotic storage yards will enhance visual amenity for passers-by, visitors, and workers.

- Enhanced sense of safety and professionalisation: The introduction of enclosed units, perimeter fencing, and defined working hours will reduce antisocial behaviour and improve the working environment within the estate.
- Improved acoustic environment: As confirmed in the submitted NIA, the replacement of open-air dismantling with internalised industrial activity will reduce noise emissions and improve the baseline acoustic conditions for adjacent businesses and remote residential receptors.
- Support for small business start-ups: The units are appropriately sized and flexibly laid out for sole traders or micro-businesses to occupy, allowing them to scale their operations from informal premises into professional space.
- Alignment with Rochdale's Inclusive Growth Strategy: By creating local jobs for local people, the scheme supports skills development and workforce resilience within an economically active, non-retail sector.

This blend of environmental rectification, visual enhancement, economic activation, and social opportunity provides the type of balanced public benefit required under the planning balance test at NPPF paragraph 11(d)(ii).

8.5 Conclusion

In totality, the proposed development delivers multi-dimensional economic and social benefits that far outweigh the modest scale of the scheme. It reactivates underutilised employment land, generates jobs, strengthens local business infrastructure, stimulates construction-sector demand, and restores amenity in a historically degraded location. These are direct, measurable, and durable outcomes that contribute to both local regeneration and borough-wide strategic objectives. As such, they represent powerful material considerations in favour of granting planning permission.

9. Planning Balance and Conclusion

This Planning Statement has presented a detailed and policy-led justification for the proposed redevelopment of land at Corporation Road, Rochdale (OL11 4JB). The application seeks permission for the construction of two new industrial/storage units (Use Classes B2/B8), to be delivered in a single modern portal frame building with dedicated service yard, secure boundaries, and associated facilities. The proposal represents a carefully considered and strategically valuable intervention that regenerates previously developed land, improves environmental performance, and delivers sustainable economic growth in accordance with national and local planning policy.

The development has been assessed in light of the full policy framework comprising the National Planning Policy Framework (NPPF, 2024), the Rochdale Core Strategy (2016–2028), and the Places for Everyone Joint Development Plan (2024). It is fully compliant with all relevant policies, including:

- NPPF Paragraph 11(c), which confirms that proposals in accordance with an up-to-date development plan should be approved without delay;
- Paragraphs 84–86, which promote economic growth through support for small businesses and the effective use of previously developed land;
- Paragraphs 161–169, which establish flood risk management requirements including the Sequential and Exception Tests;

- Paragraph 188, which requires developments to avoid and mitigate environmental harm, including noise, water, and land pollution.

On a local level, the proposal is consistent with the Rochdale Core Strategy policies, including:

- Policy E2 (Increasing Jobs and Prosperity) – by delivering new employment space that responds to market need and reuses underutilised land;
- Policy G8 (Managing Water Resources and Flood Risk) – by incorporating detailed and passive flood mitigation strategies;
- Policy G9 (Reducing the Impact of Pollution) – by eliminating uncontrolled noise, runoff, and emissions associated with the former Sui Generis use;
- Policy T2 (Improving Accessibility) – through site access improvements and support for low-carbon travel;
- Policy DM1 (General Development Requirements) – through high design quality, safe operation, and alignment with community needs.

In regional terms, the proposal actively supports key objectives of the Places for Everyone Plan, particularly:

- Policy JP-J1 – by delivering flexible, high-quality industrial floorspace for SMEs;
- Policy JP-S2 – through improved environmental resilience and low-impact design;
- Policy JP-Strat 6 – by revitalising existing industrial zones in Rochdale without greenfield encroachment.

From a flood risk perspective, the development has passed both the Sequential and Exception Tests. Although located in Flood Zone 3a, the proposal has been informed by EA Product 4 modelling, includes a suite of passive mitigation measures (such as elevated electrics, flood-rated shutters, and porous surfacing), and has been demonstrated—through a detailed Flood Risk Assessment—to be safe for its lifetime without increasing flood risk elsewhere. It introduces sustainable drainage features in an area that currently lacks any form of stormwater attenuation, contributing to overall catchment resilience.

From an environmental perspective, the proposal brings about a substantial net improvement over existing conditions. The current use generates high levels of noise, surface pollutants, and visual disorder. The proposed redevelopment will remove these impacts entirely, replacing them with enclosed, acoustically contained, and professionally managed workspace. The site qualifies for a statutory exemption from Biodiversity Net Gain obligations, but nevertheless delivers qualitative enhancements in line with the objectives of the Environment Act 2021 and Policy G9 of the Core Strategy.

The scheme will also yield measurable economic and social benefits. These include the creation of up to 7 full-time equivalent jobs, construction-phase employment for local contractors, stimulation of supply chains, and the provision of affordable, modern business premises in a borough where SME space is in critically short supply. The proposal supports inclusive economic growth, local employment, business start-ups, and place-based regeneration. Its social value includes visual uplift, improved perceptions of safety and order, and reduced environmental harm.

Importantly, there is no identifiable planning harm arising from the proposal:

- There is no loss of residential land, green infrastructure, or community assets.
- The site lies within an established industrial estate, and the proposed use is wholly compatible with the surrounding commercial context.
- There are no adverse highway impacts, no objections on flood risk grounds, and no conflict with neighbouring uses.
- There are no heritage assets or ecological designations affected, and no technical consultees are expected to raise objections.

In applying the planning balance, it is evident that the public benefits of the proposal significantly and demonstrably outweigh any residual risks. The development:

- Reactivates a low-quality employment site;
- Eliminates pollution sources;
- Introduces formal drainage and resilience measures;
- Delivers local jobs and economic growth;
- Improves the environmental baseline;
- Aligns with every tier of the statutory development plan.

This is a scheme that epitomises the aims of the NPPF 2024, Rochdale's employment strategy, and Greater Manchester's plan-led growth model. It is proportionate, low-impact, policy-compliant, and regenerative. As such, the Local Planning Authority is respectfully invited to grant full planning permission without delay in accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004 and the presumption in favour of sustainable development under NPPF Paragraph 11(c).