

PLANNINGSTATEMENT

HEAP BRIDGE, BURY

SEPTEMBER 2025

www.njlconsulting.co.uk

Signing off Sheet

Client: Franstep Limited & Mr. David Gibbons

Project: Heap Bridge, Bury

Document: Planning Statement

Date: September 2025

Ref: 2023-012

Stage	Prepared By	Checked By	Date	Signed
1 st Draft	AT	MS	02.09.2025	AT
2 nd Version	AT	MS	13.05.2026	

Final

Authorised for and on behalf NJL Consulting

Nick Lee
Managing Director

This report takes into account the particular instructions and requirements of our client. It is not intended for and should not be relied upon by any third party. Any such party relies on this report at their own risk.

© Report copyright of NJL Consulting

NJLConsulting

Planning+Development

Origin
6th Floor
70 Spring Gardens
Manchester
M2 2BQ

Contents

- 1. Introduction 3
- 2. Site and Surrounding Area 5
- 3. Statement of Community Involvement 8
- 4. Proposed Development 9
- 5. Stakeholder Engagement 1
- 6. Planning Policy Context 4
- 7. Planning Considerations..... 8
- 8. Technical Assessment 15
- 9. Planning Balance 20
- 10. Conclusion 22

1. Introduction

- 1.1 This Planning Statement (the 'Statement') has been prepared by NJL Consulting on behalf of Franstep Limited & Mr. David Gibbons (the 'Applicants') for the proposed development on land at Waterfold Lane, Heap Bridge, Bury (the 'Site').
- 1.2 The proposed description of development is as follows:
- 'Construction of 24 dwellings, comprising 24no. Apartments and 6no. Dwelling houses, alongside creation of access, landscaping and drainage works.'*
- 1.3 In justifying the suitability of the proposed development, this Statement considers the development proposals against the Development Plan, relevant national policy and other material considerations.

Application Pack

- 1.4 A full team of technical experts have been instructed by the Applicant to support the evolution of the design of the proposed development and provide supporting documentation and assessments. The application should be considered alongside the plans pack from Equilibrium and the following technical reports:

Table 1 Document Pack

Document	Consultant
Planning Application Forms and Certificates	NJL Consulting
Planning Statement (this Statement)	NJL Consulting
Affordable Housing Statement	NJL Consulting
Design and Access Statement	Equilibrium Architects
Design and Access Addendum	Equilibrium Architects
Noise Impact Assessment	Miller Goodall
Air Quality Assessment	Professional Consult
Landscape Appraisal	Land Studio
Landscape Appraisal Addendum	Land Studio
GeoEnvironmental Site Investigation Report	Earth Environmental & Geotechnical
Tree Survey	North West Tree Consultancy
Arboricultural Impact Assessment	North West Tree Consultancy
Arboricultural Method Statement	North West Tree Consultancy
Flood Risk Assessment & Outline Drainage Strategy	GWK Structural Solutions Ltd
SuDS Proforma	GWK Structural Solutions Ltd
Retaining Wall General Arrangement & Sections	GWK Structural Solutions Ltd

Transport Statement	Focus Planning
Preliminary Ecological Appraisal	Leigh Ecology Ltd
Energy Statement	Energy Counsel
BNG Assessment & Metric	Leigh Ecology Ltd
Existing Site Plan	Equilibrium Architects
Proposed Site Plan	Equilibrium Architects
Proposed Access Road	Equilibrium Architects
Landscape Proposals	Equilibrium Architects
Plots 1-6 Plan	Equilibrium Architects
Plots 1-6 Elevations	Equilibrium Architects
Plots 7-18 Plans and Elevation	Equilibrium Architects
Plots 19-24 Plans and Elevation	Equilibrium Architects
Street Scenes	Equilibrium Architects
Existing Site Sections S1-S1 and S2-S2	Equilibrium Architects
Proposed Site Sections	Equilibrium Architects
Proposed External Works	Equilibrium Architects
Site Location Plan	Equilibrium Architects

2. Site and Surrounding Area

The Site

- 2.1 The Site (**Figure 1**) referred to as 'Land at Waterfold Lane' is located east of Bury town centre and southwest of Heap Bridge in the administrative district of Rochdale Borough Council ('RBC'). It is bound to the north by tree cover and beyond this the River Roch, the east and south by Waterfold Lane and to the west by the M66.



Figure 1 Site Location Plan

- 2.2 It is understood that the site was previously occupied by Water Fold Mill, built in the mid-1800s, and demolished in the late 1960s/ early 1970s when the M66 adjacent was constructed.
- 2.3 Sole access to the site, both vehicular and pedestrian, is granted from Waterfold Lane to the south.
- 2.4 The site is located wholly in the Green Belt. It is not located within a conservation area nor are there any local or statutory listed assets within or adjacent to the site. The majority of the site is located within Flood Zone 1 save for the bank of the River Roch which is Flood Zone 3.

The Surrounding Area

- 2.5 The Site is located on the edge of Heap Bridge, a small village to the east of Bury and west of Heywood. The village comprises predominantly residential development to the east/northeast of the Site, alongside a church, social club and primary school. North of the Site surrounding the River Roch is industrial development, beyond which is additional residential dwellings.
- 2.6 The immediate area of Waterfold Lane is characterised by semi-detached and terraced housing to the east, and the boundary to the River on the west, which is densely screened in parts. To the south is undeveloped/agricultural land.
- 2.7 The Site is bound to the north by the River Roch and to the west by the M66, beyond which is a mix of leisure and commercial development, accessible from the Site via a road cutting beneath the M66. Beyond this is Pimhole and Bury.
- 2.8 The Site is in a sustainable location, with easy access to public transport. The nearest bus stop is located on Bury New Road circa 300m to the northeast of the site, which is served by the 163, B4, R2 and 471 services towards Bury and Bolton.
- 2.9 There are a number of primary schools within a 1km radius, including;
 - Heap Bridge (10 minute walk),
 - East Ward Community (15 minute walk), and
 - St. Thomas Church of England (17 minute walk)
- 2.10 Hazel Wood High School is 500m north of the Site (16 minute walk), and Bury College is 1.5km west of the Site (30 minute walk) providing access to secondary and higher education.
- 2.11 The area also supports a number of leisure and sports facilities, including;
 - Openshaw Park (14 minute walk),
 - Village Gym (8 minute walk),
 - Roach Dynamos Football Club (27 minute walk, 5 minute drive), and
 - Darnhill Library and Community Café (37 minute walk/8 minute drive),
- 2.12 The Site is also well related to accessible green space and walking routes, including a Public Right of Way running from Waterfold Lane into the southern countryside (**Figure 2**).

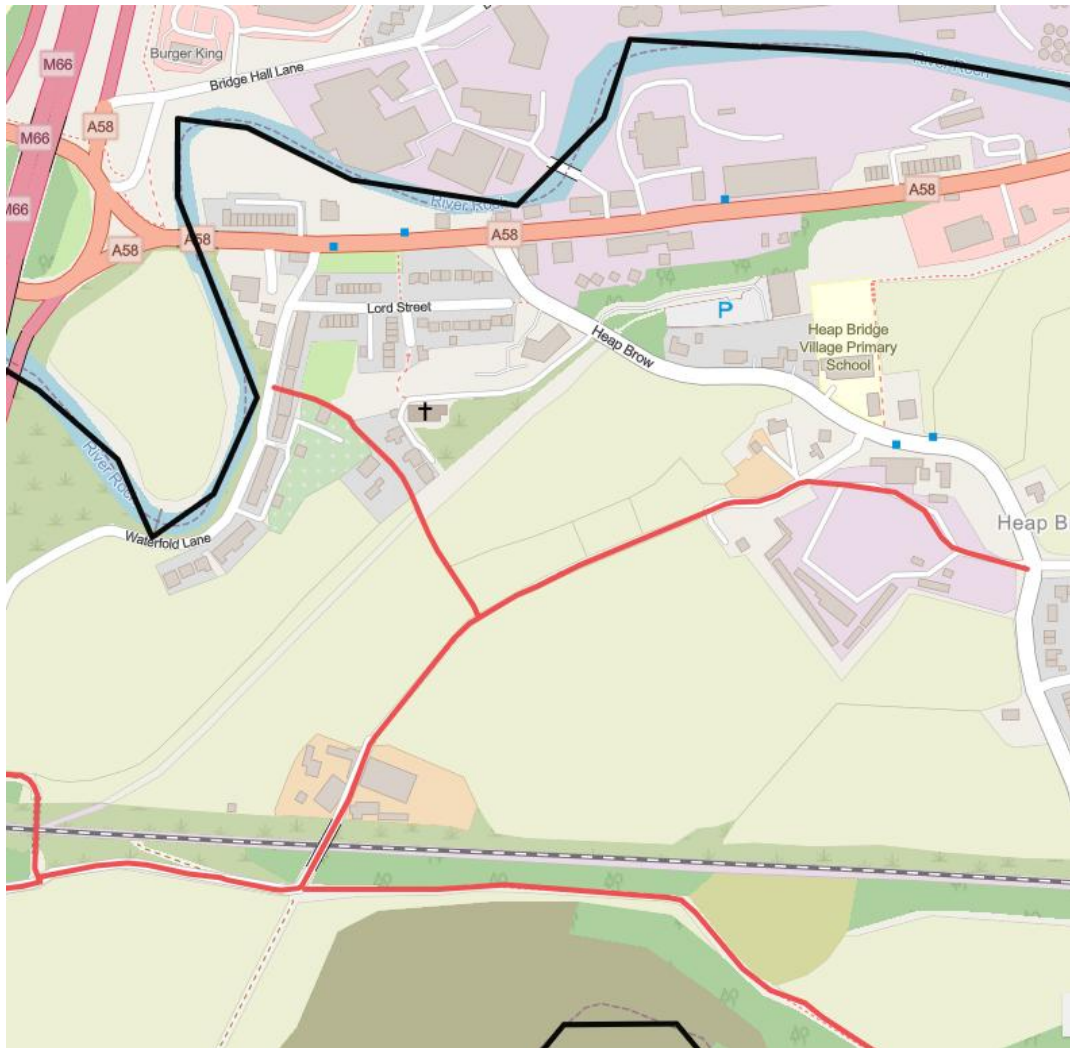


Figure 2 Rochdale Public Rights of Way

Planning History

- 2.13 A review of the RBC's public access system has identified the following applications relevant to the site.

LPA Reference	Description of Development	Decision / Date
22/01085/OUT	Outline application (including access, layout and scale) for 2 no. three storey apartment blocks comprising total of 36 units	Refused, 08/12/2022
88/D21806	Use of land as civil engineering contractors' depot	Refused, 16/06/1988
81/D12701	Outline for squash courts building	Refused, N/A

3. Statement of Community Involvement

- 3.1 The applicant team understand the importance of engaging with stakeholders as part of the pre-application and delivery process to ensure the development reflects the views of local people and Rochdale Borough Council (RBC). This reflects the position of the National Planning Policy Framework (NPPF, 2024) which promotes early engagement to improve the efficiency and effectiveness of the planning application process.
- 3.2 RBC have adopted a 'Statement of Community Involvement' (2021), which includes guidance for applicants to consult with the local community prior to submission. This is detailed at 5.11, which indicates that "circulating a letter or statement to local residents and businesses explaining the proposals" could be considered.

Public Consultation

- 3.3 A leaflet detailing the proposals was issued to 74 local residents and businesses along Waterfold Lane on the 13th August 2025.
- 3.4 As of the date of submission, no responses have been received.

4. Proposed Development

4.1 This application seeks full planning permission for the proposed development at Land off Waterfold Lane, Heap Bridge, Bury. The development comprises the following:

- 6 x 1 bed apartments
- 18 x 3 bed terraced houses

Site Layout

4.2 The layout - **Figure 3** - has been designed to create a high-quality residential development, accounting for site-specific constraints and responding positively to the local character.

4.3 Following the feedback from Planning Officers, we have designed the car parking to integrate with the development and minimise the impact from Waterfold Lane. The parking solution is screened by the development and is broken up by green verges to soften the appearance from front elevations.

4.4 The same applies to the impact of rear elevations with the development, now designed 'back-to-back', which creates an improved street scene and a more security to the development. The western block now fronts onto Waterfold Lane at an angle, with fenced front gardens providing additional private amenity space to these units.

4.5 The frontage reflects the character of Waterfold Lane, with 81-91 Waterfold Lane also fronting the street scene from an offset perspective.



Figure 3 Extract of the Proposed Site Plan

Scale

- 4.6 The proposed development comprises 24 units, split between 18 terraced dwellings and an apartment block comprising 6 units to the north of the site. The terraced properties are proposed at 3.5 – 2.5 storey, providing the maximum height to baffle the noise source.



Figure 4 Proposed Apartment Block - South East Elevation



Figure 5 Proposed Terraced Dwellings - North West Elevation

Housing Provision, Mix and Typologies

Mix

- 4.7 The proposed housing provision comprises a total of 24 no. dwellings, delivered through the following residential mix:

Table 2 Residential Mix

Dwelling Size	House Type	Area (Sqm)	Number
1 Bed	Apartment	50/56	6
3 Bed	House	99/103	18
Total			24

- 4.8 With regard to housing tenure, all 24 units will be delivered as affordable housing. The properties will be offered as Social Rent.

Design and Appearance

- 4.9 All units comply or exceed Nationally Described Space Standards (NDSS) to ensure the highest standards of design. In relation to Part M compliance, all dwellings are to M4(2) standards, however apartments on the first floor are not fully compliant as no lift is provided. The RP is satisfied with the provision, as they do not require 100% M4(2) units.

- 4.10 The proposed design incorporates a traditional architectural approach to the site's redevelopment. The revised design has been informed by feedback from RBC's design officer and discussions with the Case Officer.
- 4.11 The use of buff brick and cladding (hardie VL plank in anthracite) has been used to create visual interest and break up massing, ensuring a high-quality finish to the elevations. Slate effect roof tiles are used to ensure the development is in keeping with the surrounding built form.
- 4.12 The scheme will provide detailed finishes and refined materials palette that will provide a contemporary feel whilst complementing the surrounding streetscape.
- 4.13 Further design detail is provided within the accompanying Design and Access Statement and plans pack.

Access

- 4.14 The site is accessed from Waterfold Lane, off Bury New Road and is well served by public transport. Facilities are within an easy walking distance of the site, with a wide range of other services and facilities within close distance of the site.
- 4.15 Waterfold Lane is currently adopted up to 79 Waterfold Lane, before narrowing around the curve of the River Roch and widening back out adjacent to the site. As part of the proposed development, Waterfold Lane will be widened, with a footpath provided to the west of the road from the site access to 61 Waterfold Lane, where the existing footpath to the east of the lane finishes.
- 4.16 As part of these works, a give way junction will be created along the curve of the River Roch, acting as a traffic calming measure.
- 4.17 The site has two access points, with primary access to the southwest of the site providing access to the parking for properties fronting the western boundary and the apartment block. A total of 31 parking spaces, including 6 (19%) visitor spaces are provided to the west of the site.
- 4.18 The parking for properties fronting Waterfold Lane is located to the eastern boundary with a secondary point of access, comprising 6 parking spaces. The road is sufficient to enable two cars to pass and allow turning for cars to exit in a forward gear.
- 4.19 25% of spaces are to be fitted with electric vehicle charging.
- 4.20 Pedestrian access and public open space remain central to the development and is accessed off Waterfold Lane from 3 points of pedestrian only access.

Landscaping

- 4.21 To deliver a desirable public realm with high-quality open space, Equilibrium has detailed the proposed landscape measures on site layout ref. R0832-19 as well as within the supporting Design and Access Statement. The proposals will create a new landscape character through a planting regime and palette of materials proposed.

- 4.22 The proposed planting and ecological measures are provided on the accompanying landscape proposals and specification plan prepared by Equilibrium Architects (ref. R-0832-17_Landscape Proposals).
- 4.23 Overall, residents will have access to open green space in the form of private gardens (terraced houses), communal amenity space and planting around the buildings and wider public realm area.
- 4.24 The landscaping has been amended to 'wrap-around' the proposed development with connecting pedestrian routes adjacent to the river and linking to the new access road.
- 4.25 Please refer to the Design and Access Statement and plan pack for full details.

5. Stakeholder Engagement

Policy Context

- 5.1 The applicant team understands the importance of engaging with stakeholders as part of the pre-application process. This reflects the position of the National Planning Policy Framework (the 'NPPF') (2024) which promotes early engagement to improve the efficiency and effectiveness of the planning application process.

National Planning Policy Framework

- 5.2 The NPPF sets out the benefits of pre-application discussions within a section titled 'Pre-Application Engagement and Front Loading' (NPPF Section 4). Paragraph 40 of the NPPF states that *'early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties. Good quality pre-application discussion enables better coordination between public and private resources and improved outcomes for the community'*.

Planning Practice Guidance

- 5.3 The PPG notes that *'Pre-application engagement by prospective applicants offers significant potential to improve both the efficiency and effectiveness of the planning application system and improve the quality of planning applications.'*
- 5.4 A summary overview of the pre-application engagement held with the Council is provided below.

Engagement with Rochdale Council

June 2023

- 5.5 NJL Consulting sought initial pre-application advice from RBC in June 2023 on a previous iteration of the proposed development, comprising 2 no. 2 storey rectangular buildings comprising 100% affordable housing.
- 5.6 This first iteration was based on the 2021 version of the NPPF, and presented a Very Special Circumstances ('VSC') argument for development in the Green Belt, primarily on the provision of 100% affordable housing, alongside benefits relating to improved access, biodiversity net gain and net zero modular construction.
- 5.7 A meeting with the Council was subsequently held in September, establishing that the presented scheme was an improvement on previous iterations.
- 5.8 The meeting acknowledged that although Rochdale had a 5.7yr Housing Land Supply, they also had a 'sizeable housing register' and that named interest from a registered provider ('RP') would add confidence. The meeting also raised concerns of the noise impact to amenity spaces.
- 5.9 Following the meeting, a formal pre-application response was received in April 2024. The response provided feedback on an amended scheme, comprising 1 no. apartment block (23 units) and a terrace of 6 houses.

- 5.10 The response maintains that the development would be inappropriate development in the Green Belt, and that a VSC case would be required. The response goes on to establish that, due to insufficient information, the case presented would not amount to VSC.
- 5.11 The response also raises questions on the suitability of the Site for affordable housing, due to perceived limited access to services and public transport.
- 5.12 Further consideration is given to design, noting the improvements from the previous scheme, although similar concerns were raised around the massing of the apartment building in this context.
- 5.13 Comments were also received from the Strategic Housing team, who noted that "*As of September 2023, there are approximately 9,607 households on the Housing Register*". The comment welcomed the proposed "*contribution to addressing the boroughs housing need*".
- 5.14 The Housing team requested further information on the proposed mix and tenure of dwellings, highlighting the need for larger homes and affordably rented dwellings.

November 2024

- 5.15 Following the response from RBC, and in light of the significant change to Green Belt policy within the NPPF, NJL Consulting sought further pre-application engagement from RBC in November 2024.
- 5.16 The submission comprised a revised layout, including a reduction in units, additional parking and an optimised layout. The response also sought to establish ownership of Waterfold Lane, in order to progress suitable access.
- 5.17 Additionally, a 'Planning Update Note' was issued; establishing our view that the Site, under the draft 2024 version of the NPPF, would be considered 'Grey Belt' land and met the 'Golden Rules', satisfying the requirements of (draft) paragraph 152 and therefore comprising appropriate development in the Green Belt.
- 5.18 Feedback was subsequently received from the case officer in June 2025; following the formal adoption of the revised NPPF in December 2024. This included a detailed review of the Grey Belt position, as summarised below.
- 5.19 The response first reviewed the proposals against criteria a) of paragraph 155, in relation to the use of grey belt land. The officer reviewed the Site against purposes a (limit unrestricted sprawl), b (prevent coalescence of neighbouring towns) & d (preserve the setting and character of historic towns) of the Green Belt, establishing that the Site does not strongly contribute to these purposes, and is not excluded from grey belt land under footnote 7.
- 5.20 The officer stated "In summary, I do think the site comprises grey belt".
- 5.21 The response continues to address the remaining criteria of paragraph 155, noting that the officer does not consider that there is an unmet need for this type of development, nor is the Site sustainably located (although it is noted that any improvements to Waterfold Lane may help address concerns).
- 5.22 The officer also notes that the 'Golden Rules' would also require further consideration.

November 2025

- 5.23 Following the submission of the application in October 2025, the applicant team met with the case officer and design officer on site on the 6th November 2025. The officers expressed concern with the current layout, in particular the relationship of the site frontage and Waterfold Lane.
- 5.24 The design officer also raised concerns regarding the appearance, and requested that the team review the design in relation to the surrounding context and architectural precedents.
- 5.25 The applicant team has further engaged with the planning officer, and subsequently revised the scheme (as presented in this report) to address previous comments.

6. Planning Policy Context

- 6.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 confirms that the determination of planning applications should be made in accordance with the Development Plan unless material considerations indicate otherwise.
- 6.2 The following section outlines the Local Plan Position and the Relevant Material Considerations that should be considered in the determination of this application.
- 6.3 The application Site is located within the Rochdale Borough Council local authority area. The adopted development plan for which is:
- Core Strategy (Adopted October 2016)
 - The Unitary Development Plan 1996-2016 (Adopted June 2006)
 - Places for Everyone Joint Development Plan (Adopted March 2024)
- 6.4 For a full breakdown of relevant policies, please see Appendix 1.

Places for Everyone

- 6.5 Places for Everyone Joint Development Plan ('PfE') is a long term plan of nine Greater Manchester districts for jobs, new homes and sustainable growth (2022-2039). Greater Manchester Combined Authority ('GMCA') have prepared this plan for Bolton, Bury, Manchester, Oldham, **Rochdale**, Salford, Tameside, Trafford and Wigan.
- 6.6 Following its adoption in March 2024, PfE now forms part of the statutory development plan for each of the nine PfE authorities.
- 6.7 As a result of PfE, certain policies in the RBC Core Strategy have been partially replaced by PfE policies. This Statement takes these changes into account when assessing the proposed development against the relevant policies and guidance.
- 6.8 The relevant policies of the PfE are:
- JP-Strat13: Strategic Green Infrastructure
 - JP-S1: Sustainable Development
 - JP-S2: Carbon and Energy
 - JP-S4: Flood Risk and the Water Environment
 - JP-S5: Clean Air
 - JP-H1: Scale Distribution and Phasing of New Housing Development
 - Policy JP-H2: Affordability of New Housing
 - Policy JP-H3: Type, Size and Design of New Housing
 - Policy JP-G2: Green Infrastructure Network
 - Policy JP-G3: River Valleys and Waterways
 - Policy JP-G7: Trees and Woodland
 - Policy JP-G8: A Net Enhancement of Biodiversity and Geodiversity

- Policy JP-G9: The Green Belt
- Policy JP-P1 Sustainable Places
- Policy JP-C8: Transport Requirements of New Development

Core Strategy

- 6.9 The Core Strategy was adopted in October 2016 and provides an overview of objectives for the borough. The Strategy sets out the vision, strategies and policies to for the future development of the borough.
- 6.10 The relevant policies of the Core Strategy (not already covered by PfE) are:
- C4 – Providing Affordable Homes
 - P1 – Improving Image

Unitary Development Plan

- 6.11 The Unitary Development Plan ('UDP') was adopted in June 2006 and formed the basis of the Development Plan between 1996 & 2016.
- 6.12 Following the adoption of the Core Strategy, a number of policies of the UDP were saved, awaiting the production of an Allocations document.
- 6.13 The following saved policies (not already covered by PfE) are relevant to the proposed development:
- G/D/2 Green Belt
 - EM/7 Development and Flood Risk
 - EM/8 Protection of Surface and Ground Water

Other Material Considerations

National Planning Policy Framework

- 6.14 The National Planning Policy Framework (NPPF) sets out the overarching planning policies from the Government. In December 2024, the NPPF was updated, and this now forms the overarching planning guidance in England.
- 6.15 Regard must be had to the NPPF as a material consideration in planning decisions as per Paragraph 2 of the NPPF and Section 38(6) of the Planning and Compulsory Purchase Act 2004. This central aim of the NPPF and the planning system is highlighted in paragraph 7:
- 'The purpose of the planning system is to contribute to the achievement of sustainable development.'*
- 6.16 Where proposals are sustainable there is a presumption in favour of the development which is the core of the NPPF:
- 'So that sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development' (paragraph 10).*

- 6.17 The NPPF advises that there are three dimensions to sustainable development: economic, social and environmental (Para. 8) and establishes a presumption in favour of sustainable development stating that sustainable development proposals need 'approving...without delay' (Para. 11).
- 6.18 The Framework, taken as whole, represents the Government's definition of what constitutes a sustainable development. This definition of sustainable development includes three key roles: an economic role; a social role; and an environmental role.
- 6.19 These aims are mutually dependent and should be sought jointly and simultaneously by the planning system.

Design

- 6.20 The NPPF supports the creation of well-designed places, that shape sustainable communities, warrants development being acceptable.
- 6.21 Paragraph 133 states that at the very earliest stage, 'all local planning authorities should prepare design guides or codes consistent with the principles set out in the National Design Guide and National Model Design Code, and which reflect local character and design preferences.'
- 6.22 Paragraph 139 advises 'development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design'.
- 6.23 Paragraph 139 further recommends that significant weight should be given development which accords to local design and national guidance, which displays exemplary design that achieves and/or raises the standard of design.

Green Belt

- 6.24 Section 13 of the NPPF attaches 'great importance' to Green Belts. Paragraph 143 sets out the 5 purposes of Green Belts as:
- to check the unrestricted sprawl of large built-up areas;
- b) to prevent neighbouring towns merging into one another;
- c) to assist in safeguarding the countryside from encroachment;
- d) to preserve the setting and special character of historic towns; and
- e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
- 6.25 The NPPF goes on to consider development under the heading 'Proposals affecting the Green Belt'. Paragraph 153 sets out that "*Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.*"
- 6.26 Paragraph 155 goes on to establish that 'the development of homes...in the Green Belt' should not be considered inappropriate where the following apply:

- a. The development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan;
- b. There is a demonstrable unmet need for the type of development proposed;
- c. The development would be in a sustainable location, with particular reference to paragraphs 110 and 115 of this Framework; and
- d. Where applicable the development proposed meets the 'Golden Rules' requirements set out in paragraphs 156-157 below.

6.27 Paragraph 156 goes on to establish 'Golden Rules' that must be met for residential development to be considered appropriate. These are:

- a. affordable housing which reflects either: (i) development plan policies produced in accordance with paragraphs 67-68 of this Framework; or (ii) until such policies are in place, the policy set out in paragraph 157 below;
- b. necessary improvements to local or national infrastructure; and
- c. the provision of new, or improvements to existing, green spaces that are accessible to the public. New residents should be able to access good quality green spaces within a short walk of their home, whether through onsite provision or through access to offsite spaces.

6.28 Paragraph 157 sets out that the affordable housing contribution will be 15 percentage points above the highest existing contribution which would otherwise apply, capped at 50%. 50% is also the default where no pre-existing contribution exists.

6.29 Paragraph 158 states that:

"A development which complies with the Golden Rules should be given significant weight in favour of the grant of permission."

Supplementary Planning Documents

- Affordable Housing SPD
- Provision of recreational open space in new housing SPD
- Guidelines and standards for residential development SPD
- Biodiversity and development SPD
- Climate change adaptation SPD
- Heywood Green Infrastructure Action Plan SPD
- Residential Design Guide SPD
- Urban Design Guide SPD

7. Planning Considerations

- 7.1 The following section of this Statement assesses the application proposals against the planning policy framework for the Site, having regard to material considerations.

Principle of Development

Housing Need

Affordable Housing Demand

- 7.2 Policy JP-H1 of PfE supersedes Policy C1 of the Core Strategy, setting out a requirement for the delivery of 616 dwellings per annum between 2025-2030 in Rochdale. Policy JP-H2 sets out to maximise the delivery of affordable homes.
- 7.3 Policy C4 of the Core Strategy sets out to deliver a 7.5% contribution to affordable housing of the development sales value. Policy H/7 of the UDP (superseded by Policy C4) set out a requirement for 'an element' of affordable housing.
- 7.4 The Strategic Housing Market Assessment ('SHMA') completed in 2015, established a need of 204 affordable dwellings per year. As no other direct figure is available, this is the figure used to assess any affordable shortfall within Rochdale.
- 7.5 Figures are taken from the Rochdale Annual Monitoring Report 2022, with the exception of 2023/24, which is taken from the PfE Annual Monitoring Report 2024.

Table 3 Affordable Housing Delivery Shortfall

Year	Number of Affordable Housing Units Provided	Shortfall against target of 204
2012/13	113	91
2013/14	119	85
2014/15	123	81
2015/16	31	173
2016/17	65	139
2017/18	54	150
2018/19	130	74
2019/20	111	93
2020/21	106	98
2021/22	151	53
2022/23	164	40
2023/24	210	+6
Total Shortfall		1,071

- 7.6 It is clear that the district has a significant shortfall of affordable housing, due to the under delivery of affordable dwellings within the last 10+ years, despite the increase experienced in the latest delivery monitoring period.
- 7.7 As such, Table 3 has demonstrated a **clear unmet need** for affordable housing within the district. This is reflected within comments received from the Strategic Housing team in September 2023, who noted that "As of September 2023, there are approximately 9,607 households on the Housing Register". The comment welcomed the proposed "contribution to addressing the boroughs housing need".
- 7.8 Of the 9,607 households, the housing team noted that 1,207 households required rehousing within the Heywood Township, which Heap Bridge falls within. As such the proposed development will address a local and borough need for affordable housing.
- 7.9 The accompanying Affordable Housing Statement confirms that the development will be brought forward by the selected Registered Provider, and the provision of 24no. Affordable dwellings is considered to carry **significant weight** in the planning balance.

Development in the Green Belt

- 7.10 NPPF the NPPF establishes that the Green Belt holds significant importance, which is reflected by Policy JP-G9 of PFE & Policy G/D/2 of the UPD. In assessing proposals within the Green Belt, Paragraph 155 sets out that development should be considered appropriate where:
- a. *The development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan;*
 - b. *There is a demonstrable unmet need for the type of development proposed*
 - c. *The development would be in a sustainable location, with particular reference to paragraphs 110 and 115 of this Framework; and*
 - d. *Where applicable the development proposed meets the 'Golden Rules' requirements set out in paragraphs 156-157 below.*
- 7.11 As such, this section of the Statement establishes the appropriateness of the proposed development.

Land comprising Grey Belt (Criterion a)

- 7.12 Grey belt land is defined within the NPPF as "land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143. 'Grey belt' excludes land where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development."

7.13 Purpose a) to check the unrestricted sprawl of large built up areas

- 7.14 The Site forms part of Parcel RD50 within the Green Belt Review undertaken as part of the PFE preparation. It is noted that Parcel RD50 is considered to make a 'moderate' contribution to purpose a.

7.15 Whilst it is acknowledged that, as a parcel RD50 makes a moderate contribution, it is our belief that the Site cannot be considered to contribute to purpose a. The Site is contained by the River Roch and the M66, creating hard physical boundaries to the north and west. Land to the east of the site is not included within the Green Belt given it is already developed.

7.16 The Site is also bound to the south by Waterfold Lane, creating a further hard physical boundary for future development. The development of the Site is within a contained urban context, and would strengthen the boundaries of the Green Belt to prevent future encroachment.

7.17 Purpose b) to prevent neighbouring towns merging into one another

7.18 Parcel RD50 is considered to make a strong contribution to purpose b. It is our belief that this is not the case in relation to the Site.

7.19 The Planning Practice Guidance ('PPG') states that for an assessment area to contribute strongly, they are likely to be free of existing development and include **all** (our emphasis) following features

- forming a substantial part of a gap between towns
- the development of which would be likely to result in the loss of visual separation of towns

7.20 As discussed above, the hard physical boundaries to the Site prevent the covalence of neighbouring towns. Additionally, the southern boundary of Parcel RD50 is over 7km from the Site, ensuring that the development of the Site will not contribute to the covalence of neighbouring towns.

7.21 The above also ensures significant visual separation of nearby towns, therefore the Site is not considered to positively contribute to purpose b).

7.22 Purpose d) To preserve the setting and special character of historic towns

7.23 The Green Belt review notes that RD50 makes no contribution to purpose d), which we would support in our assessment of the Site.

7.24 footnote 7

7.25 Footnote 7 relates to land with an ecological or environmental designation, including areas at risk of flooding or coastal change.

7.26 Whilst it is acknowledged that within the red line, a small part of the Site is considered to be within Flood Zone 3 where the site meets the River Roch. This land forms a small part of the Site and is not within the development area. As such the application of policies relating to flood risk would provide a strong reason for refusing or restricting development.

7.27 Purposes of the Green Belt

7.28 The Site has been established to make limited contribution to purposes a), b) & d).

7.29 Purpose c) relates to the safeguarding of the Countryside from encroachment. Purpose e) relates to the assistance of urban regeneration.

7.30 The Site will not encroach on the Countryside, given its edge location with hard physical boundaries. Furthermore, the Site already exists within an urbanised context and is a former mill, comprising brownfield land.

7.31 **Conclusion**

7.32 In accordance with the above, the Site makes limited contribution to purposes a), b) & d) and is considered to comprise 'grey belt' land. This view has been assessed and supported by the case officer as part of pre application discussions (please refer to section 5 for further details).

7.33 The development of the Site will not undermine the purposes of the Green Belt.

Demonstrable Unmet Need

7.34 See Housing Need above.

Sustainable Location (Criterion c)

7.35 Paragraph 110 of the NPPF sets out to focus 'significant' development in locations which are or can be made sustainable. This is focussed on the reduction of travel and provision of sustainable modes of transport.

7.36 Paragraph 115 sets out criteria that should be followed in assessing applications for development.

7.37 **a) sustainable transport modes are prioritised taking account of the vision for the site, the type of development and its location;**

7.38 The proposals have prioritised sustainable transport through the provision of a footpath along Waterfold Lane, enabling and encouraging safe pedestrian access to New Bury Road and the closest bus stop (~300m). The site is also connected to the Public Right of Way via Waterfold Lane.

7.39 The Apartment block will have a cycle store with 6 (1 per unit) cycle spaces within the private amenity space. Each dwelling will be provided with a covered cycle store within rear gardens.

7.40 The accompanying Transport Statement has considered the accessibility of the site, concluding that *"the application site represents a suitable location for residential development, being surrounded by established residential & commercial areas and within a practical walking distance of high frequency public transport services and a wide range of everyday local shops, services & facilities"*.

7.41 **b) safe and suitable access to the site can be achieved for all users;**

7.42 The widening of Waterfold Lane and provision of a footpath, alongside the priority-controlled give-way ensures that all users are able to safely access the site. Within the site, all plots and areas of public open space are served by level access.

7.43 **c) the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code; and**

7.44 The improvements to Waterfold Lane have been confirmed in principle with the Local Highways Authority (LHA). Furthermore, the LHA has confirmed that it will adopt the access route to the site from the existing highway boundary at 63 Waterfold Lane.

- 7.45 The access route and primary internal access route have been designed to adoptable standards. The Parking Spaces are designed in accordance with the Council's parking standards.
- 7.46 **d) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree through a vision-led approach.**
- 7.47 The accompanying Transport Statement includes an assessment of travel demand, confirming that the predicted traffic levels demonstrate that the proposals will not generate a material change to the existing highways baseline conditions.
- 7.48 **Summary**
- 7.49 In accordance with Paragraphs 110 & 115, the proposed development is sustainably located, provides safe and suitable access and will not result in any material change to the highways network.

Compliance with the Golden Rules

- 7.50 Paragraph 156 and 157 set out the 'Golden Rules' for residential development within the Green Belt. The below table confirms that the proposed development is compliant with the requirements.

Golden Rules	Compliance
affordable housing which reflects either: (i) development plan policies produced in accordance with paragraphs 67-68 of this Framework; or (ii) until such policies are in place, the policy set out in paragraph 157 below;	The RBC Core Strategy does not set a requirement for affordable units, and as such the default 50% is applied. The scheme is for 100% affordable housing, with a RP on board to deliver and manage the dwellings. This is a significant improvement from the policy requirements.
necessary improvements to local or national infrastructure; and	Through technical design development, the requisite mitigation measures will be identified and integrated into the scheme through consultation with the Highways team and / or contributions made to ensure that supporting infrastructure can accommodate the associated impacts of the proposed development.
the provision of new, or improvements to existing, green spaces that are accessible to the public. New residents should be able to access good quality green spaces within a short walk of their home, whether through onsite provision or through access to offsite spaces.	The scheme integrates open space for the benefit of the future occupiers of the development and surrounding residents of Heap Bridge. The scheme is surrounded by a generous landscaped area which will be for the use of all in line with local policy requirements.

7.51 Conclusion

- 7.52 The proposed development is considered to be fully compliant with Paragraphs 155-158 of the NPPF and will make a significant contribution to addressing affordable housing need within the district. Paragraph 158 of the NPPF states "*A development which complies with the Golden Rules should be given significant weight in favour of the grant of permission*".
- 7.53 Should the Council disagree that the requirements of 155 are met, we believe that the provision of affordable housing, in conjunction with the additional benefits of the proposals as discussed in the following chapters, constitute 'Very Special Circumstances' and would significantly outweigh the limited harm to the Green Belt.

Material Considerations

Design and Appearance

- 7.54 Policy JP-P1 of PfE emphasises the importance of good building design. Policy JP-H3 of PfE confirms that all new dwellings must comply with the NDSS and be built to M4(2) standards and provide an appropriate mix of dwellings.
- 7.55 The proposed scheme adopts a traditional architectural approach, using refined materials and detailed finishes that offer a contemporary feel while complementing the character of the surrounding streetscape. In respect of the terraced houses, the design has captured the essence of a traditional mill building, incorporating brick elevations punctuated by evenly spaced windows, topped with a dual-pitched roof. Timber cladding at ground floor level breaks up the vertical elevation and emphasises the street scene at eyelevel.
- 7.56 Whilst apartments are built to M4(2) standards, as no lift is currently proposed, those at the first floor do not meet the requirements of M4(2). Therefore, a total of 21 dwellings (87.5%) are M4(2) accessible dwellings, which is considered an appropriate level of provision according to the RP requirements and considering the remaining flats are also adaptable beyond the staircase.
- 7.57 The proposed development has been assessed within the accompanying Landscape Visual Assessment produced by Land Studio, which confirms that from the key viewpoints, the development will have a negligible to slight impact. The LVA concludes that "*this combination of the landscape setting and the approach taken to the design of the site will enable the proposals to have a positive impact on the wider landscape setting and the Greenbelt in particular*".
- 7.58 As part of the revised scheme, Land Studio has confirmed that the "*site continues to occupy a location of relatively low landscape sensitivity, influenced strongly by the M66 and existing development, with a very limited zone of visual influence. The effect on the openness and setting of the Green Belt therefore remains limited and localised*", and that the revised proposals "*can make a positive contribution to the local landscape setting*".

Green Infrastructure

- 7.59 Policies JP-Strat13, JP-G2 & JP-G3 of PfE set out to protect and enhance the Green Infrastructure Network, including valleys and waterways.

- 7.60 The proposed landscaping scheme will enhance the public realm by introducing on-site POS, which follows the River Roch to the eastern boundary, as well as a public footpath running along the curve of the River Roch.
- 7.61 The proposed planting scheme will reinforce and enhance the boundaries, with a new tree line formed along the southern boundary. The site is supported by significant shrub, hedgerow and tree planting, alongside areas of wildflower meadow and an attenuation pond.

Socio-Economic Impacts

- 7.62 The development of 24 affordable dwellings would generate several positive socio-economic impacts both during construction and post-completion, benefiting the local economy and community. During the construction phase, the development could create 17 direct jobs and a potential direct gross value add to the local economy of £1,193,190¹. Additionally, it would stimulate the local supply chain, increasing demand for materials, services, and equipment from local businesses, thereby supporting indirect employment in areas such as manufacturing, transportation and professional services.
- 7.63 Post-completion, the provision of 24 affordable homes would directly address local housing shortages, offering quality housing for low- and middle-income families, key workers, and individuals who may otherwise struggle with affordability. This would help stabilise the community by providing long-term secure housing, fostering a more inclusive and balanced neighbourhood. The availability of affordable housing would also promote social cohesion, reduce inequalities and improve overall well-being for residents, contributing to a stronger, more integrated local community.
- 7.64 Overall, the positive socio-economic benefits in terms of employment generation and increased local spending should be afforded moderate weight in the planning balance.

Conclusion

- 7.65 The proposed development aims to create a sustainable and inclusive community, while respecting the character of the Green Belt. It seeks to provide high-quality affordable housing and amenities for both existing and future residents. The design prioritises pedestrian safety, convenient parking solutions and the inclusion of green amenity spaces, all contributing to a cohesive and attractive neighbourhood environment.
- 7.66 We have demonstrated that the proposed development will not cause significant harm to the Green Belt and is in accordance with paragraph 155 to 158 of the NPPF and will make a significant contribution to addressing affordable housing need within the district.
- 7.67 As set out above, the development would provide a range of benefits, including the provision of much-needed housing, the redevelopment of a site in a sustainable location, efficient land use and the delivery of high-quality affordable homes to meet local housing needs. It also offers economic, social, and environmental benefits.

¹ National Housing Federation – Local Economic Impact Calculator <https://www.housing.org.uk/resources/local-economic-impact-calculator/>

8. Technical Assessment

- 8.1 The following section presents the assessment of all other material considerations, not covered within the previous sections.

Natural Environment

Ecology

- 8.2 Policy JP-G8 of PfE requires development to be informed by appropriate biodiversity/ecological assessments and to deliver mitigation in accordance with the mitigation hierarchy.
- 8.3 A Preliminary Ecological Appraisal ('PEA') has been completed by Leigh Ecology, dated 10th October 2024, which is valid for a period of two years (October 2026).
- 8.4 The PEA confirms that the comprises "typical derelict land, with consistent underfoot of rubble and hard standing material, with grassland growth and succession species growth."
- 8.5 The Site has suitable features (tree lines and river channel) for bat foraging, and trees within the northern and eastern corners are suitable for bird roosting.
- 8.6 Although the river could not be comprehensively assessed, it may support habitat for water voles and otters.
- 8.7 The report also notes the presence of Himalayan Balsam, which requires full removal as part of the development.
- 8.8 The proposed development will retain tree line and reinforce with planting. A part of a tree group is to be removed; however, this is not likely to have a significant impact on protected species.

Biodiversity Net Gain

- 8.9 Policy JP-G8 also requires development to follow deliver a biodiversity net gain of at least 10% in line with the requirements of the Environmental Bill 2021.
- 8.10 The accompanying Biodiversity Net Gain Plan has been prepared by Leigh Ecology following the completion of the statutory metric. The metric has confirmed that, to achieve a 10% net gain, an additional 0.83 habitat units and 0.09 watercourse units are required, in addition to the landscaping proposals.
- 8.11 The additional units will be secured via a recognised habitat bank or operator within the local or regional area, with preference given to offset sites located within Bury or the wider Greater Manchester Nature Recovery Strategy area, in accordance with the Defra biodiversity gain hierarchy and trading rules.

Arboriculture

- 8.12 Policy JP-G7 of PfE sets out to increase tree cover, protect and enhance woodland and connect people to the trees and woodland around them. The policy also requires lost trees to be replaced at a 2:1 ratio, and to protect trees during construction.

- 8.13 A Tree Survey and Arboricultural Impact Assessment ('AIA') has been prepared by North West Tree Consultancy Ltd.
- 8.14 The Tree Survey identified 11 individual trees and 4 no. groups of trees. Of these trees, a part of group 3 (category B) is to be removed from the northern corner to facilitate an attenuation pond.
- 8.15 All other trees and tree groups are retained and will be protected in accordance with the specifications set out within the AIA.
- 8.16 A total of 50 trees are proposed within the landscaping scheme, replacing the 2 lost trees.
- 8.17 The proposed development is in accordance with Policy JB-G7 and the retention and planting of trees carries a modest weight, when accounting for the loss of part of group 3.

Residential Amenity

Noise

- 8.18 Policy JP-P1 of PfE sets out to create beautiful, healthy and varied places. Criterion 15 states that developments should offer a high level of amenity that minimises exposure to pollution.
- 8.19 Following the initial submission, the applicant instructed Miller Goodall to explore revised design solutions for the site. This included updated modelling of the site and a coordinated approach with the design team to achieve a high-quality design that achieves required noise criteria.
- 8.20 Miller Goodall has prepared a Noise Impact Assessment which confirms that, subject to upgraded glazing and appropriate alternative ventilation, compliance with adopted internal noise criteria can be achieved.
- 8.21 In order to achieve adopted external noise criteria, the orientation of buildings has been strategically aligned to protect rear amenity spaces. 3m acoustic fences are also proposed to the rear garden external fence, with standard 1.8m fencing to internal divides. This ensures comfortable acoustic environments without overly enclosing the space.
- 8.22 Additionally, the Waterfold Lane properties are fronted by an additional 1.5m stone boundary, which provides additional private amenity, demarcates the space and provides a high quality frontage reflective of the surrounding area.
- 8.23 The report concludes that the development can achieve acceptable noise levels and should not be a determining factor in the granting of planning permission.
- 8.24 As such, the proposed development is compliant with policy JP-P1.

Air Quality

- 8.25 Policy JP-S5 of PfE sets out that development should be located in areas that maximise use of sustainable travel modes, and have regard to potential adverse impacts.

- 8.26 The Air Quality Assessment ('AQA') prepared by professional consult has considered the potential impacts on air quality from both the construction and operational phases of development.
- 8.27 The AQA has confirmed that there are no predicted impacts for the operational phase, and subject to best practice, construction impacts can be suitably managed to an acceptable level.
- 8.28 As such the proposed development is compliant with Policy JP-S5.

Crime

- 8.29 Policy JP-P1 of PfE states that all new development should have regard to community safety and crime prevention.
- 8.30 Paragraph 135 of the NPPF states that planning policies and decisions should create places that are safe, inclusive and accessible and which promote health and wellbeing, with a high standard of amenity for existing and future users and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.
- 8.31 The accompanying DAS confirms that boundary treatments adhere to 'Secured by Design' principles, emphasizing natural surveillance where possible and incorporating security features as necessary. The POS areas are central to the site, and the trim path is overlooked in its entirety.
- 8.32 A Crime Impact Assessment ('CIA') is being prepared and will be submitted to the LPA following completion.

Ground Contamination

- 8.33 Policy JP-P1 requires development to minimise exposure to pollutants and to be safe and durable.
- 8.34 A Site Investigation ('SI') has been prepared by Earth Environmental and Geotechnical Ltd to examine the ground conditions of the Site. The investigation comprised borehole sampling, in-situ testing and laboratory geotechnical and contamination testing.
- 8.35 The assessment confirms that soil contamination and water contamination risk is moderate to low and recommends a soil remediation strategy and a surface water sample. We would propose to condition these items.
- 8.36 The assessment also confirms that shallow strip/pad foundations are suitable for the development of the terraced housing. However, due to made ground, an alternative solution is required for the apartment block.
- 8.37 The proposed development will be carried out in accordance with the recommendations of the SI, and is in compliance with policy JP-P1.

Flood Risk and Drainage

- 8.38 JP-S4 of PfE sets out to manage flood risk and protect the quality and quantity of waterbodies. This includes locating and designing development to minimise the impacts of flood risk, and expecting development to manage surface water run-off through Sustainable Urban Drainage Systems (SuDS).

- 8.39 Policies EM/7 & EM/8 of the UPD back up policy JP-S4, and set out that applications must be accompanied by an appropriate flood risk assessment, and make satisfactory drainage arrangements.
- 8.40 This application is supported by a Flood Risk Assessment and Drainage Strategy ('FRADS') prepared by GWK, which has assessed the Site and proposals against relevant policy and guidance.
- 8.41 The FRADS establishes that, although a small section of the Site is within Flood Zone 3 where it meets the river "A detailed assessment of the modelled flood levels from the Environment Agency against the site-specific topographical survey has proved that in fact the flood water will not pass out of bank and therefore the site can be considered to be located fully in Low-Risk Flood Zone 1".
- 8.42 The assessment has considered all other forms of flooding and found that the site is at low risk of flooding from all sources.
- 8.43 An outline drainage strategy is included, and confirms that SuDS will be incorporated and drainage can be suitably managed.
- 8.44 The proposed development is therefore considered compliant with the relevant policies of PFE and the UDP.

Energy and Sustainability

- 8.45 Policies JP-S2 of PFE sets out objectives and requirements to achieve a carbon neutral Greater Manchester. The policy requires new development to be net zero in operation, unless it is not practicable or viable, and to incorporate Electric Vehicle Charging Points ('EVCP') and achieve heat energy demand reductions.
- 8.46 The accompanying Energy Statement has been prepared by Energy Counsel and details how the proposed development will incorporate sustainable design and resource efficiency in line with the Energy Hierarchy.
- 8.47 The design of all buildings has followed the 'Be Lean, Be Clean, Be Green', fabric first strategy and measures include the following:
- Enhanced building fabric to meet the current Building Regulation ADL1 2021
 - Enhanced air tightness and thermal bridging.
 - Highly efficient decentralised mechanical extract ventilation with low specific fan powers (SFPs) to the houses
 - Highly efficient mechanical ventilation with heat recovery to the apartments
 - Heating to flats will be provided by direct electric panel heaters
 - Hot water to flats will be provided by highly efficient hot water heat pumps.
 - Heating and hot water to houses will be provided by highly efficient air source heat pumps
 - Efficient lighting strategy primarily using LED type fittings.

- Photovoltaic (PV) panels are mounted on pitched roofs to further reduce the carbon emissions of each dwelling.

- 8.48 An assessment of the potential for low carbon and renewable energy sources has been undertaken within the assessment.
- 8.49 The use of high efficiency heat pumps will result in an overall 84.59% improvement in CO2 emissions and a 68.24% improvement in primary energy above the Building Regulations baseline.
- 8.50 It is considered that the sustainability credentials of the proposed development carry limited weight in the planning balance, due to the policy requirement for Net Zero Carbon.

9. Planning Balance

- 9.1 Section 7 has considered the various planning matters in relation to the proposed development, including establishing the principle of development.
- 9.2 We have demonstrated that RBC has a delivery shortfall of over 1,000 affordable dwellings; as well as 1,207 households requiring rehousing within the Heywood Township.
- 9.3 Additionally, it has been previously established through pre-application discussions that the Site is considered to compromise grey belt land. Section 6 has assessed the Site and proposed development against the relevant paragraphs of the NPPF in consideration of development in the Green Belt, and it has been demonstrated that the proposed development is considered appropriate development under paragraphs 155-158.
- 9.4 The proposed development will also provide significant benefits to meeting the social, environmental and economic objectives of the NPPF, as demonstrated below.

Benefit	Weight	Justification
Addressing a shortfall in affordable housing	Significant	The delivery of 24 affordable dwellings would contribute positively to addressing the local and district wide shortfall in affordable housing.
Improvements to sustainable travel along Waterfold Lane	Significant	The proposed improvements to the highway along Waterfold Lane will improve access to sustainable travel for both future and existing residents of Waterfold Lane.
Strengthening of Green Belt boundaries	Moderate	The strengthening of Green Belt boundaries at Waterfold Lane would assist in preventing future encroachment.
Redevelopment of a sustainable site	Moderate	The Site is currently derelict vacant land and is located close to Heywood and Bury centres. The Site benefits from access to a number of sustainable transport modes.
Effective and efficient use of land	Moderate	The Site is considered to be brownfield land and the redevelopment of such a site in a sustainable location is in line with national planning policy.

Delivery of BNG and improvements to the public realm	Modest	The delivery of 10% net gain will benefit local biodiversity. By improving access to wildlife and green spaces, local health will improve.
Socio – Economic Benefits	Modest	The site will deliver a number of socio economic benefits including the creation of 17 direct jobs and a potential direct gross value added to the local economy of £1,193,190.
Sustainability	Limited	The significant improvements to CO2 and Energy consumption are considered to have limited weight, given the policy requirement for Net Zero. However, it is noted that the development represents a significant improvement on building regulations and will contribute to the long-term sustainability and efficiency of the development.

- 9.5 This Statement demonstrates that the proposed development represents sustainable development and is in accordance with the NPPF and relevant policies of the development plan as a whole.
- 9.6 The proposed development should therefore be granted permission without delay, in accordance with paragraph 11 of the NPPF.

10. Conclusion

- 10.1 This Planning Statement has been prepared on behalf of Franstep Limited & Mr. David Gibbons to support the proposed development for 24 dwellings on land at Waterfold Lane, Heap Bridge, Bury.
- 10.2 The proposed scheme delivers 100% affordable housing, significantly exceeding the 50% affordable housing requirement set out within the NPPF and will directly support the districts efforts to meet its ambitious housing targets and address affordability issues.
- 10.3 It has been demonstrated that the proposed development meets the requirements of paragraphs 155-158 and is considered to be appropriate development within the Green Belt.
- 10.4 It has also been demonstrated that, should the LPA consider that paragraphs 155-158 are not met, that the scheme provides significant benefits amounting to Very Special Circumstances, outweighing the limited harm to the Green Belt.
- 10.5 The benefits include the provision of much-needed housing, the redevelopment of a site in a sustainable location, efficient land use and the delivery of high-quality and energy efficient affordable homes to meet local housing needs. It also offers economic, social, and environmental benefits.
- 10.6 This Statement, along with the suite of technical reports that accompany this application, demonstrates in the planning balance that there is no demonstrable or significant adverse impact that would preclude development.
- 10.7 In summary, it is evident that there are no significant and demonstrable adverse impacts or material considerations that would outweigh the benefits of granting permission when assessed against the NPPF and development plan as a whole. Paragraph 158 states that *"a development which complies with the Golden Rules should be given significant weight in favour of the grant of permission"*. The proposals constitute sustainable development and comply with the Golden Rules and should therefore be approved 'without delay'.

Appendix 1

Places for Everyone Policy Wording	RBC Core Strategy / UDP Policy	Compliance
Policy JP-Strat13: Strategic Green Infrastructure The following strategic green infrastructure assets will be protected and enhanced as key features: 1. River valleys and waterways (see Policy JP-G3 'River Valleys and Waterways') 2. Lowland wetlands and mosslands (see Policy JP-G4 'Lowland Wetlands and Mosslands') 3. Uplands (see Policy JP-G5 'Uplands') 4. Trees and woodland (see Policy JP-G7 'Trees and Woodland'). The protection and enhancement of these key strategic green infrastructure assets is complemented by a suite of policies to protect and enhance our network of green infrastructure, including protecting and enhancing sites of ecological value. This will enable our residents to access and maximise the benefits of green infrastructure on their health and wellbeing	G6	The River Roch is protected, with built development on site located away from the riverbank. Additional boundary planting is proposed, further enhancing the rivers setting and ecological value. Additionally footpaths are provided along the riverbank, with the Waterfold Lane footpath reinforced with a retaining wall. The footpaths enhance the public amenity of the river.
Policy JP-S1: Sustainable Development To help tackle climate change, development should aim to maximise its economic, social and environmental benefits simultaneously, minimise its adverse impacts, utilise sustainable construction techniques and actively	G1	The proposed development will provide significant environmental, social and economic benefits as discussed within the planning statement. This includes (but is not limited to) the provision of 24

seek opportunities to secure net gains across each of the different objectives. In preparing plans, authorities should make as much use as possible of suitable previously-developed (brownfield) land and vacant buildings to meet development needs. In bringing forward previously developed sites for development, particular attention will be paid to tackling land contamination and stability issues, ensuring that appropriate mitigation and remediation is implemented to enable sites to be brought back into use effectively.		affordable homes, 10% BNG and the creation of 17 jobs. The accompanying Site Investigation report has confirmed that the site can be made safe, and as such the proposed development will make efficient use of a previously developed site.
Policy JP-S2: Carbon and Energy 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 including: 1. Promoting the retrofitting of existing buildings with measures to improve energy efficiency and generate renewable and low carbon energy, heating and cooling; 2. Promoting the use of life cycle cost and carbon assessment tools to ensure the long-term impacts from development can be captured; 3. Taking a positive approach to renewable and low carbon energy schemes, particularly schemes that are led by, or meet the needs of local communities; 4. Increasing the range of nature-based solutions including carbon sequestration through the restoration of peat-based habitats, woodland management, tree planting and natural flood management techniques;	G1, G2	Criteria 5 is applicable to the proposed development, requiring proposals to be net zero where practical and viable. The proposals have followed the energy hierarchy, and has confirmed that The use of high efficiency heat pumps will result in an overall 85.42% improvement in CO2 emissions and a 62.21% improvement in primary energy above the Building Regulations baseline. Furthermore, the proposed development will incorporate PV Panels on all dwellinghouses and PVs to the apartment building in accordance with Table 5.1. EVCP spaces are provided in accordance with policy. Subject to viability, a contribution to a carbon offset fund will be made against

5. An expectation that new development will, unless it can be demonstrated that it is not practicable or financially viable; a. Be net zero carbon which applies: • from adoption – to regulated operational carbon emissions; • from 2028 – to all emissions 'in construction'. From 2025 development should also calculate and minimise carbon emissions from unregulated emissions alongside regulated emissions. Development proposals should set out how this has been achieved in an energy statement in accordance with the energy hierarchy, which in order of importance seeks to: - Minimise energy demand; - Maximise energy efficiency; - Use renewable energy; - Use low carbon energy; and - Utilise other energy sources From 2025 any residual carbon emissions that cannot be fully mitigated on-site should be offset, in agreement with the relevant local planning authority through a financial contribution to a carbon offset fund. As an interim measure, development should be consistent with the 2022 Part L Building Regulations unless superseded by		the 14.58% of carbon emissions to achieve net zero.
--	--	--

changes to building regulations and/or national or local planning policies. b. Incorporate adequate electric vehicle charging points, in line with Part S of the Building Regulations, unless superseded by relevant Local Plan policies, to future proof for the likely long-term demand, taking account of the potential maximum energy demand for the site; c. Where practicable, prioritise connection to a renewable energy/heating/cooling network in the first instance or a low carbon energy/heating/cooling network that is adaptable to non-fossil fuels at a later date; d. In residential developments, achieve energy demand reductions in terms of space heat demand; hot water energy demand and the delivery of on-site renewable energy generation, in accordance with Table 5.1. For renewable energy generation priority should be given to PV installation where technically feasible, alternative technologies will be appropriate where the equivalent generation is evidenced. e. For non-residential developments, achieve at least BREEAM excellent standard (or equivalent) for the 'Ene 01 – reduction of energy use and carbon emissions' category rising to 'BREEAM outstanding' equivalent for ENE 01 from 2028. f. Include a detailed energy statement to demonstrate via site relevant evidence how the development has sought to maximize reductions in carbon emissions in line with relevant policy targets, including the minimisation of overheating risks		
---	--	--

and appropriate measures for post occupancy evaluation.
Whole life cycle emissions should be considered where possible.

Districts may set out specific carbon emission reduction and energy demand targets within Local Plans.

Table 5.1 Best Practice Thresholds for Reducing Energy Demand and Onsite Renewable Energy Generation within residential developments

-	Space Heat Demand ²⁵	Hot Water Energy Demand ²⁶	Renewable Energy Generation Targets
2021 - 2025	Houses (30kWh/m2) Flats (25kWh/m2)	20% energy demand reduction in the total heat required for water heating	*Photovoltaic installation: 20% ground floorspace
2025 - onwards	Houses (20kWh/m2) Flats (15kWh/m2)	^20% energy demand reduction in the total heat required for water heating	*Photovoltaic installation: 40% ground floorspace
*Ground floorspace used as a proxy for available roof area.	-	-	-
^will need to be reviewed with Future Homes Standard 2025 to determine if savings already embedded.	-	-	-

JP-S4: Flood Risk and the Water Environment

G8, EM/7,
EM/8

The FRADS establishes that, although a small section of the Site is within Flood Zone

An integrated catchment-based approach will be taken to protect the quantity and quality of water bodies with reference to the North West River Basin Management Plan and managing flood risk, by: 1. Returning rivers to a more natural state, where practicable; 2. Working with natural processes and adopting a natural flood management approach to slow the speed of water drainage and intercept water pollutants; 3. Locating and designing development so as to minimise the impacts of current and future flood risk, including retrofitting or relocating existing developments, infrastructure and places to increase resilience to flooding; 4. Expecting developments to manage surface water run-off through sustainable drainage systems and as close to source as possible. Development should achieve greenfield run-off rates unless it is demonstrated to be impracticable. District local plans should consider setting more detailed surface water drainage policies to reflect local circumstances, including alternative surface water discharge rates, such as in areas with critical drainage issues; 5. Ensuring that sustainable drainage systems: i. Are designed to provide multifunctional benefits wherever possible, including for water quality, nature conservation and recreation; ii. Avoid adverse impacts on water quality and any possibility of discharging hazardous substances to ground;		3 where it meets the river "A detailed assessment of the modelled flood levels from the Environment Agency against the site-specific topographical survey has proved that in fact the flood water will not pass out of bank and therefore the site can be considered to be located fully in Low-Risk Flood Zone 1". The assessment has considered all other forms of flooding and found that the site is at low risk of flooding from all sources. An outline drainage strategy is included, and confirms that SuDS will be incorporated and drainage can be suitably managed.
---	--	---

iii. Are delivered in a holistic and integrated manner, including on larger sites split into different phases; and iv. Are managed and maintained appropriately to ensure their proper functioning over the lifetime of the development. 6. Securing the remediation of contaminated land and the careful design of developments to minimise the potential for urban diffuse pollution to affect the water environment; and 7. 7. As a minimum, residential development should meet the mandatory water efficiency standard of 125 litres/person/day as set out in Building Regulations. District local plans may and should consider setting a tighter water efficiency standard of 110 litres/person/day where there is a clear local need with reference to national guidance on housing optional technical standards.		
Policy JP-S5: Clean Air A comprehensive range of measures will be taken to support improvements in air quality, focusing particularly on locations where people live, where children learn and play, where there are impacts on the green infrastructure network and where air quality targets are not being met, including: 1. Locating and designing development, and focusing transport investment, so as to reduce reliance on forms of transport that generate air pollution; 2. Determining planning applications having regard to the most recent development and planning control guidance published jointly by the Institute of Air Quality Management (IAQM) and Environmental Protection UK (EPUK), and the most recent IAQM	G9	The proposed development is sustainably located, and will reduce the dependence on private car journeys. The proposed landscaping scheme enhances the green infrastructure and will support the removal of pollutants. The Air Quality Assessment ('AQA') prepared by professional consult has considered the potential impacts on air quality from both the construction and operational phases of development. The AQA has confirmed that there are no predicted impacts for the operational

Guidance on the Assessment of Dust from Demolition and Construction, or relevant successor guidance, including the requirement for developers to submit construction management plans as appropriate; 3. Requiring applications for developments that could have an adverse impact on air quality to submit relevant air pollution data so that adverse impacts on air quality can be fully assessed and development only permitted where they are acceptable and/or suitable mitigation can be provided; 4. Restricting developments that would generate significant point source pollution such as some types of industrial activity and energy generation; 5. Significantly expanding the existing commercial network of electric vehicle charging points, both for public and private use, including as part of new developments; 6. Implementing the Clean Air Plan and associated measures; 7. Facilitating the more sustainable distribution of goods within the urban area, including through accommodating urban consolidation centres and urban distribution centres that use ultra-low-emission vehicles, and local delivery facilities to reduce repeat delivery attempts; 8. Designing streets to avoid trapping air pollution at ground level, including through the appropriate location and scale of buildings and trees; 9. Controlling traffic and parking within and around schools, early years sites and other locations that are particularly sensitive to air quality;		phase, and subject to best practice, construction impacts can be suitably managed to an acceptable level.
--	--	--

10. Promoting actions that help remove pollutants from the air, such as enhancing the green infrastructure network and using innovative building materials that capture air pollutants; and Development should be located in areas that maximise the use of sustainable travel modes and be designed to minimise exposure to high levels of air pollution, particularly for vulnerable users.		
JP-H1: Scale Distribution and Phasing of New Housing Development A minimum of 175,185 net additional dwellings will be delivered over the period 2022-2039, or an annual average of around 10,305. The new homes will be of good quality and design, adaptable, supported by the necessary infrastructure and amenities and their distribution (as set out in Table 7.2) will support the Plan's overall strategy which enables people to reduce the need to travel when taking advantage of our key assets. The delivery rates in Table 7.2 are the minimum number of net additional dwellings each district is expected to identify a sufficient supply of sites for through their local plans. The phasing of development is set out in Table 7.2. Where national policy requires a local planning authority to identify and update annually a supply of specific deliverable sites in their district, this will be assessed against the minimum delivery rates for the district set out in Table 7.2, irrespective of any shortfalls or surpluses in other districts and in the Plan area overall (unless national policy requires a different figure to be used). Each local authority will monitor delivery rates within their area and will take action as necessary to ensure that delivery rates are maintained as anticipated in this plan. If this regular monitoring reveals significant	C1	The Rochdale Annual Monitoring Report 2022 and PfE Annual Monitoring Report 2024 demonstrate that the Council has a total shortfall of 1,071 affordable dwellings over the past 10 years. The proposed development will therefore make a small but significant contribution to the supply of affordable housing.

deviation from the phasing in this plan, the factors resulting in these changes will be determined and consideration will be given to what action would be appropriate, including development management action and review of the policies in this plan. This work would feed into the regular reviews of this plan, although individual authorities may wish to take specific local action outside the formal review process to ensure that they can maintain delivery rates.

Table 7.2 Distribution and Phasing of new dwellings 2022-2039

-	Annual average 2022-2039	2022-2025 (annual)	2025-2030 (annual)	2030-2039 (annual)	Total 2022-2039
Bolton	787	787	787	787	13,379
Bury	452	246	452	520	7,678
Manchester	3,533	3,533	3,533	3,533	60,061
Oldham	680	404	680	772	11,560
Rochdale	616	568	616	632	10,472
Salford	1,658	1,658	1,658	1,658	28,186
Tameside	485	236	485	568	8,245
Trafford	1,122	817	1,122	1,224	19,077
Wigan	972	814	972	1,025	16,527
PfE	10,305	9,063	10,305	10,719	175,185

Policy JP-H2: Affordability of New Housing

Substantial improvements will be sought in the ability of people to access housing at a price they can afford, including through:

1. Significantly increasing the supply of new housing, in accordance with Policy JP-H1 'Scale, Distribution and Phasing of New Housing

C4

The proposed development is 100% affordable, and therefore exceeds the requirements of JP-H2.

Development', thereby reducing the potential for a shortfall to lead to large house price and rent increases 2. Maximising the delivery of additional affordable homes, including through local plans setting targets for the provision of affordable housing for sale and rent as part of market-led developments based on evidence relating to need and viability 3. Supporting provision of affordable housing as part of new developments (avoiding where possible clusters of tenure to deliver mixed communities) 4. Working with Government to maximise the amount of public funding being directed towards the provision of new affordable housing 5. Increasing the supply of low-cost market housing, to complement the provision of affordable homes and diversify options for low income households.		
Policy JP-H3: Type, Size and Design of New Housing Development across the plan area should seek to incorporate a range of dwelling types and sizes including for self-build and community led building projects to meet local needs and deliver more inclusive neighbourhoods. Where appropriate, this should include incorporating specialist housing for older households and vulnerable people. Residential developments should provide an appropriate mix of dwelling types and sizes reflecting local plan policies, and having regard to masterplans, guidance and relevant local evidence.	C3	The proposed development provides a range of housing to meet the housing need as identified by the Registered Provider. The proposed development provides a mix of 1 bed apartments and 3 bed houses, providing a range of housing types. All dwellings meet or exceed the NDSS. At present 21 dwellings (87%) also meet M4(2)

Housing provision to accommodate specific groups, such as students and travelling people, will be addressed through district local plans. All new dwellings must: 1. Comply with the nationally described space standards; and 2. Be built to the 'accessible and adaptable' standard in Part M4(2) of the Building Regulations unless specific site conditions make this impracticable. Innovation in housing development will be supported where it is consistent with the principles of good design and contributes to local distinctiveness, including the use of modern methods of manufacturing that can help to improve the speed of delivery and increase building standards.		standards. The remaining 3 represent those dwellings on the first floor of the apartment block, which are designed to meet M4(2) however cannot be considered compliant as the scheme does not include a lift. It is considered that the 21 dwellings presents a suitable proportion for accessible dwellings, as required by the RP and with reduced maintenance requirements.
JP-G2: Green Infrastructure Network A strategic approach will be taken to the protection, management and enhancement of our Green Infrastructure in order to protect and enhance the ecosystem services which the Green Infrastructure Network provides, including flood management, climate change mitigation and adaptation. Alongside this primary function an enhanced Green Infrastructure network will support wider public health benefits, including promotion of active travel, food growing and recreational opportunities. The protection, management and enhancement of Green Infrastructure will contribute to the development of a Local Nature Recovery Strategy for Greater Manchester. This Strategy will feed into the development of a Nature Recovery Network locally and nationally. Development within and around the Green Infrastructure Network should be consistent with delivering major green infrastructure improvements within them and should contribute to improvements.	G6	The proposed development will enhance the green infrastructure on site through the provision of 48 trees, in addition to significant hedgerow and shrub planting. Whilst the development will remove land from the Green Belt, the Planning Statement has established that the development is in accordance with paragraphs 155-158 of the NPPF and as such is not considered inappropriate. Furthermore, the improvements to Waterfold Lane, including the provision of a footpath, represent a significant improvement to the accessibility of the Green Belt from Waterfold Lane. It is considered that the significant ecological,

Development which involves the removal of land from the Green Belt (including allocations proposed in this plan) will be required to offset the impact of removing land from the Green Belt through identifying and delivering compensatory improvements to the environmental quality and accessibility of remaining Green Belt in the vicinity of the site. Details of specific sites and projects will be established in discussion with the relevant Local Authority. Wherever practicable, opportunities to integrate new and existing green infrastructure into new development will be taken to protect, enhance and expand the green infrastructure network. Where new or improved green infrastructure is delivered as part of a development, the developer should make appropriate provision for its long-term management and maintenance		environmental and access improvements are in accordance with Policy JP-G2.
Policy JP-G3: River Valleys and Waterways River valleys and waterways will be protected and improved as central components of our Green Infrastructure Network and a vital part of a Nature Recovery Network, making a major contribution to local identity, quality of life and the natural environment. In making planning decisions and carrying out other associated activities, we will seek to deliver the following priorities: 1. Retain the remaining open character of the river valleys, avoiding their fragmentation and prominent development on valley edges; 2. Promote public enjoyment of the river valleys, including as key features connecting urban areas to the countryside, providing opportunities for active travel, and enhance their high recreational value as green fingers through densely populated areas;	G6	The proposed development will improve the public enjoyment of the River Roth, through the provision of a new footpath along Waterfold Lane and POS within the site. The proposed development does not adversely impact on the open character of the valley, given the presence of surrounding development and previously developed nature of the site. The development increases the ecological value of the riverbank and enhances the public realm. The proposed development is in accordance with JP-G3.

3. Protect and enhance the mosaic of semi-natural habitats, including: riparian (waterside), clough, broadleaved and ancient woodland; wet and semi-natural grassland; meadow; and lakes and ponds; 4. Retain existing pockets of relative tranquillity and seclusion, especially within the more tightly enclosed and wooded valleys; 5. Reduce flood risk, through Natural Flood Management (NFM), including careful land management and a catchment-wide approach; 6. Improve water quality, including through land decontamination and the management of diffuse pollution from industry and agriculture; 7. Return rivers to a more natural state where practicable, including through deculverting and the re-naturalisation of riverbanks and flood plains; 8. Where compatible with the requirements of commercial and freight use, increase the use of canals and watercourses for active travel, with improved and extended rights of way alongside the water providing walking and cycling routes for both recreation and commuting, thereby increasing access to natural green space; and 9. Ensure that development relates positively to nearby rivers and other waterways, taking advantage of opportunities to integrate green infrastructure through: a. High quality frontages to the water; and		
---	--	--

b. Public realm alongside the water for both recreation use and maintenance access.		
Policy JP-G7: Trees and Woodland We will work to deliver the aims and objectives of the Greater Manchester Tree and Woodland Strategy, aiming to significantly increase tree cover, protect and enhance woodland, and connect people to the trees and woodland around them. This will be done through local planning and associated activities such as: 1. Protecting and expanding the mosaic of woodland habitats, linking fragmented areas of woodland, in particular wooded cloughs and pockets of ancient and riverside (riparian) woodland; 2. Encouraging habitat diversity through conserving and managing existing woodland and trees that are of heritage, cultural and/or aesthetic value, including ancient woodland and veteran trees; 3. Aiming to plant a tree for every resident in the plan area over the next 25 years as part of the City of Trees initiative; 4. Targeting tree-planting at the areas of greatest need where the green infrastructure benefits can be maximised, whilst avoiding the loss of, or harm to, other priority habitats, including encouraging woodland planting schemes on areas of low-grade agricultural land and land in need of remediation; 5. Establishing a new City Forest Park in Salford, Bolton and Bury, which will provide a vast urban forest close to the City Centre;	G6	The proposed development retains almost all trees on site, with an additional 48 trees planted to enhance the boundaries and create a high quality public realm. The proposed planting far exceeds the 2-1 ratio required, and will provide significant ecological and social benefit. The accompanying Arboricultural Impact Assessment provides the details for tree protection throughout construction, which will be adhered to. The proposals are therefore in accordance with policy JP-G7.

6. Considerably increasing the provision of street trees within urban areas; 7. Promoting the provision of community orchards to increase fruit consumption 8. Promoting the opportunity for woodland conservation to raise awareness for the sustainable use of timber; 9. Securing a diversification of broadleaved species, in order to increase biodiversity and disease resilience; 10. Improving public access to woodland and trees particularly by sustainable travel models to capture the health and wellbeing benefits whilst managing the associated pressures; 11. Encouraging the positive management of woodland to bring it into a more productive state, improve habitat diversity, and more effectively contribute to important green infrastructure functions such as flood risk management, urban cooling and carbon storage/sequestration; And through development as follows: 12. 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; and 13. Protecting trees and woodland during the construction phase of development.		
---	--	--

Policy JP-G8: A Net Enhancement of Biodiversity and Geodiversity Through local planning and associated activities a net enhancement of biodiversity resources will be sought, including, where relevant, by: 1. Increasing the quality, quantity, extent and diversity of habitats, particularly priority habitats identified in national or local biodiversity action plans and those that support priority species; 2. Improving connections between habitats, to protect and enhance the provision of corridors, ecological networks (including Nature Recovery Networks) and steppingstones that enable the movement of species, especially as the climate changes; 3. Enhancing the management of existing habitats, including through habitat restoration, avoiding habitat fragmentation and combating invasive species; 4. Protecting sites designated for their nature conservation and/or geological importance, with the highest level of protection given to international and then national designations; 5. Facilitating greater access to nature, particularly within urban areas; 6. Supporting the development and implementation of the Great Manchester Wetlands Nature Recovery Network; and 7. Safeguarding, restoring and sustainably managing our most valuable soil resources, tackling soil degradation/erosion and recovering soil fertility, particularly to ensure protection of peat-	G7	The proposed development will create and enhance habitats on site, including wildflower meadows, tree and hedgerow planting. The River Roch corridor is protected, with additional planting improving the connectivity of existing planting in this area. The landscaping will be maintained under a management plan over 30 years, ensuring that the biodiversity net gains on site are delivered. The development is centred around nature, with significant areas of public open space to encourage access to nature. The site also connects to the PRoW via Waterfold Lane, enabling access to the wider countryside. The proposals have been designed in accordance with the mitigation hierarchy and will, through a combination of on-site planting and the purchase of credits, provide a 10% net gain in biodiversity. For further details, please refer to the Preliminary Ecological Assessment and BNG Assessment prepared by Leigh Ecology.
---	-----------	---

based soils and safeguard 'best and most versatile' agricultural land.

Development will be expected to:

- a. Follow the mitigation hierarchy of:
 - i. Avoiding significant harm to biodiversity, particularly where it is irreplaceable, through consideration of alternative sites with less harmful impacts, then
 - ii. Adequately mitigating any harm to biodiversity, then
 - iii. Adequately compensating for any remaining harm to biodiversity
- b. Avoid fragmenting or severing connectivity between habitats;
- c. Achieve a measurable net gain in biodiversity of no less than 10%
- d. Make appropriate provision for long-term management of habitats and geological features connected to the development;
- e. Where appropriate, development should: mitigate air pollution impacts on Manchester Mosses SAC; mitigate urban edge, functionally linked land and recreation disturbance impacts on the South Pennine Moors SAC/SPAs; and assess and potentially mitigate boat movement, water pollution, and light spillage and shading impacts on the Rochdale Canal SAC; and
- f. Development proposals should be informed by the findings and recommendations of the appropriate biodiversity/ecological assessment(s) in the PfE evidence base and/or any updated or appropriate biodiversity/ecological assessments submitted as part of the planning application process.

Policy JP-G9: The Green Belt The Green Belt is defined on the Policies Map and illustrated on Figure 8.6. The Green Belt serves the five purposes set out in national policy: • to check the unrestricted sprawl of large built-up areas; • to prevent neighbouring towns merging into one another; • to assist in safeguarding the countryside from encroachment; • to preserve the setting and special character of historic towns; and • to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. The beneficial use of the Green Belt will be enhanced where this can be achieved without harm to its openness, permanence or ability to serve its five purposes. In particular, the enhancement of its green infrastructure functions will be encouraged, such as improved public access and habitat restoration, helping to deliver environmental and social benefits for our residents and providing the high quality green spaces that will support economic growth	G4, G/D/2	The Planning Statement has demonstrated that the site is in accordance with paragraphs 155-158 of the Local Plan, and will not result in significant harm to the Green Belt. Furthermore, the provision of 24 affordable homes, creation of POS and improvements to Waterfold Lane are considered to amount to Very Special Circumstances and would outweigh any harm to the Green Belt associated with the development of this site.
Policy JP-P1 Sustainable Places We aim to become one of the most liveable city regions in the world, consisting of a series of beautiful, healthy and varied places, each having the following key attributes that all development, wherever appropriate, should be consistent with: 1. Distinctive, with a clear identity that: a. Conserves and enhances the natural environment, landscape features, historic environment and local history and culture;	P3, DM1	The accompanying DAS demonstrates that the site has a distinct identity, creating a high quality, inclusive and engaging community design. The design and layout is reflective of the surrounding area and sites history. The landscaping proposals highlight the sites location along the River Roch and create an inviting outdoor environment.

b. Enables a clear understanding of how the place has developed; and c. Respects and acknowledges the character and identity of the locality in terms of design, siting, size, scale and materials used 2. Visually stimulating, creating interesting and imaginative environments which raise the human spirit through the use of green space, public art and quality design 3. Socially inclusive: a. Responding to the needs of all parts of society; b. Enabling everyone to participate equally and independently; c. Providing opportunities for social contact and support; and d. Promoting a sense of community 4. Resilient, capable of dealing with major environmental events 5. Adaptable, able to respond easily to varied and changing needs and technologies 6. Durable, being built to last and using robust materials that reflect local character, weather well and are easily maintained 7. Resource-efficient with: a. A low carbon footprint; b. Efficient use of land; c. Minimised use of new materials; d. High levels of recycling		The dwellings are built sustainably, with high-quality materials, to minimise energy and water usage.
---	--	--

8. Safe, including by designing out crime and terrorism, reducing opportunities for anti-social behaviour and by ensuring that developments make appropriate provision for response and evacuation in the case of an emergency or disaster. 9. Supported by critical infrastructure, such as energy, water and drainage and green spaces 10. Functional and convenient, enabling people and uses to act efficiently with minimal effort, and responding to needs relating to servicing, recycling facilities, refuse collection and storage 11. Incorporating inclusive design within all spaces with support for tackling inequality and poverty to form part of creating sustainable places 12. Legible, being easy to understand and navigate, with the protection and enhancement of key views and new development well-integrated into the place 13. Easy to move around for those of all mobility levels, particularly by walking and cycling, with enjoyable routes free from obstacles and disorienting stimuli, and with places to rest 14. Well-connected to other places, particularly by public transport and digital infrastructure enabling everyone to take advantage of the employment, cultural and leisure opportunities across Greater Manchester and beyond 15. Comfortable and inviting, with indoor and outdoor environments:		
---	--	--

a. Offering a high level of amenity that minimises exposure to pollution; and b. Addressing microclimate issues such as sunlight, indoor air quality, overheating, shade, wind and shelter 16. Incorporating high quality and well managed green infrastructure and quality public realm, with: a. Opportunities for recreation and outdoor play for children, and interaction between the generations; b. Public and private spaces clearly distinguished; c. Development clearly defining, and promoting activity within, public spaces; d. High quality landscaping with schemes 17. Well-served by local shops, services and amenities, including education and health facilities		
Policy JP-C8: Transport Requirements of New Development 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. We will do this by: <u>Connectivity and Permeability</u> 1. Prioritising safe and convenient access to the site and buildings for all users in accordance with the user hierarchy in Policy JP-C1 'An Integrated Network', including;	T2	The proposed development has designed all internal routes to adoptable standard, and has proposed significant improvements to Waterfold Lane in order to create safe and convenient access to and from the site, including a new pedestrian footpath along the River Roch, and a give-way priority junction. It is expected that, following the improvement works, the section of Waterfold Lane forming the access will be adopted by the LHA.

• Prioritising new and enhanced walking, cycling and public transport routes and stops, through and around the site. These routes should: ○ be direct, safe and convenient; ○ connect to nearby facilities, employment areas, public transport stops; and ○ improve the coverage, quality and integration of the wider walking and cycling infrastructure and public transport provision; • Ensuring that the layout, design and landscaping of development prioritises the provision of safe, secure and attractive access to local services and facilities for pedestrians, cyclists and people with a disability; and • Ensuring that new development is connected visually and physically; within the site and to the surrounding built environment; 2. Ensure appropriate connectivity to the existing highway network. <u>Design</u> 3. Reducing the need to travel by ensuring that community facilities, services and amenities are provided within the site or within walking distance of new development; 4. Incorporating highway design at a human scale using street-based prescriptions such as those within Manual for Streets and/or any locally adopted design guidance, to ensure that highways do not dominate the development; <u>Public Transport</u>		The proposed development has provided sufficient parking (31 spaces), including and EVCP (25%). The parking is in line with the LPA standards and reflects the sites sustainable location. Sufficient space is provided for servicing and maintenance vehicles accessing the site. The accompanying transport statement has confirmed that no reason exists for refusal due to traffic or highways safety.
--	--	---

5. Ensuring (through funding improvements where appropriate) that the nearest public transport stops (both within and adjacent to the development site) are attractive to users in terms of seating, shelters, information and easy step-free access; 6. Subsidising new or amended public transport services where the development would otherwise have inadequate public transport access; <u>Parking Infrastructure</u> 7. Making adequate car parking provision, including for disabled drivers and passengers; 8. Ensuring that car parking provision is well integrated and unobtrusive, so it supports the street scene; and where appropriate parking provision is flexible and can be adapted over time to reflect demand; 9. Incorporating enough secure and covered cycle parking to meet long-term demand from occupiers and visitors in a convenient location that helps to maximise its use, and for workplaces, where appropriate providing: i. Showers, changing facilities and lockers for cyclists and walkers ii. Pool or hire bikes for use by occupiers iii. Information in advance about facilities to visitors; 10. Promoting alternatives to car ownership, such as the use of ULEV car clubs rather than the provision of private car parking spaces; 11. Promoting the increased provision of ULEV charging infrastructure including meeting any standards set by local plans.		
---	--	--

12. Providing for overnight parking and rest areas, with appropriate facilities, for heavy goods vehicle drivers, where the development is likely to generate demand, and it is appropriate to the location. <u>Access and Servicing</u> 13. Providing designated pick-up/drop-off points for taxis and other demand responsive transport services where appropriate, taking into account the potential increase in demand if car ownership falls; 14. Making appropriate provision for deliveries and servicing (including requiring Delivery and Servicing Plans for appropriate developments), in a way that: • meets road safety requirements, • reduces transport emissions and other environmental impacts, • reduces traffic congestion, the number of vehicle movements and the need for repeat deliveries <u>Construction Management</u> 15. Ensuring Construction Management Plans are produced for developments, where appropriate, to mitigate construction logistics and environmental impacts including air quality and noise on the surrounding area and encourage sustainable deliveries. <u>Transport Assessments</u> 16. Planning applications will be accompanied by a Transport Assessment / Transport Statement and Travel Plan where		
--	--	--

appropriate, in order to assess impacts and determine the most appropriate mitigation on the SRN and local transport network. Where a Transport Assessment is required, this should start with a vision of what the development/allocation is seeking to achieve and then test a set of scenarios to determine the optimum design and transport infrastructure to realise this vision. Consultation should be undertaken, at pre-application stage, with the relevant local highway authorities to agree which committed developments / allocations and which potential transport interventions should be considered, with reference to Appendix D, as appropriate. 17. Planning applications which are required to be accompanied by a Transport Assessment will need to consider air quality impacts on Holcroft Moss, within the Manchester Mosses Special Area of Conservation (SAC). Any proposals that would result in increased traffic flows on the M62 past Holcroft Moss of more than 100 vehicles per day or 20 Heavy Goods Vehicles (HGVs) per day must devise a scheme-specific range of measures to reduce reliance on cars, reduce trip generation and promote ultra-low emission vehicles and provide a contribution towards restoration measures in accordance with the Holcroft Moss Habitat Mitigation Plan.		
---	--	--

Policy	Compliance
Rochdale Core Strategy	
C4 – Providing Affordable Homes We will seek affordable housing on all developments of 15 dwellings or more. We will seek a contribution to affordable housing of 7.5% of the development sales value of the overall scheme. Affordable housing should be: a. Provided on-site using this contribution to deliver homes of a type, size and tenure agreed by the developer and	The proposed development is 100% affordable and as such is considered to exceed the requirements of Policy C4.

the local authority based on local evidence and, where appropriate, delivered in partnership with a Registered Provider; or b. b. Provided via an off-site financial contribution in exceptional circumstances, for example, where: i. The local authority considers that the site is not an appropriate location for affordable housing e.g. poor access to local services and public transport; or ii. The type of housing on the site makes it difficult to provide an element of affordable housing; or iii. It is not practical to properly manage an element of affordable housing on the site e.g. on-site provision would only deliver a very small number of homes. We will take the following factors into account when negotiating the level of affordable housing and how it is to be provided: i. The type of affordable housing required in the area; ii. The availability of Social Housing Grant or equivalent; iii. The need to deliver other planning objectives with a higher priority; and iv. The economic viability of the development.	
P1 – Improving image We will require high quality design in all new developments, and this will be particularly important in the following areas, which are crucial to the image of the borough: 1. Key gateways into the borough (see Spatial Strategy key diagram and Township delivery diagrams); 2. Local gateways to centres, communities and attractions;	The Site is designed to be high-quality, with the car park screened significantly from view by soft landscaping and built form, and high-quality materials and design ensuring the dwellings are cohesive with the surrounding built environment when viewed from afar. At a site level, the layout prioritises interaction and play, with planting and pathways creating a vibrant and distinctive public realm.

3. 3. Local Improvement Corridors and those stretches of main transport corridors which are currently characterless or unattractive (see township delivery diagrams); 4. 4. Town centres; and 5. 5. Prominent sites, regeneration areas and key visitor attractions. We will ensure new development improves the image of the borough by: a. Requiring design which is of a high standard, demonstrating innovation and originality; b. Working with developers of major developments to incorporate public art in the design of buildings and spaces or contribute to public art projects as appropriate; c. Helping to 'green' the urban environment, for example by securing tree planting on sites and along streets and roads; d. Promoting the development and re-use of under-used land and buildings, maximising the potential for heritage assets to provide a sense of place and image; and e. Creating people-friendly, safe, vibrant, uncluttered public areas.	
Unitary Development Plan	
G/D/2 – Green Belt The Green Belt boundary is defined on the proposals map. The Green Belt will be protected from inappropriate development in	The accompanying planning statement has assessed the sites contribution to the Green Belt, demonstrating that the site does not strongly contribute to the purposes of the Green Belt, in

order to satisfy the purposes and objectives for Green Belt set out in ppg 2, and in particular to maintain the framework of open land separating and surrounding the urban areas of the borough.	particular, the site is bound by the River Roch, Waterfold Lane and the M66 which prevent urban sprawl. Additionally, the southern boundary of Parcel RD50 is over 7km from the Site, ensuring that the development of the Site will not contribute to the covalence of neighbouring towns.
EM/7 Development and Flood Risk Development will not be permitted in areas identified as flood plains, or other areas where development could contribute to increased flood risk, unless an appropriate flood risk assessment has been carried out and all of the following criteria are met: a. It will not increase the risk of flooding within the flood plain or in adjoining areas by reducing flood storage capacity, increasing flows within a flood plain or through the additional discharge of surface water; b. It will not itself be at risk from flooding; c. Appropriate sustainable drainage systems are used; d. Adequate access adjacent to the water course for maintenance is provided; e. Existing or proposed flood defences are protected; f. It would not result in extensive culverting; and g. Flood defence works required as a consequence of development are provided at the developer's expense. Flood defences and related engineering works must also ensure that recognised ecological, geomorphological, archaeological, landscape and recreational interests associated with a water course or adjacent areas are fully taken into account and appropriate mitigation provided. The sequential test approach and principles set out in PPG 25 'Development and Flood Risk' will be followed in considering development proposals.	The accompanying FRADS has been carried out in accordance with EM/7 and establishes that, although a small section of the Site is within Flood Zone 3 where it meets the river "A detailed assessment of the modelled flood levels from the Environment Agency against the site-specific topographical survey has proved that in fact the flood water will not pass out of bank and therefore the site can be considered to be located fully in Low-Risk Flood Zone 1". The assessment has considered all other forms of flooding and found that the site is at low risk of flooding from all sources.

EM/8 Protection of Surface and Ground Water Development likely to pose an unacceptable risk to surface water and ground water quality, or to water supply will not be permitted. Development proposals will be expected to: a. Make satisfactory arrangements for the disposal of sewage, trade effluent or contaminated surface water; b. Avoid exacerbating existing problems such as premature or increased frequency of discharges through storm sewer overflows due to inadequate infrastructure or lack of capacity; c. Ensure adequate safeguards against the pollution of surface or ground water through the spillage or leakage of stored oils/chemicals or other potentially polluting substances; and d. Ensure that there will be no detrimental effect upon the availability of water resources to existing users and the environment.	An outline drainage strategy is included, and confirms that SuDS will be incorporated and drainage can be suitably managed.
---	--

This report takes into account the particular instructions and requirements of our client. It is not intended for and should not be relied upon by any third party. Any such party relies on this report at their own risk.

© Report copyright of NJL Consulting

www.njlconsulting.co.uk