

PLANNING STATEMENT

PROPOSED RESIDENTIAL DEVELOPMENT

At : GNG Foam Converters (Lancs) Ltd, Pennine Industrial Estate,
Todmorden Road, Littleborough, OL15 9EG

Construction of 11.no residential dwellings,
together with access, parking and private garden areas.



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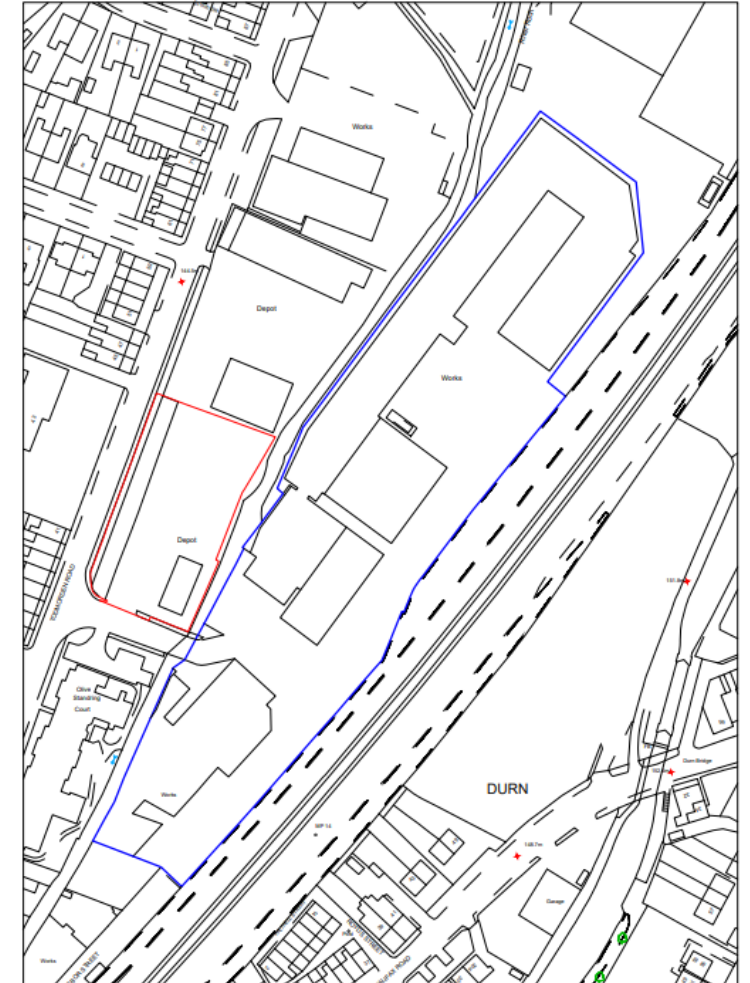
- The Statement has been prepared by James Campbell Associates to assist Rochdale Borough Council in the consideration of an application for 11 residential dwellings.
- This statement will assess the proposed development against the prevailing planning policies and the spatial suitability for housing at the site. The Statement is structured as follows :
 - Page 3 describes the site and the surrounding area
 - Page 4 outlines the site history and planning History
 - Pages 5 & 6 sets out the Sustainability of the location site
 - Page 7 describes the site access & transport options within the area
 - Page 8 sets out the development proposal
 - Page 9 outlines out the development proposal documents
 - Page 10 sets out the Environmental Impact considerations
 - Page 11 outlines the relevant planning policy for the determination of the application
 - Page 12 Assess the pertinent planning considerations
 - Pages 13 considers the principle of development.
 - Pages 14 – 16 assesses the Design, Appearance, Layout, Landscaping
 - Page 17 outlines Density
 - Page 18 assess neighbour/residential amenity for existing occupiers
 - Page 19 assess neighbour/residential amenity for proposed occupiers
 - Page 20 analyses Transport, Access and Highway Safety
 - Page 21 assess Flood Risk and Drainage
 - Page 22 covers Noise
 - Page 23 covers Ecology & Tree matters
 - Page 24 addresses Crime & Natural Surveillance
 - Page 25 covers Energy Efficiency
 - Page 26 analyses Contaminated Land & Land Stability
 - Page 27 assesses Refuse services and Collection
 - Page 28 considers Presumption in Favour of Sustainable Development
 - Page 29 draws an overall Conclusion

THE SITE AND SURROUNDING AREA



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- The application site is located off Todmorden Road, Littleborough within the Littleborough Lakeside ward.
- The site measures 0.28 hecatres
- The site contains previously developed land with an existing single storey industrial building and the site was formerly used as outdoor storage and parking for HGVs vehicles.
- The site is bordered by the River Roch to the east with GNG Foam Converters sited beyond the river. GNG Foam Converters manufacture and process moulded foam products found in everyday household items and associated products. There is also warehousing units.
- To the rear of the site (south) is sheltered residential accommodation
- Across Todmorden Road to the west is terraced residential dwellings.
- To the north of the site is Corrosion Resistant Products who manufacture piping and equipment
- As highlighted above the surrounding area features a mix of industrial, commercial, and residential



SITE HISTORY & PLANNING HISTORY

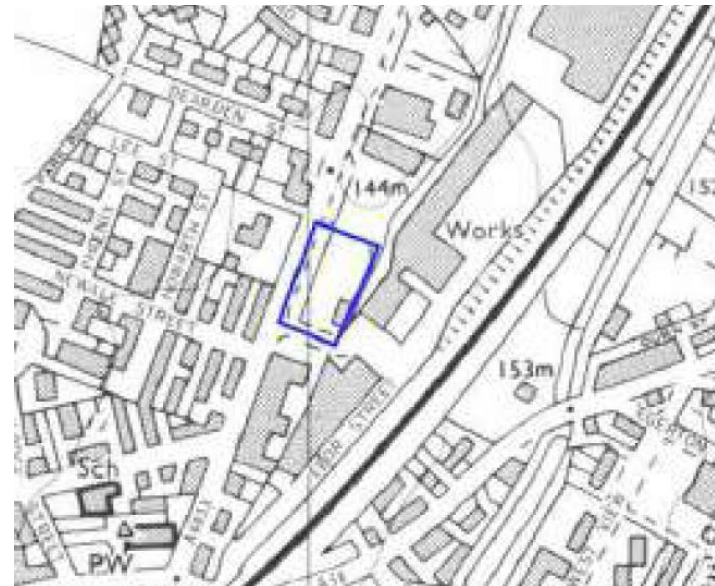


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- No previous planning history on the site was found on the councils planning portal, however the adjacent site within the applicants ownership received planning permission in June 2025
- Permission was granted for the erection of front extension to create new two storey office building, rear infill extension to existing warehouse to provide additional storage and operational space including the creation of three new loading bays. Other works include the associated raising of the eaves and ridge height of the existing warehouse building (Application reference: 24/01216/FUL).
- Historic Mapping is shown below;



1910/1911 Map



1989 Map



Present Day

SUSTAINABILITY OF THE LOCATION SITE



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- The site is located within walking distance of a number of local services and facilities available in Littleborough which is 0.3miles away (approx. 6minute walk)
- Littleborough Town Centre and primary shopping area is sited 300m away.
- There is a bus stop 11metres away to the west of the site on Todmorden Road with a regular 20 minute service to Rochdale
- The nearest Railway station is Littleborough Railway Station approximately 0.3miles away.
- Approximately 3.8miles to the south-west is Junction 21 of the M62.
- There is a medical practice 0.5m away from the site to the south-west on Peel Street
- Rochdale Infirmary hospital sited 1.8miles away from the site to the east.
- The map to the right shows the public transport links and networks in the vicinity of the site.



- Greater Manchester Accessibility Levels (GMAL) are a detailed and accurate measure of the accessibility of a point to both the conventional public transport network (i.e. bus, metrolink and rail) and Greater Manchester's Local Link (flexible transport service), considering walk access time and service availability.
- The method is essentially a way of measuring the density of the public transport provision at any location within the Greater Manchester region.
- The GMAL methodology is derived from the Public Transport Accessibility Level (PTAL) approach developed by the London Borough of Hammersmith and Fulham, but modified to consider flexible transport service provision (Local Link) and to reflect local service provision levels (different accessibility levels) within Greater Manchester.
- The site benefits from a score of 7.7 and a GMAL (Greater Manchester Accessibility Level) of 5 which is considered above average based on the table to the right.
- Accordingly the site is considered to be positioned within a highly sustainable location.

Accessibility Levels

The final formula given above calculates the Greater Manchester Accessibility Index (GMAI). Each POI index score is allocated to an accessibility level where Level 1 represents the lowest level of accessibility and 8 the highest level of accessibility. The table below shows the relationship between GMAI scores and the final GMAL.

Accessibility Level	Range of Index Scores	Description	Map Colour
1	0 , <=0.5	Very Low	
2	>0.5 , <=2.5		
3	>2.5 , <=5.0		
4	>5.0 , <=7.5		
5	>7.5 , <=12.5		
6	>12.5 , <=17.5		
7	>17.5 , <=25.0		
8	>25	Very High	

SITE ACCESS & TRANSPORT OPTIONS



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- The site fronts onto the A6033 Todmorden Road
- There is ample parking off road on the site and there is on street car parking in front of the site on Todmorden Road.
- There is pedestrian access on pavements to the front and side (west) of the site on Todmorden Road



DEVELOPMENT PROPOSAL



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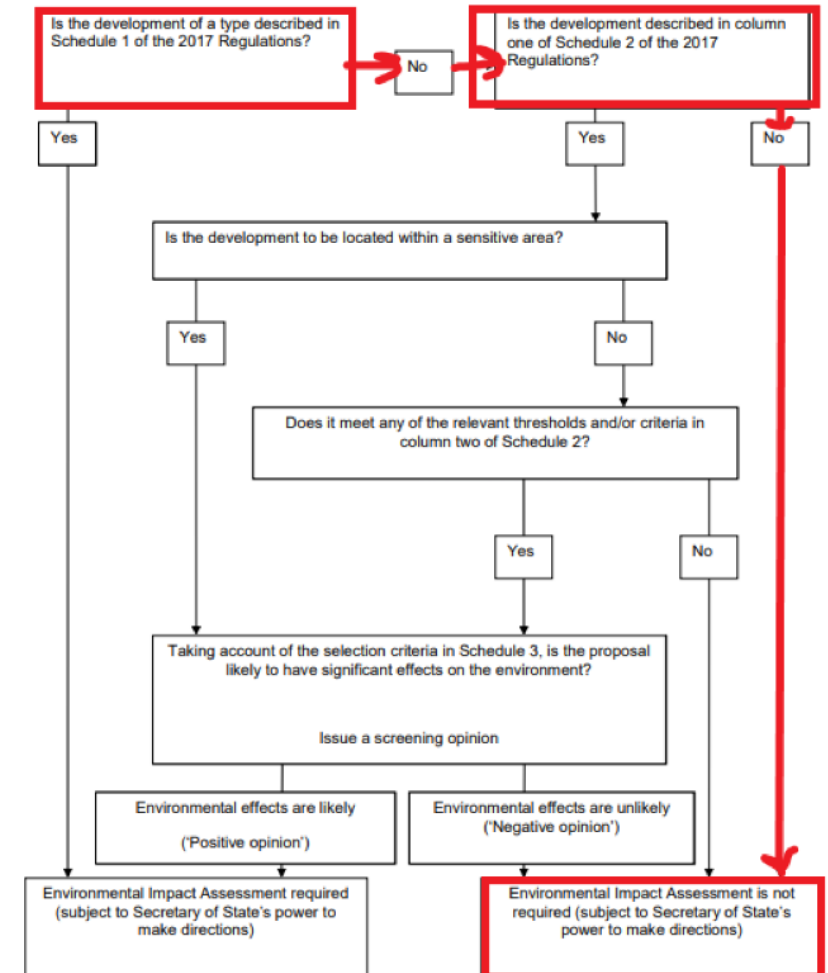
- The application seeks full planning permission for the construction of 11.no residential dwellings, together with access, parking and private garden areas, best understood when viewing the submitted plans (Appendix. A).
- 2.no separate blocks are proposed which are separated by a turning head and parking spaces and each dwelling has 2.no parking spaces.
- Block 1 comprises of 6.no dwellings and Block 2 comprises of 5.no dwellings.
- The Blocks are symmetrical in design with a dual pitched frontage comprising of a three storey design containing a stepped entrance.
- The dwellings measure 10m in length with a width of 5.5m containing a maximum ridge height of 9.9m and an eaves height of 6.7m.
- Each property contains 4 bedrooms
- The dwellings back onto the canal and the dwellings contain garden areas to the front with large gardens/patio areas to the rear.
- The existing access point will be utilised and extended with the site entrance being made up to standard highway and footpath design
- The existing trees and landscaped area to the west fronting Todmorden Road will be retained
- Each property will contain 2.no parking spaces with 1.no EV Charging point per dwelling.
- Refuse Storage will be provided along with cycle storage where required



The application is supported with the following documents:

- Design & Access Statement
- Flood Risk Assessment dated May 2025
- Contaminated Land Phase 1 Assessment dated May 2025
- Arboricultural Impact Assessment and Arboricultural Method Statement
- Biodiversity Net Gain Assessment and BNG Metric dated 6th October 2025
- Noise Impact Assessment dated 3rd November 2025
- Crime Impact Statement dated 29/04/26
- Energy Statement dated April 2026

- The process of Environmental Impact Assessment is governed by the Town and Country Planning (Environmental Impact Assessment) Regulations 2017.
- These regulations apply the EU directive “on the assessment of the effects of certain public and private projects on the environment” (usually referred to as the Environmental Impact Assessment Directive) to the planning system in England .
- The regulations only apply to certain types of development and/or projects.
- The flowchart to the right establishes whether a proposed development requires an Environmental Impact Assessment.
- The agent has completed the screening exercise, and it has been established that an Environmental Impact Assessment is not required.



RELEVANT PLANNING POLICIES



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The following policy and guidance are considered relevant to the consideration of this application: -

- **Rochdale Core Strategy**
 - SP3/R The Strategy for Rochdale - SD1, DM1, DM2
 - SO2 Creating successful and healthy communities: - C1, C2, C3, C4, C6, C8
 - SO3 Improving design, image and quality of place: - P1, P2, P3
 - SO4 Promoting a greener environment: - G6, G7, G8, G9
 - SO5 Improving accessibility and delivering sustainable transport: - T2
- **Places for Everyone (2024)**
 - Sustainable and Resilient Places: - JP-S1, JP-S2, JP-S3, JP-S4, JP-S5, JP-S6
 - Places for Homes: - JP-H1, JP-H2, JP-H3, JP-H4
 - Greener Places: - JP-G3, JP-G7, JP-G8
 - Places for People: -JP-P1, JP-P2, JP-P6, JP-P7
 - Connected Places: - JP-C1, JP-C3, JP-C4, JP-C5, JP-C6, JP-C8:
 - Delivering the Plan:- JP-D2 Developer Contributions
- **Rochdale Unitary Development Plan**
 - G/D/1 Defined Urban Area
 - EM/7 Development and Flood Risk
 - EM/8 Protection of Surface and Ground Water
- National Planning Policy Framework (NPPF); - Chapters 2, 4, 5, 8, 9, 11, 12, 14, 15, 16
- **Supplementary Planning Documents (SPD)**
 - Affordable Housing (March 2008)
 - Biodiversity and Development (January 2008/February 2017)
 - Guidelines and Standards for Residential Development (June 2016)
 - Provision of Recreational Open Space in New Housing (March 2008; Updated January 2017)
 - Ministry of Housing, Communities and Local Government: National Design Guide (2019).
 - Department for Communities and Local Government – Technical housing standards - nationally described space standard.
 - Climate Change Adaption (June 2012)
 - Planning Practice Guidance



Ministry of Housing,
Communities &
Local Government

National Planning Policy Framework

December 2024

ROCHDALE
BOROUGH COUNCIL

Guidelines & Standards for
Residential Development
Supplementary Planning Documents (SPDs)
(Consultation Draft - February 2016)



PLACES FOR EVERYONE JOINT
DEVELOPMENT PLAN DOCUMENT
FOR BOLTON, BURY,
MANCHESTER, OLDHAM,
ROCHDALE, SALFORD, TAMESIDE,
TRAFFORD AND WIGAN

2022 to 2039
ADOPTED 21 MARCH 2024

National Design Guide
Planning practice guidance for housing, working and communities



Ministry of Housing,
Communities &
Local Government

- Section 38(6) of the Planning Compulsory Purchase Act 2004 requires that proposals be determined in accordance with the development plan unless material consideration indicates otherwise.
- This section therefore assesses the proposal against the development plan policies outlined above and examines relevant material considerations where appropriate. The assessment draws upon the suite of application documents listed at Page 9 of this statement.
- Policy DM1 – General Development Requirements (as shown to the right) states that all development should have regard to the following specific issues. The planning considerations are considered to be:
 - Principle of Development
 - Design
 - Appearance
 - Layout & Landscaping
 - Density
 - Landscaping
 - Residential Amenity – Existing and Proposed Occupiers
 - Transport, Access and Highways
 - Flood Risk and Drainage
 - Noise
 - Trees & Ecology
 - Crime
 - Energy Efficiency
 - Contaminated Land & Land Stability
 - Waste Collection
 - Sustainability / Presumption in Favour of Sustainable Development

DM1 - General development requirements

All development proposals, including changes of use of land and buildings, extensions and alterations, will be expected to demonstrate that they:

- a. Are of high quality design and take the opportunity to enhance the quality of the area;
- b. Are compatible with surrounding land uses, both in terms of its impact upon those uses and the impact of the surrounding land uses upon the amenities of future residents / users;
- c. Do not adversely affect the amenity of residents or users through visual intrusion, overbearing impact, overshadowing or loss of privacy;
- d. Mitigate against any impacts due to noise, air, dust, light and odour pollution, traffic generation or inadequate access, where such mitigation is identified as being necessary;
- e. Provide satisfactory vehicular access with adequate parking, manoeuvring, and servicing arrangements taking into account of the proposed use and location;
- f. Do not have an adverse impact on health, through its impact or the effect of existing problems e.g. land contamination, or poor air quality;
- g. Provide, or demonstrate the availability of, the service and community infrastructure necessary to meet local needs e.g. local shops, community, leisure and sport facilities and provision of open space;
- h. Minimise opportunities for crime against people or property;
- i. Take account of ground conditions including unstable or contaminated land - where a potential risk exists, a survey should be carried out and any necessary remedial measures identified and carried out;
- j. Incorporate, where appropriate, high quality landscape schemes;
- k. Have assessed whether the development may be affected by ground instability;
- l. Have considered the availability of water and wastewater infrastructure, and any need for additional capacity; and
- m. Do not lead to impacts detrimental to the conservation interests of European Protected Sites.

Policies

- *Adopted Rochdale Core Strategy policy C1 seeks to maximise the potential of previously developed sites within the urban area to achieve a target of 80% of new housing on previously developed land (PDL).*
- *PfE Policy JPH-1 sets out the requirement for Rochdale to deliver 10,472 dwellings over the plan period to 2039, at an average of 616 dwellings per year, which increases during the plan period periodically, with the delivery target at 568 dwellings over 2022-25.*
- *The NPPF requires local planning authorities to support the delivery of a wide choice of quality homes in sustainable locations. Paragraph 61 of the NPPF identifies the Government objective to significantly boost the supply of homes, stating that it is important that a sufficient amount and variety of land can come forward where it is needed and that land with permission is developed without unnecessary delay.*
- *Paragraph 125 of the NPPF states that Planning policies and decisions should: d) promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained”.*

Assessment

- The application site is not allocated for a specific use in the Core Strategy. The site is within a mixed use area with residential uses to the south and west of the site, therefore the proposed use is entirely appropriate and in accordance with the prevailing land use locally.
- The principle of the redevelopment of previously developed brownfield land for the provision of residential development in the area is long established and prioritised within the adopted development plan policies of the Core Strategy as mentioned above and in the NPPF.
- The proposed development will regenerate a vacant, dilapidated and derelict building on a brownfield site located close to associated amenities within Littleborough Town Centre.
- The proposed development would significantly improve the appearance of a site which could otherwise be left to further deteriorate and will substantially uplift the appearance of the area, by providing a high-quality residential development, which will enhance the appearance of the site to which the surrounding streetscene relates to.
- The proposed development represents the opportunity to regenerate and re-use a brownfield site for residential development in a mixed use area and is considered to be an efficient and appropriate use of the site, the principle of repurposing a brownfield site and securing the sites stewardship to deliver additional housing land supply should be welcomed.
- Having regard to the national planning policy framework, PfE policies and Local planning policy along with national planning guidance, the principle of the development is considered acceptable and that the provision of residential development accords with adopted planning policies which seek to increase housing supply on previously developed brownfield land in the Borough.

Policies

- *DM1 of the Core Strategy states that all development proposals will be expected to demonstrate that they are of high quality design and take the opportunity to enhance the quality of the area, P3 - Improving design of new development states that all new development should adhere to high standards of design.*
- *PfE and NPPF policies are clear in their expectations of achieving high quality development that enhances a locality and contributes to place making. Policies relevant here are PfE policy JP-P1 and paragraphs 128,135 and 139 of the NPPF.*

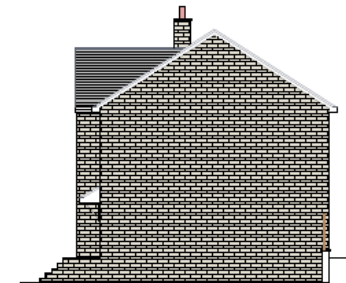
Assessment

- The dwellings are two stories in height with accommodation being provided within the roofspace.
- The 2-storey height of the development is considered to be appropriate within the context of the height of surrounding built form which contains a mixture of residential and industrial development, all of which is relatively low rise. The treatment of the elevations will be relatively uniform, reflecting the uniformity of the terraced dwellings in the surrounding area, as well as the robust nature of nearby industrial development.
- The massing created by the length of the 2.no blocks of dwellings will be broken up by the turning head and parking area separating the two terraces.
- Gable features and uniform openings and a structured window pattern create a rhythm to the façade, similar to surrounding properties.
- The applicants share the vision of the Residential Development SPD and the proposals have been developed to mirror existing design cues in the area. The application is accompanied by a Design and Access Statement that sets out the context of the site and the design process undertaken.
- For the reasons outlined above It is believed that the proposed development accords with above policies, with the proposed dwellings providing a significant improvement compared to the existing building on site. The proposed dwellings will enhance the character and appearance of the area delivering a sustainable, active use for the site and thereby secure its future.

- The adjacent residential terraced properties are stone built and the sheltered residential accommodation to the south of the site is brick built.
- In terms of appearance, the proposed materials adopts a traditional historic approach using a selection materials such as stone with header and cills to present a development that will fit well within the streetscene. (See Appendix A and the submitted Material Details)
- There is a contemporary look to the rear with the introduction of dormer windows and canopies, whilst still providing a traditional appearance with the introduction of stone chimneys.
- The windows are in keeping with the surrounding design and the fenestration is symmetrical to each property.
- A stepped access to each front door will mirror the residential properties opposite the site across Todmorden Road.
- The dormers will be consistent with the existing fenestration
- The overall impact would present a design of an appropriate quality which would significantly improve the appearance of the site in the street-scene, without being out of character or obtrusive.



PROPOSED FRONT ELEVATION



PROPOSED SIDE ELEVATION 1



PROPOSED SIDE ELEVATION 2



PROPOSED REAR ELEVATION

- The proposed site layout makes efficient use of the site as shown on the proposed site plan to the right
- The proposed dwellings are orientated so principle habitable room windows and the entrance front onto the highway.
- The proposed layout would result in active frontage to the highway and riverside. This is a positive element of the scheme which enables the development to be outward facing and to respond to the character of the surrounding area.
- The proposal follows a consistent building line and the continuation of the historical development pattern
- The proposed development will integrate itself effectively into the local pattern of development
- As a result based on the above, the proposed site layout is believed to be satisfactory, the development has been designed to make best use of the size and orientation of the application site, taking into account accessibility, safety, visual amenity, proximity to existing adjacent properties, the existing building line and flooding concerns.
- Landscaping is provided to the front and rear of the site along with the existing strip of shrubbery and trees to the front of the site (west) fronting Todmorden Road.
- With regard to parking arrangements, the layout does not appear overly car dominated. Parking is provided to each property and there is soft landscaping proposed throughout the site and the landscaping buffer surrounding the boundaries of the site will offset the dominance/impact. The highway geometry ensures that there is sufficient capacity to accommodate visitor parking within the site.
- Due to the highly urbanised nature of the site and its surroundings coupled with the existing site context, we consider that the proposal would not conflict with the policies contained with the councils Core Strategy and the NPPF in relation to landscaping matters.

Site Plan



Policies

- Core Strategy Policy C3 states that *“We will deliver the right types of homes, well designed and built to appropriate densities, to meet the overall needs and aspirations of the borough. To do this we will:*
 - *Ensure new development provides housing types that take account of local needs and aspirations;*
 - *Ensure that the supply of larger and higher value housing in the borough is improved;*
 - *Require a high standard of design and layout that produces attractive places and takes account of energy efficiency and climate change;*
 - *Promote densities that make efficient use of land whilst delivering a range of housing to widen choice in the borough and reflect local character; and*
 - *Support the provision of housing on appropriate sites to meet the needs of specific groups including older people and other vulnerable groups.*
- *In the north of the borough there will be a focus on providing a range of higher value housing to attract and retain residents. To do this we will:*
 - a. *Support lower density development if it delivers higher value dwellings of a type and size that are currently in short supply across the borough; and*
 - b. *Limit higher density development (50 dwellings per hectare and above) to sites in the centre of Littleborough, close to transport interchanges, and along the canal corridor.*
- Pfc Policy JP-H4 *“requires a minimum net residential density of 35-dwellings per hectare for all other locations”*

Assessment

- The scale of development would equate to a density of approximately 39.2 unit per hectare (uph) which is broadly in line with the above policies. The proposal will bring about significant regeneration in an area identified for change to make an efficient and effective use of the land. In addition, the density of the proposed development is related to the prevailing character of neighbouring residential development.
- As such it is considered that the proposals are in compliance with the strategy set out in the adopted housing policies of the Core Strategy, the Achieving appropriate densities section of the NPPF and the planning practice guidance for Effective use of land.

Policies

- Paragraph 135 of the NPPF states that developments should create places with a high standard of amenity for existing users.
- Policy DM1 of the Core Strategy states that *“all development proposals, including changes of use of land and buildings, extensions and alterations, will be expected to demonstrate that they :c. Do not adversely affect the amenity of residents or users through visual intrusion, overbearing impact, overshadowing or loss of privacy;* PfE policies JP-P1 and JP-H3 further supports this along with the councils Guidelines & Standards for Residential Development SPD.

Assessment

- The neighbouring uses directly opposite the site to the north are industrial uses which are long established and the use has operated within the context of the surrounding residential uses and therefore the proposals would not result in an adverse impact on the amenity of any sensitive uses in that location.
- The neighbouring residential properties across Todmorden Road are approximately 32meters away thus complying with the councils Residential Design Guide SPD.
- The neighbouring residential sheltered housing to the south of the site is sited approximately 22meteres away and there are no habitable room windows to the elevation closest to the site. As such the impact on the residents of this building is considered acceptable.
- In terms of the interaction between the buildings within the development, the proposal has been laid out so no overlooking of habitable rooms will occur. Therefore there would be no harm to the residential amenity of the proposed properties.
- Disruption from the development would be mainly attributable to the construction phase. A construction environment management plan (CEMP) can be secured via a planning condition to ensure best practice measures are employed and overall disturbance is kept to a minimum.
- Following the above assessment, it is considered that the proposal would not result in an adverse impact on the residential amenity of any of the neighbouring properties. The proposal is considered acceptable and compliant with policy DM1 of the councils Core Strategy, Sections 11 and 12 of the NPPF and PfE policies JP-P1 and JP-H3 subject.

Policies

Section 12 (para.135) of the NPPF, states that developments should create places with a high standard of amenity for future users. This is further supported by Core Strategy policy DM1. Internal space is interpreted by reference to the nearest equivalent national technical standard which is given in the Government's Technical housing standards – nationally described space standard document (THS). PfE policies JP-P1 and JP-H3 further supports this along with the councils Guidelines & Standards for Residential Development SPD.

Assessment

- As shown on the table on the right the DCLG technical standards recommend a minimum internal floor area of 121sqm for 4bed (7person) accommodation. The proposed areas of the dwellings measure 129m2 and therefore the properties contain sufficient space to accommodate at a maximum 7 persons meeting the requirements of the THS.
- All the habitable rooms in each dwelling are served by windows which allow natural light to be provided in all the habitable rooms. There are 4.no bi-fold doors to the kitchen/dining rooms which provides a good standard of light and outlook.
- Each property contains outdoor amenity space in the form of a rear patio and garden area along with front gardens which is a significant amenity benefit to the future occupants. As such, it is considered that the proposed dwellings would be subject to an acceptable level of residential amenity in accordance with the councils policies and the NPPF.

Table 1 - Minimum gross internal floor areas and storage (m²)

Number of bedrooms(b)	Number of bed spaces (persons)	1 storey dwellings	2 storey dwellings	3 storey dwellings	Built-in storage
1b	1p	39 (37) *			1.0
	2p	50	58		1.5
2b	3p	61	70		2.0
	4p	70	79		
3b	4p	74	84	90	2.5
	5p	86	93	99	
	6p	95	102	108	
4b	5p	90	97	103	3.0
	6p	99	106	112	
	7p	108	115	121	
	8p	117	124	130	

Area Schedule

Ground Floor

Room	Area
Lounge	16.2m2
Hall	6.7m2
W.c	1.5m2
Kitchen / Dining	21.5m2

Total Gross Ground Floor Area = 47m2

Total Gross Internal Area = 129m2

First Floor

Room	Area
Landing	9.4m2
Bedroom 1	12m2
Bedroom 2	14.2m2
En Suite	2.7m2
Bathroom	7.6m2

Total Gross First Floor Area = 47m2

Second Floor

Room	Area
Landing	4.5m2
Bedroom 3	12m2
En Suite	3.1m2
Bedroom 4	13.9m2

Total Gross Second Floor Area = 35m2 (Min. 1.5m Height)

Policies

- Paragraph 116 states that *“Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into all future scenarios”*
- The aforementioned NPPF paragraph is further supported by Core Strategy policy T2, PfE policies JP- C5, JP-C6, JP-C8 along with JP-P1.

Assessment

- The site is in location accessible to a variety of public transport modes as identified on pages 5 and 6 of this planning statement.
- The application site is located in a highly accessible location close to Littleborough Town Centre. Future residents will have access to a range of shops, amenities, leisure facilities, services and job opportunities. The site benefits from good public transport links, being in close proximity to Littleborough Train Station offering regular services to a wide range of destinations.
- The application proposals involve provision for 22.no car parking spaces at a rate of 2.no parking spaces per dwelling with one parking space for Electric Vehicle Charging, this is considered appropriate given the highly sustainable location of the site and cycle storage can also proposed and conditioned.
- It is considered that walking, cycling and public transport offer realistic modes of transport for residents and visitors of the development. The site is well located to take advantage of existing pedestrian, cycle and public transport facilities. These modes of transport are provided within the recommended distance as stated in national guidelines.
- The additional trips generated by sustainable modes are not severe and are therefore unlikely to have a detrimental impact on the existing infrastructure.
- The application shows that the development would not have an unacceptable impact on highway safety and the residual cumulative traffic impact would not be severe. The development is therefore in accordance with the transport principles set out in NPPF and the Councils Core Strategy. As such, we believe the development should be supported on transportation grounds.

Policies

- Paragraph 181 of the NPPF states *that when determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere*, PpE Policy JP-S4 and Core Strategy Policy G8 further support this.
- The National Planning Practice Guidance, states that the aim should be to discharge surface water run-off as high up the drainage hierarchy, as reasonably practicable:
*into the ground (infiltration);
to a surface water body;
to a surface water sewer, highway drain, or another drainage system;
to a combined sewer.*

Assessment

- The site is located in Flood Zone 3 and the application has been accompanied with a Flood Risk Assessment and a sequential test has been carried out.
- The site is presently laid entirely to hard surfacing and there would be no material increase to the size of this area. And the development would not change surface water generation. Surface water would be disposed of using SuDs techniques.
- It is proposed that a formal Flood Warning and Emergency Response Plan is developed for the proposed development to communicate flood emergency response procedures to all the occupants of the site.
- The new development contributes positively to the flood zone by increasing its capacity.
- Foul drainage will be provided under a separate system. Taking all of the above into account, it is considered that the site can be suitably drained in accordance with PpE policy JP-S4, Core Strategy policy G8 and the NPPF and the proposals would not result in a detrimental impact on flood risk or drainage capacity as identified by the measures outlined in the Flood Risk Assessment.

Foam Converters, Todmorden Road,
OL15 9EG

Reference: R0844 FRA-v1

May-25

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Site Location Plan	A
Existing and Proposed Site Layouts	B
Site Characteristics	C
Flood Level Data	D

Policies

- Policy G9 of the Core Strategy sets out that the Council will “*require that development does not have impacts that lead to an unacceptable increase in air, water, noise, light or other pollution.*” which is further supported by Core strategy DM1 and outlined in Paragraphs 187 (e) and 198 of the NPPF.

Assessment

- The site is located in close proximity to adjacent industrial uses. A Noise Impact Assessment has been submitted to determine what the noise impact of the adjacent industrial uses could potentially have on the proposed residents.
- On-site monitoring has identified the site experiences elevated daytime and night-time noise levels from both road traffic (MP1) and industrial activity (MP2) which would not meet BS 8233 external amenity standards and may not meet internal bedroom noise criteria on road-facing elevations. As such additional mitigation measures are required in the form of the following :
 - Targeted Building Layout with noise-conscious façade design
 - Acoustic Barriers and Acoustic Ventilation
 - Enhanced Glazing
- The above mitigation measures will ensure that internal and (for some areas) external amenity noise levels compliant with BS 8233:2014, WHO Guidelines, and planning expectations for residential development is achieved.
- As such the development will meet the objectives of the National Planning Policy Framework in ensuring that no significant adverse impact is experienced by the future residents and the development is considered to be acceptable in terms of noise.
- In accordance with the Control of Pollution Act, the construction of the proposal will only take place between the normal working hours as below:
 - Monday to Friday: 8am to 6pm.
 - Saturdays: 8am to 1pm.
 - Sundays and bank holidays: No work will be permitted.
- Construction activities can also be controlled via the submission of a Construction Environmental Management Plan which can be conditioned.
- The applicant would agree with any conditions the Council’s Public Protection Officers require with respect to acoustic insulation and noise mitigation measures as outlined within the submitted Noise Impact Assessment in order to act as a safeguard for proposed occupiers and to limit the impact of the surrounding environment upon living conditions.

Policies

- *Paragraph 187 of the NPPF states that the planning policies and decisions should contribute to and enhance the natural and local environment. PfE policy JP-G7 (Trees and Woodland) seeks for the replacement of any removed trees on a 2 to 1 basis or other measures which result in a net enhancement in the quality and character of tree cover. Policy JP-G8 also seeks a 10% net enhancement of biodiversity and geodiversity. Core Strategy policy G7 requires that no development should result in a net loss of biodiversity and geodiversity.*
- *Policy G6 of the adopted Core Strategy expects development proposals affecting green infrastructure to avoid the loss of existing features such as trees unless suitable alternative provision is made or they have limited value which is further supported by paragraph 135 of the NPPF which covers Trees”.*

Assessment

- There are a number of trees and sparsely areas of vegetation on site. The groups of trees and individual trees to be removed are classified as U and considered low amenity self seeded trees as such the removal of these trees would be considered acceptable.
- The trees to the west of the site fronting onto Todmorden Road are considered category A and B trees of high amenity value, these trees will be retained and measures put in place in the form of protected fencing and no dig construction methods to protect the trees as indicated by the submitted Tree Constraints Plan.
- The site consists primarily of building and hardstanding with peripheral areas of sparsely vegetated urban land, mixed scrub along the boundaries and scattered trees. There would be a loss of 1.48 Biodiversity Units on site as identified with the submitted BNG metric. The intention is to purchase the units credits off site via a habitat bank which the applicant is agreeable to as identified within the submitted Biodiversity Net Gain Assessment.
- Measures to enhance the site for biodiversity should be secured as a result bird and bat boxes (see specification to the right) will be incorporated into the dwellings.
- We consider that the scheme will provide biodiversity enhancements and provide a net gain for biodiversity at the site, in line with the requirements of the National Planning Policy Framework. As such, we consider that the proposed development would not result in harm to the ecological interest of the site and would not result in harm to the visual amenity of the area.

Provide 1SP Schwegler Sparrow Terrace

* Material: Woodcrete with integrated wooden panel
* Height: 24.5cm
* Width: 43cm
* Depth: 20cm



Policies

- Paragraph 96(b) of the National Planning Policy Framework (the Framework) states that planning policies and decisions should aim to achieve places which promote safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion.
- Paragraph 135(f) of the NPPF states that *“Planning policies and decisions should ensure that developments create places that are safe, inclusive and accessible and which promote health and well-being,; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.”*
- Policy DM1 of the Core Strategy states that all development should have regard to community safety and crime prevention.

Assessment

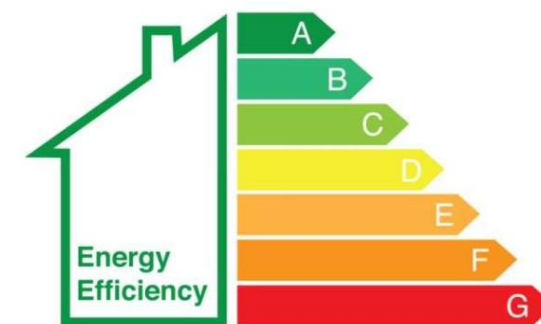
- Fear of crime is a material consideration in planning decisions, although the weight that can be given to it is often limited unless there is significant evidence to show that the increased fear of crime would actually occur. A Crime Impact Statement has been submitted. The CIS has indicated that the scheme can be designed and constructed to secured by Design standard. Active use of the properties will provide a benefit for natural surveillance in the vicinity of the site.
- Secured by Design (SBD) is the official police security initiative. SBD has worked with the Government to embed crime prevention into the planning process and establish police security standards in the building and construction industry. The published document - Secure By Design, Homes 2025 has been taken into account during the design process and the changes advised within the Crime Impact Statement will be incorporated.
- High levels of natural surveillance will occur as the buildings will contain windows to the front and rear at all levels therefore this results in a high level of neighbour surveillance creating a safe community feeling for residents.
- Other Crime prevention measures as recommended by Secure by Design including cycle stores and boundary treatments can be incorporated into the scheme. The crime prevention measures to be included are appropriate and adequate for the perceived crime risks.
- With the redevelopment of the site, enclosure of the curtilage and measures recommended by Secure by Design, we consider that the redevelopment of the site will lead to enhancements to security and help design out crime.
- This development will be consistent with the principles of the National Planning Policy Framework and has adopted principles of Secured by Design and Crime Prevention as referenced above. The development creates a sense of place that enables people to identify with their surroundings and feel safe. Overall the development includes clearly defined and well-lit public and provides semi-private spaces. We believe the proposal fully accords with the secured by Design principles, the NPPF and the Councils Core Strategy.

Policies

- Para.161 of the NPPF states that *“The planning system should support the transition to net zero by 2050 and should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.”*
- Para.166 of the NPPF states that *“In determining planning applications, local planning authorities should expect new development to:
a) comply with any development plan policies on local requirements for decentralised energy supply unless it can be demonstrated by the applicant, having regard to the type of development involved and its design, that this is not feasible or viable; and
b) take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption.”*
- *Policy G1 sets out measures to address climate change and emissions, whilst Policy G2 requires that new development adheres to the energy hierarchy. PfE policy JP-S2 (Carbon and Energy) seeks to reduce the carbon footprint of development via reducing energy demand and maximising efficiency.*

Assessment

- The application has been accompanied by an Energy Statement which details how the development will incorporate sustainable design and resource efficiency in line with the both the Energy Hierarchy and national sustainable design definitions, so to meet the policy requirements and council targets contained within policies G1 and G2 of the Core Strategy, PfE policy JP-S2 and the NPPF.
- The submitted Energy statement indicates key measures to maximise efficiency and incorporate a number of sustainable design principles as indicated to the right -
- Furthermore, it should be noted that the application site is situated within a highly sustainable location, within an existing brownfield site with excellent access to a range of shops, amenities, transport services and job opportunities. The proposed development therefore represents the opportunity to regenerate the site for a more sustainable use.



Energy Efficiency Measures including:

- High levels of thermal insulation to walls, roofs and floors;
- Enhanced air tightness standards;
- Energy efficient glazing with low U-values;
- Limiting thermal bridging within construction detailing;
- Efficient dwelling layouts maximising natural daylight;
- Appropriate orientation of habitable rooms where site layout permits;
- Low energy lighting throughout.

Sustainable design principles including:

- Efficient use of a previously developed brownfield site;
- Durable and thermally efficient building materials;
- Water efficient fittings and appliances;
- Sustainable urban drainage measures where appropriate;
- Electric vehicle charging provision in accordance with current standards.

Policies

- *Policy G9 of the Core Strategy covers matters relating to impact of pollution, contamination and land instability which is further supported by policies JP-S1 and JP-S4 of the adopted Places for Everyone.*
- *Paragraph 187, 196 and 197 of the NPPF covers ground conditions and any risks arising from land instability and contamination.*
- *Para 184 of the NPPF states that “Where a site is affected by contamination or land stability issues, responsibility for securing a safe development rests with the developer and/or landowner.”*

Assessment

- The application is accompanied with a Phase 1 Preliminary Risk Assessment which identified potential risk primarily associated with the presence of made ground and the site’s historical industrial uses and possible ground gas generation which is not uncommon for a site of this nature.
- It is recommended that a Phase 2 Intrusive Site Investigation be undertaken which the applicant will undertake following a grant of planning permission. Therefore the proposals accords with the relevant policies of the Core Strategy and NPPF in relation to Contaminated Land.

CONTAMINATED LAND PHASE 1 ASSESSMENT

GNG Foam Converters (Lancs) Ltd, Pennine
Industrial Estate, Todmorden Road, Littleborough

HME
CIVIL ENGINEERING
CONSULTANTS

STRUCTURAL | ENVIRONMENTAL | GEOTECHNICAL



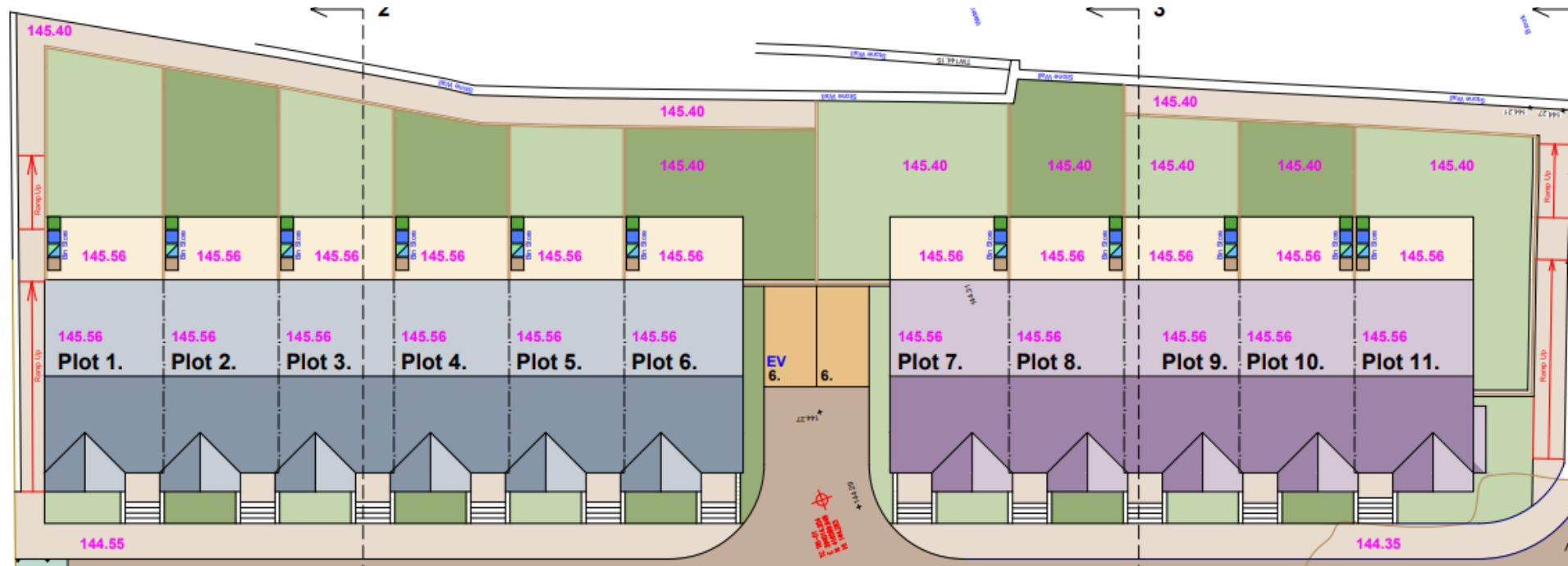
HME Civil Engineering Limited. Registered in England: 15684044

Policies

- Policy DM1, Appendix 1 of the Guidelines & Standards for Residential Development SPD and Pfc Policies JP-P1 & JP-S6 are relevant.

Assessment

- A dedicated bin storage area has been shown on the proposed site plan for each dwelling as shown below of which details can be conditioned accordingly.
- We consider that the waste management plan is acceptable and accords with Core Strategy policy DM1 and the Guidelines & Standards for Residential Development SPD.



PRESUMPTION IN FAVOUR OF SUSTAINABLE DEVELOPMENT

The proposed development will help to facilitate the continued development and improvement of housing sector within Rochdale, and will secure the benefits of sustainable development outlined in Paragraph 8 of the NPPF, namely:

- **Economic** – It is well documented that a shortage of housing can result in economic barriers. The provision of 11.no 4 bedroomed dwellings will make a meaningful contribution to Rochdale’s housing delivery targets adding to the existing family housing stock. Nearby shops and businesses will also benefit as a result of the proposals increasing the customer base. The development will create jobs during the construction and operational phase.
- **Social** - The proposed development will ensure that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed, beautiful and safe place. The occupation of a vacant/underutilised site will help to reduce the possibility of crime and antisocial behaviour. The proposals will provide much needed housing in a sustainable location which is in proximity to a range of amenities, employment opportunities and well served by public transport. The proposed development will deliver good quality housing and contribute to the creation of a mixed and sustainable community.
- **Environmental** – by occupying a brownfield site in a sustainable urban location, the proposal seeks to reinvigorate the site and breathe new life into the area. Utilising this redundant site will create activity and vibrancy within a section of the streetscene that is currently visually unappealing. The site will enhance the natural environment by improving biodiversity. The scheme will provide much needed accommodation, which will help to ease pressure on greenfield and Green Belt sites. Future residents will benefit from the highly sustainable and accessible nature of the development, thereby reducing the need to travel by car and helping to reduce carbon emissions and air quality impact. The visual environment will be greatly enhanced by the proposals, which in turn will have a positive impact on the area and canalside. The application has considered low zero carbon renewable technologies and these will be explored further during the application phase and pre-construction phase.

The proposed development performs a positive economic, social and environmental role and comprises sustainable development in accordance with the provisions of the Framework. As a result there is a presumption in favour of granting the application proposals.

CONCLUSION



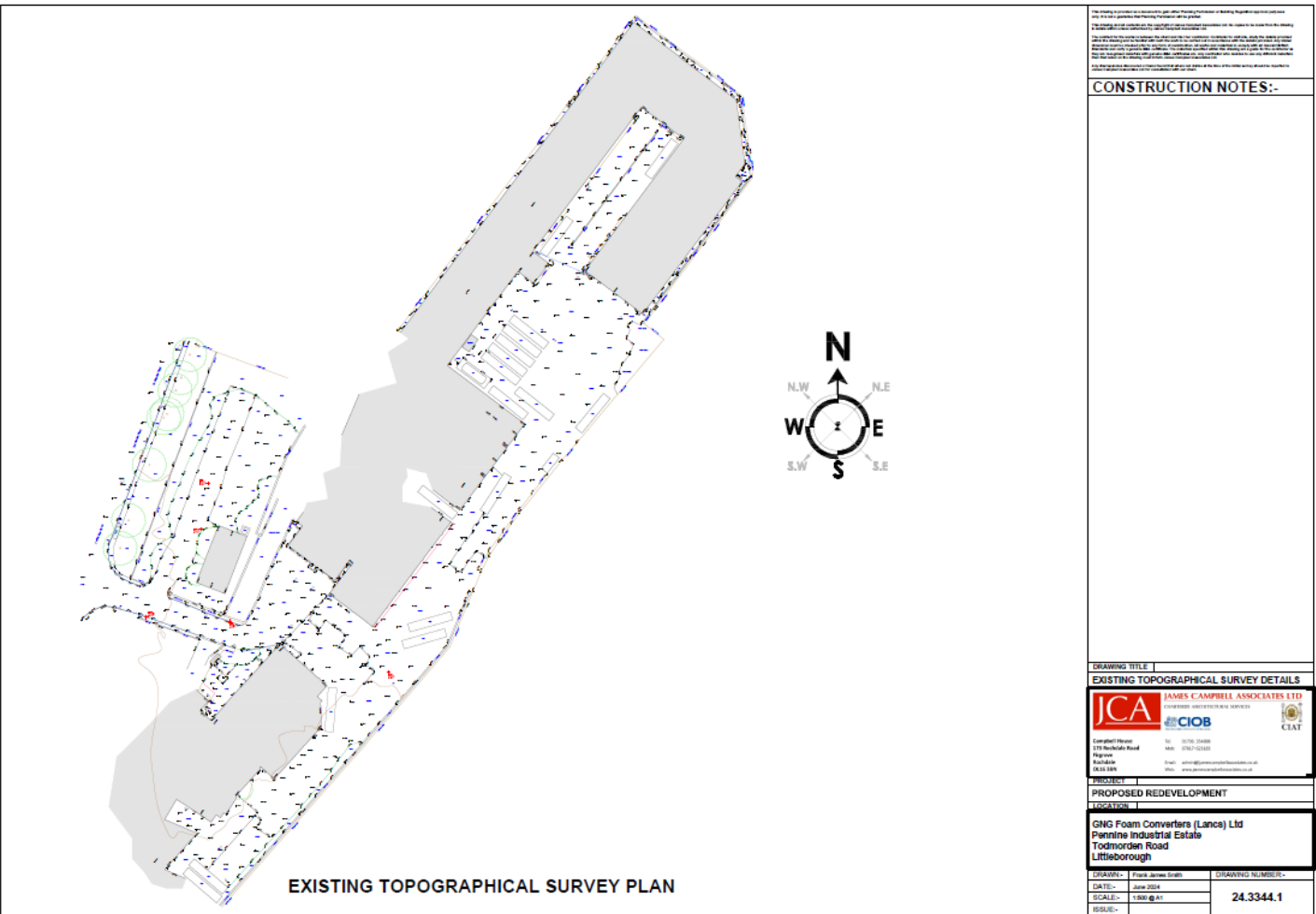
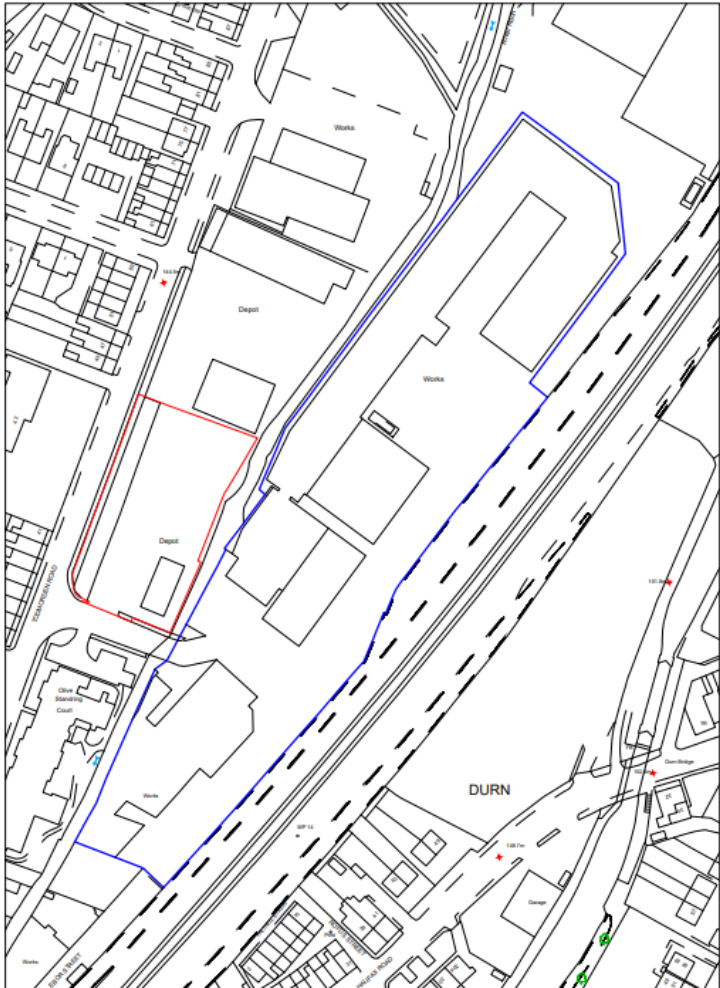
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- The site is currently vacant with no beneficial use and is not allocated for a specific use in the Core Strategy. The site is not subject to any special protection in the context of either the natural or historic environment. The principle of the redevelopment of previously developed brownfield land is long established and prioritised within the adopted development plan policies of the Core Strategy and the NPPF. The principle of this residential development is considered acceptable as assessed within this statement.
- Taking account of the site's prominent and highly sustainable location along Todmorden Road and proximity to district facilities, this brownfield site will deliver a high quality development, which provides 11 no 4 bed dwellings to a high standard and contemporary design.
- Careful design detailing has taken place as evident within this submission. The design and layout of the scheme reflects the character of the area and the layout of the site has been sensitively designed in order to ensure that it positively enhances the area. The development has been designed to respond to the layout and appearance of the site context and the design of adjacent buildings to produce a well-designed residential development.
- The proposed development is 'high quality', is architecturally charismatic, aesthetically pleasing and has been designed to meet the requirements of modern living as well as being sympathetic with the immediate area. We believe the development doesn't overbear or dominate surrounding buildings and the building sits comfortably in the streetscape and will enhance the setting and streetscene.
- The site is within walking distance of a number of local services and facilities available in Littleborough Town Centre which is 0.3 miles away and is well positioned for commuting and served by road, rail and bus modes of transport with easy access to the town centre and very good access to public transport links.
- The proposal will provide adequate parking spaces and cycle storage facilities and therefore will not have a detrimental impact on network capacity.
- There would be no adverse consequences for the residential amenities of neighbouring dwellings, from either overshadowing, loss of light or loss of privacy.
- The proposed new dwellings will provide a high level of residential amenity for future residents meeting the DCLG technical standards.
- The scheme will provide biodiversity enhancements and provide a net gain for biodiversity at the site, in line with the requirements of the National Planning Policy Framework.
- The proposed development will be constructed to modern energy efficiency standards ensuring that the development will be environmentally friendly.
- The development is in accordance with local and national policies and the impact on flooding is considered acceptable.
- The development can be constructed in accordance with crime prevention measures outlined on page 24 in accordance with Secured By Design and GMP. Therefore the impact on crime is acceptable.
- A waste management plan has been submitted and we believe this accords with policy DM1 of the councils Core Strategy and Guidelines & Standards for Residential Development SPD
- The proposals accords with the relevant policies of the Core Strategy and NPPF in relation to Contaminated Land.
- The statement demonstrates that the proposed development can be accommodated within the site, in accordance with local and national planning policy. It is therefore proposed that this scheme positively contributes to the surrounding area, and is appropriate in terms of the site's context and location. Overall, the proposal is shown to comply with local and national policy guidance and will provide a high quality residential development in a sustainable location; therefore, we believe that this development presents an overwhelming case to grant planning permission.

APPENDIX A – SUBMISSION DRAWINGS



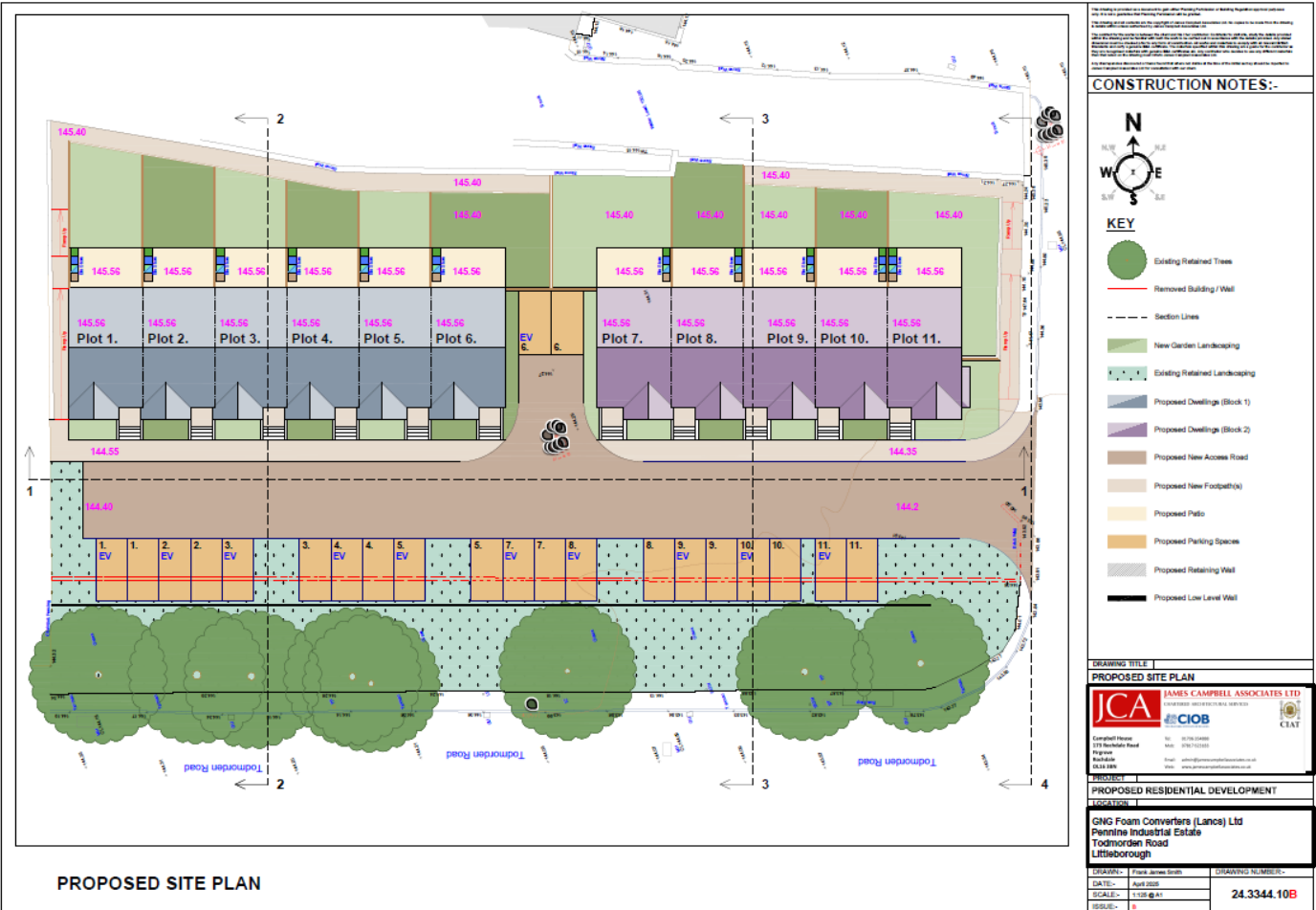
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APPENDIX A – SUBMISSION DRAWINGS



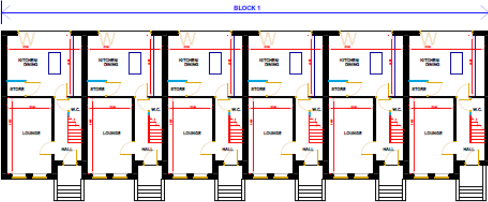
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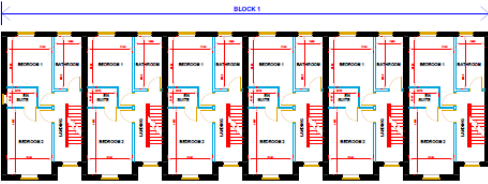
APPENDIX A – SUBMISSION DRAWINGS



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PROPOSED GROUND FLOOR PLAN



PROPOSED FIRST FLOOR PLAN



PROPOSED SECOND FLOOR PLAN

Ground Floor		First Floor		Second Floor	
Room	Area	Room	Area	Room	Area
Lounge	16.2m ²	Landing	8.4m ²	Landing	4.9m ²
Hall	6.7m ²	Bedroom 1	12m ²	Bedroom 2	12m ²
WC	1.5m ²	Bedroom 2	14.2m ²	En Suite	3.1m ²
Kitchen + Dining	21.5m ²	Bedroom 3	12m ²	Bedroom 4	12.3m ²
Bathroom	7.8m ²				
Total Gross Ground Floor Area = 422m ²		Total Gross First Floor Area = 422m ²		Total Gross Second Floor Area = 422m ²	
Total Gross Internal Area = 1266m ²					

CONSTRUCTION NOTES:-

DRAWING TITLE
PROPOSED BLOCK 1 FLOOR PLANS

JCA JAMES CAMPBELL ASSOCIATES LTD
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CIBO CIBO
CEAT CEAT

PROPOSED RESIDENTIAL DEVELOPMENT

LOCATION
GNG Foam Converters (Lancs) Ltd
Pentine Industrial Estate
Tadborn Road
Littleborough

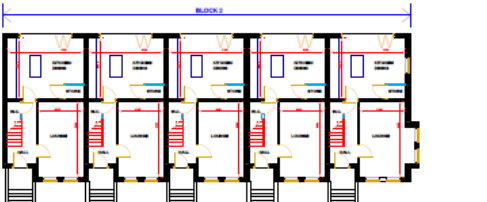
DESIGNER
Frank James Smith

DATE
April 2024

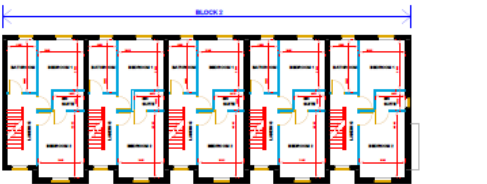
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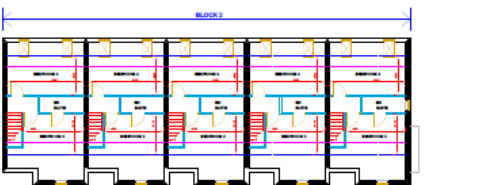
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PROPOSED GROUND FLOOR PLAN



PROPOSED FIRST FLOOR PLAN



PROPOSED SECOND FLOOR PLAN

Ground Floor		First Floor		Second Floor	
Room	Area	Room	Area	Room	Area
Lounge	16.2m ²	Landing	8.4m ²	Landing	4.9m ²
Hall	6.7m ²	Bedroom 1	12m ²	Bedroom 2	12m ²
WC	1.5m ²	Bedroom 2	14.2m ²	En Suite	3.1m ²
Kitchen + Dining	21.5m ²	Bedroom 3	12m ²	Bedroom 4	12.3m ²
Bathroom	7.8m ²				
Total Gross Ground Floor Area = 422m ²		Total Gross First Floor Area = 422m ²		Total Gross Second Floor Area = 422m ²	
Total Gross Internal Area = 1266m ²					

CONSTRUCTION NOTES:-

DRAWING TITLE
PROPOSED BLOCK 2 FLOOR PLANS

JCA JAMES CAMPBELL ASSOCIATES LTD
CHARTERED ARCHITECTURAL SERVICES
CIBO CIBO
CEAT CEAT

PROPOSED RESIDENTIAL DEVELOPMENT

LOCATION
GNG Foam Converters (Lancs) Ltd
Pentine Industrial Estate
Tadborn Road
Littleborough

DESIGNER
Frank James Smith

DATE
April 2024

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DRAWING NUMBER
24.3344.5

PROPOSED FRONT ELEVATION

PROPOSED SIDE ELEVATION 1

PROPOSED SIDE ELEVATION 2

PROPOSED REAR ELEVATION

CONSTRUCTION NOTES:-

1. All external walls to be constructed in brickwork to be specified by the client.

2. All internal walls to be constructed in brickwork to be specified by the client.

3. All floors to be constructed in concrete to be specified by the client.

4. All roofs to be constructed in slate to be specified by the client.

5. All chimneys to be constructed in brickwork to be specified by the client.

6. All windows to be constructed in timber to be specified by the client.

7. All doors to be constructed in timber to be specified by the client.

8. All external finishes to be specified by the client.

9. All internal finishes to be specified by the client.

10. All fixtures and fittings to be specified by the client.

11. All services to be specified by the client.

12. All landscaping to be specified by the client.

13. All other details to be specified by the client.

DRAWING TITLE

PROPOSED BLOCK 1 ELEVATIONS	
Consultant Name	100%
Client Name	100%
Project Name	100%
Location	100%
Scale	100%
Drawn By	100%
Checked By	100%
Approved By	100%

PROJECT

PROPOSED RESIDENTIAL DEVELOPMENT

CLIENT

NAME

ADDRESS

POSTCODE

DATE

SCALE

REVISIONS

NO.	DESCRIPTION	DATE
1	Issue for client approval	24.03.2024

DRAWING NO.

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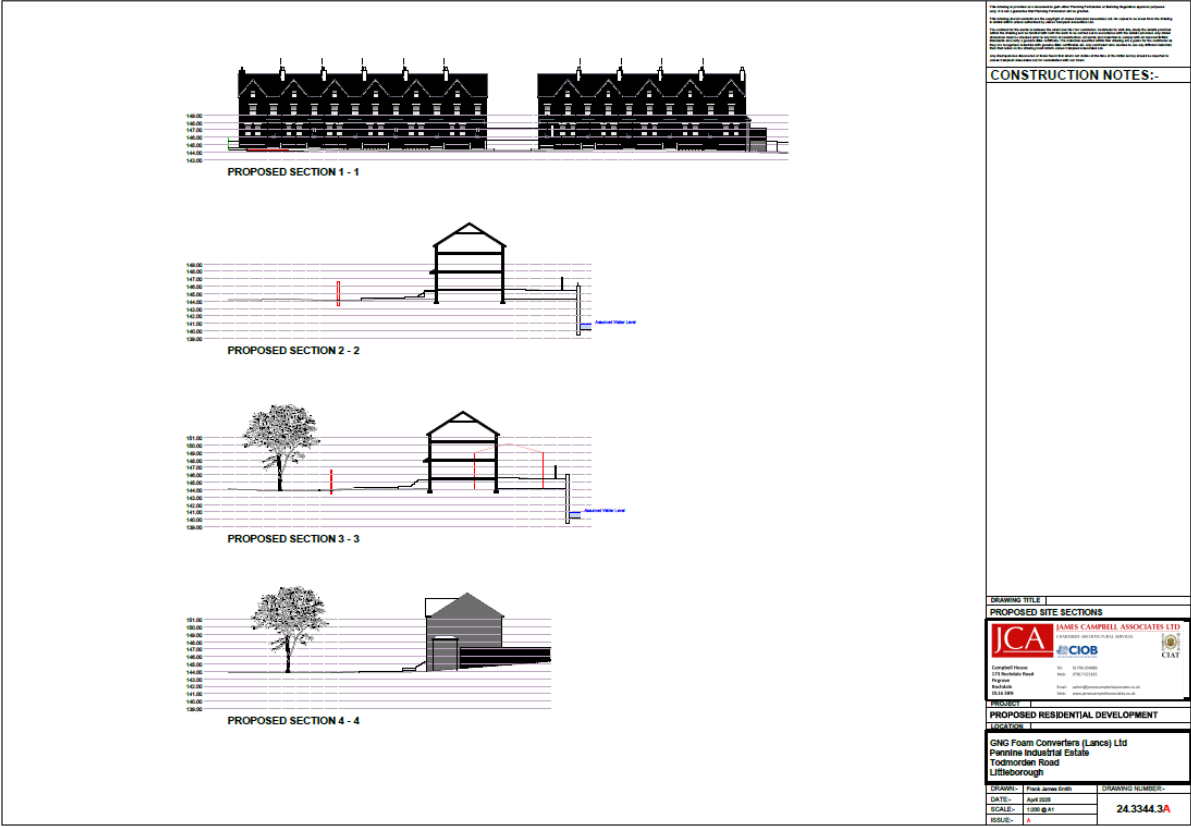
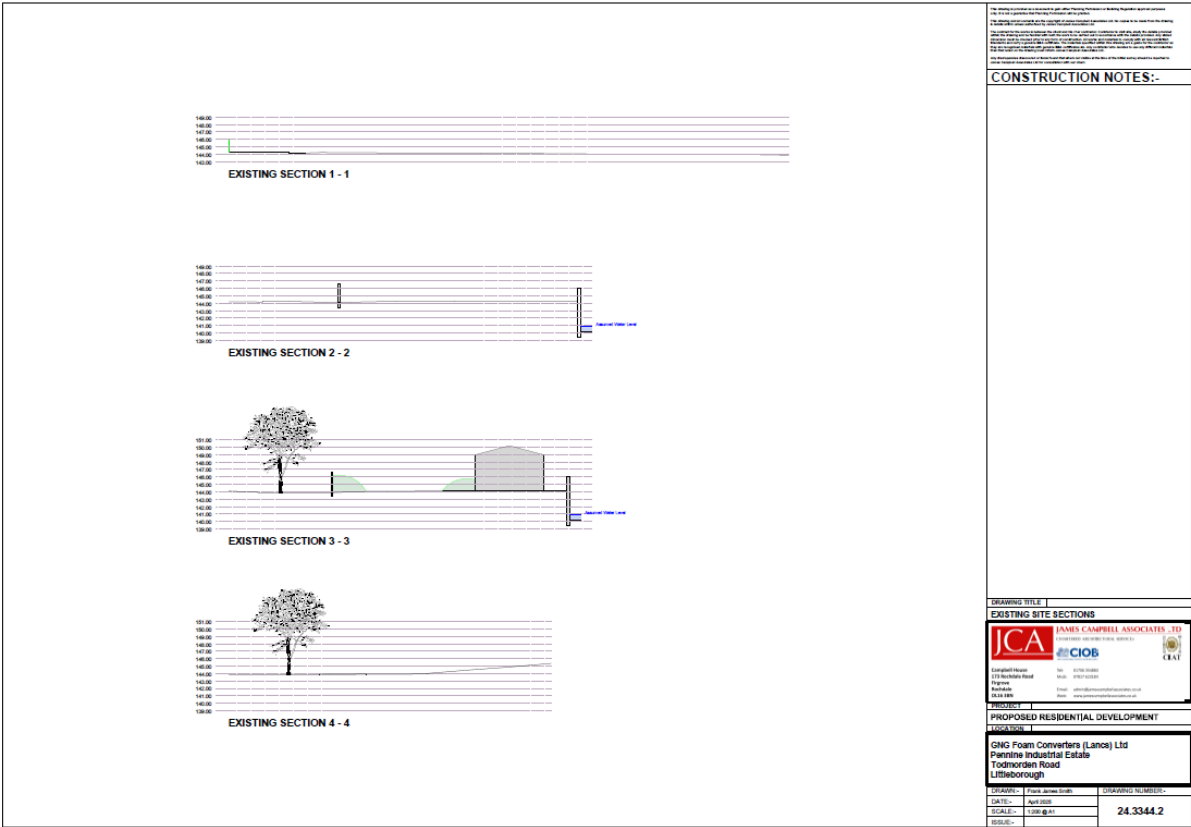
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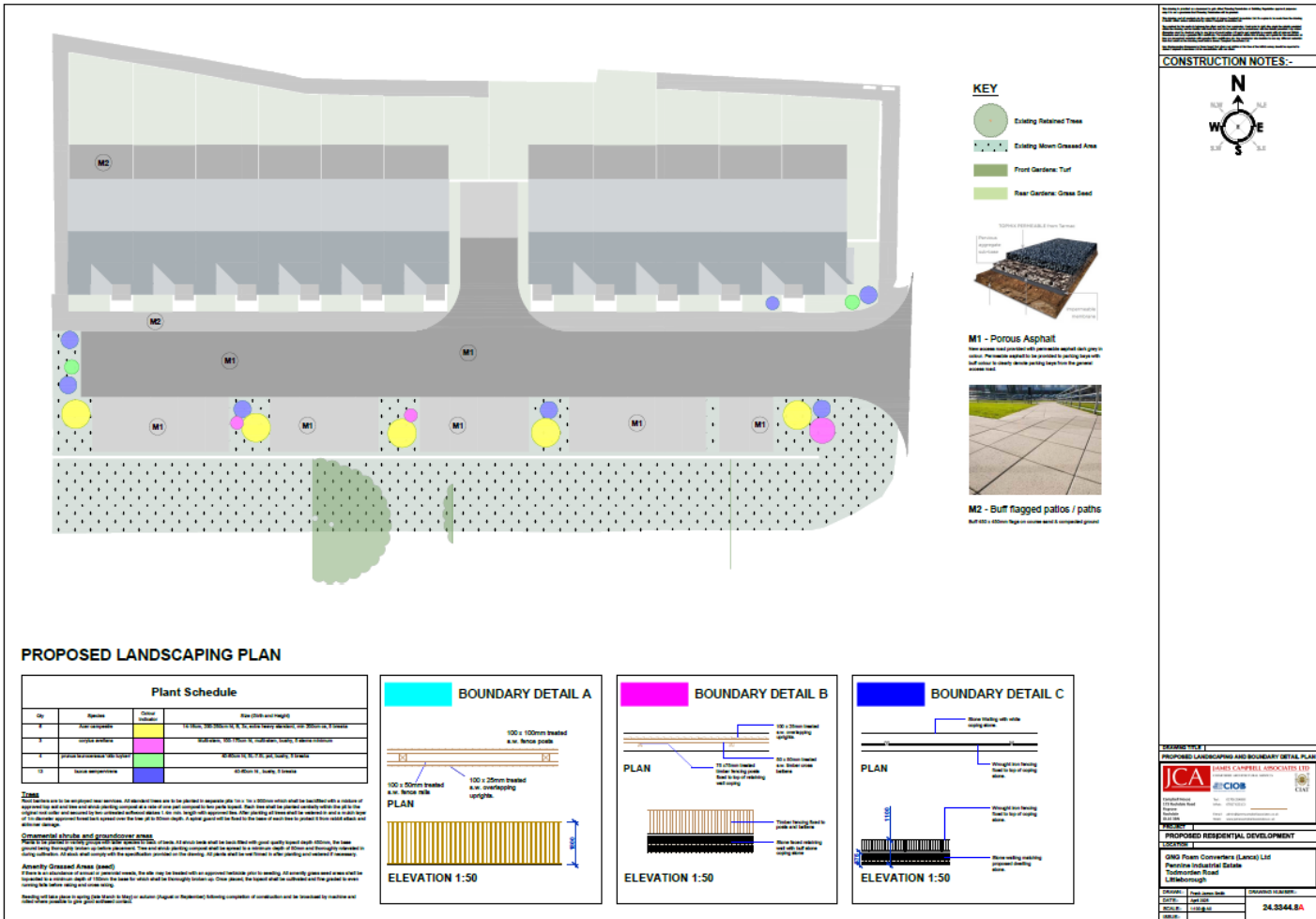
APPENDIX A – SUBMISSION DRAWINGS



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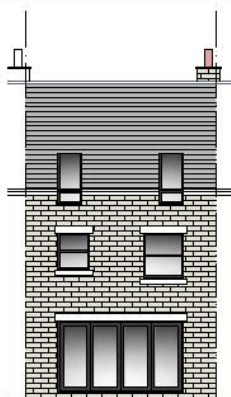
APPENDIX A – SUBMISSION DRAWINGS



APPENDIX A – SUBMISSION DRAWINGS



PROPOSED FRONT ELEVATION



PROPOSED REAR ELEVATION

1. External Facade



Primary - Anstone Premier (Med Buff)

2. Roofing



Marley Modern Grey Concrete Tile

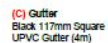
3. Misc.



(A) Window and Doors
Dark Grey upvc Window/
Door Frames - Anthracite



(B) Eaves
Slate grey eaves boards
(RAL7015)



(C) Gutter
Black 117mm Square
UPVC Gutter (4m)



(D) Chimneys
GRP Chimney Fixtures
stone clad



(E) Cladding
Anthracite cladding to
canopies

[illegible]

CONSTRUCTION NOTES:-

DRAWING TITLE

MATERIAL DETAIL	
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PROJECT	
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PROPOSED RESIDENTIAL DEVELOPMENT

LOCATION	
----------	--

GNG Foam Converters (1 each) 1 ft

GNG Fuel Converters (Europe) Ltd
Pennine Industrial Estate

Todmorden Road

Littleborough

CRAWNE -	Frank James Smith	CRAWNING
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DATE:	April 2005
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SCALE:-	150 @ A1	24.
DATE:-		

CHS ADVANCE NUMBER 19

GRADING NUMBER	
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