

PRINCIPLE OF DEVELOPMENT

AUGUST 2026

WATERFOLD LANE, HEAP BRIDGE, BURY

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Signing off Sheet

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Final

Authorised for and on behalf NJL Consulting

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1. Introduction

- 1.1 This Planning Statement Addendum has been prepared in response to Consultee Comments, including the Case Officer's comments received on 17th June 2026. Its purpose is to provide further clarification and assessment of the key planning issues raised during the determination of the application, including the principle of development. Responses have also been prepared in relation to technical considerations material to the proposed development.
- 1.2 This Statement has been prepared in accordance with the latest version of the National Planning Policy Framework ('NPPF'), published 17th August 2026. We do not consider the changes to national policy to change our overall firm position that the proposals represent appropriate development in all regards. However, where necessary we have noted the updated policies or provisions now of relevance to this application.
- 1.3 The addendum should be read alongside the original Planning Statement and accompanying application documents, and seeks to address the matters raised by the Case Officer whilst demonstrating that the proposal accords with the relevant provisions of the Development Plan and the National Planning Policy Framework.
- 1.4 In particular, it considers the site against Green Belt policy, confirming that the proposed development will be brought forward in accordance with national Green Belt policy.

2. Principle of Development: Grey Belt

- 2.1 It is agreed common ground between the applicant and the case officer that the site meets the definition of 'Grey Belt', as per the NPPF, and as such policy GB7-1.g/i is met.

Need

Evidencing Affordable Housing Need

- 2.2 The case officer briefly considers the site's credentials against policy GB7-1.g/ii (previously paragraph 155b), stating that in accordance with footnote 41 (previously 56) of the NPPF, the proposals do not serve a 'demonstrable' (now 'evidenced') unmet need.
- 2.3 We disagree that the provisions of footnote 41 limit an evidenced/demonstrable unmet need to that of the 5YHLS and HDT. The Footnote relates generically to 'proposals for housing', and does not consider specific need of specialist development, which can be demonstrated under policy GB7-1.g/ii.
- 2.4 It is clear within appeal decisions¹ that the need for affordable housing is considered separate and in addition to a lack of 5YHLS when applying weight in the planning balance. Whilst a lack of 5YHLS is typical of Grey Belt Housing cases, the need case is expected to be demonstrated for each application, and should not be limited only to instances where the LPA can demonstrate a 5YHLS.
- 2.5 This is consistent with the revisions to the NPPF; policy H07 applies **substantial weight** to the benefits of providing homes which contribute towards "*meeting the evidenced accommodation needs of the community, as identified through needs assessments prepared for the area of the local planning authority and other relevant evidence*". This includes the needs for groups identified under HO1, which identifies those in need of affordable housing at HO1-2.a.
- 2.6 In October 2023, Rochdale Borough Council declared a housing emergency, emphasising the need for supply of affordable housing². The data behind this included the number of applicants on the housing register, sitting at 9,339, as well as 21,832 waiting for accommodation. These values were considered so significant as to declare an emergency.
- 2.7 Fast forward to late 2025, where government data³, in the form of the Local Authority Housing Statement, states that 7,892 applicants remain on the housing register. This data was then followed up by an article in 2026 uncovering that over 20,000 people remain housing waiting list in the current year⁴, which is a staggeringly close figure to those justifying the declaration of a housing emergency just 3 years ago.
- 2.8 The emergency declaration reiterates that this problem arose due to a lack of supply of affordable housing and figures, which has hardly improved. It is therefore evident that urgent development of affordable housing is required in Rochdale to address the Borough wide housing emergency.

¹ Appeal Decision 6002295, 3328366 & 3354498

² [Committee Report](#)

³ [Local Authority Housing Statistics 2024 25.xlsx](#)

⁴ [The major developments coming to Rochdale in 2026 - Manchester Evening News](#)

- 2.9 The establishment of affordable housing need under GB7-1.g/ii is supported under appeal case 3376957 against non-determination for outline permission for 350 homes at the Former Camelot Theme Park. Whilst the Council in question could not demonstrate a 5YHLS, and as such a demonstrable need was already met, paragraph 46 of the inspector report notes that the contribution of affordable housing “addresses a considerable local affordable housing need” and “carries substantial weight”.
- 2.10 The provision of affordable housing on the proposed development site is supported by the Strategic Housing comments received on the application, emphasising the unmet need for affordable housing not just within Rochdale, but at a local level within Heywood.
- 2.11 The comments received 12th July confirm that within Heywood, the average number of bids per property for 1-bed and 3-bed accommodation (as proposed by the application) is 169 and 535 respectively. This matches (1-bed) and exceeds (3-bed) the average bids for the whole Borough, evidencing that not only is there a borough-wide shortage of affordable housing, there is also a demonstrable acute unmet need within Heywood.
- 2.12 As such, we consider that the evidence supplied within the Planning Application and through the comments of the Strategic Housing Officer clearly evidences an unmet need for affordable homes, in accordance with policy GB7-1.g/ii of the NPPF. Furthermore, substantial weight is now afforded to this contribution under HO7.

Sustainability

- 2.13 Policy GB7-1.g/iii requires that the “development would be in a sustainable location, with particular reference to TR3 of this Framework”. Policy TR3 ‘locating development in sustainable locations’ sets out a number of development principles, including; limiting the need to travel for proposals which could generate a significant amount of movement, utilise existing transport infrastructure to optimise development and mitigate any significant adverse effects.
- 2.14 This section has considered the site’s location with regard to sustainable travel and transport, as well as evidence to demonstrate that GB7-1.g/iii has been met.

Site Credentials

Safety and Comfort

- 2.15 Waterfold Lane is proposed to be substantially improved, with the road to be upgraded in accordance with adoptable standards to the site entrance.
- 2.16 The improvements include extending the footpath from the site entrance to the existing footpath where it terminates at 63 Waterfold Lane. The footpath will also be lit, guiding pedestrians towards the site, as well as ensuring a safe exit route to Bury New Road, encouraging people to walk/board public transport with the comfort they feel in this area.
- 2.17 Furthermore, the introduction of a ‘Give way to oncoming vehicles’ junction at the bend will significantly reduce the likelihood of traffic accidents travelling around the bend on Waterfold Lane.

Wayfinding and Legibility

- 2.18 Waterfold Lane is proposed to be significantly upgraded, and will receive new lighting along and into the site, which will improve the areas wayfinding at nighttime. Furthermore, the upgrade works will extend the public footpath to lead into the site, to ensure safe and convenient travel to Bury New Road for onward travel.
- 2.19 Given the site's proposed use, it is considered that the location and the proposed design of the site will provide sufficient wayfinding opportunities for residents and any guests.
- 2.20 Upon the site, natural planting and landscaping around the buildings will help to shape footpaths and establish clear legibility in the area. The back-to-back lay out of the dwellings would establish an outer loop for pedestrians and vehicles around the houses.

Walkability and Public Transport

- 2.21 The nearest bus stops to the site are located at Bury New Road, 300m from the site along Waterfold Road. The walk to the nearest bus stop is 2 minutes, which with new highway improvements on Waterfold Lane, would be well-lit and safe.
- 2.22 The buses available from Bury New Road Bus Stop are as follows:

Table 1 Bus Timetable

Bus Route	Destination	Frequency
471	From Rochdale to Bolton via Bury	Every 12 minutes, Sunday service every 30 minutes
163	From Manchester to Bury	Every 12 minutes, Sunday every 15 minutes
475	From Heywood to Bury	Every 1/1.5 hours, not on Sundays

Key Services

- 2.23 In addition to access to public transport, the site is accessible on foot to a number of key services:

Table 2 Proximity to Key Services

Key Service	Location	Walking Distance
GP	Huntley Mount	25 minutes
Primary School	East Ward Community Primary School	15 minutes
Church	Church of St Thomas	17 minutes
Public House	Waterfold Farm	11 minutes
Convenience Store	Spar	5 minutes

- 2.24 Access to the primary school is reached via footpaths along Heap Bridge, Lord Street and Heap Brow, reducing the need for young children to cross busy roads.
- 2.25 Everyday services and amenities are very accessible on foot, or via public transport from the site. The table 2 shows essential services and amenities which are comfortably accessed on foot, which is an encouraged mode of transport given the site improvements. Alongside this, table 3 considers access to employment; whilst not a definitive list, the table demonstrates that residents can reasonably be expected to walk/bus to work.

Employment	Location	Travel Distance
Waterfold Business Park	Waterfold Business Park	Walking 5 minutes
Pimhole Business Park	Pimhole Business Park	Walking 10 minutes
Units 1 – 9, The Mt	The Mt, Bury Old Road	Walking 15 minutes
Heywood Distribution Park	Heywood Distribution Park	Walking 25 minutes (to closest unit)
Fairfield General Hospital	Rochdale Old Rd, Bury BL9 7TD	By bus 28 minutes Walking 35 minutes
The Rock Shopping Centre	1 Goodall St., Bury BL9 0JY	By bus 16 minutes Walking 26 minutes
Angouleme Way Retail Park	Angouleme Way Retail Park, George St, Bury BL9 7AZ	By bus 14 minutes Walking 26 minutes
Mill Gate Shopping Centre	Lancashire, Bury BL9 0QQ	By bus 18 minutes Walking 33 minutes
Bury College	Market St, Bury BL9 0BG	By bus 22 minutes Walking 36 minutes

- 2.26 Alongside this are numerous businesses, shops and education providers, which may offer further employment opportunities.
- 2.27 Bury Town Centre represents a major centre for employment, retail and leisure, and can be reached on foot from the site via convenient and lit footpaths. Bury New Road has a 30mph speed limit, and a formal crossing point is available circa 62m east of Waterfold Lane, and can be reached via a traffic free footpath connecting to Lord Street. From here, pedestrians can reach Bury via Rochdale Road and Wash Lane, with an estimated journey time from the site of 40 minutes (to Bury interchange).
- 2.28 Alternatively, a quicker route is available via Waterfold Lane, under the M66 and through Waterfold Park and onto Rochdale Road in 34 minutes. This route unlit through the M66 underpass, and so although quicker may not be a preferred route for some users during hours of darkness.
- 2.29 Alongside these walking routes, the bus stop (reached via a 2-minute walk) can provide frequent bus travel into Bury (10-minute journey), Rochdale (29-minute journey), Manchester (48-minute) and Heywood (11-minute journey).
- 2.30 Whilst it is acknowledged that walking across the interchange or under the M66 may not be preferred for those with limited mobility, the proximity and frequency of public transport means that in under 15 minutes, via sustainable transport methods, residents can access all necessary everyday services and amenities from this site.

Connectivity Tool

- 2.31 Policy TR3 also requires that the Connectivity Tool is used alongside relevant evidence in assessing the connectivity of particular locations.
- 2.32 The site scores 65-69 on the Government Connectivity Score⁵. In order to understand this score, it is necessary to understand the rural-urban classification for the Output Area ('OA') (Office for National Statistics), which for this site is E00027917. The 2011

⁵ [Connectivity Tool](#)

classification map⁶ used by the connectivity tool is not clear but appears to show the site within an 'Urban Major Conurbation' ('UMC'). The OA falls within an 'Urban: Nearer to a major town or city' 2021 classification, which would be consistent with the 2011 map.

- 2.33 The site is therefore scored against other areas of the same designation, comprising London, West Midlands, West Yorkshire, Tyneside, Merseyside and Greater Manchester.
- 2.34 The site scores within the 10th Percentile for UBC's, which suggests that the site is just above the 10% least connected squares. However, this is not a true representation of it's connectivity relative to destination. The connectivity matrix Table A outlines that by destination, a score of 66.8 is the median. Therefore, the site is (on average), within the 50% most connected squares nationally.
- 2.35 The Connectivity Matrix guidance states that scores should be used "*alongside local evidence, site knowledge and professional judgement*". Given the site's location on the edge of a town within Greater Manchester UBC, the connectivity score supports the evidence that it is reasonably well-connected.
- 2.36 We would also note that application 25/00405/FUL for the development of 45 dwellings, with a score of 54, has been recommended for approval and is considered sustainable. As such, it is clear that a connectivity score of 65, in combination with the evidence presented, should be considered sustainable.

Appeal Evidence

- 2.37 The sustainability of a site in relation to transport, in particular for Grey Belt cases, is guided by policy TR7 (previously Paragraphs 110 & 115) of the NPPF. No rigid checklist exists, with sustainable locations to be determined on a proportionate planning judgement.
- 2.38 Taking evidence into account from recent appeals, we consider that the significant merits of the site, including the proximity to frequent bus services and upgrades to pedestrian facilities, clearly demonstrate that the site is sustainable in accordance with policy TR3.
- 2.39 Appeal Case 6003023 against Broxbourne Borough Council in relation to a hybrid application for development, including 90 homes and a special educational needs establishment, was refused by Committee because "*the location was considered unacceptable as it would not allow occupants and users a genuine choice of sustainable transport options*" (Paragraph 6 of the Appeal Decision).
- 2.40 The appeal site is similar to the application site, in that it represents a site located within the Green Belt on the edge of a settlement (Goffs Oak), however we would note that the proposed application is substantially larger than the proposed development.
- 2.41 The Inspector determined that the site was sustainably located, with relation to the housing element considering that walking distance to a convenience store, as well as a nursery school alongside a regular bus service to and from Waltham Abbey (town) was considered to provide sufficient opportunities for sustainable travel, along with the option for cycling into Goffs Oak and Cuffley Railway Station.

⁶ [Connectivity Tool](#)

- 2.42 The Inspector does note that regular bus services to Waltham Abbey are only available from the Machintosh Close stop located a 20 minute walk from the site.
- 2.43 In comparison, the proposed site provides options for travel via walking, cycling and bus to everyday services and facilities within a 5-15 minute journey. When accounting for the scale of development, it is considered that the site provides significantly better credentials than the appeal site.
- 2.44 As noted by the Inspector, the policy approach also requires proposals to consider how private car use is reduced.
- 2.45 The appeal application proposed a number of highways improvements in relation to improving public transport through the C1 bus service, and pedestrian travel. The C1 service accessible via a 2 minute walk from the site east along Hammondstreet Road, provides a loop from the site to Goffs Oak and along west to Cuffley Station. The application was also supported by a travel plan, seeking to reduce reliance on private vehicle trips.
- 2.46 The proposed development is accompanied by significant improvements to Waterfold Lane, as well as a Transport Statement (TS) prepared by Focus. The TS demonstrates that accessibility and highways safety has been comprehensively considered, and that, proportionate to the scale of development, measures have been taken to reduce reliance on private vehicles. This includes limiting vehicle parking provision and safe and secure cycle storage.
- 2.47 In line with the tests applied to the appeal case, it is considered that the site plainly represents a sustainable location, and that the provisions of TR3 have been met.

Golden Rules: POS

- 2.48 It is an accepted position between the applicant and the LPA that policy GB81-a & b (previously Paragraph 156 parts a and b) have been met. The Officer has raised concerns regarding the provision of on-site amenity space, which we have sought to respond to below.
- 2.49 Policy GB8c requires *"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"*.
- 2.50 It is clearly evident that green spaces may be accessible on **or** off-site. Within the vicinity of the site, is a number of green spaces within walking distance (800m in line with CIHT guidance).
- 2.51 The closest area of green space to the site is located east of Waterfold Lane, to the rear of 27 Waterfold Lane. The green space comprises an open field and is approximately 270m from the site. The field is relatively flat and well overlooked by the surrounding properties.
- 2.52 Additional green space is located off Bury New Road, to the east of Waterfold Lane approximately 350m from the site, and at St. George's Church approximately 400m from the site.
- 2.53 Therefore, notwithstanding the proposed POS within the development site, new residents would have access to green spaces within a short walk of their home. It would be the responsibility of the LPA to outline proposed off-site contributions required to

improve off-site green spaces should on site provision not be deemed sufficient. In this way, we believe that policy GB81-c has been misinterpreted and would not currently represent a reason for refusal.

- 2.54 In addition to the accessible green spaces within vicinity of the site, it is our view that the proposed development provides access to good-quality green spaces suitable for relaxation and movement proportionate to the proposed development.

Quantity

- 2.55 The Rochdale Borough Council Local Plan does not set out size requirements for public open space in relation to new developments, and as such the Natural England Standards for Accessible Green Space ('AGS') have been considered in accordance with GB81-c.iii.

Accessible Greenspace Standard	Description	Site Compliance
Doorstep Standard	Accessible Greenspace and Playing Fields of at least 0.5 ha within 200 m from home. The incorporation of Playing Fields is unique to this buffer.	Whilst no playing fields of 0.5ha are reachable, the local greenspace does provide opportunity for informal play, and in combination with on-site green space will surmount to 0.45ha. The closest playing fields are Openshaw Park (1.1km walk), Topping Fold and the Roach Dynamos Football Club (both a 1.3km walk).
Local Standard	Accessible Greenspace of at least 2 ha within 300 m from home.	Similarly, Openshaw Park is the closest site to meet the 2ha site requirement.
Neighbourhood Standard	Accessible Greenspace of at least 10 ha within 1 km from home.	The nearest 10ha site is Chesham Woods, approximately 2.8km north-west of the site.
Wider Neighbourhood Standard	Accessible Greenspace of at least 20 ha within 2 km from home.	The site falls within the buffer for this Standard, as per the GIF map ⁷ .
District Standard	Accessible Greenspace of at least 100 ha within 5 km from home.	The site falls within the buffer for this Standard, as per the GIF map.
Sub-regional Standard	Accessible Greenspace of at least 500 ha of within 10 km from home.	The site falls within the buffer for this Standard, as per the GIF map.

⁷ [Green Infrastructure Map](#)

- 2.56 The proposed development offers 2234sqm of amenity space, including a walking trail connecting through the site and highlighting the riverside location. Further pockets are provided for play or relaxation, including an enclosed space to the rear of plots 16-17, and to the north east of the site. The riverbank is densely vegetated and has a steep embankment beyond this. It is not considered likely that children playing would reasonably be expected to access the riverbank, and as such we disagree that this space does not make a meaningful contribution to amenity.
- 2.57 The POS proposed will ensure that, alongside local PRow walking routes, and existing POS close to the site and further afield in Heywood, future residents have sufficient access to a range of play and recreational opportunities, reflective of the standards set out by Natural England.
- 2.58 It is noted that the AGS standards at an area-wide level, the standard focuses on 'green and blue spaces within 15 minutes' walk from home'.
- 2.59 The site is within 15 minutes of Openshaw Park, and in combination with proposed and existing greenspace, will provide over 0.5ha of accessible green space. Paragraph 4.6 of the AGS user guide requires either a doorstep or local greenspace and Paragraph 4.3 of the AGS Standards user guide states *"The Accessible Greenspace Standards are most applicable in urban areas. It is also important to take other types of provision such as Public Rights of Way (PRow) and village greens into account, especially in rural areas"*.
- 2.60 The site is well connected to the PRow network, and provides access to significant areas of open access land. Whilst the full set of Natural England standards are not met, it is considered that the slight shortfall of the 'doorstep'/'local' and 'neighbourhood' standards does not amount to non-compliance with the standards when viewed as a whole, and in the context of the requirements of GB8-1.c

Quality

- 2.61 The case officer has also flagged the quality of the proposed POS as a concern. Taking each point in turn, the first concern relates to the area of amenity space to the south, noting that this *"is immediately adjacent to the main vehicular access into the site and would not be an attractive area for children to play for example given its small size and the inevitable risk to their safety from vehicles accessing and egressing from the site, as well as farm related vehicles travelling further south along Waterfold Lane."*
- 2.62 The POS to the south sits alongside the site entrance, and is not intended to be an area for children's play. On the contrary to the case officers' statement, the area separates the vehicle access from the pedestrian access south, which leads onto Waterfold Lane, where it becomes a PRow circa 85m south.
- 2.63 The pathway is bordered by hedgerow and trees, and it is considered unlikely that users would congregate in this area. The POS here also provides a welcoming and green entrance to the site, improving visitors experience from the west.
- 2.64 Furthermore, the case officer states that *"the river path purely creates a pedestrian link from the east of the site running west along the river boundary to the car park on the west side of the site. It is only approximately 80-100m in length and does not adjoin any existing public right of way or existing green space. The 2 areas of informal amenity space accessible off this pedestrian link are small scale and again would not necessarily be an attractive proposition for children's play given their location next to*

an attenuation pond and the River Roch which both pose their own health and safety risks".

- 2.65 The river path connects directly to the proposed footpath along Waterfold Lane, enabling continued access through the site from the public highway, and running the length of the riverside boundary. As established above, the site facilitates car-free access south of Waterfold Lane, which forms part of PRow HeyFp85.
- 2.66 The footpath has been designed to intentionally utilise the site's natural features, and presents opportunities for recreation through movement both within and outside of the site.
- 2.67 The two areas of informal space off the pedestrian link centrally form two purposes. The eastern most section is intended for attenuation and will form an attractive water feature connecting the site to its waterside location. The western section directly above this provides an enclosed space, which will provide opportunity for more peaceful and private relaxation, as well as providing a suitable area for small children to play supervised.
- 2.68 The officers' comments have also failed to address the larger amenity area proposed to the north of the site. This area provides a larger open space, with benches positioned to the visitor parking, and additional benches added to the riverside, forming barriers to the car park and river, and providing opportunities for relaxation and social interaction.
- 2.69 The officer concludes his comments, stating that *"the onsite green space would likely only be used by future occupiers of the development and not by other members of the public given its small scale, location away from public areas and lack of play equipment for example"*.
- 2.70 The POS proposed is primarily intended for use by residents of the site, and their visitors. The site's location set back from the road and lack of on-site attractions mean that it is considered unlikely that the site in itself will draw unrelated visitors. However, those walking through Waterfold Lane to access the wider PRow network and adjacent residents may well be expected to use the riverside path on occasion.
- 2.71 It is considered that the proposed POS area is proportionate to the scale of development, and provides a high-quality environment for relaxation, movement and play that celebrates the sites natural features. Therefore, we would consider that policy GB8-1.c has been met, and the site accords with the Golden Rules as set out by the NPPF.

3. Consultee Comments

Comments received

- 3.1 Table 1 below outlines the comments received through the Planning Application process from statutory consultees. The comments received cover a range of technical and material considerations, ensuring that the proposed development has been appropriately assessed.

Consultee	Response date	Brief Summary of response	Actions
Environmental Agency	22/10/2025	Request for copy of River Condition Assessment	River Condition Assessment issued.
Environmental Control (Landfill Gas)	24/10/2025	Recommend Remediation Scheme is conditioned	N/A
Highways	28/10/2025	No objections	N/A
Strategic Housing	03/11/2025	Supportive in principle, require review of housing mix (include 4/5 beds) and M4(3) compliance.	Review mix/M4(3) inclusion.
National Highways	10/11/2025	Holding objection, a RRRAP/CD377 Assessment is required. Also requested confirmation of the attenuation pond and fence location.	RRRAP/CD377 assessment issued. Attenuation pond and fence location confirmed.
Environmental Health (Air Quality)	14/11/2025	concerns regarding the air quality assessment submitted as it does not seem to account for the busy entry slip road onto the M66. The proximity of the properties, they believe, would be adversely affected by the location of the slip road and motorway which has not been adequately represented in the report.	Response issued; assessment included the M66 slip road.
Environmental Health	17/11/2025	No objection; standard condition relating to unexpected contaminated land.	N/A

United Utilities	11/11/2025	No objection; standard conditions relating to drainage and protection of the water main.	N/A
Transport for Greater Manchester	12.11.2025	No objection; below threshold for impact review. Makes recommendations to footpaths, cycle parking and sustainable travel measures.	N/A
Schools Services	03.12.2025	Education contributions not required	N/A
LLFA	12.12.2025	The drainage strategy is acceptable in principle, however the following needs to be addressed: • Additional evidence / incorporation of infiltration • Addition of tree pits / rain gardens / swales (or otherwise justified) • Maintenance & management plan for drainage components (Could be conditioned)	Drainage strategy updated.
Revised Scheme Submission – 01.06.2026			
Land contamination	09.06.2026	Request for report to be updated	Report updated and issued. No change to conclusions.
GMEU	12.06.2026	No objection, although preference for buffer zone to river to be widened to 10m+. Advise for following conditions: - TPP - CEMP - Clearance restrictions	N/A

		- Lighting Plan - INNS removal - BNG condition	
Environmental Management	12.06.2026	Requested S106 contributions for POS. Est. cost £62,898.78 based on 'no' on-site provision.	Contribution to be agreed.
Canal and River Trust	12.06.2026	No Requirement for comment	N/A
Strategic Housing	12.06.2026	Confirms support based on demand for affordable housing within Rochdale and Heywood. Request for larger 4-bed units and provision of some 3 bed M4(3) units.	Revised scheme to include M4(3). Response below on mix.
Street lighting	12.06.2026	Clarity needed for adopted/private areas.	Clarified as part of response. Adopted roads are suitable for lighting, to be conditioned.
Case Officer	17.06.2026	Current position to recommend refusal on: Grey Belt - Site agreed as Grey Belt - Need not considered demonstrated due to LPA 5YHLS and performance against HDT. Strategic Housing comments and AH need not considered a 'demonstrable unmet need'. - Site considered unsustainable due to lack of lighting, daily services and challenge of Heap Bridge Interchange. - Proposals not considered to meet Golden Rules in respect of POS due to small scale and 'lack of functional use'.	Response forms section 2 of this statement.

		Harm to Green Belt/Harm - Harm to spatial and visual openness would require VSC to overcome. - Other harm noted as amenity /design impacts of 3m acoustic fencing and garden noise exceedance. Also noted is lack of M4(3) provision and not 100% M4(2). VSC - Applies substantial weight to the green belt. Benefits afforded weight: - Housing; moderate weight - BNG; very limited weight - Any other benefits within PS not considered to outweigh the harm.	
National Highways	19.06.2026	RRRAP review in progress. Clarity needed on proposed fence (new or replace existing)	Fence confirmed as new, in addition to existing.
Highways	19.06.2026	Ideally would prefer 150% parking provision. Proposed access road improvements acceptable, although wish to see a landscaping management plan.	See below response.
United Utilities	19.06.2026	Objection due to the proximity of the proposed development (inc. highways embankment) to UU assets (strategic large diameter trunk mains).	Evidence needed of relationship to UU asset.
Environmental Agency	19.06.2026	No further comments	N/A
TFGM	18.06.2026	No further comments	N/A
Highways	03.07.2026	RRRAP accepted	N/A

LLFA	14.07.2026	Consider a step back from previous re. attenuation. Need to address infiltration potential.	See response below.
Urban Design	14.07.2026	Remains unsupportive: - Acoustic fencing will be overly dominant - Car parking overly dominant - Maintains that site over-developed - Roof line relationship doesn't work between the flats and terraces - Amenity space will likely be noisy	See response below.
EHO – Noise	27.07.2026	Acknowledges outdoor exceedances, however given the constraints and the maximised layout they have not raised any objection. Details of mitigation measures would need to be conditioned	N/A
EHO – Air Quality	30/07/2026	No objection. Dust management plan, EVCP's and assessment of sustainable building methods requested.	See response below.
National Highways	17/08/2026	RRRAP accepted, clarity requested on Fence and attenuation pond.	Fence confirmed as new, in addition to existing. Attenuation pond to be sloped 1:3.

Case Officer

Noise

- 3.2 The case officer identifies harm to amenity from the proposed acoustic barrier boundary treatment proposed at the rear edge of gardens and to exposed plots (those being 18, 19 and 24). Further harm is identified from areas of gardens and POS that exceed recommended dB levels for external amenity areas.

- 3.3 We note that these comments were made in absence of Environmental Health Officer's ('EHO') comments on the proposed development. The EHO comments have since been received and, subject to details of mitigation being conditioned, have not raised any objection.
- 3.4 We would therefore refer the case officer to the submitted Noise Impact Assessment ('NIA') prepared by MillerGoodall and the comments made by the EHO Officer.
- 3.5 The NIA has confirmed that the proposed development provides suitable noise environments within private amenity space, and that guidance suggests a flexible approach in locations such as the site that are in close proximity to strategic transport networks.
- 3.6 MillerGoodall has confirmed that exceedances within gardens equate to 1-2dB, and are imperceptible in standard residential environments. The proposed development does not propose to expose residents to 'adverse sources of noise', and all users will have access to private amenity space that is within the recommended limit, or at an exceedance that is negligible.
- 3.7 Policy P3-1-b states that development should "*Not give rise to, or contribute to, [...] unacceptable levels of air, **noise**, artificial light, water, soil or other forms of pollution on or beyond the site. Adverse impacts of this nature should be avoided where possible, or else mitigated to an acceptable degree*". The impact of noise has clearly been mitigated to an acceptable degree, as confirmed by the EHO response of no objection.
- 3.8 With regard to the acoustic barrier, whilst it is a requirement to ensure the proposed development can provide an acoustically comfortable environment, effort has been made to minimise the impact of this as much as practicable, including the proposal for a high-quality green fence. The green fence will form part of the garden, and create a softer and more natural environment than a traditional fence.
- 3.9 The barrier is anticipated to have a negligible impact on the amenity of the majority of properties and would also increase security along the service path through the development. This is also true in the case of those properties with two sides at the acoustic height.
- 3.10 Whilst 3m high fencing is taller than typical garden fencing, it is not considered that the height of the one – two fencelines would materially impact the usability of the garden spaces. Fences of this height, whilst atypical, are of a scale considered appropriate for residential use.
- 3.11 One such example of this is APP/N4205/W/22/3296970 for 119 homes in Bolton. The application site sits adjacent to a railway, and in order to mitigate against noise, a 3m acoustic fence has been approved to the rear (and in the case of an end unit, rear and side) of gardens.
- 3.12 As such, we do not consider that the proposed fencing would have an unacceptable impact on amenity, and is designed in accordance with policy DP3 of the NPPF.
- M4(2)/(3)
- 3.13 The case officer has also identified harm arising from the need to meet M4(2) standards at minimum, and a shortage of M4(3) properties within the Borough.

- 3.14 In order to address this, the proposed development has been amended to provide 3 no. M4(3) bed units, and is considered a benefit of the scheme above that required by policy.
- 3.15 It is not possible to introduce a lift within the apartment block given owing to constraints on development viability, and as such **limited weight** is considered in relation to the three flats that cannot meet M4(2) standards in light of the constraints and the introduction of M4(3) units.

Strategic Housing

- 3.16 The submitted updated pack has introduced three M4(3) units within the proposed development, in line with Strategic Housing's request and exceeding policy requirement for M4(3) units.
- 3.17 The proposed mix has not been revised, as the mix has been agreed with the proposed Registered Provider. Within Rochdale, and Heap Bridge more locally there is a clear and demonstrable need for 3 bed units. The need within the ward significantly exceeds the proposals, with 535 bids per available 3-bed property.
- 3.18 This demand is higher than the Rochdale average, and the introduction of 3-bed properties is a significant benefit to addressing the shortfall in affordable housing provision.

Highways

- 3.19 Based on census data for the local area⁸, car ownership for rented accommodation is low. This would result in an estimated car ownership for the proposed development of 16 cars, or 48% of the parking provision.
- 3.20 The data clearly supports a reduced number of parking spaces, with a number of spaces likely to be vacant. Furthermore, the provision of a reduced number of parking spaces aligns with national policy to reduce private car use. The site is sustainably located to support active and public transport, and as such it is not considered necessary to provide additional parking at the requested level (150%).
- 3.21 The proposed landscaping will be managed by the RP as part of on-going maintenance of the properties. The details of management will be confirmed within a Landscaping Management Plan, which can be conditioned.

National Highways

- 3.22 The most recent National Highways comments have requested confirmation that the proposed attenuation pond is to be constructed with battered slopes, and clarity on the proposed fence.

Table TS4.1: Census Statistics: Car/Van Availability (Rented & All Tenure)

Car or van availability	Rented	All Tenure
No cars or vans in household	770 (47%)	1,035 (28%)
1 car or van in household	698 (42%)	1,625 (44%)
2 cars or vans in household	187 (11%)	1,037 (28%)

- 3.23 The attenuation pond is proposed to have sloped sides at 1:3 and will not form an excavation for an underground storage tank. The cross-sections of this pond will form part of the detailed drainage design, which is expected to be conditioned.
- 3.24 The fence is confirmed as new, and in addition to the existing National Highways fence. The proposed fence sits within the site ownership boundary, and will not impact the existing fence.

United Utilities

- 3.25 With regard to the United Utilities ('UU') objection, we would agree with the proposed condition requiring details to ensure that UU assets are protected from damage.
- 3.26 The developer is committed to undertaking the relevant location survey, CMP and pre-construction condition survey ahead of the commencement of any development.

Drainage

- 3.27 The drainage report clearly outlines how we have considered the SuDS hierarchy and developed the drainage design. The Phase 2 site investigation indicates that the underlying ground to be either made ground and or till (clayey) which is not typically compatible with rainwater infiltration. As such it had not been proposed to undertake infiltration testing.
- 3.28 However, in order to address the LLFA comments, infiltration testing is underway, and the results are expected shortly. We will issue a further update following the receipt of the testing results.
- 3.29 We would request that the final drainage design be conditioned. Should the infiltration testing result in compatible ground conditions, the drainage strategy will be updated to reflect this in line with the SuDS hierarchy.

Urban Design

- 3.30 The Urban Design Officer comments summarise that the site is considered 'over-developed' and that frontages are 'heavily dominated by parking'. Whilst the officer acknowledges the site's constraints, a 'less intensive and more organic form of development' is considered to be a better design response.
- 3.31 Taking his comments in turn, the car-parking is not considered to be overly dominant. The parking for the 6 dwellings fronting Waterfold Lane is well screened by existing vegetation and proposed hedgerow planting. Furthermore, frontage parking is consistent with the existing character of Waterfold Lane, with a significant stretch of frontage parking at 65-79 Waterfold Lane exceeding the proposals.
- 3.32 To the rear of the site, all frontage parking is proposed to be broken up by soft and hard landscaping, similarly ensuring that cars are not overly dominant. All parking bays are proposed to be paved with block paving, softening the appearance and improving legibility between the highway and parking spaces.
- 3.33 The officer has also raised concerns regarding the appearance of the rear acoustic fencing. Similar concerns have been raised by the case officer, and has been addressed in detail within section 2. The rear acoustic fencing has been reduced in size

as far as practicably possible whilst maintaining acceptable noise levels. The fencing is screened from the road by the properties fronting Waterfold Lane, with visibility reduced to the fencing relating to Block A and property 24. Whilst taller than traditional fencing, the fence will be read in context with the adjacent properties and is partially screened by the proposed landscaping. The glimpsed views of the fencing is considered appropriate to a residential development and is not likely to have an unacceptable impact on amenity.

- 3.34 The final details of landscaping will be confirmed via condition, and will ensure that the fencing is appropriately screened.
- 3.35 The officer's view that the site is over-developed appears to relate to the relationship between the flats and terraces, with the officer preferring a 'visual break'. The comment expands to consider that the variation in materials adds 'unnecessary visual complexity', and that maintaining a 3-storey form may be more cohesive.
- 3.36 We have amended the brick choice to the flats and included for a vertical, projecting soldier band detail at high level to break-up the mass of brickwork above window head height where the mono-pitch roof occurs. The revised brick and soldier detail ensures that the flats retain an individual character whilst maintaining a cohesive frontage across the site. The revised design is considered to present a high-quality and appropriate scale of development, reflective of the existing terraces along Waterfold Lane.
- 3.37 Materials are considered appropriate to the proposed development, noting it's context and environment, however it is agreed that this can be conditioned through the decision and samples can be provided.
- 3.38 Finally, the officer has commented on the proposed amenity space, stating that "The informal amenity space is awkwardly arranged and does not appear particularly usable. The inclusion of two parking spaces within this area feels like an afterthought and further compromises its function."
- 3.39 The officer also raised concerns regarding the impact of noise on the function of the space. The amenity spaces have been reconfigured to ensure that the amenity area to the north east is defended from the car park, and is functional with benches to encourage social interaction and relaxation. The functionality and purpose of the POS has been further addressed within Section 2 of this Statement.
- 3.40 We do not agree with the Urban Design Officer's view that the scheme is unacceptable, and consider that the amendments made have resulted in a high-quality scheme addressing comments where reasonable and practical.

Air Quality

- 3.41 EVCP's are proposed for 25% of the spaces, which is compliant with Local Plan policy.
- 3.42 The submitted Energy Statement has completed an assessment of sustainable building methods. Solar PV's are proposed as part of the development.
- 3.43 A Dust Management Plan will be prepared as part of a Construction Management Plan, which can be conditioned. This will be prepared in accordance with the mitigation measures proposed within the accompanying Air Quality Assessment.

4. Conclusion

- 4.1 This statement addendum has demonstrated that the proposed development is in accordance with the key policies of the Development Plan and accords with the Development Plan as a whole, as per Section 38(6) of the Planning and Compulsory Purchase Act (2004).
- 4.2 The proposed development meets the requirements of NPPF Policy GB7-1 and is considered to be appropriate development within the Green Belt, and the proposals comply with the 'Golden Rules' of policy GB8.
- 4.3 The proposal would contribute towards addressing a substantial and evidenced unmet need within Rochdale with the delivery of 24 affordable homes and provide significant sustainable transport and highway improvements through the extension of the pedestrian footpath network and junction improvements.
- 4.4 The provision of affordable homes to contribute to an unmet need is afforded substantial weight under policy HO7 of the NPPF, and the exceedance of policy requirements is supported under policy H08 of the NPPF. In accordance with policy S5-5 (NPPF), proposals compliant with GB7 *"proposals should be approved unless the benefits of doing so would be substantially outweighed by any adverse effects, when assessed against the national decision-making policies in this Framework, and applying paragraph 2 of this policy"*.
- 4.5 This statement and accompanying technical work of this application has demonstrated that no adverse impacts are present that would, in our opinion, amount to a conflict with the policies of the Development Plan or NPPF.
- 4.6 Should the LPA disagree, any minor conflict in relation to residential amenity would be material considerations which would not substantially outweigh the significant benefits of the proposed development, as afforded to development compliant with the Golden Rules under policy GB8 of the NPPF.
- 4.7 As such, we would request that the LPA considers this application in accordance with national policy and the Development Plan and grants planning permission without delay.
- 4.8 Should the LPA disagree, and a refusal be issued against the application, NJL would consider this response the starting point for an appeal.

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.

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