

Response to Urban Design (App ref: PL/2026/0684) Land off Greenfield Lane, Rochdale OL11 1TJ

This note has been prepared by Savills (UK) Ltd on behalf of M.C.I. Developments (the Applicant) regarding a full planning application for a proposed residential development comprising of 44 affordable dwellings, including access, car parking, open space, landscaping and other associated works, at Land off Greenfield Lane, Rochdale OL11 1TJ (the Site). This note responds to comments received from the Council's Urban Designer (dated 01.09.2026) which reviewed the proposed development in light of new national and adopted local policy guidance.

NATIONAL PLANNING POLICY REVIEW

Whilst we appreciate the level of detail contained within the consultation response, we have assessed the proposed development against all relevant policies set out within the new NPPF which was issued on 17 August 2026.

New policies contained within the new NPPF include the following national decision making policies (NDMPs) which are relevant to the determination of this full planning application.

The following list are those that apply to this proposed development:

- Policy S3: Presumption in favour of sustainable development

For all development proposals, a presumption **in favour of sustainable development** is applied to decision making, which means application sites which fall within a settlement boundary are to be considered against Policy S4 of the NPPF.

- Policy S4: Principle of development within settlements

Policy S4 (1) allows for a default 'yes' regarding decision making, unless the benefits of doing so would be **substantially outweighed by any adverse effects**, when assessed against other NDMPs in the NPPF. This is a very high policy bar in our view.

As set out under Annex B of the NPPF, the definition of a settlement is as follows:

"Settlement: Includes cities, towns, villages and other predominantly built-up areas, including land which is allocated or has permission for development which will form part of the built-up area once the development is complete. This includes areas defined as a settlement in the development plan (whether using defined settlement boundaries or equivalent terms, or criteria for identifying settlement extents where boundaries have yet to be defined). Settlements do not include hamlets and scattered groups of houses located outside predominantly built-up areas, unless specifically defined as a settlement in the development plan. For the purpose of this Framework they also exclude villages which lie within and are defined as part of the Green Belt in the development plan."

The site clearly falls within the settlement boundary and S4 applies.

In applying S4 (2) a., the policy details circumstances in which the benefits of approving development are 'likely' to be substantially outweighed by adverse effects, including situations where the development proposal would have a substantial adverse impact in relation to:

- i. Safeguarded land or buildings; or,
- ii. The application of the policies in the NPPF for existing recreational land (HC7), Local Green Space (HC8), areas of particular importance for biodiversity and geodiversity (N6), Protected Landscapes (N4) and development within residential curtilages (L2(1)(d)).

The proposed development does not negatively impact safeguarded land or buildings, or any protected assets listed above.

Policy S4 (2) b. refers to development proposals which involve the whole or partial loss of undeveloped land which is used for a cemetery or burial ground; or for water storage and/or flood risk management.

The proposals do not relate to the above and therefore does not apply.

Policy S4 (2) c. refers to failure to comply with one of the NDMPs which states development should be refused in specific circumstances.

The following list of planning policies are relevant NDMPs which relate to the determination of these development proposals:

- Policy CC2: Mitigation of climate change
- Policy CC3: Adaption to climate change
- Policy HO7: Meeting the need for homes
- Policy HO8: Providing affordable homes
- Policy HO9: Specialist forms of accommodation
- Policy L2: Making effective use of land
- Policy L3: Achieving appropriate densities
- Policy DP3: Key principles for well-designed places
- Policy DP4: The design process
- Policy TR3: Locating development in sustainable locations
- Policy TR4: Street design, access and parking
- Policy TR6: Assessing transport impacts
- Policy P2: Ground conditions
- Policy P3: Living conditions and pollution
- Policy P5: Maintaining public safety and security
- Policy F4: Assessing flood risk for decision-making
- Policy N2: Improving the natural environment

Upon high level review of the NDMPs above, and through the submission of technical reports that have accompanied this planning application, there are no adverse effects that have been identified by the Council and/or relevant statutory consultees which would substantially outweigh the benefits of bringing forward a fully affordable residential scheme, on this brownfield site which is located in a highly sustainable location.

Additional information has been requested by consultees to date, and the Applicant is providing these details to the Council imminently.

The comments received to date by Urban Design relate to the design, layout, and contextual consideration of the proposed development. This is largely dealt with by Policy DP3 (2) which states that development proposals should respond to their context (the history, character and features of their site and its setting), so that they integrate with and enhance their surroundings; such as through the arrangement of development plots and buildings, the use of materials and architectural features, and the restoration, reuse and integration of heritage assets.

In addition to this, Policy DP3 (2)(a. – g.) sets out 7 key design principles which development proposals should reflect to create well-designed places. An assessment has been carried out below, against these key design principles which demonstrates the proposed development has fully considered and incorporated the key principles for well-designed places as outlined in Policy DP3 (2)(a. – g.) of the NPPF.

POLICY ASSESSMENT TO ASSIST WITH DECISION MAKING

To assist Planning Officers with the assessment against NDMPs, we have undertaken a review of Policy DP3 (2) which relates to the comments received by Urban Design. The proposed development has considered and applies all design principles set out under NPPF Policy DP3 (2) (a. – g.), as evidenced in Table 1 below.

Table 1. Policy DP3: Key principles for well-designed places (2) (a. – g.)

Criteria (a. – g.)	Response / Compliance
a. Liveability: support healthy, mixed, vibrant and integrated communities, which will function well over the lifetime of the development, by incorporating a range of uses and tenures, employing features which promote social interaction, and which are robust, durable and easy to look after	The proposed development will bring a derelict and underutilised site back into active use, facilitating the regeneration of previously developed land and promoting the efficient use of a sustainable brownfield location. The scheme will deliver 100% affordable housing ranging from 2 and 3 bedroom dwellings, suitable for 3, 4 and 5 person households, which supports mixed, vibrant and integrated communities, as well as delivering a fully M4(2) compliant scheme. The development is located within walking distance of local shops, schools, healthcare facilities, public transport connections and Rochdale town centre, supporting day-to-day living without reliance on the private car. The site at present reflects a fenced off, unsafe environment which has attracted unsocial behaviour. The proposed development would therefore alleviate crime and safety concerns associated with the current state of the site. The proposed layout also makes positive use of the site's steep topography, turning a physical constraint into a defining landscape feature. By utilising the natural gradient, the scheme creates a substantial area of public open space adjacent to the Rochdale Canal, providing an attractive and accessible focal point. This shared space will offer opportunities for recreation, relaxation, and community interaction, while strengthening the site's relationship with the canal corridor and enhancing residents' access to the natural environment (and 'social interaction'). Proposed pedestrian routes provide convenient links to Rochdale Bypass, the new public open space, and the north eastern part of the site, ensuring permeability and facilitating future connections to adjoining developments as and when they are to come forward. The high-quality public open space, and new landscaping throughout the scheme will not only enhance the setting of the development but also create opportunities for positive social engagement, promote health and wellbeing, and strengthen connections with the natural environment. Together, these elements contribute to the creation of a sustainable, inclusive, and well-connected neighbourhood.
b. Climate: contribute to climate change mitigation and adaptation and the transition to net zero by using building layouts, building orientation, massing, landscaping and materials which conserve energy and other resources, and which minimise risks from the impacts of climate change including overheating	The development adopts a fabric-first approach to energy efficiency, incorporating enhanced insulation standards, reduced thermal bridging and improved airtightness to minimise energy demand. In addition, the scheme is proposed as an all-electric development, removing the need for fossil fuel-based heating systems. Heating and hot water will be provided through a combination of air source heat pumps and electric panel heaters, significantly reducing operational carbon emissions and supporting long-term climate change mitigation. Climate adaptation is supported through the retention of mature boundary vegetation, extensive new tree and shrub planting, and the provision of significant public open space adjacent to the canal corridor. These measures help improve biodiversity, provide shading and cooling benefits during periods

	of extreme heat, and contribute to sustainable surface water management through the use of soakaways where feasible. The proposals have been designed with sustainable transport considerations in mind. Each dwelling will be equipped with electric vehicle charging infrastructure and allow for storage for cycles within the rear gardens. Trees along the boundary of the site have been retained where possible which provide immediate landscaping buffers and the vegetation aligning Rochdale Canal has been retained. In addition to the designs, a supporting Energy Statement by AES Sustainability Consultants has been provided as part of the submission documentation. This report outlines several climate change mitigation measures considered as part of the development including installation of air source heat pumps, opportunity for the installation of solar PV systems, and provision of electric vehicle charging which accords with Approved Document S of Building Regulations.
c. Nature: incorporate and/or connect to a network of high quality, accessible, multifunctional green infrastructure to provide opportunities for recreation and healthy living, strengthen habitats, improve climate change resilience and improve air and water quality. This should include maintaining and enhancing tree cover and incorporating sustainable drainage systems in accordance with policies N3 and F8.	The layout has been designed to be surrounded by existing and proposed landscaping which will provide biodiversity benefits and opportunities for the community to interact with nature. The proposed landscaping scheme that accompanies this application provides enhanced opportunities for tree, hedge, wildflower and shrub planting, which is a significant improvement when considering the site's current state. The proposals seek to maintain majority of trees which border the site. The retention and enhancement of green infrastructure contributes to climate resilience through increased shade, cooling, biodiversity and stormwater management. Extensive planting helps improve local air quality by filtering pollutants and creating a healthier living environment. The submitted Air Quality Assessment concludes that operational impacts from the development will be negligible and that air quality is not a constraint to development. Surface water management measures include the use of soakaways where feasible, whilst landscape enhancements adjacent to the canal provide environmental benefits and help protect the site's natural setting. A biodiversity net gain of 10% will be delivered through off-site mitigation measures, as specified within the accompanying Biodiversity Metric Report prepared by E3P.
d. Movement: provide transport infrastructure and choices which support the design vision for the site, provide good connections to the wider settlement (or those nearby), and prioritise walking, wheeling, cycling and public transport	The site is located in a highly sustainable location, only a short distance to shops, parks, schools, jobs and Rochdale town centre, through a series of existing active and public transport systems. The site benefits from good accessibility to the wider Rochdale area. Bus stops are located within walking distance on Rochdale Bypass, while Rochdale Railway Station is approximately 1.3km away. Rochdale town centre is approximately 2km from the site and is accessible via existing pedestrian, cycle, public transport and vehicular routes. Local shops, schools, healthcare facilities, restaurants and community services are all located within approximately 500 metres. The proposed development encourages active travel by proposing new pedestrian connections within the site as well as providing each dwelling with secure bike storage within the rear gardens.

	Car parking has been sensitively integrated into the overall layout and design. Car parking is proposed within the curtilage of the properties, primarily to the side of dwellings. Where frontage parking is provided, care has been taken to use integrated landscaping between spaces or runs of spaces to lessen visual impact and ensure streets are not dominated by car parking. Additionally, a review of on-site car parking has resulted in a reduction of car parking, due to the site's highly sustainable location which has freed up developable areas for further landscaping. The proposed layout follows a simple approach with a distinct hierarchy of connected streets to allow residents and visitors to navigate easily.
e. Built Form: use the pattern of buildings to define the arrangement of streets, squares and other spaces, promote compact forms of development to optimise the site's potential, distinguish between public and private areas, create focal points and, where appropriate, enhance views into and out of the scheme	The proposed layout defines the new street network so that car parking and the roads do not unduly dominate the street scene. The new public open space activates the area to the rear of the site adjacent to Rochdale Canal which integrates nature into the development and optimises public realm. As a result of pre-application discussions, a new pedestrian footpath will be provided to ensure connectivity with the site and adjacent sites which are earmarked for long term development and regeneration. The site is not prominent from the main road and is situated behind existing properties. It was once occupied by a large mill building (Dickens Mill) which previously dominated the site. All residential plots have been designed with defensible front space providing definition for public/private transitions, whilst providing landscaping throughout to soften the street lines. There is a clear definition of proposed private and public realm, with properties overlooking areas of green space wherever possible. Care has been taken to ensure buildings turn corners well through the introduction of double fronted aspect units presenting carefully designed elevations to both streets whilst actively avoiding blank façades/gable ends enhancing natural surveillance.
f. Public Space: include spaces that are safe, secure, inclusive, and accessible for all ages and abilities, including for groups such as women and girls; and which facilitate and encourage social interaction, play and healthy lifestyles (for example by providing high quality, clear and legible pedestrian and cycle routes, a variety of recreational spaces and places to meet, integrating lighting and making building entrances and windows face onto streets and other public spaces to provide natural surveillance)	The proposals have incorporated a space for all residents and the wider public to enjoy, which fronts Rochdale Canal to the rear of the site. The public open space incorporates accessible pedestrian routes, seating areas and opportunities for recreation. Buildings overlook all principal public areas, providing natural surveillance and enhancing safety. A pedestrian throughfare has also been provided which will connect the site to the wider community. A lighting scheme will be provided at a later stage (through anticipated standard planning conditions) which will provide sufficient lighting to create a safe and secure community. The siting of the development ensures natural surveillance, with dwellings overlooking on the area allocated as public open space, as well as the internal streets.
g. Identity: create visually attractive, distinctive and characterful development to establish or maintain a strong sense of place and pride, including through	The proposed dwellings within the scheme are to be constructed in buff facing bricks, with feature gables and details in a multi brown brick, which will give the scheme its own distinctive character, given it is set back from Rochdale Canal and not easily visible from this main road. The proposed character will give occupants a sense of place, and it will aid in wayfinding for visitors of the public open space.

the use of a coherent palette of materials, design features and planting	In light of the current state of the site, the proposals are considered to be a significant design improvement. A character analysis has been considered in full, and the proposals have been designed to respond to the adjacent built environment, which is reflected on Page 11 - 14 of the submitted Design and Access Statement prepared by JDA architects.
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SUMMARY

In summary, the presumption in favour of sustainable development is triggered in accordance with NDMPs S3 and S4 (by virtue of the site being within a settlement).

Policy S4 directs that such proposals should be approved unless the benefits of doing so would be substantially outweighed by any adverse effects.

No adverse impacts have been identified that would substantially outweigh the benefits of the scheme, which is to deliver 100% affordable housing to a high quality standard. The proposals will bring a derelict and underutilised site back into active use, delivering the regeneration of a brownfield site and providing a fully affordable residential development of 44 homes varying in designs and styles. When considered against Policy DP3, the proposed development has considered all design principles as evidence in Table 1 above. It is therefore considered that the proposed development does not conflict with any design policies in the NPPF.

In addition, Policy DP3 (3.) states that development proposals should be refused if, without clear justification, they conflict with Paragraph 1 of Policy DP3, or relevant aspects of DP3 (2.).

Should Planning Officers consider that the proposed development does not meet all the requirements as set out in Policy DP3, there is clear justification to support the proposals in any event, including delivering a 100% affordable scheme in a highly sustainable location, on previously developed land which is supported by Policy L2 of the NPPF. This policy states substantial weight should be given to the benefits to making use of vacant land, in which this development proposes. There are no technical reasons why this development should not be approved.

The Applicants have expressed an intention to deliver the site as soon as planning permission is received. This is demonstrated through ongoing discussions with Registered Providers, showing market interest and demand for this proposed development to proceed.

The proposed development will meet an identified housing need, contribute towards the Council's housing targets, and deliver a range of social, economic, and environment benefits. To summarise, the below Table sets out all the benefits of the scheme, weighed against the harm and what weight should be applied to each.

Table 2. Updated summary on the scheme benefits against the harm based on new NPPF 2026 policies

Benefit	Weight	Harm	Weight
<i>Sustainable development which meets the requirements of Policy S3 and Policy S4 of the NPPF.</i>	Significant	<i>Low quality vegetation clearance</i>	Limited
<i>Provision of 100% affordable housing, appropriate mix and tenure, which meets the requirements of the interested registered provider and accords with Policy HO8 of the NPPF.</i>	Significant		
<i>Housing design which meets the requirements and considers key design principles set out under Policy DP3 (2)(a. – g.) of the NPPF.</i>	Significant		
<i>Provision of a deliverable site that will supply dwellings in the next 5 years in line with the Council's SHLAA which accords with Policy L2 of the NPPF.</i>	Significant		

Response to Urban Design comments

Visual and landscape improvements by regenerating a derelict, underutilised brownfield site, complying with Policy L2 of the NPPF.

Significant

Economic benefits in terms of local employment opportunities during construction phase of development

Moderate

A minimum of 10% biodiversity net gain

Moderate

Retention and enhancement of green spaces

Limited