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Millwood Primary Special School, School Street, Radcliffe

Planning Statement

October 2023

On behalf of

ISG Ltd

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1 Introduction

- 1.1 This Planning Statement (PS) is written in support of a full planning application by ISG Construction Ltd [“the applicant”] for the provision of a new classroom block and additional car parking on the existing school site, at Millwood Primary Special School [MPSS]. Lambert Smith Hampton [LSH] have been instructed to prepare the following Planning Statement on behalf of the applicant.
- 1.2 The proposed scheme is located on the existing school site on School Street, Radcliffe, Manchester, M26 3BW.
- 1.3 MPSS is designated as a Community Special School, which typically specialise in one of the four areas of Special Educational Needs:
 - Communication and integration,
 - Cognition and learning,
 - Social emotional and mental health,
 - Sensory and physical needs.
- 1.4 Special schools can further specialise within these categories to reflect the particular needs they help with. MPSS is the primary special school for Bury for pupils aged 2-11 for children with very complex medical needs; severe learning difficulties and delays; autism; challenging behaviour; epilepsy; communication difficulties; sensory and multi-sensory impairments.
- 1.5 The school is managed through Bury Council and currently has capacity for 170 pupils and 115 parking spaces on site, including 8 accessible spaces.
- 1.6 To meet a growing demand for placements at the school, the applicant is looking to expand the current capacity of the school to 240 pupils (+70), through the provision of 7no. new classrooms and a multi-purpose hall, along with supporting ancillary accommodation. The new provision will be met by way of a new-build classroom block on the existing school site.
- 1.7 This proposed expansion of MPSS is included within Bury Council’s sufficiency strategy to deliver an increased capacity of high quality, local provision for SEND pupils. This increase in capacity at the school will see the number of staff increase by 35, to a total of 158 staff members.
- 1.8 In line with the proposed increase in pupils, the application also proposes the expansion of the existing car parking provision on the site to cater for a commensurate increase in school staff. The proposal will provide 19 new car parking spaces, including

two accessible bays, to replace displaced spaces, taking the total car parking spaces to 134 on site.

- 1.9 The proposal represents a gross internal floor area of 1,379 sq.m, with the total site area measuring 0.52 hectares, which is indicated on the Location Plan (Drawing: 2128.26.1201 P3) submitted alongside this application.
- 1.10 The existing school will remain operational throughout the works, which is expected to be completed in early 2025, after commencing in March 2024. The proposal will therefore not require the erection of any temporary teaching blocks. As shown in the submitted drawings, the proposed building encroaches slightly onto a field west of the existing playground. To the north of the proposed building is an area that is considered as the main playground for the school, which will not be impacted by the proposal.
- 1.11 Given that the proposed new classroom block will be located at the back of the main existing building, the existing vehicular and pedestrian access will remain from School Street. The existing car parking spaces will also remain accessible throughout the development phase.

Background: Millwood Primary Special School

- 1.12 MPSS is a mixed primary school for pupils aged 2-11, with 171 pupils currently enrolled. The school specialises in the provision of education for children who have a range of special educational needs, which is reflected in the design of the buildings and the type of education provided.
- 1.13 MPSS opened to pupils on 25th April 2012, with the facilities based on a design comprising a central hub, three teaching wings and a hydrotherapy pool. The existing school building is all single-storey and is set back from the southern site boundary, which minimises its impact on the adjacent housing development.
- 1.14 In 2018, an application to erect '2 new classroom areas with ancillary accommodation' (planning application ref: 63145) was approved, which increased the capacity of the school by 16 students. Figure 1.1 below shows the location of the new classrooms in red. This application did not increase the provision of car parking or alter the service arrangements.

Figure 1.1: Context of the previous expansion of the school (Bury planning reference: 63145, approved Aug 2018)



- 1.15 MPSS works in partnership with other professionals in education, health, and social care to provide high quality care and education for students.
- 1.16 The ethos of MPSS is that its students are at the heart of everything that takes place, with safeguarding and child protection at the centre of the school. This is reflected in various functions of the school, with a 'child and family support' worker employed to respond to requests for Early Help Support directly from families or from other professionals.
- 1.17 MPSS also facilitates fortnightly meetings for Bury Council SEN team and half-termly Health and Therapy meetings to ensure collaboration beyond the school function. This collaboration creates further development of effective relationships with council services in other public sectors to improve outcomes for their students and families, in turn improving the child's lived experience.
- 1.18 The school's curriculum provides for the broader development of its students, enabling them to discover and develop interests, supporting character development including confidence and independence. The school's vision supports a curriculum that aims to *'Open up the world for our school, family and community. Driven by our values we will ensure a magical and memorable discoveries through our aspirational engaging curriculum. We will inspire confidence and a love of learning in a happy, safe and nurturing environment with respect for all.'*
- 1.19 MPSS has been awarded various awards for its approach to education, such as the Leading Parent Partnership Award and the Gold Award from UNICEF, for the school's protection of children's rights. MPSS has also gained the Inclusion Quality Mark Inclusive School Award with Centre of Excellence status. Importantly, MPSS has

maintained its Ofsted rated 'Outstanding' quality of education which was judged in 2013 and most recently in 2017.

Ongoing Remediation Works

- 1.20 Following the construction of the school in 2011/12 there have been ongoing structural issues, in particular with the roof. In 2022, ISG commenced a substantial roof replacement scheme with phased works to the entrance, hub, three wings and hydrotherapy pool with works due to be completed in 2025.
- 1.21 In response to the urgent need for additional accommodation, discussed in more detail in the following section, ISG have also been awarded the contract for the proposed expansion at the school. Given that two main contractors cannot be on site simultaneously, it has been deemed that this approach is the most efficient, coupled with the fact that ISG are familiar with the operational and logistical requirements of the students and staff at MPSS.

Development Requirements

- 1.22 Bury Council have worked with the Department for Education (DfE) as an initial participator in the 'Project Safety Valve' programme, in which the Council have developed plans to transform the borough's provision in respect of Special Educational Needs and Disabilities (SEND). This agreement between the Department for Education and Bury Local Authority covers the financial years from 2020-21 to 2024-5.
- 1.23 The programme considers all aspects of the Council's approach to SEND, including an understanding of the sufficiency requirements across the local area and an extensive programme to deliver increased capacity of high quality, local specialist provision. The SEND reforms were introduced in 2014 (The Children and Families Act 2014), following which Bury was inspected as a local area in 2017 and again in 2019, with both visits concluding that Bury had not been effective in its implementation of SEND reforms and clear priorities were identified, which Bury Council has been committed towards improving.
- 1.24 The Council has developed a SEND sufficiency strategy which seeks to respond to the lack of sufficient maintained specialist provision, including a programme to deliver increased capacity. The proposal detailed within this planning statement, for the expansion of MPSS, is included within the Council's sufficiency strategy.
- 1.25 The Council has received additional revenue and capital funding through the Safety Valve agreement to support this programme of investment.

- 1.26 The proposal will provide a maximum of 70 additional places at Millwood Primary SEN, in an aim to meet the above outlined increased demand for local specialist educational provision.

Planning Application

- 1.27 This PS has been submitted to support a full planning application for the extension of the existing school, with the addition of 7 new classrooms, a multi-purpose hall and supporting ancillary accommodation and an additional 19 car parking spaces. These new classrooms will be accommodated within a new single-storey classroom 'block' on the same site as the existing school.
- 1.28 ISG have undertaken pre-application engagement with the Local Planning Authority (LPA), Bury Council. A request for Pre-Application Planning Advice was submitted on 17th July 2023, with the fee paid by ISG Construction Ltd. The pre-application advice was issued to the client on the 5th October 2023, which has provided useful advice on the scheme as a whole. The advice has informed the current proposals and is reflected in this Planning Statement and submission.
- 1.29 This PS describes the background to the scheme and the site surroundings. It describes the proposals and assesses them against the planning policy context. Section 5 summarises the supporting technical surveys that have been submitted. Section 6 provides our conclusions.
- 1.30 The following has been submitted as part of this planning application:

Submitted supporting material	Author
Full set of Planning Drawings	Bradshaw Gass & Hope LLP
Design and Access Statement	Bradshaw Gass & Hope LLP
Planning Statement	Lambert Smith Hampton
Transport Assessment	Curtins
Interim Travel Plan	Curtins
Arboricultural Impact Assessment	Treestyle Consultancy
Crime Impact Statement (CIS)	Greater Manchester Police
Land Contamination Assessment (Geo-technical Desk Study)	LK Consulting
Coal Mining Site Investigation Report	LK Consulting
Noise Impact Assessment*	STROMA
Biodiversity Report	Blackfryers Consultants
Flood Risk Assessment	LK Consulting
Surface Water Management Report	Bradshaw Gass & Hope LLP
Foul Water Drainage Layout	Bradshaw Gass & Hope LLP
External Lighting Layout*	Ridge

* Two documents to be provided during the validation process.

2 The Site and Surroundings

The Site

- 2.1 MPSS site is in Radcliffe, which lies within the Bury LPA and is approximately 2.5 miles southwest of Bury town centre. The site is an existing school site located on the eastern end of School Street. Figure 2.1 shows the existing site.

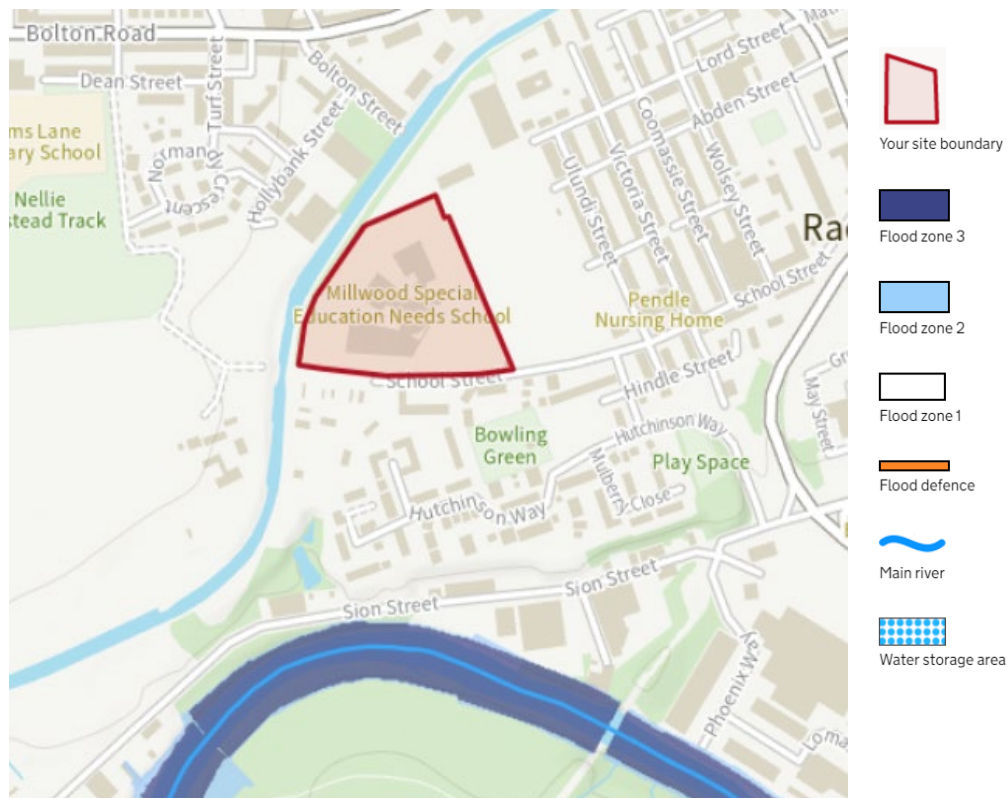
Figure 2.1 Existing Site (Source: Google Earth, 2023)



- 2.2 The site is immediately bounded to the north and west by the disused Manchester Bolton and Bury Canal. Beyond this to the north are various light industrial units, whilst Cams Lane Primary School is located beyond the canal to the west. To the south, the site is bounded by a housing estate. Immediately east of the site is an area of vacant scrub land and hardstanding which was previously used for Radcliffe High School, before being demolished in 2015. It is understood that the vacant land will be used as a site for future residential development, with a planning application (Bury planning ref: 69233) currently awaiting a decision. Beyond this lies an existing terraced housing.
- 2.3 The site accommodates a school campus with three classroom blocks branching off from a main school building. To the north of the buildings is a MUGA and a play area with tarmacked areas within the individual classroom blocks.

- 2.4 The main external play spaces are located behind the existing school building, with the access provided via footpaths behind the classroom wings. There are also individual external play spaces associated with each classroom wing with gated access to each.
- 2.5 Vehicular access to the existing car park is off School Street, leading onto the A665. This provides access north to Bury and Bolton and south towards Prestwich and Manchester.
- 2.6 The site is within Flood Zone 1 as shown on Figure 2.2, meaning there is a low probability of flooding.

Figure 2.2 – Flood Risk Map (Source: Environment Agency, 2023)

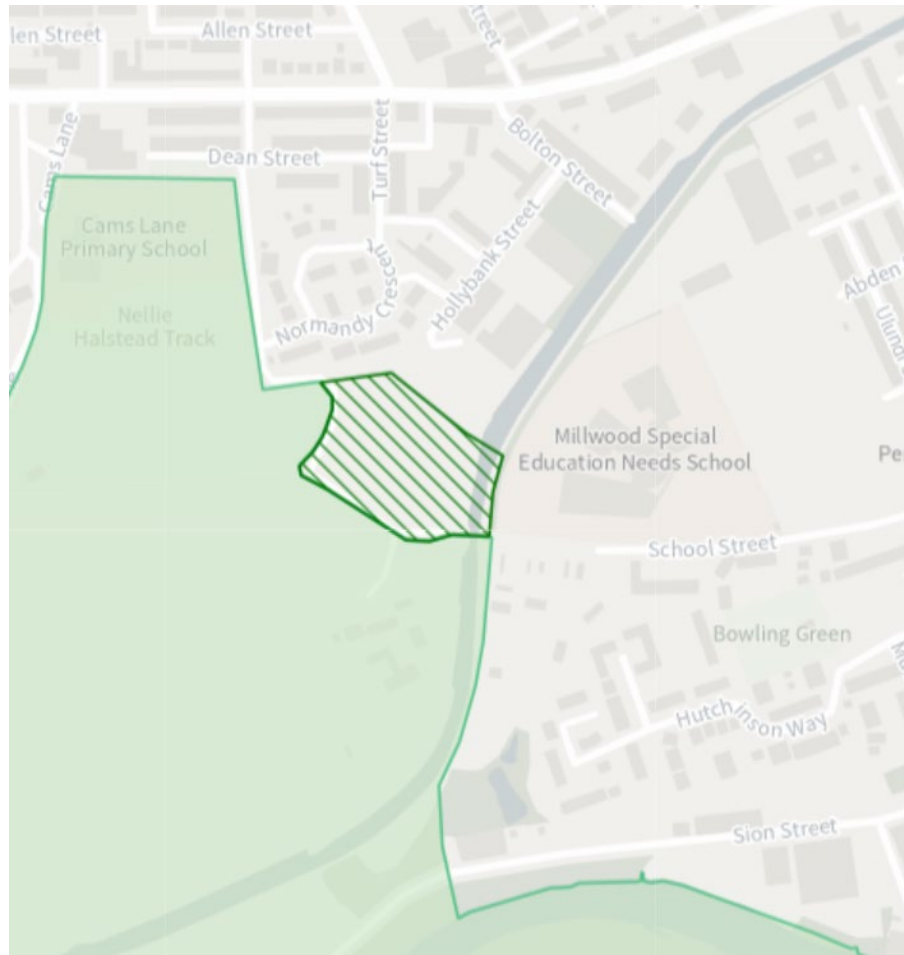


Surrounding Uses

- 2.7 The immediate northern and western boundary of the school site comprises the Manchester, Bolton, and Bury Canal, which originally ran north from Salford to Prestolee where it split into two branches, to Bury or north-west Bolton. The canal is now 'derelict' and is under active restoration, though it is a recognised Site of Biological Importance (2017). The 'School Street Footbridge' is located at the western end of School Street, immediately outside the boundary of the site, and provides pedestrian access over the canal. The canal towpath runs behind the northern and western boundary of the school.

- 2.8 Beyond the canal to the west there are a number of open fields, which are located within the Green Belt. Cams Lane Primary School, a mixed comprehensive school for pupils aged between 4-11, is located adjacent to the green belt. Figure 2.3 below shows the extent of the Green Belt land.

Figure 2.3: Green Belt land existing (shaded) and proposed in the PfE (hatched lines).



(Source: PfE, 2023)

- 2.9 To the north of the Manchester, Bolton, and Bury Canal is a small industrial estate, which accommodates various businesses such as a building materials supplier, 'Apex Self Storage', and a car stereo shop with a small housing estate beyond this. This is accessed via the A665, Bolton Road.
- 2.10 The land use to the east of the site is registered as Brownfield Land. The 2.3-hectare site was previously occupied by Radcliffe High School and currently has an application for the delivery of 90 homes (Bury public access reference: 69233), following the school's closure and subsequent demolition in 2015. The application has been recommended for approval by planning officers at the next Bury Council planning committee meeting (29th August 2023).

- 2.11 The impact of the proposed scheme on the surrounding residential properties is deemed to be low, given the existing use of the site as a school. The proposed location for the new classroom block does not face onto any residential dwellings, instead looking over the disused canal onto a section of the industrial estate.
- 2.12 Beyond this site is terraced housing, which expands to the east to the A665. The land use to the south of the site is also dominated by residential dwellings, though more recent builds than those to the east.

3 Development Proposals

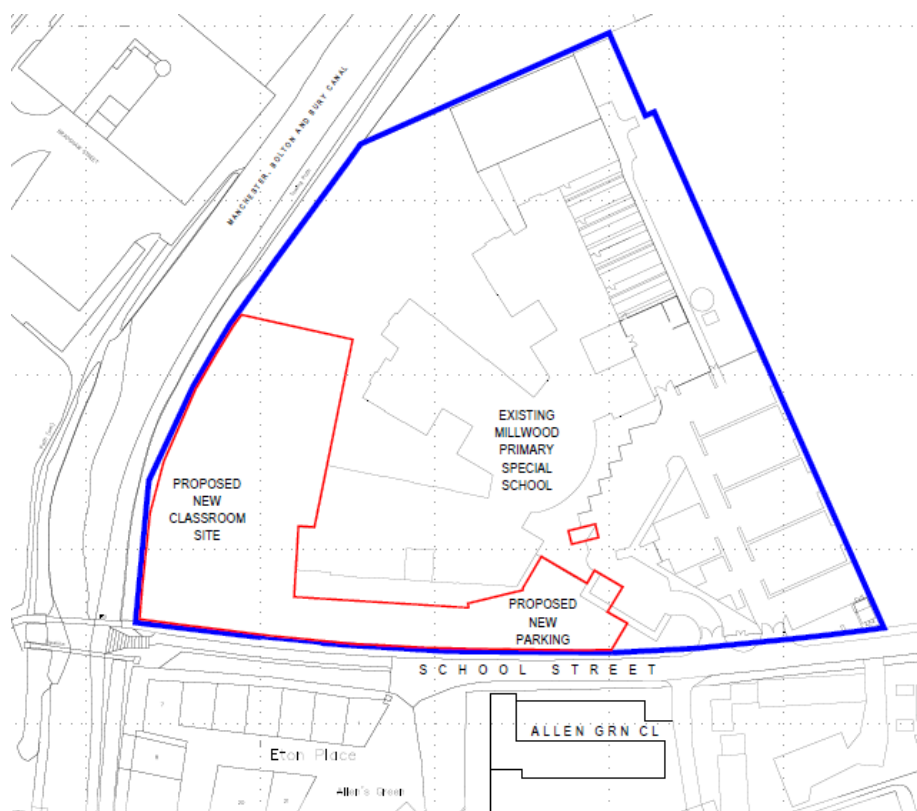
Project Brief: The Need to Provide Additional Teaching Accommodation

- 3.1 The aim of the project is to provide additional high quality teaching accommodation at MPSS, to accommodate increasing demand for places at the school and expand the overall provision of specialist education. The description of development is:

“The provision of a new classroom block with a multi-purpose hall and additional car parking on an existing school site”.

- 3.2 The staff car parking will increase from 115 to 134 (+19 spaces), to accommodate the increase in staff required to support the school's expansion. An additional minibus drop-off/ pick-up space will also be provided.
- 3.3 The school's operating times will not be affected following the proposed expansion.
- 3.4 The plan below shows the existing school site with the location of the new classroom block outlined in red to the southeast of the site and the location of the proposed additional car parking spaces outlined in red to the east of the proposed new building.
- 3.5 The site area, indicated by the red-line boundary comprises an area of 5,266 sq.m (0.5266 ha), which includes the new mini-bus pull in bay. The blue-line boundary comprises an area of 24,753 sq.m (2.4753 ha).

Figure 3.1: Proposed site plan (Source: Bradshaw Gass & Hope LLP)



3.6 Overall, the project brief is as follows:

- Provision of new classroom accommodation and additional car parking spaces on the site, whilst retaining the existing school buildings, keeping these operational during the construction.

Pre-application Engagement

3.7 The client submitted an application for pre-application advice with a response expected on 14th September 2023. Bury Council issued their written response on 5th October 2023.

3.8 The proposal is described as acceptable, pending detailed that is confirmed within the formal submission of the application.

Key Programme Dates

3.9 The target programme is as follows, this is important in order to phase the works to allow continuous school operation and to meet the requirements of the project:

- Construction start date: March 2024

- Target completion date: February 2025

Proposed Design

- 3.10 The proposed design of the building, as illustrated on the 'Proposed Sectional & Elevation Massing' drawing, is intended to sit in context with the existing school buildings, in scale, proportion and general articulation. The proposed building is single storey and faced with brickwork to fully match the brickwork of the existing school.
- 3.11 The new school building will not be connected to the existing school buildings, rather it will sit parallel to the existing blocks, as illustrated in the Proposed Site Plan.
- 3.12 The proposed extension to the school comprises 7 new classrooms including a Sensory Integration Room, two general classrooms, a Rebound Room, a staff room and a general office, as well as 19 additional car parking spaces. The classroom block will also incorporate a large multi-purpose hall / storage facility as an amenity for the new classrooms and the wider school use.
- 3.13 A direct link, in the form of an extension to the existing early years corridor, allows access from the main school entrance and the sharing of facilities within the wider school. The school and extension will have level, unobstructed access throughout, and all doorways will offer level thresholds to afford unrestricted access to the outdoor areas.
- 3.14 Please refer to the submitted Design & Access Statement (D&AS) for a full description of the scheme design and concept.

Site Layout

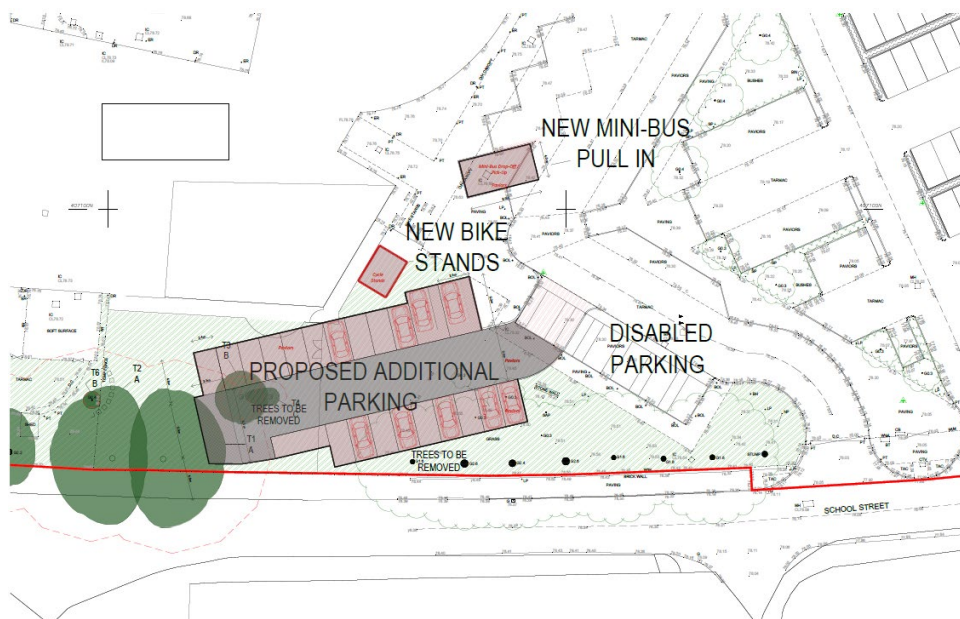
- 3.15 The proposed site layout, as illustrated in the Proposed Site Plan, is for the new school building to be erected parallel to the existing school buildings.
- 3.16 The proposal includes the introduction, removal and retention of a number of trees on site, which has been outlined in the supporting Landscape Plan.
- 3.17 The proposed extension of the school extends at a right angle, to the south of the existing school. This will partially enclose one of the courtyards and play areas. A flat roof link connects the proposed extension to the existing building, creating a natural point for access to the existing outdoor areas. This can be seen below on figure 3.2 and in more detail within the Design and Access Statement.
- 3.18 The context of the proposed extension to the existing car park is shown in figure 3.3.

- 3.19 Enclosed outdoor play areas are proposed for each of the classrooms, providing opportunities for hard and soft play and for social interaction in a safe and secure environment. These spaces will be surrounded with low fencing, to fully match that of the existing classrooms.

Figure 3.2 – proposed development shown in the context of existing site (Source: DAS, Bradshaw Gass & Hope LLP).



Figure 3.3 – Proposed extension to the existing car park (Source: DAS, Bradshaw Gass & Hope LLP)



Appearance

- 3.20 The scale and mass of the building has been designed to integrate seamlessly into the existing school site. The form picks up on that of the existing classroom blocks to ensure a parity of design.
- 3.21 The palette for the proposed extension includes brick to match the existing building, a contrasting brick, cladding panels and powder coated aluminium windows/ curtain walling with a colour coated steel roof.
- 3.22 Further detail of the appearance of the proposed new classroom block is available within the Design and Access Statement.

Landscape

- 3.23 The proposed extension has been located to retain the existing landscaping and kerbed grass areas around its footprint. New low-level fences have been located outside the landscaped classroom outdoor play areas and these are located in the existing surrounding grass.
- 3.24 Green space has been maintained around the extension to allow access and the development of a habitat area.
- 3.25 Several small trees have been removed to allow the construction of the new classroom block and car parking area. However, the supporting ecology report confirms that the current vegetation has '*extremely low biodiversity value, is in poor condition and has little connection to other habitats*' and determines that there are '*no plant species of any interest*'.

Vehicular Access

- 3.26 The existing access arrangements on site will be retained, with the school accessible via School Street for pedestrians, cycles, cars, service vehicles and buses. All entrances will include DDA compliant routes.

Pedestrian & Cycle Access

- 3.27 Pedestrian and cycle access to the school site will remain as existing on School Street. Dedicated disabled drop off points are located adjacent to the main school entrance, and these are being supplemented to accommodate the increased number of students and staff that are associated with the new classroom block, in accordance with the Transport Assessment.

Servicing, deliveries, and refuse

- 3.28 The delivery and servicing access strategy will not differ from the existing arrangement.

Parking

- 3.29 The main school car park area is used by staff and is located to the east of the existing and proposed school buildings and comprises 122 marked parking spaces. The proposed extension to the existing car park will increase this by 19 spaces, allowing for two spaces that are to be lost to the new car park access road from the existing car park, and one drop-off point that will be lost to the new minibus parking bay. This will give an overall total of 134 spaces, including 8 disabled spaces.
- 3.30 Parking requirements for developments in Bury are outlined in the Supplementary Planning Document (SPD) titled: Parking Standards in Bury, Guidance note 11, adopted in May 2007.
- 3.31 The SPD identifies the development of a primary school under '11c. Non-Residential Institutions (D1)'. The maximum standards for car parking provision (excluding disabled parking) are stated as 1.5 spaces per classroom whilst the minimum standards for car parking provision for those who are disabled is 'Up to and including 200 bays: 3 bays, or 6% of the total capacity *whichever is the greater*'.
- 3.32 The SPD also states that where facilities are specifically proposed for people who are disabled, such as dedicated schools, this is likely to justify a higher provision of disabled parking and facilities than those specified above. The Transport Statement confirms that due to the nature of MPSS, a greater volume of staff is required, which has resulted in a larger car park being proposed to meet these additional requirements.
- 3.33 The parking Standards in Bury SPD also states that the minimum standards for parking provision is 1 per 10 full time equivalent staff, plus 1 per 10 pupils.

4 Planning Policy Context

- 4.1 Having regard to Section 70(2) of the Town and Country Planning Act 1990 (as amended) and Section 38(6) of the Planning and Compulsory Purchase Act 2004, this statement considers the proposals conformity with the Development Plan, relevant national policy and guidance, as well as any other material considerations.
- 4.2 Section 70(2) of the 1990 Act and Section 38(6) of the 2004 Act state that planning applications should be determined in accordance with the Development Plan unless material considerations indicate otherwise.

National Planning Policy Framework (2021)

- 4.3 National planning policy is provided by the National Planning Policy Framework [NPPF] (July 2021), whilst the National Planning Practice Guidance [NPPG] is an extensive resource for detailed planning guidance. Both are material to the consideration in the determination of any future planning application.
- 4.4 The main theme of the NPPF is that there should be a *'presumption in favour of sustainable development.'*
- 4.5 The NPPF (Paragraph 8) is focused upon achieving sustainable development, and recognises that:
- 'Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives)'*
- 4.6 These comprise an economic objective, a social objective and an environmental objective. Paragraph 8(b) details that a social objective is:

'To support strong, vibrant and healthy communities, by ensuring 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 and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being'

- 4.7 The Framework¹ states that for decision-making, applications for proposals that accord with an up-to-date development plan should be granted without delay. However, as stated in Paragraph 11 (d):

“Where there are no relevant development plan policies or the policies which are most important for determining the application are out-of-date, granting permission unless:

i) the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or

ii) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.”

- 4.8 The Framework² sets out that decision-makers at every level should seek to approve applications for sustainable development where possible.

- 4.9 The Framework³ states that local planning authorities should give great weight to the need to create, expand or alter schools through the preparation of plans and decisions on applications.

- 4.10 The Framework⁴ sets out that planning policies and decisions should support development that makes efficient use of land.

- 4.11 Chapter 8 of the Framework is concerned with ‘promoting healthy and safe communities’. It aims to ‘*enable and support healthy lifestyles, especially where this would address identified local health and well-being needs – for example through the provision of safe and accessible green infrastructure, sports facilities...*’ [NPPF, para. 92]. Paragraph 98 emphasises that ‘*access to a network of high-quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities...*’.

- 4.12 The current proposals can contribute directly to this aim. Planning decisions should ‘*ensure that established shops, facilities and services are able to develop and modernise, and are retained for the benefit of the community*’ [NPPF, para 93].

- 4.13 A key material consideration in the determination of the planning application will be the importance of enabling school development as set out in paragraph 95 of the NPPF, which states:

¹ National Planning Policy Framework – Paragraph 11(c)

² National Planning Policy Framework - Paragraph 38

³ National Planning Policy Framework - Paragraph 95(a)

⁴ National Planning Policy Framework - Paragraph 124

“It is important that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. They should:

a) give great weight to the need to create, expand or alter schools through the preparation of plans and decisions on applications; and

b) work with schools’ promoters, delivery partners and statutory bodies to identify and resolve key planning issues before applications are submitted”

National Design Guide (2021)

- 4.14 In addition to the NPPF, a further material consideration at national policy level is the National Design Guide (January 2021). This guide expands on the design policies in Section 12 of the NPPF and identifies ten characteristics of good design. Another material consideration at national policy level is a Ministerial Statement from 2011 issued by the Secretary of State, which sets out the Government’s commitment to support the development of state-funded schools and their delivery through the planning system. The Statement sets out the Government’s belief that the planning system should operate in a positive manner when dealing with proposals for the creation, expansion and alteration of state-funded schools.

Local Development Plan

- 4.15 The Development Plan for Bury and the application site comprises the following Development Plan Documents:
- **Adopted Bury Unitary Development Plan (UDP) (1997);**
 - **Greater Manchester Minerals and Waste Plan; and**
 - **Supplementary Planning Documents (SPD’s).**
- 4.16 Bury is currently preparing a new Local Plan that will guide future development in the borough, to replace the adopted UDP. Together with the PfE joint development plan, the Local Plan will form a key part of Bury’s overall development plan.
- 4.17 The Local Plan policy directions sets out the proposed scope and a more refined direction for the planning policies that the Local Plan will contain. Bury’s Local Plan will contain a range of locally-specific planning policies and identify local sites where development should be built as well as areas where development should be restricted or controlled.

- 4.18 The Places for Everyone document is a joint development plan of nine districts across Greater Manchester. This meets the statutory requirements for local authorities to have an up-to-date development plan in place that identifies enough land to accommodate new homes and jobs for a growing population.

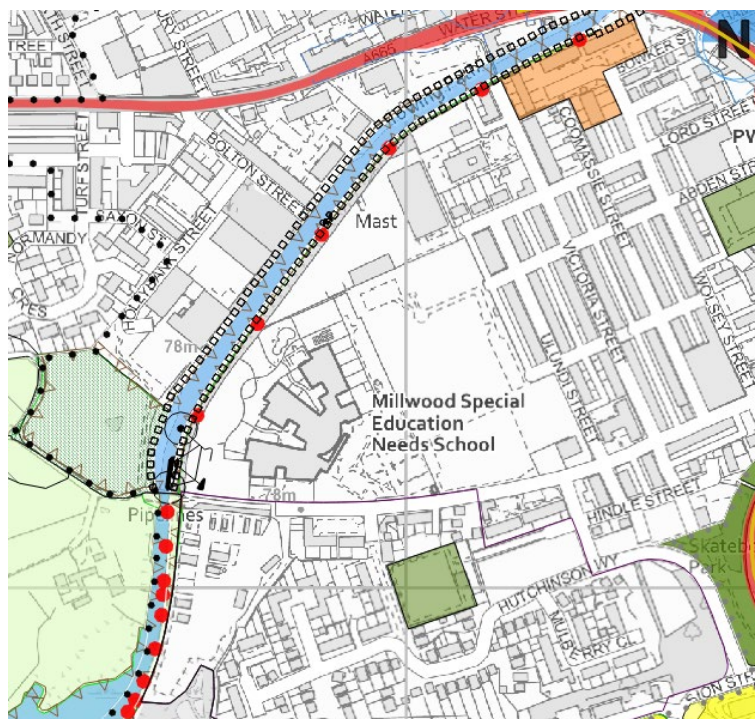
Site Specific Planning Policy

- 4.19 The Unitary Development Plan indicates there are no site-specific allocations or designations directly covering the application site. This is indicated on Figure 4.1 below which is taken from the 'Bury online map' service, showing the UDP allocations.

The Bury Unitary Development Plan (UDP)

- 4.20 The Bury Unitary Development Plan (UDP) acts as a guide for the future development or the protection of land in the Borough and its policies and proposals currently form the basis for the Council's decisions on planning applications.
- 4.21 The UDP was adopted on the 29th August 1997. As such, the Council is currently without an up-to-date Development Plan and is now working to replace the adopted UDP with the Bury Local Plan. Until then, the UDP will continue to be used to make planning decisions.
- 4.22 Without an up-to-date Development Plan, Paragraph 11 (d) of the NPPF will therefore apply, which states that in the absence of relevant development plan policies, permission should be granted unless the application refers to protected areas or assets of particular importance, or when any adverse impacts of doing so would significantly and demonstrably outweigh the benefits.
- 4.23 Further to this, Paragraph 11 (d) of the NPPF will apply in this scenario, which states that when the policies that are most important for determining applications are out of date, permission should be granted.

Figure 4.1 Bury UDP Allocations



(Source: Bury.gov, 2023)

Relevant Policies – Bury UDP

- 4.24 **EN1 Built Environment** - The Council will seek to protect, preserve and enhance the character, appearance and amenity of the Borough's built environment.
- 4.25 **EN5 Flood Protection and Defence** – The Council will seek to control development in a manner consistent with flood protection and the maintenance of flood defence systems.
- 4.26 **HT2/4 Car Parking and New Development** – The Council will require all applications for development to make adequate provision for their car parking and servicing requirements in accordance with the Council's car parking standards.
- 4.27 **HT5 Accessibility for Those with Special Needs** – The Council will seek to improve accessibility, and the means of movement for the mobility impaired and those with special needs.
- 4.28 **CF2 Education Land and Buildings** – The Council will, where appropriate, consider favourable proposals for the provision, improvement and dual use of educational facilities.
- 4.29 The development will also need to respond to the following policy:
- 4.30 **SPD Development Control Policy Guidance Note 11** – Parking Standards in Bury which has the purpose of expanding upon parking policies within the Bury UDP (HT2/4) to ensure that the level of car parking associated with a development proposal or a

particular use is appropriate, in order to support a reduction in reliance upon the private car.

- 4.31 Other than the above policies, the general policies within the Bury UDP have also been taken into consideration for this application.

Emerging Planning Policy

- 4.32 Emerging Planning Policy is represented by the following documents:
- 4.33 **Bury Local Plan** is currently being progressed which will replace the existing Bury UDP (1997), along with a Policies Map. Once adopted, the Local Plan, Adopted Policies Map, Places for Everyone Joint Plan, Greater Manchester Joint Waste Plan and the Greater Manchester Joint Minerals Plan will form Bury's overall Development Plan. The Bury 'Local Plan policy directions' document was published in October 2018, with the intention that the Local Plan will be produced in line with the emerging PfE document.
- 4.34 **Places for Everyone Plan** (previously known as the Greater Manchester Spatial Framework) is a shared strategic plan for nine of the ten Greater Manchester authorities. The nine Councils in Greater Manchester have now submitted the plan to the Secretary of State. The document was submitted for examination on 14th February 2022 and Inspectors have considered all submitted evidence and representations that were made as part of the previous consultation and have effectively concluded that the plan could be found sound with some modifications. The Inspectors have now requested that these proposed main modifications and associated documents be published for public consultation.
- 4.35 The Draft Plan has no site-specific policies affecting the MPSS; however the site directly adjacent to the site has been allocated for future housing, and currently has a planning application (Bury public access reference: 69233) for 91 homes, which is awaiting decision.
- 4.36 The draft plan also shows that MPSS is adjacent to a 'Proposed Green Belt' site, as depicted above in Figure 2.3.

Planning History

- 4.37 A review of Bury Council's planning records shows the following relevant planning application:
- 63145: Construction of 2. No new classroom areas with ancillary accommodation (approved 4th October 2018 and fully implemented).
 - 52038: Full Planning for construction of a new primary school for children with special educational needs together with the construction of associated parking and external play

areas, outline proposals to develop the remaining high school site for housing (approved 10th December 2009 and fully implemented).

Conclusion

- 4.38 In conclusion, this section has set out the prevailing planning policies relevant to the proposed development at MPSS, as well as other key guidance documents that would be material considerations in the determination of this planning application.

5 Planning Policy Assessment

- 5.1 This section explains that the proposals have conformity with the Development Plan, relevant national policy and guidance, as well as any other material considerations.

Principle of Development

- 5.2 The NPPF states that the purpose of the planning system is to contribute to the achievement of sustainable development. So that sustainable development is pursued in a positive way, at the heart of the NPPF is a presumption in favour of sustainable development, which, for decision-taking, means approving development proposals that accord with an up-to-date development plan without delay.
- 5.3 As discussed above, without an up-to-date Development Plan, Paragraph 11 (d) of the NPPF applies in this scenario and as a scheme that does not concern 'areas of assets of particular importance' and has no 'adverse impacts', there should not be any reason that the application is not approved.
- 5.4 The proposal seeks to expand and improve an existing educational facility, and as such is supported in principle by Policy CF2 (Education Land and Buildings) of the UDP which seeks to support the proposals for the improvement of educational facilities. The policy notes that as the Local Planning Authority, Bury Council has a role to play by monitoring the scale of educational facilities.
- 5.5 Further to this, the planning history on the site provides further clarification that the principle of use is acceptable. In the consideration of application 63145 (approved 2018), the Officers Report confirms that the application to extend the existing MPSS:
- 'Complies with the development plan and would improve the economic, social and environmental conditions of the area. It therefore comprises sustainable development'.*
- 5.6 In this sense, it can be confirmed that the proposal consists of an infill to an existing educational site.

- 5.7 Considering the above, and the 'Project Safety Valve' programme, in which the Council been working with the DfE to transform the boroughs provision in respect of SEND, the principle of development is established.

Impact on Open Space and Sports Pitches

- 5.8 The new extension has been located to retain the existing landscaping and kerbed grass area around its footprint and green space has been maintained around the extension to allow access and the development of a habitat area. More detail is available within the DAS.
- 5.9 A review of Bury Council's 'Playing pitch and Outdoor Sport Strategy'⁵ documents reveals that the outdoor space within the site of the existing school is not identified within the Borough's sports pitch supply assessment.
- 5.10 It can also be confirmed that MPSS does not offer community access to the sport's facilities given the nature of the SEND school and curriculum needs.

Impacts on Residential Amenity and Local Environment

- 5.11 There is also a need to consider the impacts of the school on the amenity of surrounding residents and other environmental impacts, such as on biodiversity.
- 5.12 The finger-shape design of the proposed building, consistency in massing and appearance were selected to ensure regularity across the school site. The majority of the existing school site does not overlook any residential areas, majority of the surrounding land use is light industrial or green belt. The access point to the school will remain from School Street, which is shared by a residential estate.
- 5.13 The proposed car park will be located within the school site, to the southwest of the existing car park and to the south of the main school building.
- 5.14 Given that the entrance point to the school site will remain the same, the impact on residential amenity is therefore expected to be low.
- 5.15 The proposed development is utilising existing land within an existing education campus and in accordance with the NPPF is making best use of available land in a sustainable location.
- 5.16 All other potential impacts on the local environment have been assessed through a comprehensive set of surveys and studies that have been submitted with the application

⁵ <https://www.bury.gov.uk/asset-library/bury-playing-pitch-outdoor-strategy-report-2019.pdf>

and are summarised in Section 6. This includes consideration of issues such as traffic and parking, ecology, flood risk and ground conditions (update once complete).

Conclusion

- 5.17 In summary, the proposals accord with national and local policies promoting sustainable development. The site is brownfield and in existing use as a school and the principle of use is established. The proposals will enhance education provision and promote economic growth. All potential environmental impacts have been assessed and no significant detriment will occur to residential amenity or the local environment. There is therefore no reason why the planning application should not be determined positively and efficiently.

6 Supporting Surveys

- 6.1 As outlined in the submitted covering letter as well as Section 1 of the PS, the planning application is accompanied by the following supporting material:

Submitted supporting material
Full set of Planning Drawings
Design and Access Statement
Planning Statement
Transport Assessment
Interim Travel Plan
Arboricultural Impact Assessment
Noise Impact Assessment
Biodiversity Report
Crime Impact Statement
Flood Risk Assessment
Drainage Strategy
Land Contamination Assessment (Geo-Technical Desk Study)
Coal Mining Report
External Lighting Layout

- 6.2 These reports should be referred to in full for the determination of the application. The following summaries are provided of the key documents.

Transport Statement

- 6.3 A Transport Statement (TS) was prepared by Curtins on the 18th September 2023.
- 6.4 The TS confirms that the existing vehicular access via School Street will be retained and that both the pedestrian and cycle access will not differ from the existing arrangements.
- 6.5 The proposal will provide a net increase of 19 spaces to the existing staff car park and will add a further minibus drop-off/ pick-up space.
- 6.6 It is important to note that the nature of Millwood School, as an SEN School, requires a greater number of staff, resulting in a larger car park to meet the additional considerations. Millwood School has also stated that the proposed increase in staffing and pupil numbers would make the extra strain on the existing car park unsafe and not accessible to the number of people requiring to use it without the proposed additional spaces.
- 6.7 From a transport perspective, there is no reason for planning permission to be refused as per Paragraph 111 of the NPPF which states that “*development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe*”.

- 6.8 Given that there will be no increase in traffic impact as a result of the proposed development, and it can be concluded that the proposals are fully in line with policy HT2/4 of the Bury UDP.
- 6.9 The TS is accompanied by an Interim Travel Plan (TP), also prepared by Curtins, which includes a range of measures that are intended to encourage users to choose alternative transport modes over single occupancy car use.
- 6.10 The targets that are set within the Interim TP follow the principles and goals of the Greater Manchester Transport Strategy 2040.

Parking

- 6.11 The parking provision on site has been indicated on the proposed layout (see submitted planning drawings). The existing parking provision on the site is 115 spaces and 8 cycle stands (16 spaces).
- 6.12 A 19-space expansion is proposed for the existing car park. Additionally, the proposal will add a further minibuss drop-off/ pick-up space where an existing car drop-off bay is located and as such, the net change to the number of staff and visitor parking is an increase in 19 spaces. Drop-off and pick-up arrangements will also operate as existing.
- 6.13 There are no changes to the access to the car park, which is currently from School Street. The proposed additional car park spaces will be an extension of the existing car park, as indicated on the proposed layout.
- 6.14 The present school operation of pupil drop off/ pickup will remain the same, along with the delivery and servicing access.
- 6.15 In terms of cycle provision, due to the nature of the development it is not envisaged that there would be significant demand for cycle spaces. This is due to the complex medical or behavioural needs of many of the school's pupils meaning that walking and cycling would not be safe, accessible or possible for the vast majority.
- 6.16 This level of parking is therefore in line with policy HT2/4 of the Bury UDP as well as being in accordance with the Greater Manchester Local Transport Plan in regard to accessibility.
- 6.17 Thus, the level of provision on site meets or exceeds the guidance of the local authority, which is in accordance with paragraph 104 of the NPPF.

Coal Mining

- 6.18 A Shallow Coal Mining Site Investigation Works report has been prepared by LK Group, to confirm the ground conditions below the site and allow an assessment of the potential for the site to be affected by shallow coal seams / workings.
- 6.19 The report concludes that the site is within a Development High Risk Area relating to probable shallow coal workings. The potential hazards were investigated, with the full results available within the report.
- 6.20 The conclusions within the report will need to be agreed with the Coal Authority's engineering department, the local authority and building control.

Geo-environmental Investigation

- 6.21 A Phase 2 Geo-environmental Investigation (GI), Risk Assessment and Remediation Strategy has been prepared by LK Group.
- 6.22 The report details the various risk assessments undertaken. Overall, the GI finds that the site is at low risk for majority of the risk assessments, with remediation work recommended in two areas of investigation.
- 6.23 Table 6.6 within the GI report provides further detail on this, with the specific recommendations available.

Biodiversity Report

- 6.24 A biodiversity report has been prepared by Blackfryers Consultants which considers the biodiversity implications of developing the site, following a site visit that was undertaken on 11th September.
- 6.25 The report confirms that the site does not have any statutory wildlife, landscape designations or Tree Preservation Orders. Though there are several SSSI and Local Nature Reserves in the general area, the closest is 2km from the site.
- 6.26 The report also confirms that badgers will not be affected by the school extension and the site does not contain suitable habitat for either Great Crested Newts or Voles. There is also no evidence of any invasive species on the site and it is not considered that any measures are needed in this respect.
- 6.27 In terms of Biodiversity Net Gain and mitigation, the current vegetation has extremely low biodiversity value, is in poor condition and has little connection to other habitats. It will be possible to deliver BNG within the confines of the site including planning landscaping.

The report also confirms that the extension, with associating landscaping, is likely to actually increase biodiversity overall.

Flood Risk Assessment

- 6.28 A Flood Risk Assessment (FRA) and Outline Drainage Strategy has been prepared by LK Consult in support of this application submission.
- 6.29 A detailed assessment of flood risk and comparison of topographical data with the EA modelled flood level data indicates that the whole site is in Flood Zone 1 – Very Low Risk of fluvial flooding.
- 6.30 It has also been demonstrated that safe pedestrian and vehicular access is possible under all conditions via the access road off School Street. The report also confirms that the risk of flooding at the site is low and flood resilience measures need not be included into ground floor construction.
- 6.31 This application is therefore in line with policy EN5 Flood Protection and Defence of the Bury UDP.

Noise Impact Assessment

- 6.32 The noise impact assessment will be provided during the validation process.

Crime Impact Statement

- 6.33 The Crime Impact Statement notes a number of positive aspects of the proposal that could contribute to the prevention and fear of crime. Importantly, the proposed development may provide the opportunity to include security features built into the design and construction of the extension. Furthermore, the proposed car park will be partially overlooked from within the building and from residential dwellings on the opposite site of School Street, aiding surveillance opportunities.
- 6.34 The report also provides a Physical Security checklist of recommendations for the development which includes features such as window locks, extension of any existing monitored alarm system to cover the proposed new classroom block and appropriately positioned lighting fixtures.

Conclusion

- 6.35 The technical reports have all been submitted as part of the planning application and can be read in full for further details. In conclusion, the supporting surveys and reports demonstrate that the proposed development is acceptable from a technical perspective

and that the proposals fully accord with national and local policies promoting sustainable development. Further to this, the site is in existing use as a school and the principle of use is established. The proposed development will deliver a high quality, modern education facility which will assist the Local Authority in providing the required SEN school places, in line with the Department for Education's 'Project Safety Valve'.

7 Conclusions

- 7.1 The current proposal represents a significant investment in MPSS by Bury Council and the Department for Education via the Safety Valve programme. The existing school has retained an Ofsted 'Outstanding' rating since 2007 and has won a significant number of awards.
- 7.2 The expansion of the facility will allow the school to increase its capacity and offer a high-quality service to more students that require specialist education within Bury. The expansion will represent an increase in 70 students, who will be supported not only by the 7 additional new classrooms and multi-purpose hall space, but also the existing facilities on the site including the hydrotherapy pool.
- 7.3 The principle of development has been established, with previous expansions to MPSS recognised as being compliant with the development plan and facilitating the improvement of economic, social and environmental conditions of the area.
- 7.4 The proposed developments will be constructed at the same time as the refurbishment of the existing building's roof, which is due to be completed in 2025 and for the start of the September 2025 term.
- 7.5 The proposed additional car parking spaces will be provided through the logical expansion of the existing car park and will support the necessary increase in staff as a result of the proposed development of 7 classrooms.
- 7.6 The proposed building will not face onto any residential properties and as such, the impact of the development on residential amenity is considered to be low. This position is confirmed by the suite of surveys, which also establish that there are no significant environmental impacts as well as no detriment to nearby residents.
- 7.7 In summary, from a planning policy perspective, the proposal accords with national and local policies promoting sustainable development, on an existing school site, to improve the provision of specialist education in the borough, with the principle of use established.
- 7.8 As a result, there is no reason why the planning application should not be determined positively and efficiently.