

Former Mondi Mill Paper Works Planning Statement

Eccleston Homes Limited

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1.0 Introduction

The Purpose of the Report

- 1.1 This planning statement has been prepared by Lichfields on behalf of our client Eccleston Homes Ltd [Eccleston Homes]. It accompanies a full application submitted in respect of the former Mondi Paper Mill, Ramsbottom, Bury. The purpose of this statement is to assist Bury Metropolitan Borough Council [the Council] in its consideration of a detailed planning application for:

“The erection of 72 dwellings including the retention and conversion of 2 existing buildings, the retention of a chimney and the demolition of a derelict building, together with engineering operations to create a development platform and associated parking, landscaping, drainage, the layout of internal estate roads and footways and other associated works.”

- 1.2 An application for a residential development comprising 83 no. dwellings (ref. 65217) was previously submitted to the Council in February 2020. However, due to issues raised during the applications consideration, most notably flood risk, the application was subsequently withdrawn. This revised scheme has been prepared to address the issues raised previously and is accompanied by additional and updated technical evidence.
- 1.3 Having regard to Section 70(2) of the Town and Country Planning Act 1990 and Section 38(6) of the Planning and Compulsory Purchase Act 2004, this statement considers the application’s conformity with the Development Plan, relevant national policy, as well as any other material considerations.
- 1.4 A full schedule of reports and drawings accompanying the application are listed in the cover letter.

Structure of the Report

- 1.5 The remainder of the report is structured as follows:
- Section 2.0 The Site and Surroundings
 - Section 3.0 Proposed Developments;
 - Section 4.0 Planning Policy Context;
 - Section 5.0 Main Planning Considerations;
 - Section 6.0 Other Considerations; and,
 - Section 7.0 Conclusions.

2.0 The Site & Surroundings

Site Location

- 2.1 The site is located in central Ramsbottom and is immediately bounded by Bridge Street to the north, the River Irwell to the east, Ramsbottom Cricket Club to the South, and the East Lancashire Railway Ramsbottom Station and associated heritage railway line to the west. The north-western most part of the site is located within the Ramsbottom Town Centre. The site is in a highly sustainable location with good access to public transport and within walking distance to a range of services and amenities including food stores (Morrisons, Tesco and Aldi), restaurants, pubs, cafes, takeaways, local shops, Post Office, doctors and dentist surgeries. Bus stops line Bridge Street to the north of the site and provide regular services to Bury, Manchester City Centre and Peel Brow.
- 2.2 The surrounding area is mixed in character. To the west of the site is Ramsbottom Town Centre comprising a range of shops and services. To the south is green space / sports provision including the Ramsbottom Cricket Club, Harry Williams Riverside Stadium and Nuttall Park. To the east is predominately residential separated by the River Irwell and some dense tree cover. To the north there are industrial units beyond Bridge Street, including a waste and recycling centre.

Site Description

- 2.3 The site is approximately 2.9 ha in size and is predominately flat. The site was previously occupied by the Mondi/Holcombe Paper Mill which was demolished in 2012. Retained buildings and structures include two 2-storey stone buildings, a brick building and brick chimney. Existing vehicular access to the site is from the existing unnamed road that adjoins Bridge Street. This access is also used by the Cricket Club.
- 2.4 The site is predominately located within Flood Zone 3 and party within Zones 1 and 2. The north-western most part of the site is included within the Ramsbottom Conservation Area. There are no Listed Buildings on the site or trees subject to a Tree Preservation Order.

Planning History

- 2.5 The application site has been the subject of a number of planning applications relating to its former employment use, none of which are of direct relevance to the proposed development.
- 2.6 In 2012, planning permission (ref. 54265) was granted for the demolition of buildings on the site. In 2015, planning permission was also granted for the demolition of the top 15 metres of the former Mondi Mill chimney. We understand that these permissions have been implemented.
- 2.7 Of most relevance is the previous application for a residential development on the site which was submitted to the Council on 13 February 2020 (ref. 65217). This application sought full planning permission for 83 dwellings on the site. However, due to issues raised during the applications consideration, most notably flood risk, the application was subsequently withdrawn.

3.0 The Proposed Development

Description of Development

- 3.1 This planning application seeks full planning permission for a revised scheme. As such this application seeks full planning permission for:

“The erection of 72 dwellings including the retention and conversion of 2 existing buildings, the retention of a chimney and the demolition of a derelict building, together with engineering operations to create a development platform and associated parking, landscaping, drainage, the layout of internal estate roads and footways and other associated works.”

Proposed Development

- 3.2 The application seeks full planning permission for the erection of 72 dwellings comprising 5 one-bed apartments, 14 two-bed apartments, 2 two-bed dwelling, 22 three-bed dwellings, and 29 four-bed dwellings. There are several different house types across the application site but remain similar in terms of materials and design providing a mix of apartments, semi-detached and detached dwellings. This provides variation and provokes interest providing enhanced legibility within the site.
- 3.3 The development will be accessed off the existing unnamed road that provides access into the former Mondi Mill site and the Cricket Club to the south. This road, and its junction with Bridge Street which abuts the site to the north, will be improved. An improved junction will be formed with this existing road to connect to new internal estate roads within the site. These will provide a series of cul-de-sac roads leading to shared accessways. An emergency access will be provided onto Bridge Street. The proposed dwellings are then accessed directly from the existing unamend road and the internal estate roads. No access is taken directly off Bridge Street to serve individual dwellings. Overall, dwellings are set back from the roads with a front garden and driveway area to the front or side of the dwelling. Dwellings are proposed to address street corners and enhance natural surveillance throughout the development. The dwellings have also been orientated to ensure that there is no unacceptable means of overlooking in relation to privacy to both existing and proposed dwellings. Each dwelling is proposed with a front and rear garden and 2 car parking spaces either to the front or side of the respective unit. All properties are provided with designated areas for storage of waste and recycling bins.
- 3.4 The proposals include two apartment blocks located at the south of the site comprising 16 one and two-bed apartments. The proposals also include the retention of two buildings on the site which are proposed to be refurbished for use as residential dwellings. Building A will be converted into a one-bed apartment and 2 two-bed apartments. Each apartment has its own entrance way. Building B will be converted into 2 semi-detached dwellings. The proposals also include the retention of the existing brick chimney. A further building (Building C) will be demolished as part of the proposals. This is due to it being in a state of disrepair that makes its retention unachievable.
- 3.5 All dwellings will be constructed from Marshalls Cromwell Stone Walling which has been carefully selected to respond positively to the Ramsbottom Conservation Area.
- 3.6 The scheme has been designed to include an area of Public Open Space [POS] (approximately 0.6 ha), as well as incorporating an attractive landscaping scheme. The roads have been designed to maintain vehicular access to the cricket club. The existing road unnamed road will be widened to 5.5m with 2m footpath.

Pre-application Engagement

- 3.7 The Applicant participated in an extensive programme of pre-application engagement with the Council and other statutory consultees prior to the submission of the original application and during its consideration.
- 3.8 This provided an important opportunity to engage with the Council and key stakeholders to ensure that the Applicant's proposals were consistent with the local planning policy and to gather feedback. This process raised a number of issues and concerns which have been fully addressed within the revised submission.

4.0 Planning Policy Context

Introduction

- 4.1 Section 70(2) of the Town and Country Planning Act 1990 and Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that planning applications should be determined in accordance with the Development Plan unless material considerations indicate otherwise.

National Planning Policy Framework

- 4.2 A revised National Planning Policy Framework [the Framework] was published in February 2019 by the Ministry of Housing, Communities and Local Government [MHCLG]. The overarching aim of the Framework is to proactively deliver sustainable development to support the Government's economic growth objectives.
- 4.3 The Framework (paragraphs 8 & 9) identifies three overarching dimensions to achieving sustainable development: economic, social and environmental. These dimensions are interdependent, and gains need to be pursued in mutually supportive ways. The economic objective is to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure.
- 4.4 Paragraph 11 states that *"plans and decisions should apply a presumption in favour of sustainable development"* and for decision-taking this means *"where policies which are most important for determining the application are out of date, granting permission unless any adverse impact of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies in this Framework as a whole"*.
- 4.5 Chapter 5 of the Framework relates to housing, and of particular note is Paragraph 59 that identifies a need to boost the supply of housing significantly. Paragraph 117 states that planning decisions should promote an effective use of land in meeting the needs for homes. It also sets out that policy should set out a clear strategy for accommodating objectively assessed needs in a way that makes as much use as possible of previously developed land.
- 4.6 Paragraph 118(c) of the Framework states that decisions should:

"give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs".
- 4.7 Paragraph 120 states that planning policies and decision should be informed by regular reviews of both the land allocated for development in plans and of land availability. Where the local planning authority considers that there is no reasonable prospect of an application coming forward for the use allocated, applications for alternative uses on the land should be supported where the proposed use would contribute to meeting an unmet need for development in the area.

Planning Practice Guidance

- 4.8 On 29 November 2016, the Government published the Planning Practice Guidance [PPG]. This was updated most recently on 1 October 2019.
- 4.9 The PPG includes sections relevant to the consideration of planning applications (Section 21b), the use of planning conditions (Section 21a), and planning obligations (Section 23b). It also includes advice on specific topic areas including the flood risk and coastal change (Section 7)

natural environment (Section 8), design (Section 26), noise (Section 30), air quality (Section 32), contamination (Section 33) and open space (Section 37), and viability (Section 10) amongst other matters. These sections are not repeated here but are referred to below as appropriate in the consideration of the proposed development.

Local Policy

4.10 Bury Council's Development Plan consist of the following Development Plan Documents [DPD]:

- Bury Unitary Development Plan adopted in 1997 [the UDP];
- Greater Manchester Joint Waste DPD adopted in 2012; and,
- Greater Manchester Joint Minerals DPD adopted in 2013.

Bury Unitary Development Plan

4.11 The most pertinent UDP policies to the consideration of this application are:

- **UDP Policy EC2/1/1 (Employment Generating Areas)** identifies the site as an Employment Generating Area. The policy sets out that the Council will only allow development for the Business (B1), General Industrial (B2), Warehousing (B8) and Leisure and Tourism Uses. Other uses will only be permitted where they constitute limited development or do not substantially detract from an area's value as an Employment Generating Area.
- **UDP Policy H1/2 (Further Housing Development)** sets out criteria for assessing proposals for housing development which is not identified on the Proposals Map.
- **UDP Policy EN5/1 (New Development and Flood Risk)** sets out that development will not be permitted where the development would be at risk from flooding, would be likely to increase the risk of flooding elsewhere, or would adversely affect river flood defences.

4.12 Other policies of relevance to this application are as follows:

- UDP Policy H2/1 - The Form of New Residential Development;
- UDP Policy H2/2 - The Layout of New Residential Development;
- UDP Policy H4/1 - Affordable Housing;
- UDP Policy EN1/1 - Visual Amenity;
- UDP Policy EN1/2 - Townscape and Built Design;
- UDP Policy EN1/5 - Crime Prevention;
- UDP Policy EN6/3 - Features of Ecological Value;
- UDP Policy EN6/4 - Wildlife Links and Corridors;
- UDP Policy EN7/1 - Atmospheric Pollution;
- UDP Policy EN7/2 - Noise Pollution;
- UDP Policy EN7/3 - Water Pollution;
- UDP Policy EN9 – Landscape;
- UDP Policy OL5/2 - River Valleys;
- UDP Policy OL5/3 - Riverside and Canalside Development in Urban Areas;
- UDP Policy RT2/2 - Recreation Provision in New Housing Development; and,
- UDP Policy HT5/1 - Access for Those with Special Needs.

Supplementary Planning Documents and Guidance

- 4.13 The following supplementary planning documents [SPD] are relevant to the application:
- SPD 1 (Open Space, Sport and Recreation Provision in New Housing Development);
 - SPD 7 (Managing the supply of housing land in Bury);
 - SPD 11 (Parking Standards in Bury);
 - SPD 14 (Employment Land and Premises); and,
 - SPD 16 (Design and Laying Out of New Development).
- 4.14 Supplementary Planning Guidance [SPG] 2 (Wildlife Links and Corridors) and 5 (Affordable Housing Provision) are also of relevance to the proposals.

Emerging Policy

Greater Manchester Spatial Framework

- 4.15 The Greater Manchester Spatial Framework [GMSF] intends to set out how Greater Manchester should develop up to the year 2037 and identify the amount of new development that will come forward across the 10 districts in terms of housing, offices, and industry and warehousing, and the main areas in which this will be focused. In January 2019, the revised draft GMSF was published for consultation. The GMSF does not address this site as it is already in the existing Development Plan. A further consultation is expected to take place in October / November 2020, following delays including as a result of COVID-19.
- 4.16 Whilst the revised draft continues as an emerging joint development plan document, the Greater Manchester Combined Authority [GMCA] has previously stated an intention to eventually convert the plan to a Spatial Development Strategy [SDS]. Whilst its content and future form is uncertain it can only be afforded very limited weight in decision making.

Bury Local Plan

- 4.17 The Council commenced work on a new Local Plan in March 2015 following the withdrawal of the Core Strategy. The Issues and Options consultation took place in October 2018. However, the next consultation is delayed pending progress on the GMSF.

Other Material Considerations

Strategic Housing Land Availability Assessment 2018

- 4.18 The Council's 2018 Strategic Housing Land Availability Assessment [SHLAA] categorises the former Mondi Mill site (ref. HL/2519/00) as having 'unconstrained potential' for residential development and suggests it could deliver 60 units within 5-10 years.

Five Year Housing Land Supply

- 4.19 The Council's 2018 Five Year Supply Statement acknowledges that the Council cannot demonstrate a five-year housing land supply [5YHLS] based on the local housing need figure.

Housing Delivery Test

- 4.20 The Council is required to prepare an Action Plan and apply a 20% land buffer following the latest Housing Delivery Test results (2019).

5.0

Main Planning Considerations

5.1

This section deals with the planning issues pertinent to the consideration of this application.

5.2

In all respects, the starting point for the assessment is compliance with the Development Plan (in accordance with Section 70(2) of the Town and Country Planning Act 1990 and Section 38(6) of the Planning and Compulsory Purchase Act (2004), followed by consideration against other material planning considerations.

5.3

In this instance, the main planning considerations are considered to be the principle of residential development on an area designated as 'employment generating', flood risk & drainage matters and heritage & design matters. These issues are addressed in this section of the report, with all other planning considerations addressed in the following section.

Principle of Development

5.4

The application proposals are for a residential development on a site that is identified as an 'employment generating area' within the UDP. Policy EC2/1 states that other uses will only be permitted where they constitute limited development or do not substantially detract from an area's value as an Employment Generating Area [EGA]. However, whilst the existing designation and thus, the loss of employment land is relevant, there is a strong rationale to support the lands use for a residential development which is set out below.

5.5

Firstly, it is important to note that the weight that should be given to the policies within the UDP now has to be determined having regard to the Framework. This is especially the case in the light of the absence of a 5YHLS where paragraph 11 which sets out a mechanism at (d) if the most important policies for determining the application are out of date. In this instance Policy EC2/1 which designates the site as an EGA, is clearly an important policy.

5.6

The fact of the matter is, none of the policies within the UDP can be considered up-to-date as they are time-expired. The plan was adopted in 1997 and is now considerably aged. In fact, the policies in the plan only addressed housing and employment needs up until 2001 and since this period elapsed, limited meaningful progress has been made in producing a new Local Plan. Recently, this process has been delayed further as a result of the ongoing delays associated with the GMSF.

5.7

The Council has not reviewed its policies for the protection of employment land in a development plan context since the UDP was adopted in 1997. That was over 20 years ago. Whilst it previously progressed with the preparation of a Core Strategy, this was subsequently abandoned, and the preparation of a new Local Plan is now on hold in light of the GMSF process.

5.8

In the time following the sites designation and the subsequent demolition of the majority of the structures, the site has been marketed extensively for employment, as well as other commercial uses. Further details of the marketing undertaken, and the interests of expression received are set out within the accompanying Marketing Report prepared by Lambert Smith Hampton [lsh].

5.9

In short, since the current landowner purchased the site in 2010, there has never been any interest in the site for employment uses. There has however been interest from a range of convenience goods retailers, notably Tesco and Sainsbury's. However, nothing ever came to fruition. This can be largely attributed to the over-saturation of convenience goods provision in Ramsbottom which resulted in both a lack of demand and an inability to meet the sequential and impact tests given the sites edge of centre location.

- 5.10 To date, and since the original submission in January 2020 nothing has changed and there remains no interest in the site for employment uses. This is effectively due to the significant constraints posed by the requirement to create the development platform which means that only a higher value land use such as residential development is viable for the site.
- 5.11 In relation to the significant flood risk issues associated with the site, the Council has taken a broader view elsewhere in relation to the adopted planning policies for employment where a site plays an important role in the contribution to flood risk considerations. There is no reason why this site should be treated any differently and a pragmatic approach should be taken. Especially given the fact that the adoption of the UDP pre-dates these considerations.
- 5.12 The Framework [§120] is clear that planning policies and decisions need to reflect changes in the demand for land. They should be informed by regular reviews of both the land allocated for development in plans, and of land availability. It goes on to state that in the interim prior to updating a plan (the situation in Bury at present), applications for alternative uses on the land should be supported, where the proposed use would contribute to meeting an unmet need for development in the area.
- 5.13 At present, Bury can demonstrate at best a 2.7-year housing land supply as demonstrated in their Housing Land Supply Statement (2018). This is the most generous assessment which assumes only a 5% buffer. We have not undertaken a detailed assessment as part of this application but there is no evidence to suggest that this position has changed significantly. In respect of the Housing Delivery Test [HDT], it should also be noted that the Council is required to prepare an Action Plan and apply a 20% land buffer following the latest results for 2019.
- 5.14 It is clear that Bury suffers from a chronic shortfall of housing sites and has persistently under delivered against its housing requirement. Furthermore, application site is a derelict brownfield site that has lain vacant for over 10 years. The application proposals will facilitate the regeneration of this site and deliver sustainable development in accordance with the requirement to take a 'brownfield first' approach to meeting housing needs. The Framework [§118(c)] states that; planning policies and decisions should give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land. The application proposals fully respond to this principle and substantial weight should be given to fact. Furthermore, it has been clearly demonstrated that a residential development is the only viable use for the site.
- 5.15 As such, in accordance with the Framework [§120], this application for alternative use on the land should be supported on the basis that it would contribute, in this instance significantly to meeting an unmet need for development in the area.

Conclusions on the Principle of Development

- 5.16 The UDP is now considerably dated and cannot be relied upon as a robust policy framework. This is particularly relevant for matters relating to housing and employment need which have not been reviewed since 2001. The sites designation as an 'employment generating area' is clearly outdated given that the site has now not generated employment for at least 10 years.
- 5.17 Finally, the Council is unable to demonstrate a 5-year housing land supply and also fails the HDT. The lack of 5-year supply of housing triggers a presumption in favour of sustainable development that exists in the Framework [§11].
- 5.18 It is therefore concluded that the principle for a residential development on the site is clearly established due to both the lack of any policy conflict with an up-to-date plan and the substantial weight that should be attributed to using brownfield land within settlements for

homes. The proposals will contribute significantly to addressing Bury's chronic shortfall in housing delivery and provide much needed family homes and in this context, the application should be approved.

Flood Risk & Drainage

- 5.19 This application is accompanied by a Flood Risk Assessment [FRA] and Drainage Assessment [DA] prepared by Weetwood. The site is located predominately within Flood Zone 3, with smaller areas located within Flood Zones 1 and 2. With regards to the sequential and exception tests, the application is accompanied by a Flood Risk Sequential and Exception Test Assessment which demonstrates both that there is no sequentially preferable location outwith Flood Zone 2 or 3 where the development could be located and that the application proposals pass the Exception Test.
- 5.20 During the consideration of the previous application, the Council raised concerns around both the FRA's compliance with the requirements for site specific flood risk assessments (as set out within the PPG) and the application proposals ability to demonstrate that the development would not increase flood risk elsewhere. These issues are addressed in full within the revised FRA, which fully complies with the PPG guidance and demonstrates that the application proposals will not impact flood risk elsewhere.
- 5.21 In order to ensure that the proposed dwellings will not be at risk from flooding, at the same time as ensuring that flood risk will not be increased elsewhere, a range of mitigation measures are proposed that are summarised below:
- 1 30 m wide flood relief channel to be provided along the eastern boundary of the site;
 - 2 Remove existing boundary walls along the northern boundary of the site;
 - 3 Lower ground levels directly east of the site access to direct floodwater towards the mill race;
 - 4 Upgrade the existing 600 mm diameter culvert crossing the site with a 2000 x 1200 mm culvert;
 - 5 Raise the proposed development platform above the peak 1:1000 AEP flood levels;
 - 6 Raise the proposed development plots above the peak 1:100 (+70%) AEP flood levels whilst routing floodwater along the site access roads;
 - 7 Raise finished floor levels of the newly constructed residential dwellings a minimum of 0.15 m above finished development platform levels;
 - 8 Raise finished floor levels of the refurbished residential dwellings above the peak 1:100 (+35%) AEP flood levels; and,
 - 9 Prepare a Flood Plan in consultation with Bury Council emergency planning team.
- 5.22 Most notably, the extensive engineering operations to raise the ground levels will provide substantial benefits to the area in terms of flood protection to surrounding properties. Further details can be found in the FRA.
- 5.23 In terms of drainage, surface water will be discharged to the existing mill race on the site, with the discharge rate restricted to a maximum of 70% of the existing 1:1 annual probability impermeable runoff rate.
- 5.24 Attenuation storage will be provided within the proposed pipe network, with the disused mill race, which will essentially act as a swale providing attenuation, water quality benefits and ecological value in normal conditions.

- 5.25 Overall, we consider that the proposals are in accordance with UDP Policy EN5/1 (New Development and Flood Risk) which sets out that it will not permit new development where it would be at risk from flooding and would likely risk flooding elsewhere.

Heritage & Conservation

- 5.26 The application site sits to the south and east (and is partially located within) the Ramsbottom Conservation Area. The two existing buildings proposed for retention and the chimney structure are all located within the Conservation Area.
- 5.27 During the consideration of the previous application, a number of concerns were raised in relation to the proposals impacts on the Conservation Area. The revised submission is accompanied by a Heritage Impact Assessment [HIA] which fully addresses these issues and fully assess the significance of the Conservation Area and the impact of the proposals on that significance. Further details are provided within the accompanying HIA.
- 5.28 The HIA establishes that the proposed development will preserve and enhance the character of Ramsbottom Conservation Area, representing an improvement to both this part of the Conservation Area as well as its setting.
- 5.29 The assessment also considered the impacts on the currently derelict non-designated heritage assets (Buildings A & B and the chimney structure) which are proposed for conversion (and retention in the case of the chimney structure). It is concluded that the proposed refurbishment of buildings and structures associated with the former Mondi Mill will improve their aesthetic value and have a neutral effect on their illustrative value. Their significance will therefore be preserved and enhanced as a result of the application proposals. Likewise, important views of the surviving chimney structure will be preserved.
- 5.30 The updated HIA is considered to clearly demonstrate how the development respects the surrounding landscape and is appropriate to its setting. There is no detrimental impact arising from the development on the setting of the Ramsbottom Conservation Area or the existing non-designate heritage assets that will be retained and enhanced as part of the proposals. As such, the proposals are considered to fully accord with Policy EN2 of the UDP.

6.0

Other Planning Considerations

Layout and Design

- 6.1 This application is accompanied by a Design and Access Statement [DAS] prepared by Eccleston Homes in accordance with local and national policy.
- 6.2 The statement provides a detailed justification of the layout, scale, appearance, access and landscaping of the proposed development and demonstrates how the proposals accord with local and national policy and guidance.
- 6.3 The design of the scheme has been heavily influenced by a number of constraints across the site including flood risk, proximity to the River Irwell and its location within the Ramsbottom Conservation Area. Pre-application discussions and comments received during the consideration of the previous application (ref. 65217) have also guided the final design.
- 6.4 As set out previously, the River Irwell sits to the immediate east of the site. As such, the site is partly located within flood zones 2 and 3. The Council's adopted policy map shows that part of the east of the site lies within a River Valley area. UDP Policy OL5/2 (Development in River Valleys) lists the exemptions where new development within the River Valleys will be considered acceptable. The policy states that the development will be permitted if it does not lead to the division of the open parts of the valleys into sections and it falls within the terms below:
- a *where the area is designated as Green Belt the established Green Belt policies will apply; **or***
 - b *where the area does not form part of the Green Belt, at least **one** of the following circumstances is met:*
 - i *that the development represents limited infilling to an established valley settlement or industrial area;*
 - ii *that it is an extension to, or renewal of an existing industry, where the economic and employment factors are of overriding importance;*
 - iii *that the development is required in association with an outdoor recreation or appropriate tourist facility;*
 - iv *that the development is limited and will form part of, and be essential to, the maintenance of the provision and improvement of public services and utilities;*
 - v *any other development that would be appropriate in a Green Belt.*
- 6.5 The proposals are not located within the Green Belt. As such, it is considered that the development falls within part b (i) of the above. Indeed, the proposals are for the redevelopment of a brownfield site that has been vacant for an extended period of time. There are strong, defensible boundaries to the north, east, south and west of the site. As such, the development is unlikely to encroach any further beyond the current site boundaries.
- 6.6 Notwithstanding this, as shown on the accompanying layout plan, there are extensive areas of proposed Public Open Space [POS] on the north west and eastern portions of the site. The POS area to the east is designed to be a buffer between the River Irwell and the residential dwellings. Indeed, it is designed to flood in extreme events. There area of development is therefore outside the prescribed River Valley area. It is therefore considered that the proposed scheme represents limited infilling to an established settlement and is in accordance with UDP Policy OL5/2.
- 6.7 In terms of the wider layout proposals, the development will be accessed off Bridge Street to the north of the site via the existing unmade road that runs along the western edge of the side. This

will provide access into the site via a series of cul-de-sac roads leading to shared accessways. An emergency access will be provided through the site onto Bridge Street. Use of this by future residents will be prevented by bollards or an appropriate form of access control, however it will be available to emergency services if the main site access were to be blocked.

- 6.8 The proposed dwellings are set back from the road with a front garden and driveway area. This reflects the character of the residential area to the east, providing a transition from the dense urban grain of the centre to the west. It also reflects its river corridor location which means the need for the creation of green and open space in the development to enable the management of flood risk. Dwellings are proposed to address street corners, providing dual aspect where appropriate, providing natural surveillance to public spaces throughout the development.
- 6.9 Overall, the DAS demonstrates that the proposed scheme is appropriate in its context and the development of the site for a residential scheme.

Residential Amenity

- 6.10 The development has been designed to provide a high level of amenity to future residents. Appropriate interface distances have been achieved through suitable design to ensure that adequate levels of privacy and amenity for occupiers of new and existing neighbouring properties are maintained.
- 6.11 During the consideration of the previous application (ref. 65217), the Council raised concern with a number of interface distances across the site. As such, this resubmission is accompanied by a Privacy Distances Plan (ref. 102-1). This plan details the interface distances across the development. The plan demonstrates that the proposed development is in line with the UDP Policy H2/2 (The Layout of New Residential Development).
- 6.12 The appropriate boundary treatments will be implemented in order to ensure mitigation for ensuring good residential amenity by reducing overlooking and maintaining privacy between the dwellings. Defensible private space has also been created to ensure that future residents have an appropriate level of amenity space associated with each dwelling. The dwellings have also been orientated to ensure that there is no unacceptable means of overlooking in relation to privacy to both to existing and proposed dwellings.
- 6.13 The high-quality design and landscape scheme provides an attractive development. Private amenity space is provided within the proposed area of POS, and throughout the development in the form of street tree planting, and rear gardens to dwellings.

Trees and Landscaping

- 6.14 This application is accompanied by an Arboricultural Impact Assessment [AIA] and planting plans, both prepared by Ascerta.
- 6.15 The AIA sets out that in order to facilitate the development, just 4 trees and part of 2 trees will need to be removed. Compensation for the loss of trees and the impact on canopy cover can be provided by way of planting new trees. Temporary protective fencing will also be installed in accordance with the 'Tree Constraints and Draft Protection Drawing' appended to the assessment. As such, the report concludes that on the basis of the proposed works, and the installation of the protective fencing, they do not consider the production of an Arboricultural Method Statement necessary.
- 6.16 As set out on the accompanying planting plans, the scheme involves high quality landscaping that will contribute towards mitigating the loss of the trees set out above. Indeed, extensive areas of POS including native planting are located to the north west and east of the site. The area

is designed to flood in extreme events and is also fitting with the riverside location. Each dwelling will also be afforded with front and back gardens. It is also proposed to provide tree lined streets, alongside a mix of native hedgerow planting and ornamental shrub planting. There will also be an area of wildflower grassland to the south of the site.

- 6.17 We therefore consider that the loss of trees required to develop the site will be appropriately mitigated by the trees proposed to be planted on the site. Overall, we therefore consider that the development is in complete accordance with UDP Policy EN8 (Woodland and Trees) which seeks to support replacement tree planting within the borough and Policy EN1/3 (Landscaping Provision) which requires development proposals to provide open space and landscaping to the Council's satisfaction.

Highways

- 6.18 This application is accompanied by a Transport Assessment [TA] prepared by SCP. As set out in the TA, comments were received during the pre-application stage of the previous proposals concerning highways. The Council raised concerns with the internal roads being proposed for adoption. Comments from Transport for Greater Manchester [TfGM] were also received during the consideration of application ref. 65217, before it was withdrawn. These are summarised as follows:

- A contribution of up to a maximum of £110,000 has been request towards the implementation of MOVA signal control at the Bury New Road / Manchester Road junction;
- The base trip distribution data for review;
- A review of the Traffic Regulation Orders (TROs) in the vicinity of the site should be undertaken; and,
- A review of the local bus stops and pedestrian/cycle routes, the reinstatement of redundant vehicle access points, tactile paving at the proposed access and provision of footways throughout the site.

- 6.19 The revised TA has sought to address the comments received to date. Indeed, as set out in the TA, the applicant no longer seeks for the internal estate roads to be adopted. They are proposed to remain in private ownership and maintained by a management company. As such, the previous issues raised during the pre-application process and during the consideration of the previous application concerning the adoption of the roads have been resolved.

- 6.20 Furthermore, the TA states that the site is considered to be well located in terms of its accessibility by all the major non-car modes of transport. The report demonstrates that the site access has sufficient spare capacity to accommodate the proposed development and the development will not have a material impact on the operation of the off-site junctions.

- 6.21 Matters relating to the requested financial contribution are addressed within the subsequent Planning Obligations section of this Planning Statement.

- 6.22 As such, the TA concludes that there are no highway or transport related reasons to withhold planning permission for the scheme. We therefore consider that the proposals are in full accordance with UDP Policies HT 2 (Highway Network) and HT6 (Pedestrians and Cyclists) which seeks to improve road safety and provide facilities for pedestrians and cyclists.

Parking

- 6.23 SPD 11 sets out the parking standards for each type of development across Bury.

- 6.24 For dwellings, the maximum provision of parking is dependent on whether the site is located within the defined area of high accessibility. Appendix 1 of the SPD is a map of the defined high accessibility areas within Bury. From a review of this map, it is understood that the site sits within an area of high accessibility. As such, the guidance states that for 1 parking space is required for 1 beds, 1.5 spaces in required for 2 beds, 2 parking spaces is required for 3 beds and 3 parking spaces is required for 4 beds and above. For apartment blocks, 1 space per 5 dwellings is required (with a minimum of 4 spaces).
- 6.25 As confirmed within the accompanying TA, the proposed development provides a level of parking in accordance with the Council's 'high accessibility' maximum parking standards, with parking provided in the vicinity of each residential dwelling as well as in a parking court for the apartments at the southern end of the site.
- 6.26 As such, it is considered that the proposed development is in accordance with the Council's parking standards set out in SPD 11.

Ecology

- 6.27 This application is accompanied by a Preliminary Ecological Appraisal (dated August 2019), Invasive Species Method Statement (dated October 2019), Report on Otter, Water Vole and White-Clawed Crayfish Surveys (dated January 2020), a Bat Roost Assessment (dated March 2020) and a Bat Nocturnal Survey (dated May 2020), all prepared by Ascerta.
- 6.28 The Preliminary Ecological Appraisal [PEA] concludes that the loss of habitats can be mitigated for and the proposals will not adversely affect the ecological value of the wider area, provided that the recommendations detailed in the report are followed. Furthermore, the report on Otter, Water Vole and White-Clawed Crayfish Surveys concludes that the white clawed crayfish are not present in the sections of flowing water surveyed. In addition, it was concluded that otter and water vole are not currently using habitats on the site. As such, there would be very limited impact on the local ecology as a result of the proposals
- 6.29 During the consideration of application ref. 65217, the Council raised a number of ecological related issues with the proposed scheme. These were namely associated with the bat survey, the protection of the River Irwell and the schemes ability in contributing to and enhancing the natural environment.

Bat Surveys

- 6.30 With regards to the Bat Surveys, the Council noted that the three remaining buildings on site and the chimney were not surveyed because of health and safety issues associated with the chimney. As such, it was advised that the developer enable access for the ecological consultants, under the supervision if necessary. It was also raised that there was one tree with moderate bat roosting potential. Further information regarding this tree was requested. To address these comments, the application is accompanied by a Bat Roost Assessment (dated March 2020) and a Bat Nocturnal Survey (dated May 2020).
- 6.31 For both of these reports, all the buildings on the site were subject to a preliminary search externally due to health and safety concerns. However, close focusing binoculars were also used where appropriate to search for signs of bats. It should be noted that, as the accompanying Structural Survey confirms, each of the 3 buildings on site currently have restricted access due to their condition. In particular, building 3 is considered to be derelict and not safe to enter.
- 6.32 As set out in the nocturnal bat survey, building B1 (building A on the site layout plan) and the chimney were considered to have low bat roost potential. In addition, buildings B2 and B3 (buildings B and C on the site layout plan) had moderate bat roost potential.

- 6.33 Overall, the site is considered to be of low value for bats, as a small number of bats used the site for foraging or commuting. The activity was mainly concentrated over the scrub habitat and watercourse to the north west of building B3. As set out previously, it is proposed to demolish building B3 (i.e. Building C) in order facilitate the proposals. However, the report concludes that works to the building can proceed without being detrimental to maintenance of the local bat population.
- 6.34 As such, both the separate bat reports conclude that there would be very limited impact on the local ecology as a result of the proposals, subject to the inclusion of a number of ecological enhancements. It is therefore considered that the Council's previous concerns regarding the bat survey's have been met.

Protection of the River Irwell

- 6.35 As set out above, the Council previously raised concerns over the protection of the River Irwell during the consideration of the previous application (ref. 65217). It was recommended that a Water Framework Directive [WFD] Assessment for the development and its potential impacts on the River Irwell be submitted. A WFD Assessment is in the process of being prepared and will follow shortly after the application is submitted. As such, it is considered that the Council's requirements will be met during the course of the application.

Contributing to and Enhancing the Natural Environment

- 6.36 During the consideration of application ref. 65217, the Council also asked for more information on landscaping to ensure increase in biodiversity can be met on site. As set out previously, the proposals are accompanied by a planting plans, prepared by Ascerta.
- 6.37 As set out on the planting plans, the scheme involves high quality landscaping. Indeed, extensive areas of POS including native planting are located to the north west and east of the site. The area is designed to flood in extreme events and is also fitting with the riverside location. Each dwelling will also be afforded with front and back gardens. It is also proposed to provide tree lined streets, alongside a mix of native hedgerow planting and ornamental shrub planting throughout the development. There will also be an area of wildflower grassland to the south of the site.
- 6.38 As such, it is considered that the Council's previous concerns regarding landscaping have been addressed in the revised submission. In addition to these site-specific concerns, it is also considered that the proposals are in full accordance with UDP Policies EN6/2 (Sites of Nature Conservation Interest) and EN6/4 (Wildlife Links and Corridors) which seek to mitigate any impact on Sites of Biological Importance and strengthen wildlife links and corridors.

Noise

- 6.39 The application is accompanied by a Noise & Vibration Impact Assessment prepared by Ensafe (formerly REC). The report makes recommendations for mitigation measures and demonstrates that all future residents will be adequately protected. Landscape buffering, appropriate boundary treatment and appropriate interface distances has been incorporated into the design to mitigate against any impact.
- 6.40 A number of acoustic barriers have been incorporated into the schemes design in order to ensure that no adverse effects arise from existing noise sources. These are provided in the following locations:
- 1.8m barrier around the garden area attached to plots 8 and 21;
 - 2.4m barriers on the western boundaries of plots 2–7 and 43–51; and,

2.4m barriers on the southern boundaries of plots 7 and 51.

- 6.41 Additional ventilation measures are also required for a number of units, full detailed of which are set out within the accompanying report.
- 6.42 Appropriate interface distances have been achieved through suitable design to ensure that adequate levels of privacy and amenity for occupiers of new and existing neighbouring properties are maintained in line with UDP Policy H2/2 (The Layout of New Residential Development). The appropriate boundary treatments will be implemented in order to ensure mitigation for ensuring good residential amenity by reducing overlooking and maintaining privacy between the dwellings.
- 6.43 We therefore consider that the application is in full accordance with UDP Policy EN7/2 (Noise Pollution) which seeks to refuse applications which would result in unacceptable noise levels for nearby occupiers or the amenity of proposed users.

Air Quality

- 6.44 This application is accompanied by an Air Quality Assessment [AQA] prepared by Ensaf. It is understood that the Council did not provide any comments or raise concerns with regards to the impact of the proposals on air quality when considering application ref. 65217.
- 6.45 The AQA sets out the proposals potential to cause air quality impacts at sensitive locations during the construction and operational phases of the development, in accordance with IAQM Guidance.
- 6.46 The AQA sets out that assuming good practice dust control measures are implemented, the residual significance of potential air quality impacts from dust generated by demolition, earthworks, construction and trackout activities is predicted to be negligible.
- 6.47 Traffic generated gases (NO₂, PM₁₀ and PM₂₅ concentrations) are predicted to be not significant at the sensitive receptors. Overall, the air quality impacts as a result of the operation of the development were considered to be not significant, in accordance with the IAQM guidance.
- 6.48 We therefore consider that the application is in full accordance with UDP Policy EN7/1 (Atmospheric Pollution) which seeks to refuse applications which would result in unacceptable levels of atmospheric pollution.

Crime Impact

- 6.49 This application is accompanied by a Crime Impact Statement [CIS] prepared by Paul Martin, independent crime prevention design consultant. The CIS sets out how the proposals have reduced its impact on and susceptibility to crime and disorder. The CIS also sets out recommendations for security such as: perimeter security / boundary treatments, carefully designed layout and landscaping, good lighting and security systems (i.e. intruder alarms).
- 6.50 Overall, the proposals represent a high-quality design which creates a sense of place and maximises natural surveillance opportunities. The statement concludes that all reasonable efforts to mitigate and discourage crime have been embedded within the schemes design and that the application proposals are consistent with the current principles of the Framework and has adopted the principles of Secured by Design.
- 6.51 We therefore consider that the proposals are in full accordance with UDP Policy EN1/5 (Crime Prevention) which encourages design which discourages crime. This includes through the

creation of opportunities for natural surveillance, design of landscaping and the creation of defensible space.

Contamination

- 6.52 This application is accompanied by a Ground Investigation Report prepared by BETTS GEO. It is understood that the Council did raise concerns with regards to contamination when considering application ref. 65217.
- 6.53 The report concludes that there is a low to moderate risk for ground gas and contamination exists across the site. It is advised that some remedial action may be necessary at the site, however, the likes of which cannot be confirmed until the geotechnical and contamination ground investigation has been completed.
- 6.54 We therefore consider that the proposals are in accordance with UDP Policy EN7 (Pollution Control) which seeks to minimise pollution in conformity with legislation and prescribed standards.

Archaeology

- 6.55 This application is accompanied by a Historic Environment Desk-Based and Buildings Assessment [HEDBA] prepared by Archaeological Research Services.
- 6.56 The HEDBA confirms that buildings A and B and are all included within the Ramsbottom Conservation Area boundary. The assessment notes that the Council advised these structures should be re-used as part of any new development of the site. The report agrees within this recommendation. It is therefore recommended that a structural survey is carried out of buildings A and B.
- 6.57 As set out previously, it is proposed to retain buildings A and B. They are to be refurbished for use as residential dwellings. As such, the proposals are in line with both the Council and the archaeology assessment recommendations. Furthermore, in line with the assessment recommendations outlined above, this application is accompanied by a structural survey. The survey assessed of each of the existing buildings on the site.
- 6.58 The archaeology assessment also notes that the Council advised building C should also be retained. However, the report confirms that this building is not within the conservation area and is in a very poor state of repair. It is recommended that this structure be demolished as part of the development on the site. Indeed, this is also in line with the conclusion of the structural survey. The conclusions of which advised that building C is in a dangerous condition and is not safe to enter.
- 6.59 Overall, the assessment recommends that a Historic England Level 1 survey is carried out of all three structures as far as is possible for safety reasons.
- 6.60 Having regard to the above, it is considered that the policies are compliant with UDP policies EN2/1 (Character of Conservation Areas) and ENV3 (Archaeology).

Planning Obligations

Affordable Housing

- 6.61 UDP Policy H4/1 (Affordable Housing) encourages the provision of affordable housing in developments through negotiation.

6.62 It is understood that during the consideration of the previous application (ref. 65217), the Council asked for 21 dwellings of the 83 to be affordable, equating to 25%. If the same percentage of affordable housing is to be applied to the revised proposals, the scheme would be required to provide 18 affordable dwellings.

6.63 However, this application is accompanied by an affordable housing statement prepared by Eccleston Homes, and a financial viability assessment, prepared by Grasscroft. This assessment demonstrates that due to the sites financial viability, the development is unable to support the previously requested number of affordable homes. Due to the submitted evidence of the developments financial viability, it is considered the proposals are consistent with UDP Policy H4/1.

Open Space

6.64 In terms of open space, UDP Policy RT2/2 (Recreation Provision in New Housing Development), states that developers of new housing on sites of 10 or more dwellings will be expected to provide for the recreational needs of the prospective residents. New Developments will be required to provide POS within or adjacent to the development, equivalent to a standard of 2.4 hectares per 1,000 population. The policy goes on to states that for developments providing 50 or more dwellings, such provision would normally be expected to be by the allocation of land on site and wherever possible be in a single plot, with a minimum site size of 0.4 hectares.

6.65 SPD 1 provides further advice regarding the open space, sport and recreation provision in new housing developments. The SPD states that on-site provision will only be considered in exceptional circumstances, assessing each scheme on a site by site basis. In this instance, the provision of on-site POS is essential due to its dual function for flood risk mitigation. Nevertheless, the POS is useable and will provide a significant on-site benefit for residents. As set out previously, the quantum of on-site POS is 0.6 hectares which is in accordance with the Council's standards.

6.66 It is noted that in relation to the previous application, a financial contribution of £207,795.10 was sought in relation to off-site recreation provision. However, this application is accompanied by a financial viability assessment, prepared by Grasscroft. This assessment demonstrates that due to the sites financial viability, the development is unable to support off-site contributions.

Highways

6.67 During the consideration of the previous application (ref. 65217), TfGM asked for £110,000 in contributions as a result of the developments impact on the junction of Bury New Road / Manchester Road.

6.68 The accompanying TA has assessed the capacity of the Bury New Road / Manchester Road junction. The report concludes that the proposed development will not have a material impact on the operation of the local highway network and no off-site highway mitigation measures, would be required. As such, it is considered that the highways improvement contribution will not be required.

6.69 In any event, as set out above, the application is accompanied by a financial viability assessment, prepared by Grasscroft. This assessment demonstrates that due to the sites financial viability, the development is unable to support off-site contributions.

7.0

Sustainable Development

7.1

The purpose of this section is to set out explicitly how the proposals embody the principles of sustainable development as set out in the Framework and therefore represents a form of development which ought to be approved in the public interest, without delay.

7.2

The ways in which the proposals perform a positive economic, social and environmental role and are therefore consistent with the presumption in favour of granting permission with the Framework [§11] are set out below.

Economic Role

7.3

The development of the site will sustain on-site construction jobs and support off-site jobs in construction related industries over the period of the build which will help boost the local economy. The construction of the site will also provide training opportunities, in the form of apprenticeships.

7.4

In the longer term it is expected that new residents will spend in the local area which will boost the local economy and sustain local jobs. It is also anticipated that operational jobs will be created in the local economy as a direct result of the development.

7.5

New residents will spend on first occupation expenditure on goods that relate and services that are purchased to make a house 'feel like home'. A sizeable proportion of this expenditure would be captured locally. The Council will also benefit from the New Homes Bonus and additional annual council tax revenue.

7.6

Overall, it is considered that the proposal will help support sustainable economic growth, helping to build a strong, responsive and competitive economy in accordance with the §8 of the Framework. For the reasons set out above, the proposed development will assist the Council in meeting the economic component of sustainable development.

Social Role

7.7

The proposed development will support the creation of a strong, vibrant and healthy community in Ramsbottom by increasing the supply of housing type and tenure to meet the needs of the area, in a sustainable location.

7.8

The social role and impact of the application proposals has been considered in detail and the main benefits are as follows:

- The proposals increase the availability of family homes;
- The site is within walking distance of a wide variety of existing shops and services;
- The proposals create a high-quality environment which will promote the wellbeing of its residents; and,
- The application site is located within an urban area in a highly sustainable location.

Environmental Role

7.9

The environmental impacts of the proposed development have been considered in greater detail in the technical reports that accompany the application and it is demonstrated that the development will not have any significantly adverse impacts on the environment subject to mitigation.

- 7.10 Fundamentally, the proposed development will secure the redevelopment of a vacant brownfield site. This aligns with the priorities set out within the Framework regarding making effective use of land in a way that makes as much use as possible of previously-developed land [§117].
- 7.11 In accordance with the Framework [§118], substantial weight should be given to the value of using suitable brownfield land within settlements for homes and the proposed development should be considered in this context.
- 7.12 The proposals will also retain historic buildings and new buildings will be in keeping with the surrounding area and Conservation Area.

Conclusion

- 7.13 It is therefore concluded that the proposed development forms a positive economic, social and environmental role and comprises sustainable development in accordance with the provisions of the Framework [§8]. As a result, there is a presumption in favour of granting planning permission for the proposals (the Framework §10-§14).

8.0

Conclusions

- 8.1 This Planning Statement and the associated supporting plans and documents demonstrate that all material planning matters have been given due consideration.
- 8.2 The proposed development would deliver 72 new homes on a brownfield site in Ramsbottom within the Borough of Bury. This proposal represents a scheme which is deliverable and will result in the successful regeneration of the site which has lain vacant for a considerable period of time. It will deliver much needed new homes into a Borough which cannot demonstrate a 5-year supply of housing land.
- 8.3 The development plan policies contained in the UDP are time expired and do not seek to meet current development needs. Furthermore, in the absence of a 5YHLS the most important policies that would otherwise protected this site, relating to the EGA, are out of date. And thus, any conflict with those policies should be afforded only very limited weight. The benefits of providing much needed market housing to meet an identified need are significant and weigh heavily in favour of the proposed development.
- 8.4 The suite of technical reports accompanying the application clearly demonstrate that, subject to the provision of the recommended mitigation that there are no adverse effects arising from the development. The principle outstanding issues relating to flooding and the design of the development, and its relationship to the Conservation Area have been fully resolved. As such the proposals accord with the remaining policies within the Development Plan.
- 8.5 This Planning Statement demonstrates that the principle of residential development has been clearly established and that substantial weight should be given to the value of using suitable brownfield land within settlements for new homes to meet an identified need. There are further socio-economic benefits, and the provision of POS, which weigh in favour of the scheme. There are no significant demonstrable adverse impacts arising from the proposals. It is considered that the considerable benefits outweigh the limited harm arising from the conflict with the EGA policy, given the very limited weight that should be afforded to that policy in any event.
- 8.6 It is considered that the proposal clearly amounts to sustainable development in terms of the Framework [§11] and should therefore be granted planning permission without delay.

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