



ROMAN SUMMER



PLANNING STATEMENT

RAMSBOTTOM AMBULANCE STATION, CEMETERY ROAD, RAMSBOTTOM, BL0 9PU

DECEMBER 2025

Contents	Page
1. Introduction	2
2. The Site and Context	6
3. Pre-Application Feedback	12
4. The Proposal	15
5. Consistency with the Development Plan	22
6. Material Considerations lending further support	32
7. Overall Planning Balance and Conclusions	42

Appendix 1

Historic Aerial images showing extent of street parking along Cemetery Road

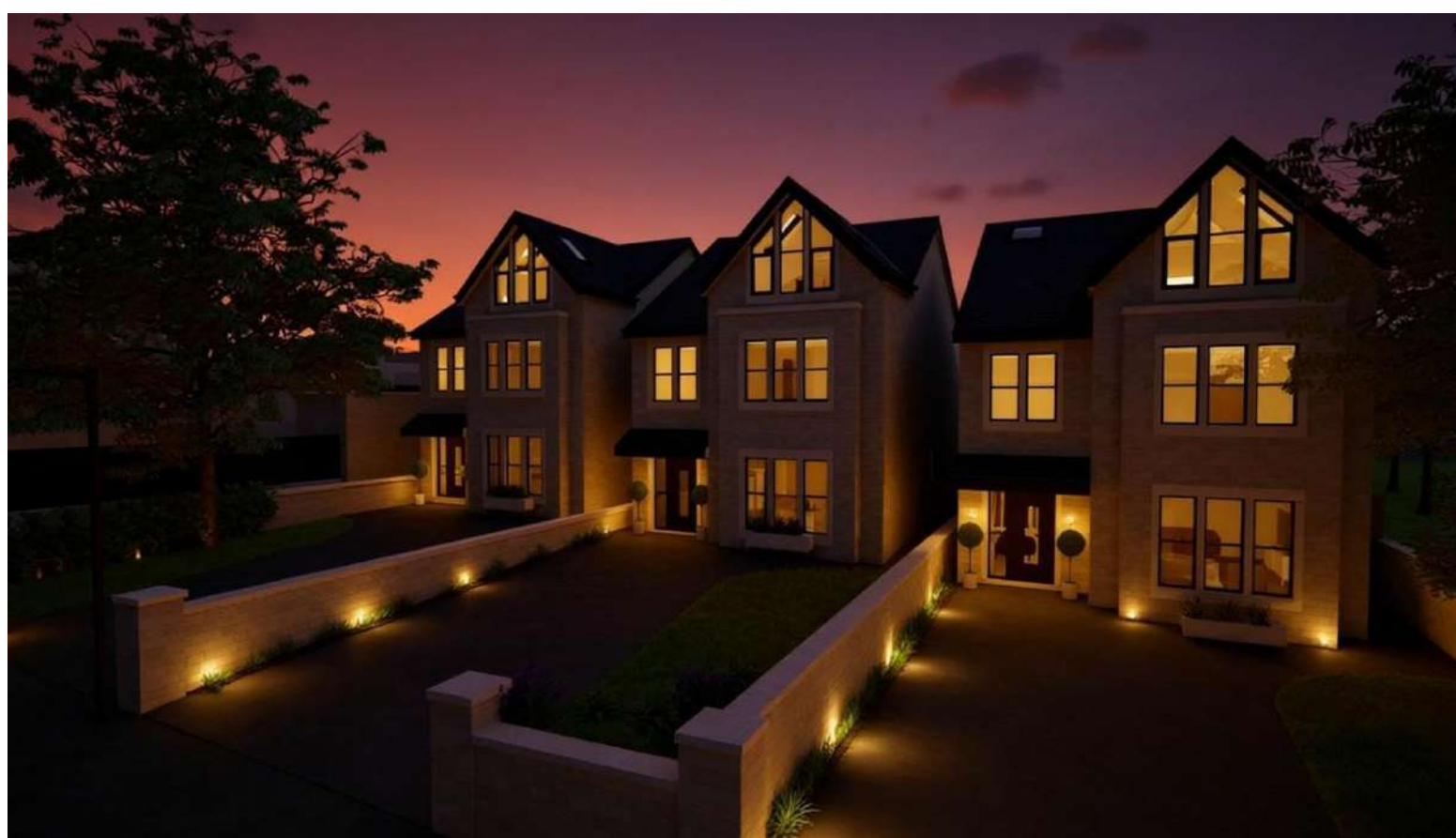
1.0 Introduction

- 1.1 This Planning Statement supports a full planning application submitted by Home Park Avenue Ltd, proposing the demolition of the former Ramsbottom Ambulance Station, Cemetery Road, Ramsbottom, BL0 9PU and the erection of three 2.5 storey detached dwellings with parking, private gardens and hard and soft landscaping (see site location marked in red below).



- 1.2 The application site is previously developed land, located within the heart of the residential area, reinforcing that the principle of housing development ought to be deemed acceptable (as has been confirmed at pre-application stage). Fundamentally, the proposed homes are well designed and reflective of local character (albeit they are

intentionally not presented as carbon copies of nearby homes), and will replace a vacant, unsightly, utilitarian building that offers nothing to the community.



- 1.3 This Planning Statement is a proportionate response to the modest scale and nature of the proposal. It summarises the content of the planning application and the proposal. It assesses the merits of the planning application against relevant planning policies at both the national and local level, and considers other material factors to weight into the overall planning balance. It also brings together and summarises the supporting information that accompanies the planning application.

Application Content

- 1.4 A comprehensive set of drawings and documents are submitted to support the application, reflecting the requirements confirmed by the LPA at pre-application stage. These should be considered alongside one another to provide a rounded, informed and comprehensive understanding of the proposal. The application as a whole comprises:
- Application form (completed by Roman Summer Associates Ltd)
 - This Planning Statement (Roman Summer Associates Ltd)
 - Design & Access Statement (Home Design & Build)
 - Preliminary Ecological Appraisal (Home Design & Build)
 - Preliminary Bat Roost Assessment (Gritstone Ecology)
 - The following Biodiversity Net Gain information (provided by Home Design & Build)
 - Biodiversity Net Gain Report & Biodiversity Gain Plan
 - DEFRA Biodiversity Metric 4
 - Natural England Biodiversity Metric 4
 - The Small Sites Metric
 - Appendix: Raw Baseline Habitat Data
 - Pre- and Post-Development Habitat Maps
 - Transport Technical Note (Focus Transport)
 - Carbon & Energy Statement (Home Design & Build)
 - Daylight and Shadowing Assessment – Plot 1 (Home Design & Build)
 - Density Statement (Home Design & Build) [nb to be read alongside the comments on density in this Planning Statement]
 - Digital Connectivity Statement (Home Design & Build)

- Drainage Strategy + United Utilities correspondence (Home Design & Build)
- National Space Standards Compliance Statement (Home Design & Build)
- Phase 1 Environmental Desk Study (Home Design & Build)
- Tree Survey and Constraints Report (Amenity Tree Care)
- Arboricultural Impact Assessment (Lally Tree Management)
- Arboricultural Method Statement (Lally Tree Management)
- The following architectural drawings (Home Design & Build):
 - 001 A – Site Location Plan
 - 001 D – Proposed Floor Plans
 - 002 C – Proposed Elevations
 - 003 B – Proposed Sections
 - 004 E – Proposed Site Plan
 - 005 D – Proposed 3D Views
 - 006 D – Proposed Street View
 - 007 C – Proposed Elevations
 - 008 B – Proposed Street & Rear Elevations
 - 009 – Proposed Site Layout

1.5 The remainder of this Planning Statement is structured as below :

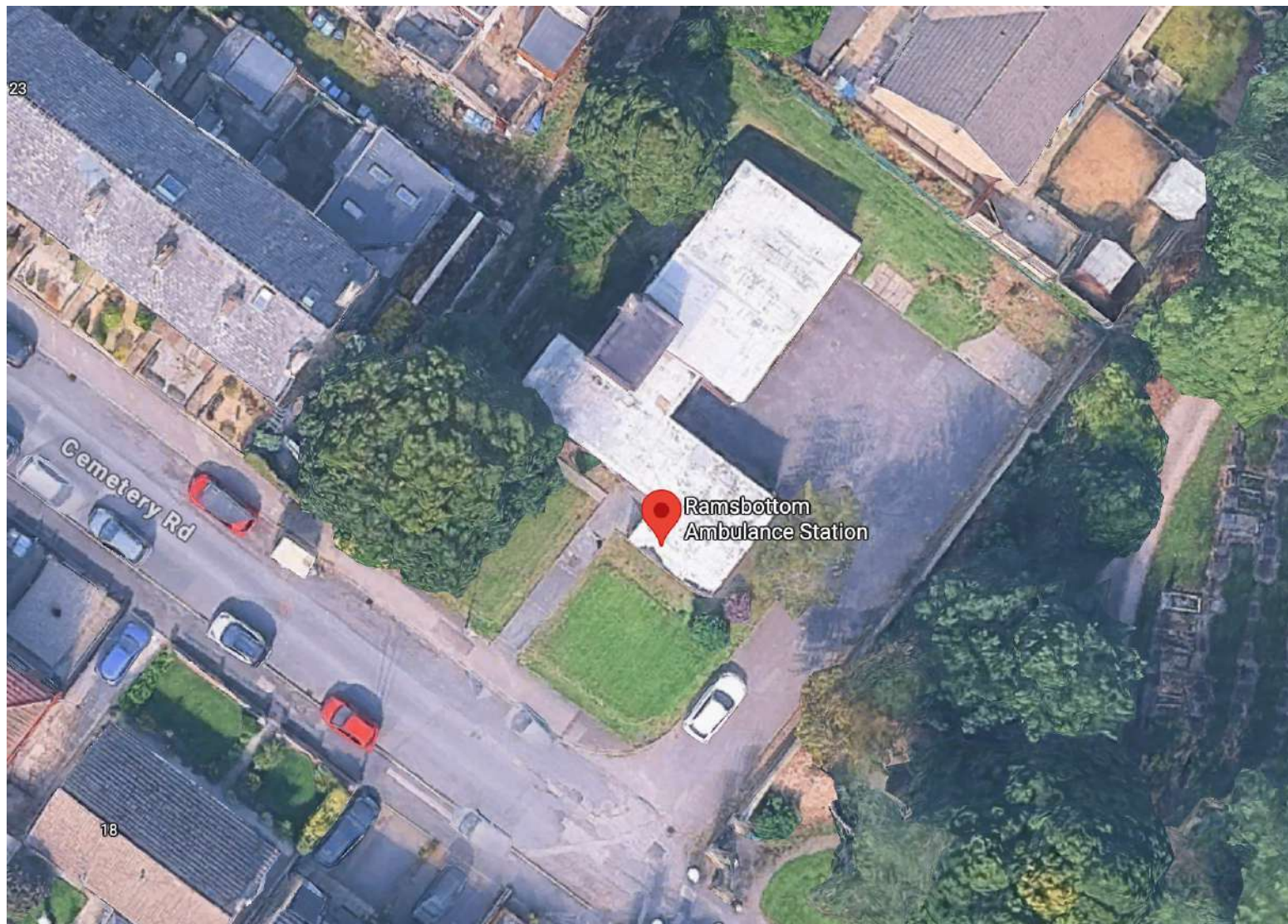
- Section 2.0 describes the site and its context;
- Section 3.0 reviews the LPA's pre-application feedback;
- Section 4.0 describes the proposal;
- Section 5.0 assesses the proposal against relevant policies of the development plan;
- Section 6.0 considers material considerations that lend further weight to approval, namely the extent of consistency with the NPPF, the National Design Guide and the LPA's relevant supplementary policies;
- Section 7.0 sets out overall planning balance and conclusions.

2.0 The Site and Context

- 2.1 The application site is 0.95 ha, located at the eastern end of Cemetery Road (Ramsbottom), a residential *cul de sac* that links Bolton Road West to Ramsbottom Cemetery.
- 2.2 It is currently occupied by the former Ramsbottom Ambulance Station, which ceased operating some time in 2023 and has since been declared redundant by the Ambulance Service, and sold to our client.
- 2.3 The ambulance station is a utilitarian, squat and unprepossessing building, which sits somewhat uncomfortably within an otherwise pleasant residential environment.



- 2.2 The site is relatively flat, albeit it rises modestly from the roadside to its rear.
- 2.3 It is provided with access via Cemetery Road, leading to a sizeable hardstanding parking / manoeuvring area.



- 2.4 The site contains two mature trees along its western flank, which are subject to Tree Preservation Orders (as marked below).



- 2.7 The site is located within the established residential area, which is characterised by a surfeit of house styles, designs and materials. For example, taking Cemetery Road in isolation, the following house types are evident.



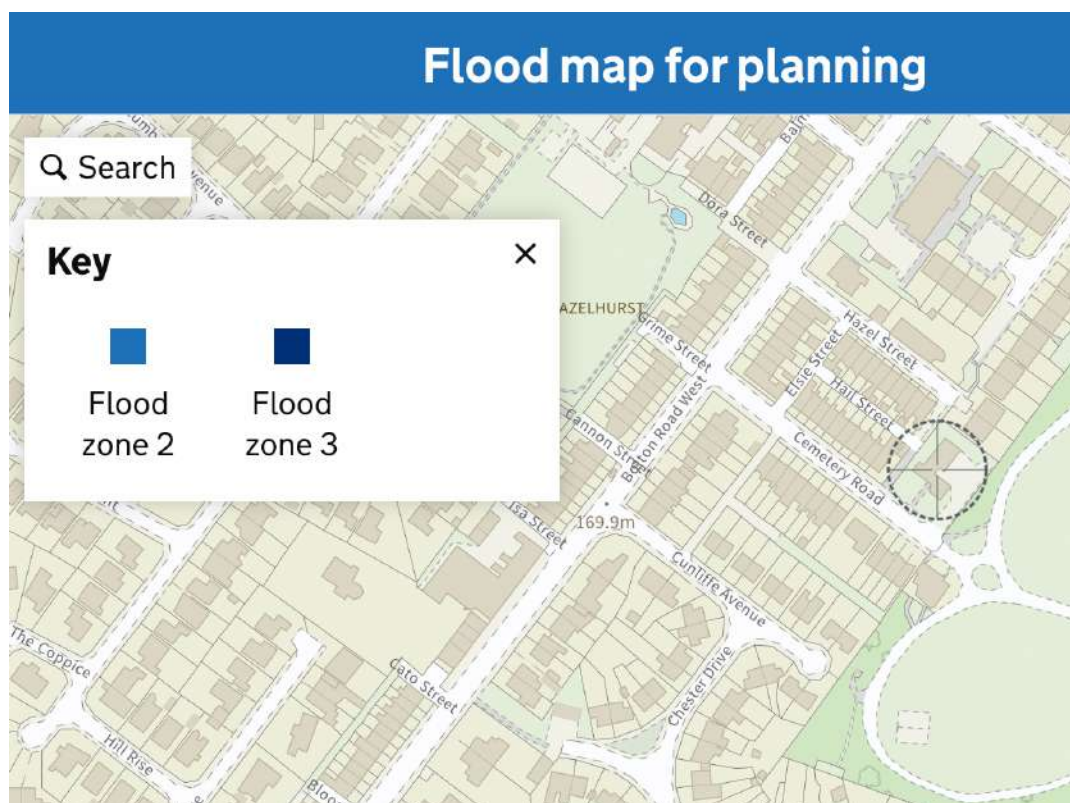
- 2.8 To the immediate rear of the site is the recently developed 'Bramble Place' housing scheme comprising mainly bungalows, but also an apartment block as seen below.



- 2.9 The above evidences that there is no fixed, clear or consistent character in the immediate locality, but rather a surfeit of styles, heights, design features and materials, including both traditional and contemporary 2 storey homes, bungalows and an apartment block,

in natural stone, red brick. The ornate and quirky entrance lodge at the cemetery's entrance adds to that diversity, as indeed does the former ambulance station itself, with its stunted, harsh appearance and dark brown brickwork.

- 2.10 The site contains no listed (or listable) buildings and none are close by, albeit we venture that the LPA may deem the cemetery lodge as a Non Designated Heritage Asset. Nor does the site sit within or close to a Conservation Area.
- 2.9 The site is located within Flood Zone 1 (evidenced below) and is not therefore at risk of flooding.



3.0 Pre-Application Feedback

- 3.1 This application has been formulated having regard to the LPA's pre-application feedback in its letter of 29th October 2025 (ref: 03119E).
- 3.2 That letter sets out the information required to validate and assess a planning application, alongside a detailed policy-led appraisal of a proposed residential scheme involving the demolition of a former ambulance station and the construction of three detached five-bedroom dwellings (identical to the scheme hereby submitted).
- 3.3 The letter confirms that the principle of residential development is considered acceptable, as the site lies within an established urban residential area and outside the Green Belt. It notes that, while Bury Council can demonstrate a five-year housing land supply, the latest Housing Delivery Test result below 75% remains a material consideration, meaning the tilted balance applies in favour of sustainable residential development unless adverse impacts significantly outweigh benefits.
- 3.4 The letter raised certain concerns in relation to layout, density and design. It stated that, based on the assumed site area, the proposed density of approximately 30 dwellings per hectare falls below the minimum 35 dwellings per hectare expected by policy, unless a clear justification is provided. It suggested that a higher-density form, such as smaller dwellings or terraced properties, may better reflect the site's constraints and the surrounding streetscene. Detailed design comments highlight the need for an extended street scene drawing, simplification of front elevations, removal of what were suggested to be incongruous architectural features, stronger vertical emphasis, and closer alignment with the prevailing terraced character rather than more ornate or suburban forms.
- 3.5 The letter is accepting of potential amenity impacts, suggesting that the separation distances meet guidance. However, it pointed to potential impacts on daylight and outlook for neighbouring properties, particularly in relation to plot 1, and suggested that these may require a daylight and shadow assessment to demonstrate acceptability.

- 3.6 It noted that highways and access issues are an area of concern. While the principle of residential use is acceptable, it was noted that the proposed access arrangements would result in the loss of on-street parking, and that further work is required to demonstrate adequate parking provision, access widths, gradients, visibility splays, refuse collection arrangements, and mitigation for parking loss. Footway reconstruction works and impacts on street lighting and boundary treatments also need to be addressed. The parking provision should comply with SPD standards, requiring three spaces per dwelling.
- 3.7 The letter noted that ecology and biodiversity matters require further investigation. Additional surveys are needed, including a full Preliminary Ecological Assessment covering both buildings and trees, checks for hedgehogs, and a Biodiversity Net Gain assessment demonstrating at least a 10% uplift, supported by a habitat management and monitoring plan and a Biodiversity Gain Plan. A lighting strategy to protect adjacent trees and habitats is also required.
- 3.8 It suggested that tree impacts are a constraint. The site contains protected trees, including an oak with a confirmed TPO and a maple with a provisional TPO. No arboricultural assessment had been submitted, and there is concern regarding the proposed removal of the maple, which is considered to have good amenity value. The retention, protection and root protection areas of all protected and nearby trees, including those within the adjacent cemetery, must be fully assessed before the acceptability of the layout can be determined.
- 3.9 The letter noted that other technical matters include the need for a drainage strategy compliant with SuDS guidance, a contaminated land desk study due to the site's former use and proximity to landfill, and a carbon and energy statement demonstrating compliance with net zero objectives. Although the site is not within an Air Quality Management Area, electric vehicle charging infrastructure would be expected. A digital connectivity statement is also required to demonstrate provision of full-fibre broadband.

- 3.10 In overall conclusion, the LPA's letter reaffirmed that, while the principle of residential development is supported, the scheme as currently as presented raises concerns regarding density, design quality, streetscene integration, highways impacts, tree retention and ecological matters. It suggested that significant additional information and design revisions would be required to address these issues and demonstrate full policy compliance.

4.0 The Proposal [and response to LPA's feedback]

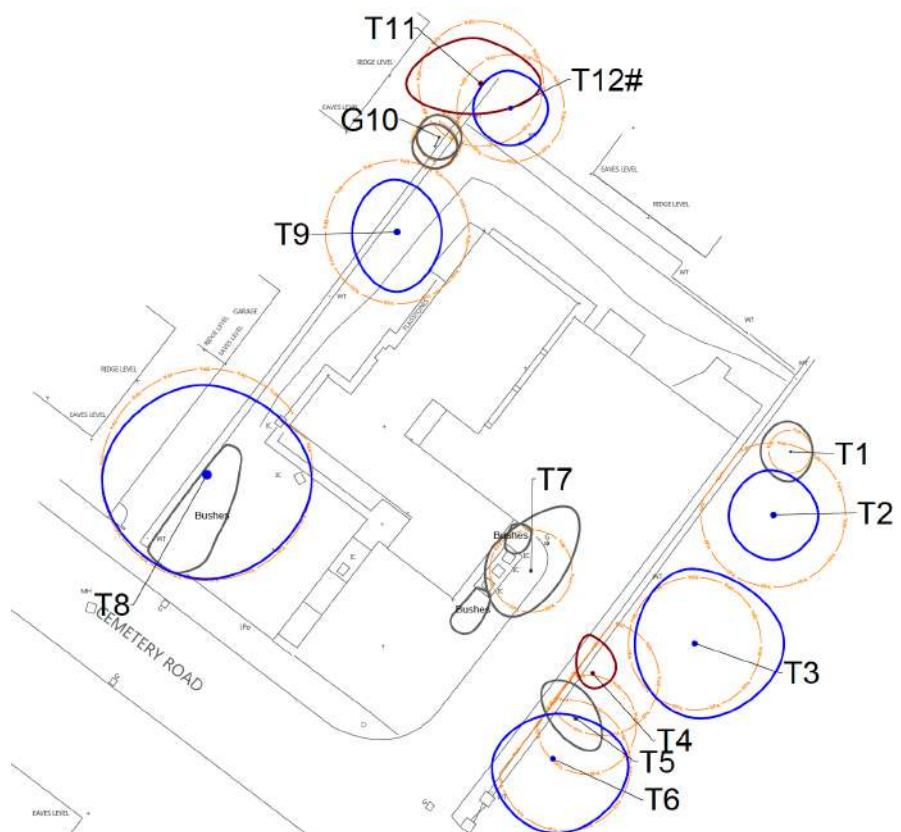
- 4.1 This application is submitted in full detail and proposes the demolition of the former ambulance station and the erection of three 2.5 storey detached dwellings with parking, private gardens and hard and soft landscaping, to be accessed via Cemetery Road.
- 4.2 Roman Summer Associates Ltd were not involved in the project at pre-application stage, but have been requested to become involved and prepare this Planning Statement in support of the proposal. Our client has explained that, whilst careful note has been taken of the LPA's pre-application comments, they respectfully disagree with certain of the design-related comments and as such wish to pursue the same scheme details (supplemented with new information) as presented at pre-application stage, as they consider it to be an appropriate and good quality design response having regard to the very mixed house types, styles and materials in the immediate context (as highlighted in Section 2.0).
- 4.3 Our client also considers that – regarding density – the approach is sensible / proportionate having regard to trees, traffic generation and striking the right balance in terms of house type / size bearing in mind the local context.
- 4.4 The separate Design and Access Statement comments further on design, where it is considered that the proposed homes are of appropriate scale and appearance, designed to sit comfortably within the context. Their height is commensurate with adjacent homes (see street scene drawings). The proposed materials are complementary to the local area, and detailed elements – such as doors and windows – present consistency with the surroundings. Ample off street parking provision is proposed, as are perfectly reasonable private gardens. All of the correct interface distances are achieved.
- 4.5 In design terms, the houses follow a broadly traditional style, but with a contemporary and respectful edge. While the scheme draws on certain design cues from adjacent homes - such as materials, roof forms and general proportions - it has not sought to replicate them directly. They have purposely not been designed as carbon copies of

adjacent homes, and we see no reason to do so. It is both appropriate and reasonable that the proposed homes do not mimic surrounding properties. Instead, the development intends to present a coherent, respectful and contextually informed design that complements the existing built form, while standing independently as a moderately different but harmonious housing typology.

- 4.6 The scheme proposes locally sourced and distinctive materials (stone/slate) and adopts a simplified architectural language with a strong vertical emphasis to read comfortably alongside the adjoining terrace, responding to pre-application advice to reflect the immediate context. The extended streetscene drawing demonstrates window/eaves lines will suitably tie with neighbouring properties to ensure coherence.
- 4.7 The pre-application feedback suggested removal of the flat roof projecting bay elements at the front of the houses. The Applicant prefers to leave those features to provide visual relief and break up the front elevations, and as a gentle, respectful nod towards the historic building at the entrance to the cemetery, as below. It is not considered that such modest contemporary flourishes results in an visual harm, and indeed those add an extent of interest and animation.



- 4.8 We note that the LPA suggested that the new houses ought to take inspiration from the terraced properties that it suggested define the character of the locality. While inspiration *has* been taken from those terraced houses, our earlier assessment of local character reveals that the locality is in fact very mixed, with an array of styles. There is not one fixed or obvious character, and as such it is perfectly fair and reasonable to have regard to that mixed character and respond to different aspects. The most attractive and characterful property in the immediate context is the old lodge building (just 12 metres from the application site), and it is not unreasonable to take an extent of inspiration from that property.
- 4.9 Although the development necessitates some tree loss, no category A trees are present, and only one category B tree is identified for removal (reference “T9” on the plan below). The tree loss will be mitigated through a planting plan that will ensure a long-term enhancement of character and quality of the treescape in accordance with Policy JP-G7: Trees and Woodland of the ‘Places for Everyone’ Joint Development Plan.



- 4.10 The construction of the driveway within the RPA of T8 will employ a no-dig, cellular confinement system with a permeable surface to protect root health and the long-term health of the tree. Appropriate mitigation and protection measures outlined in the accompanying Arboricultural Method Statement (Ref: 2524.AMS.02) have been recommended to protect retained trees during construction in line with BS 5837:2012.
- 4.11 Tree T8 (oak) is a good quality oak that we agree plays an important role in its visual contribution to the local area. That tree is retained as part of the proposal.
- 4.12 The application site also includes Tree T9 (maple), which we understand is the subject of a provisional Tree Preservation Order. It is acknowledged that the tree makes a small contribution to local amenity and is visible - to a limited extent - from the public realm. However, it is important to consider the justification for its protection in the round and as part of the wider planning balance.
- 4.13 Tree T9 has been categorised in the submitted Arboricultural Impact Assessment as a Category B tree, reflecting its moderate quality and amenity value, rather than a tree of high or exceptional importance. It is located towards the rear of the site, in close proximity to adjoining residential properties, and while partially visible from public vantage points, it does not form a prominent or defining feature of the streetscene. Nor does it make a significant contribution to the wider landscape character of the area. Its visual influence within the public realm is therefore relatively limited.
- 4.14 The provisional TPO calls to be assessed against the statutory test of expediency in the interests of amenity. In this instance, it is considered that the amenity value of Tree T9, when viewed objectively, is not so substantial as to justify its retention at the expense of delivering an appropriate, viable and policy-compliant residential development on a constrained brownfield urban site.
- 4.15 The proposed development seeks to make efficient use of previously developed land within the urban area, in a borough that has experienced ongoing challenges in meeting its housing delivery requirements. The retention of Tree T9 would materially constrain

the developable area of the site and compromise the ability to deliver a scheme of appropriate density, layout and viability, contrary to both local and national planning objectives which place significant weight on the effective use of land and the delivery of new homes.

- 4.16 Importantly, the proposal includes a comprehensive landscaping strategy which will deliver new tree planting across the site, including along the principal street frontage where visual amenity benefits will be more meaningful and publicly perceptible. The applicant is willing to provide larger specimen replacement trees to maximise early visual impact, ensuring that the scheme results in a net qualitative improvement to the streetscene over time. As such, the limited amenity value currently provided by Tree T9 would be appropriately mitigated and, in practical terms, exceeded through replacement planting in more prominent and beneficial locations.
- 4.17 In this context, the loss of a single Category B tree with limited public prominence must be balanced against the wider public benefits of the scheme, including the delivery of new housing, the efficient use of urban land, and the enhancement of visual amenity through a coherent and well-designed landscaping strategy. On balance, it is considered that the removal of Tree T9 is justified and that the objectives of the provisional Tree Preservation Order do not outweigh the clear and demonstrable planning benefits of the proposed development.
- 4.18 In its pre-application response, the Local Planning Authority raised concerns regarding the potential loss of on-street parking spaces along the site frontage as a result of the proposed access arrangements. These concerns are acknowledged, but call to be weighed proportionately and in the balance.
- 4.19 Each proposed dwelling will be served by a private driveway capable of accommodating parking for up to four vehicles. This level of on-plot provision exceeds the minimum requirement of three spaces per dwelling set out in Bury UDP Policy HT2/4 and ensures that future residents will not rely on on-street parking to meet their day-to-day needs. In addition, each dwelling will incorporate secure, covered cycle storage capable of

accommodating up to five bicycles, located within the rear garden and accessed via a dedicated side pedestrian passage. This provision supports sustainable travel choices and accords with both local and national planning objectives to encourage walking and cycling in accessible urban locations.

- 4.20 It is acknowledged that the formation of the proposed driveway access serving Plots 1 and 2 could result in the loss of a small number of on-street parking spaces, estimated to be a maximum of two vehicles. However, this impact must be considered in context. Not all on-street parking along the site frontage would be removed, and the limited loss identified represents a very small proportion of the overall on-street parking capacity available along Cemetery Road. As such, it is not considered that this would result in a material or harmful reduction in parking availability within the wider residential street. Nor would it give rise to a severe impact on the operation of the local highway network.
- 4.21 National planning policy is clear that development should only be prevented or refused on transport grounds where the residual cumulative impacts would be severe. In this instance, the combination of generous on-plot parking provision, secure cycle storage, and the very modest scale of on-street parking loss means that no such severe impact would arise. The proposal represents a clear improvement over reliance on uncontrolled on-street parking and provides a robust, self-contained parking solution that supports the proper functioning of the highway.
- 4.22 When weighed in the planning balance, the limited loss of up to two on-street parking spaces must be considered against the clear public benefits of the scheme. The proposal delivers a viable, efficient and sustainable housing development on vacant, previously developed land within an established residential area, making effective use of land in a highly accessible location. It provides good quality new homes with appropriate parking and sustainable travel infrastructure, contributing positively to housing delivery at a time when the Borough continues to face challenges in meeting its housing requirements.

4.23 On this basis, it is considered that the delivery of well-designed, policy-compliant housing on an accessible brownfield site significantly outweighs the minor and localised loss of a small number of on-street parking spaces. The balance of considerations therefore strongly supports the acceptability of the proposed access and parking arrangements.

5.0 Consistency with the Development Plan

5.1 In determining this planning application, regard must be had to section 38(6) of the Planning and Compulsory Purchase Act 2004, which requires that proposals be determined in accordance with the development plan unless material considerations indicate otherwise. We explain below why we consider that the proposal complies with the development plan.

5.2 The development plan currently comprises:

- **Bury Unitary Development Plan (UDP)** - originally adopted on 29 August 1997, the UDP remains part of the statutory development plan and continues to guide land use and development decisions where its saved policies have not been superseded.
- **Places for Everyone Joint Development Plan (PfE)** - adopted on 21 March 2024 - a strategic joint development plan for nine Greater Manchester authorities, including Bury, setting strategic priorities for housing, jobs, infrastructure, environment and sustainable growth to 2039. It has superseded some of the UDP policies as identified in its Appendix.

5.3 The UDP Policies Map confirms that the site does not fall within any particular designation or allocation, albeit (as noted earlier) two protected trees sit on its western edge (see plan on next page).

5.4 UDP Policy H1/2: Further Housing Development supports residential development within the urban area where the site is suitable and where the proposal has regard to amenity, surrounding land uses and the character of the local environment. The application site lies within an established residential area and comprises previously developed land occupied by a redundant ambulance station. The LPA has confirmed at pre-application stage that the principle of residential development is acceptable. The proposal will replace an obsolete, visually poor-quality building with good quality new housing that is compatible with surrounding residential uses and represents an

appropriate and sustainable reuse of urban land, consistent with the objectives of Policy H1/2.

Protected trees within and adjacent to the site:



- 5.5 UDP Policy H2/1: The Form of New Residential Development seeks to ensure that new housing is of an appropriate scale, height, appearance and character, and that it integrates successfully with its surroundings without causing harm to visual or residential amenity. The proposed dwellings have been designed with regard to the highly varied character of the immediate locality, which includes a wide range of building types, heights, styles and materials. There is no single, uniform house or building character to which the development must conform. The proposed houses are of a scale and height comparable to nearby residential development, and their design adopts a traditional form with a contemporary and respectful edge, taking cues from the immediate context. The proposal therefore sits comfortably within its context and accords with Policy H2/1.

- 5.6 UDP Policy H2/2: The Layout of New Residential Development requires development to provide a satisfactory layout, including appropriate spacing, private amenity space, access arrangements and parking, while safeguarding the amenities of existing and future residents. The layout has been designed to achieve appropriate separation distances to neighbouring properties, provide adequate private gardens for each dwelling, and ensure safe and convenient access via Cemetery Road. The scheme also responds sensibly to site constraints, including existing trees (albeit a small extent of loss is proposed to facilitate an efficient and viable development) and neighbouring development, and achieves a balanced layout that neither results in overdevelopment nor constitutes the inefficient use of land. As such, we suggest that the proposal complies with the requirements of Policy H2/2.
- 5.7 UDP Policy EN1/2: Townscape and Built Design seeks to ensure that development does not have a detrimental impact on the character or appearance of an area and that proposals are well designed, using appropriate materials and forms. The existing ambulance station is a utilitarian and visually unappealing structure that detracts from the quality of the surrounding residential environment. Its removal and replacement with well-designed dwellings will result in enhancement to the townscape. The proposed buildings will present a coherent and attractive frontage, use materials that are complementary to those found locally, and respect the varied character of the area. The development will therefore improve visual amenity and is consistent with Policy EN1/2.
- 5.8 UDP Policy HT2/4: Car Parking and New Development requires development to make adequate provision for car parking and servicing in accordance with adopted standards, so as not to give rise to highway safety or congestion issues. Each proposed dwelling will be served by a private driveway capable of accommodating up to four vehicles, exceeding the minimum requirement of three spaces per dwelling set out in Policy HT2/4. This level of on-plot provision ensures that future residents will not be reliant on on-street parking. Secure cycle storage is also provided for each dwelling, supporting sustainable travel choices. Although the formation of driveway accesses may result in the loss of up to two on-street parking spaces, this represents a very small and localised impact which does not materially affect parking availability along Cemetery Road as a whole.

- 5.9 Prior to submitting this application, the site has been inspected on numerous occasions over recent weeks / months, and at all times it is evident that there is surplus street parking available. Our most recent visit was at 3pm on Christmas Day 2025 – a time / day when it might be anticipated that most people will not be working and are likely to be at home with their families, and some of whom may have visitors. At that time on that day, there were 6 available parking spaces along the length of Cemetery Road. Only one car was parked on the street immediately outside the application site. That evidence appears to be backed up by the historic aerial images provided at *Appendix 1*. Whilst certain of those are not good quality images, and accepting that we are not aware of the exact time those were taken (albeit all are in daylight), in all cases they point to availability of street parking.
- 5.10 Having regard to the above, we suggest that the proposal accords with the intent of Policy HT2/4, in that it will make adequate provision for car parking and it will not give rise to highway safety or congestion issues.
- 5.11 UDP Policy EN8/1: Tree Preservation Orders seeks to protect trees that make a significant contribution to visual amenity, while recognising that tree loss may be acceptable where justified and appropriately mitigated. The proposal retains and protects Tree T8, a good-quality protected oak that makes a positive contribution to the local area, and incorporates appropriate protection measures during construction. The removal of Tree T9, a Category B tree of moderate quality and limited public prominence, has been carefully assessed and we consider is justified in the context of delivering a viable, efficient and appropriate residential scheme. Replacement planting is proposed to mitigate its loss, ensuring that overall visual amenity is maintained and enhanced, in accordance with Policy EN8/1.
- 5.12 UDP Policy EN8/2: Woodland and Tree Planting encourages the retention of existing trees where possible and promotes new and replacement planting to enhance the quality of the local environment. Again, the proposal includes a comprehensive landscaping strategy that will introduce new trees across the site, including along the principal frontage where they will make a more meaningful and publicly perceptible contribution to visual amenity. The applicant is willing to provide larger specimen trees to maximise

early impact. In this way, the development not only moderate mitigates tree loss, but delivers a long term enhancement to the site's treescape, fully aligning with the objectives of Policy EN8/2.

- 5.13 Taken together, we suggest that the proposal accords with the relevant saved policies of the Bury Unitary Development Plan, addressing matters of principle, design, layout, amenity, parking and tree protection in a balanced and policy-compliant manner.

Consistency with Places for Everyone

- 5.14 Places for Everyone Policy JP-S1: Sustainable Development requires development to maximise economic, social and environmental benefits simultaneously, make efficient use of land, support inclusive growth and minimise adverse impacts. The proposal seeks to redevelop a redundant, accessible, unattractive previously developed site within the urban area to deliver new housing in a sustainable location. It brings an underutilised site back into productive use, contributes to housing delivery at a time when the Borough has experienced underperformance against housing targets, and delivers environmental improvements through high-quality design, landscaping and biodiversity enhancements. The proposal therefore represents a balanced and sustainable form of development consistent with Policy JP-S1.
- 5.15 Policy JP-H1: Scale of New Housing Development sets the overall housing requirement for the Borough and seeks to ensure that new housing contributes positively to meeting identified needs. While Bury can demonstrate a five-year housing land supply, the most recent Housing Delivery Test results remain a material consideration and place additional weight on proposals that deliver new homes in sustainable locations. The proposal makes a modest but positive contribution to housing supply, delivering family housing within an established residential area, and therefore aligns with the objectives of Policy JP-H1.

5.16 Policy JP-H3: Type, Size and Design of New Housing seeks to ensure that new residential development provides an appropriate mix of dwelling types and sizes and delivers high-quality, well-designed homes that respond to their context. The proposed dwellings are of a size and type that reflect local housing characteristics and demand, providing larger family homes within a predominantly residential area. The design responds positively to the varied character of the surrounding context, drawing on local materials and proportions without resorting to pastiche. The proposal therefore accords with the requirements of Policy JP-H3.

5.17 Policy JP-H4: Density of New Housing requires development to achieve densities appropriate to the site's location, accessibility and character, while making efficient use of land and delivering high-quality design. The policy makes clear that minimum density benchmarks are a starting point rather than an absolute requirement and that lower densities may be acceptable where clearly justified by site-specific circumstances or local housing market considerations. Specifically, it states:

'Lower densities may be acceptable where they can be clearly justified by:

1. Local housing market issues, such as a demonstrable need for a particular type of housing that cannot be delivered at a higher density; or

2. Site-specific issues, such as the design context and any potential impact on the wider landscape or townscape including heritage assets and green infrastructure.'

5.18 The Local Planning Authority's pre-application advice identified that Policy JP-H4 sets a minimum density of 35 dwellings per hectare as a benchmark for accessible urban locations. It was noted that, based on an assumed site area of approximately 0.1 hectares and three dwellings, the indicative density would be around 30 dwellings per hectare. However, the advice also acknowledged that the exact site area had not been confirmed and that density calculations could alter depending on a more accurate assessment.

- 5.19 The submitted scheme is informed by an accurate assessment of the site area and its constraints. The gross site area is 0.095 hectares (950 square metres). Of this, an area of 100 square metres is subject to Root Protection Areas associated with retained trees and is therefore not available for built development. This results in an effective net developable area of 0.085 hectares. The proposed development of three dwellings on this net area equates to a density of 35.3 dwellings per hectare. When assessed on this proper net developable basis, the proposal meets, and indeed marginally exceeds, the minimum density benchmark set out in Policy JP-H4.
- 5.20 Beyond that numerical calculation, the policy requires density to be appropriate to character and context. The surrounding area of Cemetery Road and the wider Ramsbottom residential environment is characterised predominantly by a mix of terraced houses, detached and semi-detached dwellings at low-to-medium densities, interspersed with some bungalows and limited flatted development. There is no prevailing high-density urban grain in this location. In this context, the proposed density represents an efficient use of a constrained brownfield site, while remaining consistent with the established residential character and urban grain, and avoiding overdevelopment that might undermine amenity, townscape quality or the setting of neighbouring properties.
- 5.21 The LPA's pre-application advice suggested that higher densities could theoretically be achieved through the provision of smaller dwellings. However, Policy JP-H4 does not require density to be maximised at the expense of housing mix, design quality or site constraints. The correct policy-compliant density has been achieved while retaining important trees, respecting separation distances, and delivering a high-quality layout. Increasing density further through smaller units would place additional pressure on layout, amenity and tree retention and would not necessarily represent a better planning outcome on this particular site.
- 5.22 Furthermore, the proposed provision of five-bedroom dwellings is justified by objective evidence of housing need, existing stock imbalance and comparative analysis at borough, local, regional and national levels. Bury Council's Housing Needs and Demand Assessment identifies that the borough's existing housing stock is skewed

towards smaller dwellings, with only approximately 11.8% of homes across Bury having four or more bedrooms (Bury Housing Needs and Demand Assessment, August 2020). This figure demonstrates an under-representation of larger family homes within the borough when assessed against wider benchmarks.

- 5.23 Evidence from the same assessment confirms that Ramsbottom has a slightly higher proportion of larger homes, with approximately 18.8% of dwellings having four or more bedrooms (Bury Housing Needs and Demand Assessment, 2020). However, while this exceeds the borough-wide average, it remains below the national profile for larger dwellings. Census 2021 data published by the Office for National Statistics indicates that approximately 21.1% of homes across England and Wales have four or more bedrooms. This comparison demonstrates that, even within one of Bury's most established and family-oriented settlements, the supply of larger homes falls short of national norms.
- 5.24 In this context, the delivery of five-bedroom homes in Ramsbottom represents a proportionate and policy-compliant response to identified housing need, and at the same time satisfies the policy density requirement. National and local planning policy supports a flexible approach to density where this enables the delivery of an appropriate housing mix that reflects local character, market signals and identified housing needs.
- 5.25 Having regard to the above, the proposal demonstrates compliance with Policy JP-H4 both quantitatively and qualitatively. The scheme achieves the policy's minimum density benchmark when assessed against the correct net developable area, makes efficient use of a constrained brownfield site, responds appropriately to local character, and delivers a form and mix of housing that meets local needs. In this context, the proposed density represents an efficient, justified and policy-compliant use of land, consistent with the objectives of Places for Everyone Policy JP-H4.

- 5.26 Policy JP-P1: Sustainable Places seeks to create high-quality, inclusive and distinctive places that enhance local character and promote wellbeing. The proposal replaces a visually poor-quality and obsolete building with well-designed housing that integrates successfully into the surrounding residential environment. The development presents an active frontage to Cemetery Road, provides private amenity space, and incorporates landscaping that will enhance visual quality. In doing so, the proposal contributes positively to place-making and accords with the objectives of Policy JP-P1.
- 5.27 Policy JP-C5: Streets for All seeks to ensure that streets are safe, attractive and function well for all users, balancing the needs of vehicles, pedestrians and cyclists. The proposal provides safe and appropriate access arrangements from Cemetery Road, with clear visibility and adequate turning space (refer to separate Transport Technical Note by Focus Transport). The limited and localised loss of on-street parking is mitigated by generous on-plot parking provision and does not undermine the function of the street as a whole. Secure cycle storage is also provided, supporting a more balanced and inclusive street environment in accordance with Policy JP-C5.
- 5.28 Policy JP-C6: Walking and Cycling seeks to promote active travel by ensuring that new development is accessible and supports walking and cycling. The site is located within an established residential area with good access to local facilities, and the proposal incorporates secure cycle storage for each dwelling. The layout provides safe pedestrian access and integrates with the existing street network, supporting the objectives of Policy JP-C6.
- 5.29 Policy JP-G7: Trees and Woodland seeks to protect existing trees where they make a significant contribution to amenity, while also promoting new tree planting to increase overall tree cover. The proposal retains and protects the most visually important tree on the site and adopts appropriate construction techniques to safeguard retained trees. The removal of one moderate quality tree is justified by the wider planning benefits of the scheme and is mitigated through replacement planting, including new trees in more prominent street-side locations. The proposal therefore accords with the balanced approach advocated by Policy JP-G7.

- 5.30 Policy JP-G8: A Net Enhancement of Biodiversity and Geodiversity requires development to deliver measurable biodiversity gains where possible. The proposal is supported by ecological information and a landscaping strategy that will enhance habitat quality compared to the existing largely hardstanding site. Replacement planting, habitat creation and appropriate mitigation measures will ensure that the development delivers biodiversity enhancements in accordance with Policy JP-G8.
- 5.31 Policy JP-S2: Carbon and Energy seeks to reduce carbon emissions and support the transition to net zero through energy-efficient design and low-carbon technologies. The proposal is supported by a Carbon and Energy Statement demonstrating compliance with this policy, including measures such as energy-efficient building fabric, low-carbon heating solutions and electric vehicle charging infrastructure. In this way, the development aligns with the objectives of Policy JP-S2.
- 5.32 Policy JP-S4: Flood Risk and the Water Environment requires development to manage surface water sustainably and avoid increasing flood risk. The site lies within Flood Zone 1 and is at low risk of flooding. A drainage strategy is provided to ensure that surface water is managed appropriately in accordance with SuDS principles, ensuring compliance with Policy JP-S4.
- 5.33 Overall, we suggests that the proposal is consistent with the relevant policies of the Places for Everyone Joint Development Plan. It delivers new housing in a sustainable and accessible location, makes effective use of vacant, previously developed land, responds positively to local character, and balances environmental considerations with the clear public benefits of housing delivery.
- 5.34 Having regard to the above, we contend that the proposal is consistent with all relevant policies of both core parts of the development plan.

6.0 Material Considerations lending further support

6.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that proposals be determined in accordance with the development plan **unless material considerations indicate otherwise**. It is therefore important to consider if there are any material considerations that counterbalance the extent of compliance with the development plan.

6.2 We contend that there are no such 'negative' material considerations. There are, however, material considerations that lend further weight to approval of the application, as outlined below, namely:

- The extent of consistency with the NPPF
- The extent of consistency with the National Design Guide
- The extent of consistency with Bury's Supplementary Planning Guidance

Consistency with the NPPF

6.3 At §2, NPPF confirms that:

'The National Planning Policy Framework must be taken into account in preparing the development plan, and is a material consideration in planning decisions'.

6.4 The promotion and encouragement of sustainable development goes to the heart of the NPPF. In this case, a viable, bespoke, good quality housing scheme is being promoted on a vacant, accessible brownfield site within the established residential area. As such, the principle of housing development is clearly appropriate and encouraged by policies at all levels. The proposal will assist Bury to '*significantly boost*' its housing supply. The provision of sufficient good quality housing (of all types) goes to the heart of a good and strong society, and is an important social benefit.

- 6.5 In respect of *'Making Efficient Use of Land'* and *'Achieving Appropriate Densities'*, the scheme has been formulated with regard to the requirement at §123, which promotes the effective use of land, while balanced against site constraints, respecting local context and safeguarding of the environment.
- 6.6 We are also mindful of NPPF §129, which notes that it is important that planning decisions avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site. The proposed density reflects a deliberate design response to the site's context, constraints and the character of the surrounding suburban area. It achieves the correct density standard established by Places for Everyone.
- 6.7 The scheme also responds positively to NPPF §135, which looks to ensure that developments will function well and add to the overall quality of the area; are visually attractive as a result of good architecture, layout and appropriate and effective landscaping; and are sympathetic to local character and history, including the surrounding built environment and landscape setting.
- 6.8 The proposed development aligns with the aims of NPPF §135 by delivering a layout and architectural approach that will contribute positively to the overall quality of the area and creates a well-functioning residential environment. The scheme incorporates reasonable plot sizes, an active frontage and a coherent street structure that ensures legibility and promotes natural surveillance. The dwellings are designed with high-quality materials and detailing, and the inclusion of new landscaping will create a visually attractive setting that integrates sensitively with the surrounding suburban context. The development reinforces the established character of the area, taking cues from adjacent houses / buildings, but without replicating those in a pastiche form, responding instead through appropriate detailing, scale, massing and spacing. As a result, we suggest that the proposal is sympathetic to the local built environment, while achieving a high standard of design, consistent with the expectations of NPPF §135.

- 6.9 The proposal also responds positively to NPPF §136, which emphasises that existing trees make an important contribution to the character and quality of urban environments and should be retained wherever possible. The layout has been carefully arranged around the most mature and visually significant boundary tree, ensuring that its root protection area is respected. Supplementary tree planting will reinforce this structure and ensure long term landscape continuity, demonstrating alignment with the environmental and design objectives of §136.
- 6.10 The proposal also aligns with the NPPF's locational expectations for new housing. NPPF §15 emphasises that the planning system should be genuinely plan-led, with decisions following the development plan unless material considerations indicate otherwise. NPPF §60 - §61 require local planning authorities to identify a sufficient supply of housing and to direct this towards sustainable locations. NPPF §82 further confirms that planning decisions should support patterns of development that reduce the need to travel, promote sustainable modes of transport and make the most effective use of existing infrastructure.
- 6.11 The site is a vacant, unattractive plot in the heart of the residential area, clearly suitable and deliverable for housing in a sustainable location close to services, schools, public transport and established walking and cycling routes. Bringing forward housing on this well-connected and sustainable site is consistent with the NPPF's spatial strategy to focus growth where it will support existing communities, minimise reliance on the private car and contribute to sustainable patterns of development.
- 6.12 NPPF §180 states that planning decisions should contribute to and enhance the natural and local environment by, *inter alia*, minimising impacts on and providing net gains for biodiversity, while §186 states that:

'opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate.'

- 6.13 In the case of this application, a concerted attempt has been made to address biodiversity on site insofar as possible. Attempts have been made to preserve existing trees, when balanced against the need to deliver an efficient and viable scheme, and to introduce new planting. The submitted Biodiversity Net Gain information explains that the baseline habitat data confirms that the site is dominated by habitats of low distinctiveness, with no habitats of principal importance. While new planting will improve biodiversity value, it cannot deliver the minimum 10% net gain, and – even if it was possible to do so on the site – BNG provision cannot be secured in private residential gardens. As such, off-site biodiversity provision is required, and appropriate units will need be secured from a suitable provider in order to achieve the 10% requirement (albeit we are aware that the Government has signalled its intention to exempt schemes of this scale from BNG requirements).
- 6.14 The site lies within Flood Zone 1, the area of lowest probability of flooding, where the NPPF confirms that all forms of development are appropriate in principle. In line with NPPF §162, the Sequential Test directs development toward areas of lowest flood risk, and the proposal therefore occupies a sequentially preferable location. As the site is less than 1 ha and situated within Flood Zone 1, a site-specific Flood Risk Assessment is not required under NPPF paragraph 167, which only requires an FRA for sites in Flood Zones 2 and 3 or for sites of 1 ha or greater in Flood Zone 1.
- 6.15 The application will incorporate appropriate sustainable drainage measures to ensure that it will not increase flood risk elsewhere, consistent with NPPF §169.
- 6.16 In accordance with NPPF paragraphs 152–158, the proposed development has been designed to support the transition to a low-carbon future, minimise energy consumption, and promote sustainable construction principles. The application is supported by a Carbon and Energy Statement which explains that the proposal has been assessed against national and local planning and climate change policy, including the NPPF, Building Regulations Part L (2021), the Future Homes Standard trajectory and the Places for Everyone Joint Development Plan. It adopts a proportionate approach appropriate to a small-scale residential scheme. It explains that the development follows the recognised

energy hierarchy, with a fabric-first strategy incorporating enhanced insulation, high-performance glazing, improved airtightness and efficient layouts to minimise energy demand and operational carbon emissions. The dwellings will be gas-free and heated via air source heat pumps, with provision for roof-mounted photovoltaic panels subject to final design and orientation, and electric vehicle charging provided in accordance with local standards. The scheme is designed to be net-zero ready in operational terms and represents an efficient reuse of a brownfield site, delivering modern, energy-efficient homes that align with local and national climate change objectives without imposing disproportionate requirements such as detailed embodied carbon assessments for a development of this scale.

- 6.17 Having regard to the above assessment, we contend that the scheme complies with the relevant provisions of the NPPF as an important material consideration. That lends further support to approval of the application.

Consistency with the National Design Guide

- 6.18 The National Design Guide (2021) is another material consideration, which sets out the Government's expectations for the delivery of well-designed places. The proposed development of three dwellings has been assessed against the Guide's ten characteristics of good design and is considered to accord fully with its objectives.

- 6.19 Paragraph 23 of the Guide confirms that good design should be informed by its surroundings, stating:

"Well-designed places are based on a sound understanding of the features of the surrounding context, including the natural, built and social environment."

- 6.20 However, the Guide is explicit that responding to context does not equate to replicating or copying existing development. Paragraph 24 states:

"Good design does not mean copying what is already there."

6.21 The site is located within an established residential area that is characterised by a notable diversity of architectural styles, building forms, heights and materials. Cemetery Road and its immediate surroundings comprise terraced properties, detached and semi-detached dwellings, bungalows, the recently developed Bramble Place scheme (including an apartment block), the quirky, ornate Ramsbottom Cemetery Lodge, and the former ambulance station itself, which presents a more utilitarian form and darker brickwork. This evidences that there is no single, clear or consistent streetscene or architectural typology that defines the area.

6.22 In this context, it would be inconsistent with the National Design Guide to require the proposal to take design cues solely from one subset of nearby development, such as the terraced housing, to the exclusion of the wider and demonstrably mixed townscape.

6.23 Paragraph 27 of the Guide states:

“Well-designed places have a positive and coherent identity that everyone can identify with.”

6.24 Paragraph 28 further clarifies that:

“This does not mean that all buildings have to be the same or that innovation is discouraged.”

6.25 The proposed dwellings present a coherent and unified architectural approach across the site, providing a clear identity, while avoiding unnecessary uniformity. The inclusion of contemporary design features, such as articulated elevations and modest projecting elements (as a subtle nod to the nearby cemetery lodge), contributes to visual interest and legibility and ensures the development avoids a bland or pastiche appearance. This approach is consistent with the Guide’s encouragement of innovation and distinctiveness where it contributes to overall design quality.

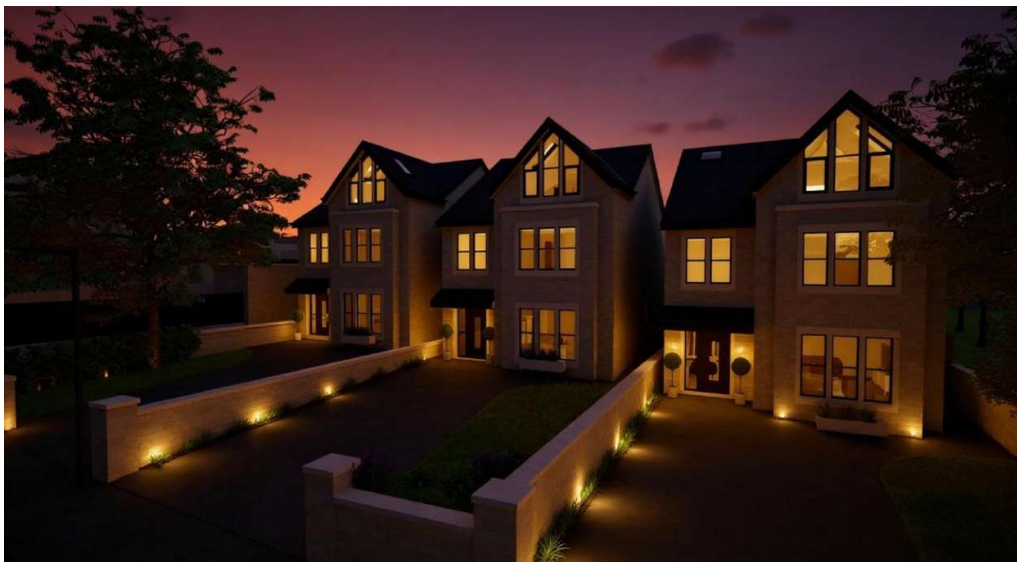
6.26 In relation to built form, paragraph 33 of the National Design Guide states:

“Well-designed places can be inspired by their surroundings, without replicating them.”

6.27 The proposed dwellings are 2.5 storeys in height and are entirely appropriate in scale and massing when viewed in the context of the surrounding development, which ranges from bungalows to two-storey dwellings and an apartment block. The scheme respects the residential character of the area while making efficient use of a previously developed site within the settlement boundary.

6.28 Whilst the Local Planning Authority has expressed a preference for further simplification of the front elevations, the removal of the flat-roofed projecting bay element, and a greater emphasis on vertical fenestration to reflect nearby terraced housing, it is respectfully considered that such an approach would represent an overly prescriptive interpretation of local character. The National Design Guide does not identify vertical emphasis or replication of historic terrace proportions as a universal requirement. Instead, it promotes balanced, proportionate and human-scale façades, all of which are achieved by the proposal.

6.29 We would, however, point out that vertical emphasis is very evident in the scheme details as is evident on the visual image below.



6.30 Paragraph 34 of the National Design Guide confirms that:

“Innovation should be encouraged where it adds to the overall quality of the area.”

6.31 The proposed palette of materials and architectural detailing sits comfortably alongside the varied range of materials present in the immediate locality, including red brick, stone and more contemporary finishes. The development will neither dominate nor visually compete with its surroundings, and will instead contribute positively to the established pattern of diverse residential development that characterises the area.

6.32 The presence of contemporary architectural features should not be viewed as harmful, particularly in an area where there is no consistent architectural language. On the contrary, the Guide supports such an approach where it results in high-quality, well-resolved design.

6.33 In conclusion, the National Design Guide is explicit that good design does not require slavish imitation of existing buildings and that contemporary architecture and innovation are acceptable and encouraged where they enhance overall quality. Given the mixed and varied character of the surrounding area, the proposal represents a proportionate, contextually responsive and high-quality design solution.

6.34 Accordingly, we suggest that the development accords with the principles set out in the National Design Guide, which weighs positively in favour of the proposal as a material consideration.

Consistency with Bury's Supplementary Planning Policies

SPD 7 – Managing the Supply of Housing Land

- 6.35 The proposed development accords with the principles of SPD 7 – Managing the Supply of Housing Land by making efficient and effective use of a previously developed brownfield site within the urban area of Ramsbottom. The scheme contributes positively to the borough's housing supply through the delivery of three new dwellings and does so at a scale and form that reflects the surrounding residential character. The proposed density, layout and dwelling typology respond appropriately to the site's context and constraints, ensuring that the development integrates successfully with its surroundings while avoiding overdevelopment. As such, the proposal aligns with SPD 7's guidance on the acceptability of residential development on unallocated sites and its emphasis on efficient land use and contextual design.

SPD 11 – Parking Standards in Bury (June 2025)

- 6.36 The proposal is also compliant with SPD 11 – Parking Standards in Bury. Adequate off-street parking is provided to serve each dwelling in accordance with the adopted standards, ensuring that the development will not result in on-street parking pressure or highway safety concerns. Provision is also made for electric vehicle charging, and opportunities for cycle storage can be accommodated within the curtilage of each dwelling in line with the guidance. Overall, the parking strategy supports sustainable travel choices and reflects Bury Council's objectives for well-designed, functional and proportionate parking provision for small-scale residential development.

Development Control Policy Guidance Note 16: Design and Layout of New Development in Bury

- 6.37 The proposed development has been designed in accordance with Note 16 by responding positively to the site context and surrounding townscape. The scale, massing and form of the proposed dwellings reflect the established residential character of the

area, ensuring that the development integrates comfortably with neighbouring properties and avoids overdevelopment. The layout has been carefully considered to provide appropriate separation distances, protect residential amenity, and create a clear and legible arrangement of buildings, access and private garden space. Adequate levels of daylight, outlook and privacy are maintained for both future occupants and neighbouring residents, while boundary treatments and landscaping contribute to a coherent and attractive street scene. The scheme also promotes safe and convenient access, with parking and servicing arranged in a manner that does not dominate the public realm. Overall, the proposal accords with the principles of Guidance Note 16 by delivering a high-quality, contextually responsive design that supports the creation of a well-functioning and visually appropriate residential environment.

- 6.38 We therefore contend that, in overall terms, the proposal is consistent with the above supplementary policies as material considerations.

7.0 Overall Planning Balance and Conclusions

- 7.1 Section 38(6) of the Planning and Compensation Act requires planning decisions to be made in accordance with the development plan, unless material considerations indicate otherwise.
- 7.2 In this Planning Statement we have explained why we consider that the proposal complies with the most important policies of the development plan.
- 7.3 We have also highlighted material considerations that we believe lend further weight to approval.
- 7.4 This application seeks the redevelopment of a vacant, redundant and visually poor-quality brownfield site within an established residential area. The Local Planning Authority confirmed at pre-application stage that the principle of residential development on the site is acceptable. The proposal therefore aligns with the spatial strategy of both the development plan and the National Planning Policy Framework, which strongly support the effective reuse of previously developed land in sustainable urban locations.
- 7.5 The development will deliver three good quality family dwellings in a sustainable and accessible location. While modest in scale, the proposal makes a positive contribution to housing delivery at a time when the Borough's most recent Housing Delivery Test result remains below 75%, engaging the tilted balance in favour of sustainable development. However, we are aware that, in March 2025, Bury Council published its locally calculated estimate of its 2024 Housing Delivery Test result within its housing evidence to support plan-making and decision-taking (Topic Paper 2: Housing). That estimate, which covers housing delivery from 2021/22 to 2023/24, suggested delivery of around 76% of the homes required.

- 7.6 Notwithstanding that, the Council is charged with '*significantly boosting*' its supply, and the provision of larger 5 bedroom family homes responds positively to identified housing need and stock imbalance at borough and local levels, and does so without compromising design quality, residential amenity or environmental considerations.
- 7.7 The Local Planning Authority's pre-application advice identified Policy JP-H4's minimum density benchmark of 35 dwellings per hectare for accessible urban locations, noting that an initial estimate of 30 dwellings per hectare was based on an assumed site area. The submitted scheme is informed by a precise assessment of the site and its constraints. The gross site area measures 0.095 hectares, of which 0.01 hectare is constrained by tree Root Protection Areas, resulting in a net developable area of 0.085 hectares. On this basis, the provision of three dwellings achieves a density of 35.3 dwellings per hectare, thereby meeting and marginally exceeding the minimum benchmark set out in Policy JP-H4, without artificially manipulating the site boundary.
- 7.8 Beyond the numerical calculation, Policy JP-H4 requires density to be appropriate to character, context and housing mix. The surrounding area is characterised by a mix of terraced and low-to-medium density detached and semi-detached dwellings (also flats), and as such there is no prevailing high-density urban grain. The proposed density therefore represents an efficient and balanced use of a constrained brownfield site, avoiding overdevelopment while respecting local character, amenity and tree retention. Although higher densities could theoretically be achieved through smaller units, the policy does not require density maximisation at the expense of design quality or housing mix. The delivery of larger family homes responds to identified housing need, with evidence demonstrating an under-supply of larger dwellings at borough and national levels, including within Ramsbottom. Taken together, the scheme satisfies both the quantitative and qualitative requirements of Policy JP-H4 and represents a justified, efficient and policy-compliant use of land.

- 7.9 In design and townscape terms, the proposal represents a clear improvement over the existing situation. The existing former ambulance station is a utilitarian, squat and unattractive building that sits uncomfortably within its residential context and detracts from the character of the street. Its removal and replacement with well-designed dwellings and new landscaping will enhance the visual quality of the area, provide a more active and attractive frontage to Cemetery Road, and reinforce the residential character of the locality. The proposed design responds appropriately to the highly varied context with its mix of house types, sizes, styles and materials, without resorting to mimicking and pastiche, and accords with both local and national design policy.
- 7.10 The proposal is consistent with the National Design Guide (2021), which is a material consideration and makes clear that good design should be informed by its context without requiring copying or pastiche. The immediate area is characterised by a clear diversity of building types, scales, styles and materials, including terraced housing, bungalows, an apartment block, the ornate cemetery lodge and the former ambulance station itself, such that there is no single or uniform streetscene to replicate. In this context, the proposed dwellings appropriately respond to their surroundings in terms of use, scale and massing while introducing a coherent and high-quality contemporary design.
- 7.11 The National Design Guide expressly confirms that “*good design does not mean copying what is already there*” and that innovation and contemporary features are acceptable and encouraged where they add to overall quality. The scheme therefore avoids an overly prescriptive or reductive interpretation of local character, delivers a positive and legible identity, and accords fully with the objectives of the National Design Guide, which weighs in favour of the proposal.
- 7.12 The scheme has been carefully designed to respect the amenities of neighbouring residents. Appropriate separation distances are achieved, private amenity space is provided for all future occupants, and the height, scale and massing of the proposed houses are commensurate with surrounding development. Potential impacts on outlook

or daylight have been assessed and are considered acceptable in the context of an established residential environment.

- 7.13 In highways and parking terms, the proposal provides generous on-plot parking in excess of adopted standards, together with secure cycle storage and electric vehicle charging infrastructure. While the formation of driveway accesses may result in the loss of up to two on-street parking spaces, this represents a limited and localised impact which, when considered in context, would not result in a material shortfall of parking provision or a severe impact on the operation of the highway network. This limited harm is clearly outweighed by the benefits of the scheme and is consistent with national policy, which sets a high bar for refusal on transport grounds.
- 7.14 The proposal has also been assessed carefully in relation to trees and ecology. The most visually significant protected tree on the site is retained and protected, with appropriate construction methodologies secured. The removal of one Category B tree of moderate quality and limited public prominence has been justified, assessed against the statutory test of expediency, and is mitigated through a comprehensive landscaping strategy that will deliver new tree planting in more prominent locations and result in a net qualitative enhancement to local amenity. Biodiversity matters have been addressed through appropriate assessment and mitigation, with off-site provision required to secure the required Biodiversity Net Gain.
- 7.15 The development further delivers environmental benefits through sustainable drainage, low-carbon design, energy-efficient construction, and homes supported by air source heat pumps and electric vehicle charging. The proposal therefore aligns with the transition to net zero and accords with the climate change objectives of both Places for Everyone and the NPPF.
- 7.16 When the proposal is assessed in the round, the benefits are clear and substantial. These include the regeneration of a redundant brownfield site; the delivery of much-needed family housing in a sustainable location; enhancement of townscape and visual amenity; efficient use of urban land; support for housing delivery objectives; and alignment with

environmental and climate change policy. Any identified adverse impacts are limited in scale, localised in nature, and fully mitigated or outweighed by these benefits.

- 7.17 In overall conclusion, we suggest that the proposal represents a good and sustainable form of development that accords with the development plan when read as a whole, is supported by material considerations, including compliance with the objectives of the National Planning Policy Framework. There are no adverse impacts that would significantly or demonstrably outweigh the benefits of the scheme. The planning balance therefore falls clearly and decisively in favour of approval, and planning permission should be granted accordingly.

Appendix 1

Historic aerial images showing street parking availability [note date at top left of each image]

