

Mondi Mill

Planning Statement

Application for residential development

Eccleston Homes Ltd

27 October 2023

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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 for residential development at the former Mondi Paper Mill, Ramsbottom, Bury [the Application Site].
- 1.2 Proposals for residential development on the application site was recently dismissed at Appeal (ref. APP/T4210/W/22/3302543) on grounds that insufficient evidence was provided to assess a particular aspect of flood risk relating to associated with groundwater, foul drainage, fluvial and surface water sources. It was therefore not possible for the Inspector to be certain that the proposed development would not cause an elevated risk of flooding elsewhere in order to demonstrate compliance with the Exception Test or that the development could be made safe for the intended ‘more vulnerable’ occupants of the site over its lifetime.
- 1.3 The proposal was for the erection of 73 dwellings including the retention and conversion of 2 existing buildings to residential use (5 units), 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. The revised proposal is for a similar residential development but incorporating a new public car park to serve the adjacent train station and town centre in the location of the previously converted buildings. Additional technical evidence has been prepared to provide enough evidence to overcome the concerns of the Inspector in relation to flood risk.
- 1.4 The purpose of this statement is to assist Bury Metropolitan Borough Council [the Council] as Local Planning Authority [LPA] in its consideration of the revised application for full planning permission. The revised description of development is:
- “The demolition of a derelict brick building and two stone buildings, the retention of a chimney and the erection of 57 dwellings together with engineering operations to create a development platform, public car park, substation, public open space, landscaping, drainage, the layout of internal estate roads and footways and other associated works”.*
- 1.5 This statement considers the application’s conformity with the Development Plan, relevant national policy, as well as any other material considerations 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.
- 1.6 A full schedule of reports and drawings accompanying the application is provided in the covering letter which accompanies the application.

Structure of the Report

- 1.7 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;
- Section 7.0 – Sustainable Development; and,
- Section 8.0 – Conclusions.

2.0 The Site & Surroundings

Site Context and Description

- 2.1 The site comprises approximately 2.9 ha of previously developed land located on the eastern edge of Ramsbottom Town Centre in the Metropolitan Borough of Bury. The site was previously occupied by the former Mondi Paper Mill and associated car park up until its closure in 2008 and subsequent demolition in 2012, with the site now comprising a large area of concrete hardstanding with grassed areas to the south. The site is vacant and has not generated any economic activity for the last 15 years. Retained buildings and structures on site include two 2-storey stone buildings, a brick building, and the former mill chimney stack. Descriptions of these buildings are set out in the accompanying Heritage Impact Assessment and are referred to as Buildings A, B and C.
- 2.2 The application site is bound as follows:
- To the north by Bridge Street, beyond which lies industrial development including a waste and recycling centre;
 - To the east by the River Irwell, beyond which lies an area of woodland and residential development;
 - To the south by the Ramsbottom Cricket Club and the Harry Williams Riverside Stadium, beyond which lies Nuttall Park; and,
 - To the west by the East Lancashire Railway and associated heritage railway line, beyond which lies the wider settlement and town centre of Ramsbottom.
- 2.3 Existing vehicular access to the site is taken from the west via an unnamed road which adjoins Bridge Street to the north. This vehicular route continues south providing access to the Ramsbottom Cricket Club and Harry Williams Riverside Stadium.
- 2.4 The application site is partly located within Flood Zone 3, with the remainder of the site lying within Zones 1 and 2. The north-western extent of the site including two of the retained non-listed structures and chimney stack are located within the Ramsbottom Conservation Area, however there are no listed buildings or trees subject to a Tree Preservation Order [TPO] situated within the application site boundary.
- 2.5 The application site is sustainably located with good access to public transport services and within walking distance to a range of local amenities located within Ramsbottom Town Centre to the west. Bus stops line Bridge Street to the north of the application site, providing regular services to Bury, Manchester City Centre, and Peel Brow.

Planning History

- 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 On 13 February 2020 (ref. 65217), a planning application for residential development on the site was submitted to the Council. This application sought full planning permission for residential development. However, due to issues raised during the applications consideration, most notably flood risk, the application was subsequently withdrawn.

- 2.8 On 17 September 2020, a new planning application (ref. 65844) for residential development was submitted to the Council. This application sought full planning permission for the following development:
- “Erection of 73 no. dwellings including the retention and conversion of 2 existing buildings to residential use (5 no. units), 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.”*
- 2.9 The applicant was Eccleston Homes. Planning permission was refused on 7 June 2022 following a resolution at Planning Committee on 31st May contrary to the Officer’s recommendation. The reasons for refusal by members related to detriment to road safety and increased flooding from surface water and combined sewer network.
- 2.10 An Appeal was lodged on behalf of Eccleston Homes but was subsequently dismissed on 14 February 2023. The issue of concern raised by the Inspector was not a concern previously raised by the local planning authority [LPA] or the consultees in their responses to the application.
- 2.11 The Inspector found that insufficient evidence was provided by both parties to clearly assess the flood risks associated with groundwater, foul drainage, fluvial and surface water sources. It was therefore not possible for the Inspector to be certain that the proposed development would not cause an elevated risk of flooding elsewhere or that the development could be made safe for the intended ‘more vulnerable’ occupants of the site over its lifetime.
- 2.12 In the absence of demonstrated compliance with the exceptions test, it was found that the development would thereby conflict with saved Policy EN5/1 (New Development and Flood Risk) of the UDP and the Framework which require that the development should be safe for its lifetime without increasing flood risk elsewhere. The Inspector therefore found the proposal would conflict with the development plan taken as a whole and did not meet the requirements of paragraph 11(d) in the context of granting permission.
- 2.13 However of relevance, the Inspector also found that the requirement of a transport contribution of £110,00 for the installation of MOVA at the A56/Bury New Road junction would be excessive and would not be necessary to make the development acceptable in planning terms. The Inspector also awarded full costs to Eccleston Homes as it was found that the Council failed to substantiate each reason for refusal and relied on generalised assertions about the proposal’s impacts which were unsupported by objective analysis.
- 2.14 Public access also identified a number of other planning applications on the application site submitted in 2005-6 relating to its former employment use, none of which are of direct relevance to the proposed development.

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 demolition of a derelict brick building and two stone buildings, the retention of a chimney and the erection of 57 dwellings together with engineering operations to create a development platform, public car park, substation, public open space, 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 57 dwellings comprising 2 two-bed semi-detached homes, 31 three-bed semi-detached / detached / mews homes and 24 four-bed detached homes. There are several different house types across the application site but there is continuity in terms of materials and design. This provides variation and provokes interest providing enhanced legibility within the site. The houses will be a mixture of two-storey and 2.5 storey dwellings. The broad principles of the design and layout of the development are the same as the previous application.
- 3.3 Access is proposed off the existing unnamed access road located along the western boundary of the application site running north south from Bridge Street. This road has been designed to maintain vehicular access to the Ramsbottom Cricket Club to the south. The existing access from Bridge Street will be improved through widening of the carriageway and the provision of a footway either side. It will provide access to a new public car park comprising 47 spaces and the substation as well as the new internal estate roads, cul-de-sacs and driveways to serve the new dwellings. An additional emergency access is proposed directly from Bridge Street. This will also allow for pedestrian access. An additional pedestrian access is proposed from Bridge Street to the east of the emergency / pedestrian access. The new car park will provide 47 car parking spaces for use by the public.
- 3.4 Dwellings are set back from roads and are proposed to address street corners and enhance natural surveillance throughout the development. The use of headers, cills, pike details, porches and canopies would add visual interest to the elevations. 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 side or rear garden and 2 off-street car parking spaces either to the front or side of the respective unit or in a suitable location well related to that dwelling. Some larger dwellings are proposed with an additional parking space in the form of an integrated or detached garage. The detached garages will not project forward of their associated building lines. Proposed boundary treatments include fencing, railings and walls. The brick wall is to be retained to the north of plots 8-12 and pedestrian access. It was not possible to retain the brick wall around the car park for drainage reasons as water needs to be able to pass through.
- 3.5 All dwellings will be constructed from Marshalls Cromwell Stone and slate effect tile which has been selected to respond positively to the Ramsbottom Conservation Area. The scheme has also been designed to include an area of Public Open Space [POS] (approximately 0.58

ha), as well as incorporating an attractive landscaping scheme. All properties are provided with designated areas for storage of waste and recycling bins.

- 3.6 The proposals also include the retention of the existing brick chimney stack. Three buildings will be demolished as part of the proposals.
- 3.7 Overall, the key changes since the previous scheme relate to the introduction of a new public car park and new improvements to the existing access from Bridge Street. The access will be widened and a footway is now proposed on either side of the road. This will also accommodate a turning into the new public car park. The provision of this car park will require the removal of the two existing stone buildings and has also resulted in a reduction in the total number of dwellings proposed. An updated housing mix is proposed to take account of more recent market demands. Apartments are no longer proposed.
- 3.8 The general arrangements of the internal road network remain the same as originally proposed with some tweaks to the access from Bridge Street and the arrangements of some shared driveways where plots have been reconfigured as a result of the new car park and updated housing mix.

Pre-application Engagement

- 3.9 The Framework recognises the importance of early engagement to improve the efficiency and effectiveness of the planning application system for all parties. Indeed, Paragraph 39 states:

“Good quality pre-application discussion enables better coordination between public and private resources and improve outcomes for the community.”

- 3.10 The Applicant participated in extensive programme of discussions with Council Officers and other statutory consultees prior to the submission of the application in 2020 and during its consideration.
- 3.11 Various pre-application meetings and discussions have also taken place prior to the submission of this application. During pre-application discussions, the applicant agreed to accommodate a public car park into any new application for residential development on the application site at the request of the LPA given the benefits this will bring to the local area. This has resulted in a requirement to demolish the two existing stone buildings.
- 3.12 A formal pre-application enquiry submitted on 7 July 2023 in relation to the development proposed by this application. Detailed feedback was received on 17 August 2023. This established the following matters:
- The loss of employment use on the site to residential is acceptable in principle;
 - The Council is unable to demonstrate a five-year housing land supply and the tilted balance applies;
 - The site as it currently exists represents a negative feature on and within the setting of the Conservation Area and that the proposed development would remove this negative feature;
 - The proposed development would preserve the character of the conservation area and would not be a prominent feature;

- The proposed car park would not have an adverse impact upon the character of the area as the existing use of the land is already a car park;
- The proposed dwellings comply with the aspect standards and would not impact upon the neighbouring properties;
- The proposed development including the surface water drainage impact, public open space / flood alleviation scheme would have a positive impact on the ecological potential of the river; and,
- The contribution of £110,000 for the implementation of MOVA at the junction of Bury New Road and Manchester Road would not be pursued as part of any subsequent application.

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 September 2023 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 (paragraph 8) 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 there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.” [part d].*
- 4.5 Footnote 8 states that the presumption in favour of sustainable development is triggered where the Housing Delivery Test [HDT] indicates that the delivery of housing was substantially below (less than 75% of) the housing requirement over the previous three years (see HDT section below).
- 4.6 Chapter 5 of the Framework relates to housing, and of particular note is Paragraph 60 which identifies the Government's objective to boost the supply of homes. Paragraph 119 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.
- 4.7 Paragraph 120(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”.*
- 4.8 Paragraph 122 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 LPA 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.

- 4.9 Chapter 14 of the Framework relates to climate change, flooding and coastal change. Paragraph 159 seeks to avoid inappropriate development in areas at risk of flooding by directing developments away from areas at highest risk. Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere. Paragraph 163 states that if it is not possible for development to be located in areas with a lower risk of flooding (taking into account wider sustainable development objectives), the exception test may have to be applied. The need for the exception test will depend on the potential vulnerability of the site and of the development proposed. Paragraph 164 further states that the application of the exception test should be informed by a strategic or site-specific flood risk assessment, depending on whether it is being applied during plan production or at the application stage. To pass the exception test, it should be demonstrated that:
- a The development would provide wider sustainability benefits to the community that outweigh the flood risk; and,
 - b The development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.

- 4.10 Paragraph 203 of the Framework states that the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

Planning Practice Guidance

- 4.11 On 29 November 2016, the Government published the Planning Practice Guidance [PPG]. This was updated most recently on 21 June 2021.
- 4.12 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

- 4.13 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

- 4.14 The most pertinent UDP policies to the consideration of this application are as follows:
- **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.
- 4.15 The UDP was adopted at a time when the former mill was fully operational as an employment generating use. The following policies are therefore also relevant to the application site:
- **UDP Policy EC1/1/1 (Employment Land Provision)** allocates part of the site (Trinity Paper Mills, Bridge Street, Ramsbottom) for business (B1), general industrial (B2) and warehousing uses (B8).
 - **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.
- 4.16 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 EN5/1 – New Development and Flood Risk;
 - 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;
 - UDP Policy HT2/4 – Car Parking in New Development;
 - UDP Policy HT4 – New Development; and,

- UDP Policy HT5/1 - Access for Those with Special Needs.

Supplementary Planning Documents and Guidance

- 4.17 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).
- 4.18 Supplementary Planning Guidance [SPG] 2 (Wildlife Links and Corridors) and 5 (Affordable Housing Provision) are also of relevance to the proposals.

Emerging Policy

Places for Everyone

- 4.19 Places for Everyone [PfE], once adopted, will set out how nine Greater Manchester local authorities (Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan) will develop up until 2037. The Plan will provide a vision, strategic thematic policies and site allocations for development across the sub-region.
- 4.20 The document was submitted to the Secretary of State [SoS] for examination in February 2022. The hearing sessions into the PfE document began in November 2022. A consultation on proposed main modifications has just commenced on 11 October and will close on 6 December 2023. Given the advanced stage of the examination of the PfE document, this should be given weight in the determination of this planning application.

Bury Local Plan

- 4.21 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 has been delayed pending progress on PfE.

Other Material Considerations

Strategic Housing Land Availability Assessment

- 4.22 The Council's 2022 Strategic Housing Land Availability Assessment [SHLAA] identifies the former Mondi Mill site (ref. HL/2519/00) as having capacity to deliver 72 units.

Five Year Housing Land Supply

- 4.23 The Council's 2022 Five Year Supply Statement acknowledges that the Council cannot demonstrate a five-year housing land supply [5YHLS] based on the local housing need figure. It is calculated at 2.3 years (including 20% buffer as per the results of the HDT below).

Housing Delivery Test

- 4.24 The Framework requires LPA's to monitor progress on housing delivery using the Housing Delivery Test [HDT]. This measures the net additional dwellings delivered against the number of homes required, using a rolling three-year period. The latest measurements for 2021 were published in January 2022. The 2021 HDT equates to 52% and the Council is therefore required to prepare an Action Plan and apply a 20% land buffer to their 5YHLS supply position. The presumption in favour of sustainable development is also triggered as per footnote 8 of the Framework.

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 partially allocated for employment and identified as an 'employment generating area' by UDP Policies EC1/1 or EC2/1. It is noted that the former mill was fully operational at the time the UDP (including the allocation and designated) was adopted in 1997. The mill closed in December 2008 and some of the former buildings have been demolished leaving a vacant site. The site has generated no economic activity for the last 15 years. It is considered that these policies within the UDP are considerably out-of-date.
- 5.5 Paragraph 122 of the Framework requires LPAs to support applications for alternative uses on the land where there is no reasonable prospect of an application coming forward for the use allocated and the proposed use would contribute to meeting an unmet need for development in the area. Paragraph 119 also promotes decisions to accommodate objectively assessed needs on previously developed land. The site has been marketed extensively for employment, as well as other commercial uses. Details of which are set out in the marketing report prepared by Lambert Smith Hampton. This concludes that the site is unlikely to attract employment-related uses due to various planning constraints associated with the site. The report has already been submitted to the LPA and considered during the consideration of the previous application. The Council have accepted that there is a reasonable conclusion to draw from the assessment of the site and that there is no reasonable prospect of the site being reused for employment purposes.
- 5.6 The Council have accepted that they cannot demonstrate a 5YHLS and has under delivered on housing with a HDT result of 52%. Indeed, the Inspector agreed as part of the recent appeal decision that footnote 8 of the Framework is triggered in this instance. This requires that permission should be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole in accordance with paragraph 11(d). The appeal was however dismissed on the basis that insufficient evidence was provided by both parties to clearly assess the flood risks associated with groundwater, foul drainage, fluvial and surface water sources. It was therefore not possible for the Inspector to be certain that the proposed development would not cause an elevated risk of flooding elsewhere in order to demonstrate compliance with the Exception Test or that the development could be made safe for the intended 'more vulnerable' occupants of the site over its lifetime.

Flood Risk

- 5.7 Further assessment has been undertaken in this regard to support the application. This application is accompanied by an updated 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.
- 5.8 The proposed drainage strategy has been updated and additional hydraulic modelling has been carried out to demonstrate that the proposed development does not increase flood risk on Bridge Street, and more generally reduces modelled flood levels (Section 5.5 of the FRA).
- 5.9 The Environment Agency hydraulic model outputs indicate that the existing site is subject to minor flooding in the 3.3% annual exceedance probability [AEP] event, with flooding limited to the south-east corner of the site. More significant flooding is shown to occur across the eastern portion of the site in events exceeding the 1.0% AEP event, with a maximum flood depth of approximately 1.1 m occurring in the south-east of the site in the 0.1% AEP event. The site is generally considered to be at a low risk of flooding from surface water, groundwater and reservoirs and is assessed not to be at risk of flooding from canals or other artificial water bodies.
- 5.10 Sections 5.1, 5.2 and 5.3 of the FRA illustrate how the risk of flooding from the River Irwell is being dealt with and confirms that FFL's remain dry in all modelled events and Section 5.4 confirms that the proposed flood risk mitigation measures also manage flood risk from surface water, groundwater and sewers.
- 5.11 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:
- a 30 m wide second stage channel along the eastern boundary of the site (west bank of the River Irwell).
 - b Remove existing boundary walls along the northern boundary of the site adjacent to the proposed car park;
 - c Design levels to direct floodwater entering the site via Bridge Street into the existing mill race;
 - d Upgrade the existing 600 mm diameter culvert crossing the site with a 2000 x 1200 mm box culvert;
 - e Raise the proposed development platform above the peak flood levels in 0.1% AEP event;
 - f Raise the proposed development plots above the peak flood levels in the 1.0% climate change AEP;
 - g Raise finished floor levels a minimum of 0.15 m above finished development platform level; and,
 - h Construct an appropriately designed surface water drainage system.
- 5.12 The proposed drainage strategy will restrict the proposed discharge rate to 142.5 l/s, equivalent to a 30% reduction of the 1 year runoff rate from the existing site. Attenuation storage is principally providing using oversized pipes given the proposed development

layout; however, a geocellular tank is proposed within the new area of car parking. The drainage system has been designed to store the 100 year storm event including a 45% allowance for climate change (previously 40%) to account for latest EA guidance.

- 5.13 On the basis that the finished floor levels will be raised above peak flood levels in the extreme 0.1% AEP (1:1000 year) flood event scenario, Weetwood have advised that future residents should not need to take any specific actions in the event that a flood warning is issued and as such, a Flood Plan is no longer considered to be required.
- 5.14 Overall, the information submitted has been prepared having regard to 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.
- 5.15 Given that the majority of the appeal site is located within Flood Zone 3, this application is accompanied by a Flood Risk Sequential & Exception Test Assessment and a Flood Risk Sequential Assessment Addendum prepared by Lichfields. There were submitted to support the previous application for planning permission and the appeal. The sequential test concludes that no alternative sites were found to be sequentially preferable and appropriate or reasonably available.
- 5.16 Paragraph 163 of the Framework stipulates that, if it is not possible for development to be located in areas with a lower risk of flooding (taking into account wider sustainable development objectives), the exception test may have to be applied. The PPG further states that where there are no reasonably available sites in Flood Zones 1 or 2 should the suitability of sites in Flood Zone 3 be considered, taking into account the flood risk vulnerability of land uses and applying the exception test if required.
- 5.17 Paragraph 164 of the NPPF provides two criteria which should be met for the exception test to be passed. These are:
- a The development would provide wider sustainability benefits to the community that outweigh the flood risk; and
 - b The development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.

Sustainability Benefits to the Community

- 5.18 The proposed development has several community benefits which are considered to outweigh the flood risk associated with the scheme. The development will expand the provision of new market housing in the Borough, addressing an identified need and regenerating a derelict brownfield site back into a sustainable use. The proposed development will also deliver much needed car parking infrastructure to serve Ramsbottom and to tackle existing parking issues within the local area which should be afforded great weight.
- 5.19 Indeed, paragraph 33 of the Inspector's report for the recent appeal decision stated *"there is no dispute between the main parties that the proposal would provide wider public benefits. This would comprise the benefits of housing delivery, including affordable units, and the effective use of a derelict brownfield site located close to services and facilities. It would respond to local land-use demand, provide management of the site surface water*

regime to limit peak flows to the River Irwell and provide public access to open space alongside it. Economic benefits would also arise from its construction and occupation phases.”

- 5.20 The development will also contribute towards the longstanding investment priorities of the Council by creating spin-off jobs and associated benefits that are normally attributable to new housing.
- 5.21 Paragraph 8 of the Framework sets out the economic, social and environmental dimensions of sustainable development, all of which are to be pursued in a mutually supportive manner. Accordingly, the appeal development will provide community benefits which respond to all three of the interdependent dimensions of sustainability, namely:
- Sustaining on-site construction employment and supporting off-site employment in construction related industries over the build period;
 - Generating resident expenditure in the local area, boosting the local economy and sustaining jobs;
 - Creating a strong, vibrant and healthy community with sustainable housing located within walking distance of a wide variety of existing shops and services located at Ramsbottom Town Centre; and,
 - Securing the development of a redundant brownfield site, whilst retaining historic buildings in-keeping with the locality and surrounding Conservation Area.
- 5.22 Further factors of sustainable development which demonstrate that the provisions of the exception test have been met is set out in Section 7 of this statement.

Lifetime Safety of the Proposed Development

- 5.23 The FRA demonstrates that the proposed development has been designed to ensure that it will be safe for its lifetime, thus passing the second element of the exception test. It is important to note that through the creation of a development platform, all of the proposed residential units will be raised to a level which effectively places all dwellings within Flood Zone 1.

Summary

- 5.24 Overall, the proposed development will not lead to increased flooding in the vicinity of the site. It is therefore considered the proposed development now complies saved Policy EN5/1 (New Development and Flood Risk) of the UDP and the Framework which require that the development should be safe for its lifetime without increasing flood risk elsewhere. We also conclude that the requirements of the exception test have been met, and on the basis that a Flood Plan is no longer required, we consider that the revised proposals fully address the Inspector’s previous concerns relating to flood risk.

Heritage & Conservation

- 5.25 The application site sits to the south and east (and is partially located within) the Ramsbottom Conservation Area, which covers much of the town. The Conservation Area includes the north-western corner of the application site, fronting Bridge Street. As set out in the HIA, Ramsbottom is a good example of a West Pennine town which prospered during

the Industrial Revolution largely as a result of the rapidly expanding cotton and textile industry in Greater Manchester. Through the decline of the industry Ramsbottom lost many of its industrial buildings and structures but the stone built domestic and civic structures have been relatively well preserved.

- 5.26 The application site itself generally makes a poor contribution to the setting and significance of the Conservation Area, though some former industrial buildings are present. Within the north-west portion of the site are three existing buildings, as well as a chimney stack, which comprised part of the former Mondi Mill. These structures are locally listed. From north to south, the buildings are referred to respectively as Buildings A, B and C. A goit is also present.
- 5.27 Buildings A and B (and the chimney stack) are located within the Conservation Area, whilst Building C is located just outside of it.
- 5.28 These structures make a limited positive contribution to the historic and architectural interest of the Conservation Area, though the chimney stack is the only structure which can be widely appreciated throughout the majority of the Town. The remainder of the application site consists of deteriorated brownfield land and currently forms a negative element within the Conservation Area and within its setting.
- 5.29 The cavity in the chimney will be repaired and its long-term maintenance will be secured. The chimney is a key feature within the conservation area and can be viewed across the town, so its retention will assist in preserving the character of the Conservation Area. The goit will also be retained and an area of open space orientated around these two features to improve legibility.
- 5.30 Buildings A, B and C will be demolished. This is due a combination of factors including the need to accommodate a public car park within the front of the site, the very poor condition of the buildings, as well as the failure of the buildings to meet flood risk/drainage standards due to the existing floor levels not meeting modern requirements (and the difficulties that raising floor levels within the buildings would present). As set out in the HIA, these structures cannot be seen within the majority of the Conservation Area due to intervening development, vegetation and the scale of the buildings. At present, the only place outside of the application site from which the structures can be appreciated is Bridge Street. For these reasons the impact of the loss of these buildings on the significance of the Conservation Area is limited, and must be considered together with the benefits to the Conservation Area.
- 5.31 The proposed development comprises an attractive residential scheme, which incorporates sympathetic building materials, areas of open landscaping and buildings of a domestic scale. The proposed buildings will reference the stone-built buildings within Ramsbottom Conservation Area, without seeking to imitate. The proposed house types in the conservation area itself are smaller terraced plots, with a simple design that references the workers housing typology which is present across the town. The proposed layout and house types will respect the character of the Conservation Area.
- 5.32 Larger house types are focused in towards the 'back' or east of the site, outside of the Conservation area. Whilst it is recognised that there is a predominance of two-storey workers cottage style dwellings within the heart of Ramsbottom Conservation Area, it is considered that this part of the site is capable of accommodating a modest increase in

height due to the lack of visual relationship with the wider Conservation Area, as well as the more contemporary development (predominantly supermarkets) present to the immediate west of the application site on Railway Street.

- 5.33 Taking into account the baseline position, (i.e. that the wider application site detracts from the setting and significance of the Conservation Area) it is considered that the overall effect of the proposed development on the Conservation Area will be neutral, and its character and appearance will be preserved in accordance with S.72 (1) of the 1990 act, Policy 4 of the Conservation Area Appraisal and UDP Policy EN2/1.
- 5.34 In terms of non-designated assets, notwithstanding the retention of the chimney and goit, the demolition of buildings A, B and C will represent the total loss of these non-designated assets. The HIA establishes that the value of the building ranges from negligible to low, and that the residual heritage harm arising from the loss of the buildings is low. This low level of harm to must be factored into the planning balance in accordance with Paragraph 203 of the Framework.

Planning Balance Conclusions

- 5.35 Overall, the application proposals will facilitate the regeneration of the site and deliver sustainable development in accordance with the requirement to take a 'brownfield first' approach to meeting housing needs. The proposed development will also now include a new public car park which is to be given great weight in the determination of this planning application. The proposed development will not impact on any statutory heritage assets. In terms of non-designated assets, the chimney and goit will be preserved but there will be a low level of residual harm arising from the demolition of non-designated Buildings A, B and C, which are required to be demolished for the reasons set out in Section 3. Overall, it is considered that the benefits resulting from the proposed development significantly outweighs this low level of harm. Further factors which are considered to play in the planning balance are detailed in Section 7 of this statement. We therefore consider that the proposals represent sustainable development in accordance with paragraph 11 (d) of the Framework.

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 applications have also guided the final design.
- 6.4 The proposals will deliver a mix of terraced, semi-detached and detached dwellings. The proposed dwellings would be predominantly two storeys in height with some dwellings with converted roof space.
- 6.5 The proposed development has been designed to respect the character of the conservation area by delivering a high-density development, with the use of headers, cills, pike details, porches and canopies adding visual interest to the elevations. Indeed, whilst the scheme has been revised since the previous application, the proposed development is in keeping with the previous proposals in terms of the general arrangement of the layout and proposed materials. These matters have already been found to be acceptable by Bury Council as part of the previous application for planning permission. For example, page 35 of the Committee report concluded that:
- “All of the proposed dwellings would have a side or rear garden, which would provide a suitable level of amenity space. There would be space within the gardens for bin storage and the proposed boundary treatments of timber fencing, railings and brick walls would be acceptable. As such, the proposed development would preserve the character of the conservation area and would not be a prominent feature in the streetscene. Therefore, the proposed development would be in accordance with Policies EN1/2, H2/1, H2/2, EN2/1 and EN2/2 of the Bury Unitary Development Plan”.*
- 6.6 This statement was also echoed in the Council’s pre-application response to the revised proposals. This statement also confirmed that the proposed car park would not have an adverse impact upon the character of the area. This is on the basis that the existing use of the land is a car park.
- 6.7 Overall, the DAS concludes that the development is in a sustainable location and used high quality design and sustainable principles. The scale and appearance of the new development along with the associated landscaping will present a much more positive aspect to the surrounding area. The proposals are of high quality design which positively contributes to the local environment and respect the character and appearance of the area. The DAS considers that the scheme complies with design policy at national, regional and local levels and is therefore considered to be acceptable.

Residential Amenity

- 6.8 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.
- 6.9 The proposed development has been designed to achieve appropriate interface distances in line with the UDP Policy H2/2 (The Layout of New Residential Development).
- 6.10 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.
- 6.11 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

- 6.12 This application is accompanied by an Arboricultural Impact Assessment [AIA] and planting plans, both prepared by Ascerta.
- 6.13 The AIA sets out that in order to facilitate the development, 5 tree groups (G1, G2, G3, G4, G5), part of 1 tree groups (G6) and a dead Crack Willow Tree in G8 will need to be removed. Compared to the previous proposal, this now includes the removal of G3 and part of G1 which were previously proposed for retention. 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.
- 6.14 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 west of the site.
- 6.15 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

- 6.16 The previous application for planning permission as accompanied by a detailed Transport Assessment [TA] which concluded that the development could be safely accessed, is well located in terms of its accessibility by all the major non-car modes of transport and the traffic generated by the development could be accommodated on the local highway network. This was reviewed by the LPA, Local Highways Authority [LHA] and Transport for Greater Manchester [TfGM] and no objection was raised. As set out in Section 3 above, the application was refused on flood risk and highways grounds. However during the appeal, the Inspector found that there was little to demonstrate that the proposed scheme would cause an unacceptable impact on highways safety or result in a severe impact on the road network and concluded that the previous proposals would align with local and national policies in relation to highways safety or capacity of the road network.
- 6.17 Whilst the scheme has been revised since the previous application, the proposed development is in keeping with the previous proposals in terms of the general arrangement of the layout and proposed materials. The main change relates to the introduction of a new public car park at the request of the Council. The access from Bridge Street will also be widened and a footway is now proposed on either side of the road. This will also accommodate a turning into the new public car park.
- 6.18 This application is accompanied by an updated TA prepared by SCP. The TA concludes that the proposed development will not have a material impact on the operation of the local highway network but the impact of the traffic arising from the development has been tested in detail at the site access junction, which demonstrates that the site access has sufficient spare capacity to accommodate the proposed development. We therefore consider that the proposals are in full accordance with UDP Policies H2/2 (The Layout of New Residential Development), HT 2/4 (Car Parking in New Development), HT 4 (New Development) and HT 6 (Pedestrians and Cyclists). As previously advised in the pre-application engagement section of this statement, the LPA have confirmed that they will no longer pursue the transport contribution of £110,00 for the installation of MOVA at the A56/Bury New Road on the basis that the Inspector found that this would be excessive and would not be required to make the development acceptable in planning terms.

Ecology

- 6.19 This application is accompanied by a Preliminary Ecological Appraisal, Invasive Species Method Statement and Bat Roost Assessment, all prepared by Ascerta.
- 6.20 The Preliminary Ecological Appraisal [PEA] concludes that any 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. This includes an updated watervole, otter and white-clawed crayfish surveys, control of invasive species (as per the management plan), use of Reasonable Avoidance Measures in relation to hedgehogs, enhancements of site through appropriate landscape planting and provision of bat / bird features, production of Biodiversity Net Gain calculations, production of a landscape management plan and recommendations for timescales on vegetation clearance.
- 6.21 The Bat Roost Assessment concludes that the buildings to be demolished provides some bat roost potential and makes recommendations for further bat surveys to be undertaken as well as an application to Natural England for a licence, mitigation for loss of habitat and

control on lighting and timeframes for works to building / vegetation clearance. New nesting provision for birds has also been recommended.

- 6.22 These recommendations are broadly in line with those considered acceptable by the LPA as part of the previous planning application and no objections were received on ecological grounds.
- 6.23 It is noted that the LPA concluded that the development proposed by the previous application would not cause harm to protected species or the River Irwell and would accord with local policies relating to ecology.
- 6.24 It has already been established through the assessment of potential impacts on the River Irwell submitted as part of the previous application that the proposal and proposed public open space / flood alleviation scheme would have a positive impact on the ecological potential of the river. No objections were received by GM Ecology Unit. We are not aware of any other considerations which would alter this assessment.
- 6.25 This application is accompanied by planting plans and a landscape and ecology management plan which provides high quality landscaping. An 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 west of the site. This is entirely in line with what was proposed as part of the previous application to which no objection was received by GM Ecology Unit and the LPA concluded that the proposed development is considered to accord 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

- 6.26 The application is accompanied by a Noise Impact Assessment prepared by JPM Acoustics to assess the impact of noise on the proposed development. The assessment of external noise levels from road and rail traffic indicated that external noise levels would be below the 50 dB(A) desirable guideline value from BS 8233. The assessment of internal noise levels identified that environmental noise break-in to noise sensitive spaces would require windows to be closed to achieve the internal desirable guideline values from BS 8233. It was identified that, provided appropriate glazing and ventilation units are selected, the desirable guideline values can be achieved. An assessment of commercial/industrial noise sources identified that provided suitable glazing and ventilation units are selected suitable internal noise levels can be achieved. Suitable external noise levels in rear gardens will be achieved with the current scheme layout. Subject to the inclusion of conditions and the incorporation of recommended mitigation measures, the development would not have a significant adverse impact upon the amenity of future occupiers of the proposed dwellings.
- 6.27 The Planning Committee report for the previous application considered that the proposed development would not have a significant adverse impact upon the amenity of the occupiers of the proposed dwellings subject to conditions. It also considered that the proposed development would be in accordance with the requirements of UDP Policy EN7/2. Whilst the scheme has been revised since the previous application, the proposed development is in

keeping with the previous proposals in terms of the general arrangement of the layout and proposed noise mitigation. We therefore consider the proposals to be entirely compliant with local and national policies relating to noise pollution and there are no noise considerations which would prevent planning permission being granted for the proposed residential development.

Air Quality

- 6.28 This application is accompanied by an Air Quality Assessment [AQA] prepared by Enzygo. 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.
- 6.29 The AQA sets out that the implementation of good practice dust control measures during the construction phase would ensure that residual impacts relating to fugitive dust emissions were not significant. Results also indicated that pollutant concentrations across the site were acceptable at all sensitive locations. Further mitigation to protect future occupiers is not required. In terms of traffic impacts, the results indicated that operational impacts were not significant at all modelled sensitive locations in the vicinity of the site
- 6.30 As such it is not considered that the development would result in any air quality constraints which would prevent the granting of planning permission at this site. The conclusions remain the same as those made as part of the previous application for planning permission and no objection was raised by the LPA. As such we consider 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

- 6.31 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).
- 6.32 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.
- 6.33 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

- 6.34 This application is accompanied by a Ground Investigation Report prepared by BETTS GEO. 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. No objections were received from Environmental Health (Contaminated Land) as part of the previous application for planning permission and the application was recommended for approval subject to conditions to secure appropriate remediation of the site. This application is accompanied by a remediation strategy in line with the recommendations set out within previous reporting. 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

- 6.35 This application is accompanied by a Historic Environment Desk-Based and Buildings Assessment [HEDBA] prepared by Archaeological Research Services. 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. This has already been reviewed by the LPA during the previous application and found to be acceptable. No objections were raised by Greater Manchester Archaeological Advisory Service, subject to the inclusion of a condition to secure a programme of archaeological works.
- 6.36 Having regard to the above, it is considered that proposals have had full regard to ENV3 (Archaeology) and there should be no reason why the development would not be acceptable on archaeological grounds.

Planning Obligations

Affordable Housing

- 6.37 UDP Policy H4/1 (Affordable Housing) encourages the provision of affordable housing in developments through negotiation. However, this application is accompanied by an affordable housing statement prepared by Eccleston Homes, and a financial viability statement prepared by Northern Land Agency. It has been agreed between Eccleston Homes and Bury Council that a viability statement will be prepared rather than a full viability assessment. The statement to be submitted, confirms that the economic climate in 2023 is considerably worse than the previous submission made in 2020. Notwithstanding the fact that, the viability assessment was not agreed on the previous application and Eccleston Homes made a commercial decision to offer 10 affordable housing units to enable the application to be determined at planning committee. Currently, Eccleston Homes have made a further commercial decision that the provision of a car park will offered as a benefit to the community.

Open Space

- 6.38 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 state 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.

- 6.39 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 0.58 hectares which is in accordance with the Council's standards. The same approach was accepted by officers during the consideration of the previous application.
- 6.40 The LPA recommended the previous application for approval on the basis of no contributions for any off-site provision and we consider that the same approach should be taken for this application.

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 paragraph 11 of the Framework 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 proposals will provide public car parking spaces for the local area which will provide great benefits to the local community;
 - 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;
 - The proposals allow for the retention of the existing chimney stack; 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.
- 7.11 In accordance with the Framework, 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 the existing chimney stack 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 paragraph 8 of the Framework. As a result, there is a presumption in favour of granting planning permission for the proposals (paragraph 11).

8.0 Summary and 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 57 new homes on a brownfield site in Ramsbottom within the Borough of Bury. It will also deliver a new public car park to serve the local area which should be afforded great weight in the determination of this planning application. 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 protect this site 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. The benefits are also considered to significantly outweigh the low level of harm on non-designated heritage assets.
- 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. Overall, there are no other considerations resulting from the revised proposals which would prevent granting of planning permission for the proposed development on this site.
- 8.5 The principle outstanding issues raised by the Inspector as part of the previous appeal relating to flooding have been fully addressed through the preparation of an updated drainage strategy and additional hydraulic modelling to demonstrate that the proposed development does not increase flood risk on Bridge Street, and more generally reduces modelled flood levels (Section 5.5 of the FRA). It can therefore be concluded that the proposals now comply with saved Policy EN5/1 (New Development and Flood Risk) of the UDP and the Framework which require that the development should be safe for its lifetime without increasing flood risk elsewhere.
- 8.6 On the basis of the above, it can also be concluded that the benefit of the scheme outweighs the flood risks associated with the proposed development in accordance with part 1 of the exception test and has been demonstrated to make the development acceptable for its lifetime (part 2). A flood plan will also no longer be required on the basis that all finished floor levels will be raised above peak flood levels. We consider that the proposed development now satisfies the Inspector's previous concerns in relation to the exception test and safe access and escape routes for occupiers.
- 8.7 Overall, 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 employment allocation, given the very limited weight that should be afforded to that policy in any event, and the low level of harm on non-designated heritage assets.

- 8.8 It is considered that the proposal clearly amounts to sustainable development in terms of paragraph 11 of the Framework and should therefore be granted planning permission without delay.

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