PROPOSED NEW SADDLEWORTH SCHOOL

SITE: FORMER WH SHAW PALLET WORKS, HUDDERSFIELD ROAD, DIGGLE OL3 5NX

WARD: SADDLEWORTH NORTH

APPLICATION REPORTS OF THE HEAD OF PLANNING AND INFRASTRUCTURE

PLANNING COMMITTEE: 25th February 2016

Application A (PA/337931/15)

A full planning application submitted by WRT Developments Ltd to demolish the existing buildings on the WH Shaw site within the red line boundary. It does not include the grade II listed office building and clock tower or link bridge;

Registration Date: 22/12/15

Agent: Mr Michael Brown, HNA Architects Ltd

Application B (LB/337929/15)

A listed building consent application submitted by WRT Developments Ltd to demolish the link bridge attached to the Grade II listed office building and clock tower;

Registration Date: 21/12/15

Agent: Mr Michael Brown, HNA Architects Ltd

Application C (PA/337301/15)

A full planning application submitted by Interserve Construction Ltd on behalf of the Secretary of State for Education to build a new secondary school and associated facilities;

Registration Date: 28/7/15

Agent: WYG
Application D (PA/337930/15)

A full planning application submitted by Oldham Council to provide a parental drop off facility plus residential car parking as part of the wider highways scheme on land off Huddersfield Road.

Registration Date: 21/12/15

Agent: Mr Paul Groves, Unity Partnership
EXECUTIVE SUMMARY

Application A
1) The planning benefits to the area of allowing the demolition of the factory buildings, to enable the redevelopment of the site outweigh the loss of the group value of the buildings in understanding the historical context of the former factory’s listed office building and the canal’s setting.

2) Officers consider that this scheme will cause less than substantial harm to the listed office building as it is not touched by this application, other than in relation to the partial demolition of the link bridge that is the subject of Application B.

3) The setting of the listed building is currently a ‘wall’ of factory buildings behind it and two either side of it. Should the school application be approved, the listed buildings setting will be a ‘wall’ of school buildings slightly further away from the listed office building and the removal of two side buildings of little architectural merit that do little to support its setting positively. As such, the school redevelopment would have a neutral impact on its setting if it is allowed.

4) In officer’s opinion, there are no other material planning concerns that would warrant the refusal of the application to demolish the factory buildings. As such, the application is considered acceptable and in line with principles set out in the relevant national and local planning policy.

Application B
1) The removal of part of the bridge would sever the physical link between the listed building and the utilitarian factory buildings, which provides the historical context for its construction. However, it has to be noted that:

- The link bridge is not in any way mentioned in the listed description;
- The design is markedly different from the public facing facades it is attached to; and,
- It retains its original purpose, materials and position.

2) Moreover, we consider the link bridge itself to be of:

• Low aesthetic value;
• Some historic value;
• Low communal value; and,
• Low evidential value.

3) Overall, whilst this is a finely balanced decision, the Department considers that the demolition of the link bridge results in less than substantial harm to the significance of the designated heritage asset as the link bridge is not an original element of the listed building and the special architectural and historic interest of the office building itself is not significantly affected by its removal.

4) The test that consequently has to be applied is that the less than substantial harm to the significance of a designated heritage asset has to be weighed against the
public benefits of the proposal, including securing its optimum viable use. In this respect, we concur with the applicant’s view that the benefits of the proposal to remove the link bridge are significant enough to outweigh the ‘less than substantial harm’ to the significance of the listed building.

5) In officer’s opinion, there are no other material planning concerns that would warrant the refusal of the application to demolish the link bridge. As such, the application is considered acceptable and in line with principles set out in the relevant national and local planning policy.

**Application C**

1) The loss of employment land is acceptable as the applicant has shown the site is no longer viable as an employment use and the new school would benefit the community.

2) The use of the Green Belt for outdoor sport and recreation purposes is considered appropriate and the visual amenity and openness of the Green Belt is largely unaffected. Moreover, there are very special circumstances that justify the use of the Green Belt land for new school purposes. Finally, none of the overarching purposes of the Green Belt are significantly affected by this proposal.

3) Numerous benefits are gained from using the site for school purposes, including remediating a contaminated site, providing a fit for purpose school with better facilities than the existing one and significant socio-economic benefits in terms of jobs and new facilities. The school will also be more energy efficient.

4) No best and most versatile agricultural land is lost by this proposal.

5) The proposed replacement sports facilities are at least equivalent in terms of usefulness, attractiveness, quality, accessibility and quantity as the existing school.

6) It is acknowledged that landscape and visual impacts will occur, but these will be mitigated wherever possible and the impact on the landscape and visual amenity will not be significantly detrimental to sustain a reason for refusal.

7) In design terms, the scheme scores highly in terms of its functionality but less so in terms of its form. Nevertheless, the proposal in design terms is considered, on balance, acceptable and in line with the relevant national and local design policies and guidance.

8) In Crime Prevention terms, GMP are generally supportive of the proposals but, in relation to external covered areas to the rear of the building and their subsequently suggested shutters / railings, we do not feel that this is the right design treatment for the school. Equally, the suggested works outside the application site cannot reasonably be required.

9) In heritage terms, it is considered that the individual and cumulative harm to the designated and non-designated heritage assets is outweighed by the strong and clear public benefits of providing the proposed school development, together with the associated demolition and highways works.
10) In highways terms, Officers accept that congestion will occur during peak periods when the school is open. However, the short periods of time during which this will occur are outweighed by the benefits that the proposed highway improvements will bring to the surrounding highway network at all other times and allowing the new school to function effectively. Moreover, the cumulative impact on the scheme on the highways network is not ‘severe’. As such, there are no grounds that would sustain a reason for refusal in this instance.

11) It is not considered that the school will create any amenity issues that will affect residents to such an extent that it would sustain a reason for refusal, particularly in view of the fact that the proposal could potentially replace an unrestricted industrial use.

12) The development proposals seek to retain and enhance existing habitats where possible, with new habitats proposed to mitigate for unavoidable loss and to enhance ecological value in the long term. The cumulative impact of the development proposals with other nearby development will not result in major adverse impacts on ecology, but will allow for improvements to be made to habitats.

13) The lighting associated with the proposed development will be clearly visible. However, following adoption of appropriate mitigation measures, it has been demonstrated that the proposals do not conflict with national and local planning policies on lighting.

14) The impact from the proposed development on surface water run-off and flood risk, both on site and off site, would be insignificant. An assessment of the cumulative effects of the proposed development and other adjacent proposed developments, has identified that the overall cumulative impact, in terms of flood risk, surface water, and surface quality, would be negligible.

15) There are no tree, air quality, ground condition, waste and energy concerns raised by this proposal.

16) In these circumstances, the proposal is considered acceptable when assessed across a range of planning policy considerations.

Application D

1) In summary, the highways works, new drop-off area and resident’s car parks are all considered acceptable, subject to conditions. Paragraph 32 of the NPPF states that development should only be refused on transport grounds where the residual cumulative impacts of development are “severe”. Despite the fact that officers acknowledge that there will be some minor delays and congestion in the area during very concentrated periods of time, this can be managed and mitigated effectively. The impact on the highways is not ‘severe’.

2) The very minor loss of business and employment land will not prejudice the potential use of the adjacent site for these purposes.

3) There are very special circumstances that outweigh the limited impact of the proposal would have on the visual amenity and openness of the Green Belt.
4) The proposal’s limited impact on landscape and visual amenity would not sustain a reason for refusal when weighed against the positives of the works to ensure highway safety and the operation of the new school.

5) No concerns are raised on design grounds, barring the loss of the existing stone walls to Huddersfield Road and to the access road to the factory site. On balance, their loss is considered acceptable bearing in mind the site levels and subsequent cost of rebuilding them.

6) There are no heritage or crime prevention issues raised and air quality, ecology and lighting issues are all adequately dealt with.

7) There are no amenity issues raised by the application in terms of loss of privacy, noise, pollution and light grounds.

8) In view of the above, the application is recommended for approval by Officers.
8.2 Application B (LB/337929/15) – Listed Building Application ................................................................. 39
8.3 Application C (PA/337301/15) – School Planning Application ................................................................. 39
8.4 Application D (PA/337930/15) – Highways Application .................................................................................. 50
9.0 REPRESENTATIONS ............................................................................................................................ 53
COMMUNITY CONSULTATIONS .................................................................................................................. 53
REPRESENTATIONS RECEIVED AGAINST THE FOUR APPLICATIONS ...................................................... 53
   Application A (PA/337931/15) – Demolition of 5 no. buildings ............................................................... 54
   Application B (LB/337929/15) – Demolition of link bridge ........................................................................ 55
   Application C (PA/337301/15) – New school, sports pitches and associated works ............................. 56
   Application D (PA/337930/15) – Car park drop-off facility and associated works .................................. 62
REPRESENTATIONS RECEIVED IN SUPPORT OF THE FOUR APPLICATIONS ......................................... 66
ORIGINAL REPRESENTATIONS AGAINST APPLICATION C (PA/337301/15) .............................................. 67
ORIGINAL REPRESENTATIONS IN SUPPORT OF APPLICATION C (PA/337301/15) ............................... 73
10.0 PLANNING CONSIDERATIONS .............................................................................................................. 74
APPLICATION A (PA/337931/15) - The planning application to demolish the existing
buildings on the WH Shaw site within the red line boundary. It does not include the grade II
listed office building and clock tower or link bridge .................................................................................. 74
   Designated and Non-Designated Heritage Assets ..................................................................................... 74
   Applicants View ......................................................................................................................................... 75
   Officers view ............................................................................................................................................. 77
   Significance of the individual buildings .................................................................................................... 77
   Impact of the proposal ............................................................................................................................... 79
   Justification for the proposals .................................................................................................................. 80
   Landscape and Visual Impact .................................................................................................................. 83
   Air Quality ................................................................................................................................................ 84
   Flood Risk and Drainage ............................................................................................................................ 85
   Ecology ..................................................................................................................................................... 86
   Waste ....................................................................................................................................................... 87
   Highways .................................................................................................................................................. 87
   Overall Conclusion .................................................................................................................................... 88
   Recommendation ...................................................................................................................................... 88
11.0 PLANNING CONSIDERATIONS .............................................................................................................. 93
APPLICATION B (LB/337929/15) - Listed building consent application to demolish the link
bridge ......................................................................................................................................................... 93
PLANNING CONSIDERATIONS.................................................................................................................. 157

APPLICATION D (PA/337930/15) - Planning application for an off-site parental drop off facility, two residents’ parking areas, highways alterations and works to the access road to the former factory site................................................................. 157

Background.................................................................................................................................................. 157

Principle of Development, including Green Belt......................................................................................... 157

Landscape and Visual Amenity .................................................................................................................... 159

Design .......................................................................................................................................................... 160

Crime Prevention ........................................................................................................................................ 161

Heritage and Archaeology ......................................................................................................................... 161

Transport, Access, and Highway Safety ................................................................................................... 161

Impact on Amenity ...................................................................................................................................... 167

Air Quality .................................................................................................................................................. 168

Ecology ...................................................................................................................................................... 169

Lighting ...................................................................................................................................................... 169

Flood Risk and Drainage ........................................................................................................................... 170

Conclusion .................................................................................................................................................. 170

Recommendation....................................................................................................................................... 171
1.0 INTRODUCTION AND BACKGROUND

1.1 The proposed development relates to the proposed new Saddleworth School at the former WH Shaw Pallet Works, Huddersfield Road, Diggle.

1.2 The proposal comprises of four separate, but related applications as follows:

- Application A (PA/337931/15) - A planning application submitted by WRT Developments Ltd to demolish the existing buildings on the WH Shaw site within the red line boundary. It does not include the grade II listed office building and clock tower or link bridge;

- Application B (LB/337929/15) - A listed building consent application submitted by WRT Developments Ltd to demolish the link bridge attached to the Grade II listed office building and clock tower;

- Application C (PA/337301/15) - A planning application submitted by Interserve Construction Ltd on behalf of the Secretary of State for Education to build a new secondary school and associated facilities;

- Application D (PA/337930/15) - A planning application submitted by Oldham Council to provide a parental drop off facility plus residential car parking as part of the wider highways scheme on land off Huddersfield Road.

1.3 The demolition of existing buildings, construction of the new school, and associated highway works have been submitted under separate planning applications, with each application having its own supporting documents. In addition, an over-arching planning statement, covering all four applications, has been submitted to ensure that the impact of the project’ as a whole is considered.

1.4 The Environmental Statement previously submitted for the school application (PA/337301/15) has been revised to provide an assessment of all four applications.

1.5 It has been recognised for a number of years that the existing Saddleworth School in Uppermill is in a poor state of repair and requires rebuilding. In particular:

- All of the school's present classrooms are draughty with poor acoustics;
- Classrooms on the top floor suffer from water ingress;
- There is no effective regulation and control of lighting and heating;
- All of the electrical safety systems require replacing; and,
- There is no single fire management system.

1.6 Furthermore:

- The school is situated on a constrained site, thereby limiting its potential for improvement;
- Disabled children are not able to fully access the school curriculum;
• The dining room does not have sufficient capacity for the current amount of students; and,
• The number of places to be provided at the school is also to increase from 1,350 to 1,500 to meet increasing demand for spaces.

1.7. A site appraisal and selection process for a new school was undertaken by the Education Funding Agency (EFA) and Oldham Council which entailed, amongst other things, a site comparison process to evaluate alternative sites (14 locations) to ensure clear and due consideration was made as to the most suitable new school site based on a variety of factors including elements such as Green Belt issues, feasibility, availability, engineering and cost. The conclusion was that the new school should be put forward to be built on the application site.

1.8. Construction activity is proposed to be undertaken over a period between early 2016 and 2018, subject to approval of the applications. In summary:

• Demolition forms the first phase and is estimated to take 12 weeks.
• The school would be built in a single phase with work expected to commence in Summer 2016, completing early in 2018 with the school becoming operational in Spring 2018.
• The highways works and drop-off and residents car park areas would be completed prior to the opening of the school.
• The residents’ car parking areas would form an early stage of the highways works so as to free up parked cars from the highway which would be advantageous during the construction period of the school.
• The construction of the car park is estimated to take 10-12 weeks, the footway widening 6-8 weeks and the works to the access road 6-8 weeks.
THE SITE

2.1 The development site (‘the Site’) for the proposed new Saddleworth School is located in the village of Diggle, Saddleworth.

2.2 Diggle is a linear village and is predominantly located along the lower valley sides between Standedge Road and Huddersfield Road in the Saddleworth area of Oldham. The junction of Huddersfield Road and Standedge Road (A640) is located approximately 530m from the site entrance. The village comprises of houses ranging from traditional multi-storied mill weavers cottages to modern estates of family housing. There is no predominant style or material of buildings in the village itself, although stone faced buildings predominate close to the site. The village also historically comprises of manufacturing uses, particularly woollen manufacture and evidence of this can be seen on various sites within the village, including Wrath Mill.

2.3 The whole site (of the four applications) is bounded by Huddersfield Road to the west, a public footpath to the north, the Huddersfield Narrow Canal and railway line to the east and further grazing land to the south.

2.4 The site partly comprises former manufacturing premises used for a variety of purposes over the years. It was originally built as a mill, but subsequently used as a pallet works (WH Shaw) and more recently used for an injection moulding business. That part of the site is now vacant and many of the factory buildings are in a poor state of repair. This part of the site is also extensively covered in hard standing and it is here where it is proposed to accommodate the new school, parking areas and outdoor teaching and hard play space.

2.5 The school site will be accessed by an existing road which leads from Huddersfield Road. The road passes over a bridge across Diggle Brook into the WH Shaw site.

2.6 The playing fields for the new school are proposed to the south of the school on land which is currently greenfield and used as grazing land.

2.7 The proposed school site and playing fields are approximately 5.87 hectares in size, comprising 2.3 hectares of previously developed land and 3.57 hectares of greenfield land.

2.8 A link bridge which connects an existing factory building on the site to the Grade II listed office building is also required to be demolished. The link bridge is considered to be listed by virtue of its attachment to the listed office building (which is to be retained but is not in the application site).

2.9 The proposed residential car parking on land adjacent to Huddersfield Road is suggested in order to remove parked cars on the existing public highway. Due to access to the main school site being restricted, a parental drop off facility is proposed next to the residential car parking. The site of the drop-off facility and residential car
parking is on greenfield grazing land. The site of the highway works also includes a section of Huddersfield Road and the site access road to the proposed school.

2.10 A culvert lies in the northern part of the previously developed part of the site, which will remain in situ.

2.11 The original Grade II listed office building associated with the mill lies adjacent to the previously developed part of the site and lies outside the site boundary.

2.12 A canal bridge and pedestrian tunnel under the canal, both listed, lie within close proximity of the site. Various listed buildings are situated on the hillsides around the site.

2.13 The Huddersfield Narrow Canal Site of Biological Importance is to the east of the site. The Peak District National Park boundary is some 860 metres to the east.

2.14 A public right of way passes the northern boundary of the proposed drop-off area, carries on over the Diggle Brook and then separates the proposed playing fields from the previously developed portion of the site.

2.15 Site boundaries currently comprise post and wire and post and rail fences, stone walls, natural vegetation, changes in ground level, and wire mesh fencing.

Policy Designation

2.16 The previously developed W H Shaw mill part of the site is allocated for employment use in the adopted Oldham Council Joint Core Strategy and Development Management Policies DPD (April 2012) (Saddleworth Employment Area - SEA8).

2.17 The adjacent Diggle Brook is labelled as a flood zone and a green corridor and link.

2.18 The Canal to the rear of the site is designated as a recreational route.

2.19 The proposed playing field and area to be used for the residents’ car park and Huddersfield Road drop-off area are designated as Green Belt land.

2.20 The land to be used to widen the existing access road is allocated as a Saddleworth Employment Area and for Business and Industry under reference B1.1.28.
3.0 THE PROPOSALS

3.1 The four applications relating to the Saddleworth School ‘Project’ can be summarised as follows:

Application A (PA/337931/15) - Planning application for demolition of existing buildings

3.2 This application comprises the demolition of all buildings, structures and areas of hard standing on the previously developed part of the site. All buildings, hard standings and foundations are proposed to be removed except for those associated with retaining the canal. The industrial water abstraction equipment and housing are to be carefully removed with the canal wash wall and footpath reinstated. The canal towpath will remain open during these works. The land is proposed to be graded down from the canal retaining wall in an East to West direction. 100 tonnes of clean demolition hardcore is to be crushed to an agreed grade and stockpiled on the site at a location to be agreed. All other arisings will be removed from the site.

Application B (PA/337929/15) - Listed building consent application to demolish link bridge

3.3 It is proposed to demolish the footbridge attached to the former mill buildings and the Grade II listed office building, which lies outside the site. Where the footbridge is to be removed, a cut will be made at the point of contact with the roof of the lower ground floor of the office building leaving a 2-3m length of footbridge remaining attached to the listed building. The form and context of the existence of the bridge would therefore remain visible.

3.4 The method for finishing the edge of the bridge after demolition consists of the end of the bridge being boarded with vertical timber boards painted black.

Application C (PA/337301/15) - Planning application for new school, sports pitches, playing fields and areas for play and parking

3.5 This application is for the construction of a new Saddleworth School (for ages 11-16). The number of pupils to be accommodated in the new school will increase from 1,350 to 1,500.

3.6 The total built floorspace will equate to 10,500 sqm gross floorspace and will include:

- five ‘home zones’ (one for each year group);
- specialist science, IT, art, music and food technology classrooms;
- a hall;
- dining facilities;
- a sports hall; and,
- studios and associated offices and supporting facilities.
3.7 The building will take the form of the letter ‘E’ and will have a predominantly single storey spine to the front elevation with three projecting fingers, which will be three storeys to the front elevation and two to the rear (due to levels differences). Above the ground floor spine plinth will be glass corridors connecting the fingers on the upper levels.

3.8 The proposed materials for the school building comprise insulated metal cladding panels to the three ‘fingers’, each with its own muted colour theme with contrasting horizontal bands of slightly darker panels between the window openings. The two building elements which project forward of the building line to the ground floor spine are proposed to be clad in stone, as is an area of the sports hall near to the main entrance of the school. The stone has been used to break up the mass of the front elevation, to emphasise the main school entrance and to respond to the adjacent listed building. The main and pupil entrances will be emphasised by a contrasting red entrance feature. The remainder of the sports hall is proposed to be clad in darker grey insulated metal cladding panels with contrasting configuration of smooth and textured finishes.

3.9 The proposed school grounds include:

- an all-weather pitch;
- an U15-U16 grass football pitch;
- grass practise cricket wickets;
- a 100m grass running track;
- a long jump;
- two shot put facilities;
- three multi-use games areas;
- a horticultural area and orchard;
- a grass amphitheatre; and,
- social areas for students.

3.10 The all-weather artificial grass pitch, together with associated fencing and floodlighting, is on the greenfield part of the site which is also designated as Green Belt. Some engineering works will be required on that part of the site to create a flat surface. This will involve the construction of retaining walls.

3.11 The rest of the green field portion of the site will be laid out as amenity grass. However, some further levelling will be required in order to accommodate a grass football pitch, running track, cricket wickets and athletic field facilities and this will also require the construction of a retaining wall. The retaining walls will be constructed of stone-filled, gabion baskets. Other areas will be seeded with wildflowers.

3.12 Parking will be provided for 122 cars with 5 disabled spaces and two minibuses. 30 bike hoops will also be provided, as well as a bus drop off facility for 14 buses.

3.13 The proposed boundary treatments will vary from 2.4m high weld mesh fencing to 1.2m high post and rail fencing with 3m high ball stop fencing enclosing some sports pitches.
Application D (PA/337930/15) - Planning application for an off-site parental drop off facility, two residents’ parking areas, highways alterations and works to the access road to the former factory site

3.14 This application seeks permission for:
- two separate areas of parking for residents;
- an off-site parental drop off area;
- highway alterations; and,
- works to the access road to the school site.

Residents Parking (20-44 Huddersfield Road Residents)

3.15 The scheme seeks to introduce a residential car park for the properties at 20-44 Huddersfield Road.

3.16 The applicant’s intention is that the land that would be designated for parking, would be gifted to each property owner and, through agreement, the residents would be able to enclose their own parking space with fencing and gates.

3.17 An access road where two-way traffic would be permitted would be provided to the south-east of this area of the car park and would be maintained in Oldham Metropolitan Borough Council’s ownership.

3.18 Access to this section of resident’s car park would be through the main drop-off car park and the exit point would be through the resident parking section, both sections of which operate on a one-way arrangement.

3.19 A minimum of two spaces will be provided per property. Space available for parking will be based on the width available between the boundaries of each property.

3.20 Signage will be installed to inform users that this area is for specific residents and their visitors only.

Residents Parking (29-43 Huddersfield Road Residents)

3.21 The scheme seeks to introduce a 20 space residential car park for the properties 29-43 (8 properties) Huddersfield Road.

3.22 Access to this section of residents’ car park would be through the main drop-off car park and the exit point would be directly onto Huddersfield Road. Both sections will operate on a one-way arrangement.

3.23 The car park spaces would not be allocated to individual properties.

3.24 The applicant envisages that residents would generally have free access to spaces as they require and they will predominantly be either parked up or have vacated the
car park at the times when the demand from parents at the start and end of school day are present.

3.25 Signage will be installed to inform users that this area is for specific residents and their visitors only.

3.26 The operation of the car park will be monitored following the introduction of the works and the opening of the school. The school will be encouraged to advise all parents and pupils of the intended operation of the car park and drop-off area and will be encouraged to include these details as part of their School Travel Plan documents.

**Drop-off Area and Parental Parking**

3.27 The scheme will introduce a layby along the eastern perimeter of the site (for up to 10 vehicles) for parents dropping off pupils similar to a “kiss and drop” arrangement typical at airports where waiting is prohibited.

3.28 Double yellow lines are proposed to enable enforcement of parents parking in this area.

3.29 Parking for parents needing to wait longer will be provided by the 15 additional spaces provided at the north western area of the site. Access would be directly from Huddersfield Road and the exit point would be through the residents’ car park. Both sections will operate on a one-way arrangement.

3.30 A mini-roundabout with significant circulatory space for vehicles to access and exit spaces is proposed to maintain efficient movement of traffic through the car park and ensure quick turnover of parents’ vehicles which will in turn ensure that the traffic signals proposed on Huddersfield Road operate efficiently.

3.31 Signage will be installed to inform users which area is to be used for drop off and which for parental parking.

**Residents parking and Drop-off area boundary treatments and lighting**

3.32 A timber post and rail fence will be installed around the perimeter of the drop off and residents’ car park site to the north, south and east. A mixed native hedgerow is proposed along the eastern boundary of the drop off and residents’ car park. Additional landscaping is proposed in this area.

3.33 The lighting proposals for the drop-off facility and residents’ car park will be based on current lighting standards and guidance for minimising the effect of obtrusive light in line with ILP Guidance Notes for the reduction of obtrusive light (GN01) and requirements of the Oldham & Rochdale Street Lighting PFI Output Specification for the future adoption of the proposed apparatus.

3.34 The provision of the drop off and residents’ car park will require the existing bus stop adjacent to the site to be relocated nearby.
**Traffic Signals**

3.35 A single file operation is proposed for the section of Huddersfield Road between properties 20-44, to positively control traffic to allow the creation of a wider footpath. Traffic signals will be required to allow the carriageway to be converted to footway as adjacent space is not available due to the properties on either side of Huddersfield Road.

**Widened footways**

3.36 The footway on the eastern side of Huddersfield Road that links the drop-off car park and the school will be widened to improve safety for pupils walking either from the car park or from Wool Road and the nearby village of Dobcross.

3.37 The existing stone wall at the back of the eastern footway between 40 Huddersfield Road and the proposed school access road will be removed in part to enable the footway surface to be widened. This will be replaced with a close boarded timber fence to ensure the footpath is secure.

**Access Road**

3.38 The existing access road from Huddersfield Road to the former WH Shaw Pallet works site will be resurfaced and widened to provide the vehicular and primary pedestrian access to the school with a new footway provided to the boundary of the school site.

3.39 The existing stone wall will be taken down to facilitate the widening and creation of the footway and replaced with a timber post and rail fence.

3.40 There is an existing bridge that allows traffic to cross the Diggle Brook that will be maintained to access the school site. The width of the bridge is not sufficient to provide two-way traffic. An informal shuttle working arrangement will be introduced with give way markings and signage introduced.

3.41 The new footway will continue along the access road over the bridge into the school site.
4.0 CONSIDERATION OF ALTERNATIVE SITES

4.1 The rural nature of the Saddleworth area means that there is generally a short supply of sites which are large enough to accommodate a new secondary school. The Saddleworth area comprises a number of tightly defined and separate villages which are surrounded by Green Belt land. Most of the roads in the area are relatively small and rural in nature such that most sites would result in the need for substantial off-site highway improvements in order to provide satisfactory access. In some cases adequate access would not be feasible. The area is historically industrial, although most of the historic mill sites have been redeveloped for alternative uses. Those that remain are generally still in active use, lend themselves to higher value uses, or are difficult to redevelop.

4.2 As part of the BSF programme commencing in 2008, Oldham Council carried out an options appraisal and concluded that redevelopment of the school on the existing site would be expensive and disruptive.

4.3 In March 2013, the Council was advised by the EFA that funding would be made available to develop a replacement Saddleworth School under the Priority Schools Building Programme. The Council undertook a further site identification and appraisal exercise and a series of sites were considered but subsequently discounted for a variety of reasons. In July 2014, the EFA carried out a feasibility study to consider the four sites that were shortlisted, which were:

- Diggle greenfield site;
- Former WH Shaw Pallet Works site;
- Uppermill existing location; and
- Uppermill playing field.

4.4 The EFA’s feasibility study was released in January 2015 and this provided a comprehensive analysis of the four potential options and identified the Shaw Pallet Works site as its preferred option. A period of public consultation took place prior to Oldham Council’s cabinet formally approving the proposed site in March 2015.

4.5 To aid the site selection process information was shared with local communities and groups and feedback was taken into consideration in making the final decision. Such information sharing included:

- press releases;
- a list of frequently asked questions on the Council’s website;
- technical groups;
- letters to selected residents on Huddersfield Road;
- discussions at the Saddleworth and Lees Executive committee;
- correspondence between the Council and EFA and various groups and individuals; and,
- public consultation by Oldham Council to gauge public opinion.

4.6 The decision was taken not to develop the school on the existing site (when compared to the Shaw Pallet Works site), primarily for the following reasons:
• A higher level of disruption to education during construction.
• Higher build cost (exceeding EFA budget);
• A new school building which would be compromised in its design;
• Issues regarding build complexity and programming.

4.7 The replacement school could be rebuilt on the existing site but:
• the phasing required;
• provision of temporary accommodation; and,
• requirement for several decants,

means that the construction period would be prolonged and problematic.

4.8. It would also be challenging in terms of noise, dust and loss of facilities, resulting in significant disruption to the school and a detrimental effect on the education and attainment of students.

4.9. It also presents a safety risk as the main site access would be shared between school and construction traffic.

4.10 The complexity of the build and the costs were projected to be significantly higher.

4.11 The design would also be compromised due to the layout and topography of the site. The proposed school building in Diggle has, by contrast, received the highest design grading in terms of educational provision.

4.12 The capital receipt to be received by the Council as a result of the land swap deal would be used to assist in the mitigation of the development of the proposed Diggle site, primarily in respect of off-site highway works.

4.13 The EFA funding provides monies for the new school building but does not provide funding for resources and facilities to be used by the school, such as furniture and IT equipment. If the school was to remain on the existing site in Uppermill, there would be no land deal or additional funds available to the school for educational improvement.

4.14 Furthermore, if the school were to remain on the existing site, off-site highways improvements would likely be required, which, in the absence of a capital receipt, would fall on the Council to provide funding from existing budgets.

4.15 Although there are a greater number of environmental considerations to be addressed at the Diggle site when compared to the existing school site, it was anticipated that these could be mitigated appropriately. Overall, it was considered that the factors weighing in favour of the Diggle site outweighed those in favour of the existing school site in Uppermill.

4.16 It is acknowledged that a high number of the objections received as a result of the planning consultation process state that the school should be re-built on the existing site in Uppermill. However, the Local Planning Authority is tasked with assessing the acceptability of the current planning applications for the school on the Shaw Pallet
Works site on its own merit, having regard to the relevant national and local planning policy framework and any other material planning considerations. **It is not a principle objective of the planning process to assess whether or not a new school should be developed on the current site in Uppermill.**

**Scheme Benefits**

4.17 The applicant has set what they consider to be the benefits arising from the proposed development of the new school (Application C), including the following:

- Development of a new school which is fit for purpose;
- Provision of much needed secondary school places;
- Provision of school and supporting external facilities which are consistent with the school’s aspirations;
- Provision of significantly more comfortable and inspiring learning environment which will encourage improved educational attainment;
- Allow students and staff to have pride in their school buildings thereby reflecting values of the school;
- Provision of a modern, efficient, low maintenance and sustainable building;
- Removal of a derelict site which is subject to anti-social and criminal behaviour, and bringing the site back into use;
- Regeneration of a site which presently detracts from the character of the area;
- Decrease the built footprint of buildings and hardstanding on the site and increased landscaping;
- Removal of contamination and invasive species;
- Enable redevelopment of a site which forms an important part of the setting of a Grade II listed building;
- Deliver highway improvements;
- Provision of construction and education related jobs, plus additional jobs through the supply chain;
- Provision of new and improved habitats and biodiversity;
- Potential to halve the amount of rainwater run-off from the site lowering flood risk;
- Greater participation in sport due to new and improved sports facilities and students and the community; and,
- Allow the school to develop its role and involvement in the wider community.
5.0 ENVIRONMENTAL STATEMENT

5.1 The Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 2011 (EIA Regulations) require certain planning applications to be accompanied by an Environmental Impact Assessment (EIA). Schedule 1 of the EIA Regulations outlines developments that always require an EIA. Schedule 2 of the EIA Regulations outlines developments that may require an EIA should it be considered that it gives rise to significant environmental impacts. Given the scale of the proposed development and the sensitivity of the site, it was agreed that the planning application for the new school should be accompanied by an Environmental Statement (ES).

5.2 The applicant voluntarily submitted a request for an EIA Scoping Opinion in May 2015, and, following consultation with a number of statutory and non-statutory consultees, the Local Planning Authority adopted a Scoping Opinion in July 2015. This document advised the applicant on the scope of the information to be gathered during the Environmental Impact Assessment (EIA) preparation process. The findings of the EIA process have been reported through the Environmental Statement which is submitted with this planning application.

5.3 Following submission of the planning application and associated ES relating to the new school in July 2015 (Application C), a revised ES was submitted in December 2015, which supersedes the previous ES, and now incorporates consideration of the potential impacts arising from Application C, together with the potential impacts of the other three related applications (Applications A, B and D).
6.0 RELEVANT HISTORY

6.1 The following previous applications are considered relevant to the site:


- LB/337133/15 – Demolition of the link bridge connected to the office building - Withdrawn 18th December 2015.

- PA/054698/08 – Change of use from pallet works to building materials supplier for trade and public - Approved 9th May 2008.

- PA/054352/07 - Siting of a temporary building to be used as a private vehicle hire booking office and erection of 5.8m high aerial on existing building - Refused 29th April 2008.


- PA/032639/95 - Extension to existing retaining wall to accommodate future drying kiln and tipping of excavated material - Approved 4th April 1995.

- PA/025353/90 – Warehousing, storage, turning, parking, plant facilities - Approved 12th April 1990.


7.0 PLANNING POLICY BACKGROUND

National Planning Policy Framework

‘Achieving sustainable development’

The purpose of the planning system is to contribute to the achievement of sustainable development. Paragraph 7 goes on to set out the three dimensions to sustainable development which give rise to the need for the planning system to perform a number of roles including:

- **A social role** – supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community’s needs and support its health, social and cultural well-being.

‘Core planning principles’

Paragraph 17 sets out 12 core planning principles that should underpin both plan-making and decision-taking. These include:

- always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings;
- encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value (further set out in paragraph 111); and,
- take account of and support local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs.

Chapter 4 on ‘Promoting Sustainable Transport’

Paragraph 32 requires all developments that generate significant amounts of movement should be supported by a Transport Statement or Transport Assessment. Plans and decisions should take account of whether:

- the opportunities for sustainable transport modes have been taken up depending on the nature and location of the
site, to reduce the need for major transport infrastructure;
- safe and suitable access to the site can be achieved for all people; and,
- improvements can be undertaken within the transport network that cost effectively limit the significant impacts of the development. Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.

Paragraph 34 states that plans and decisions should ensure developments that generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised. Taking account of policies set out elsewhere in the NPPF, particularly in rural areas.

Paragraph 35 states that to protect and exploit opportunities for the use of sustainable transport modes for the movement of goods or people developments should be located and designed where practical to:

- accommodate the efficient delivery of goods and supplies;
- give priority to pedestrian and cycle movements, and have access to high quality public transport facilities;
- create safe and secure layouts which minimise conflicts between traffic and cyclists or pedestrians, avoiding street clutter and where appropriate establishing home zones;
- incorporate facilities for charging plug-in and other ultra-low emission vehicles; and,
- consider the needs of people with disabilities by all modes of transport.

Finally, paragraph 36 states that developments which generate significant amounts of movement should be required to provide a Travel Plan.

In relation to design paragraph 58 states that decisions should aim to ensure that developments:

- will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
- establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to
live, work and visit;

- optimise the potential of the site to accommodate development, create and sustain an appropriate mix of uses (including incorporation of green and other public space as part of developments) and support local facilities and transport networks;
- respond to local character and history, and reflect the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation;
- create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion; and,
- are visually attractive as a result of good architecture and appropriate landscaping.

Chapter 8 on ‘Promoting healthy communities’

Paragraph 72 states the Government attaches great importance to ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities. It goes onto say that LPAs should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education through:

- giving great weight to the need to create, expand or alter schools; and,
- working with schools promoters to identify and resolve key planning issues before applications are submitted.

Chapter 8 on ‘Promoting healthy communities’.

Paragraph 73 highlights that access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of communities.

Paragraph 75 states that local authorities should seek opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails.

Chapter 9 on ‘Protecting Green Belt land’

Paragraph 80 sets out the main purposes of the Green Belt, which are to:

- to check the unrestricted sprawl of large built-up areas;
- to prevent neighbouring towns merging into one another;
- to assist in safeguarding the countryside from encroachment;
- to preserve the setting and special character of historic
towns; and
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

Once Green Belts have been defined, paragraph 81 states that local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land.

Paragraph 87 defines ‘inappropriate development’ as being harmful to the Green Belt and should not be approved except in very special circumstances.

Paragraph 88 goes on to say that when considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. ‘Very special circumstances’ will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations.

The construction of new buildings as inappropriate in Green Belt. Paragraph 89 outlines the exceptions to this policy which include the provision of appropriate facilities for outdoor sport, outdoor recreation and for cemeteries, as long as it preserves the openness of the Green Belt and does not conflict with the purposes of including land within it.

Paragraph 90 sets out other forms of development also not inappropriate in Green Belt provided they preserve the openness of the Green Belt and do not conflict with the purposes of including land in Green Belt. These include local transport infrastructure which can demonstrate a requirement for a Green Belt location.

Paragraph 100 states that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere.

Following principles of the ‘Sequential Test’ paragraph 101 goes on to state that development should not be permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower probability of flooding. The Strategic Flood Risk Assessment will provide the basis for
applying this test. A sequential approach should be used in areas known to be at risk from any form of flooding.

If, following application of the Sequential Test, it is not possible, consistent with wider sustainability objectives, for the development to be located in zones with a lower probability of flooding, paragraph 102 states that the Exception Test can be applied if appropriate.

For the Exception Test to be passed:

- it must be demonstrated that the development provides wider sustainability benefits to the community that outweigh flood risk, informed by a Strategic Flood Risk Assessment where one has been prepared; and,
- a site-specific flood risk assessment must demonstrate that 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.

Both elements of the Exception Test will have to be passed for development to be permitted.

Finally, paragraph 103 states that when determining planning applications, local planning authorities should ensure flood risk is not increased elsewhere and only consider development appropriate in areas at risk of flooding where, informed by a site-specific flood risk assessment following the Sequential Test, and if required the Exception Test, it can be demonstrated that:

- within the site, the most vulnerable development is located in areas of lowest flood risk unless there are overriding reasons to prefer a different location; and,
- development is appropriately flood resilient and resistant, including safe access and escape routes where required, and that any residual risk can be safely managed, including by emergency planning; and it gives priority to the use of sustainable drainage systems.

**Chapter 11 on Conserving and enhancing the natural**

Paragraph 118 states that when determining planning applications, local planning authorities should aim to conserve and enhance biodiversity by applying, amongst others, the following principles:

- if significant harm resulting from a development cannot be
avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused; and,

- opportunities to incorporate biodiversity in and around developments should be encouraged.

Chapter 12 on Conserving and enhancing the historic environment

When determining applications, paragraph 128 states that LPAs should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance.

Paragraph 131 then sets out the factors that LPAs should take account of, which are:

- the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
- the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and,
- the desirability of new development making a positive contribution to local character and distinctiveness.

Where a proposed development will lead to substantial harm to or total loss of significance of a designated heritage asset, paragraph 133 states that LPAs should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

- the nature of the heritage asset prevents all reasonable uses of the site;
- no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation;
- conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and,
- the harm or loss is outweighed by the benefit of bringing the site back into use.

Paragraph 136 goes on to say that LPaS should not permit loss of the whole or part of a heritage asset without taking all reasonable
steps to ensure the new development will proceed after the loss has occurred.

**Joint Core Strategy and Development Management Policies DPD Policies**

<table>
<thead>
<tr>
<th>Policy Name</th>
<th>Policy Detail</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Policy 1</strong> Climate Change and Sustainable Development</td>
<td>This is an overarching policy that states development should adapt to and mitigate against climate change and address the low carbon agenda, contribute towards sustainable development, help create a sense of place, improve the quality of life for residents and visitors, and enhance the borough's image. It also states that the council will promote and support improvements in education and skills which contribute to Oldham as a university town. This policy relates to all types of development.</td>
</tr>
<tr>
<td><strong>Policy 2</strong> Communities</td>
<td>This policy states that the council will support improvements to the education and skills of the borough’s population by working with a range of partners to facilitate the development of new and improved education facilities. This policy is relevant as the application is for the development of a new school.</td>
</tr>
<tr>
<td><strong>Policy 5</strong> Promoting Accessibility and Sustainable Transport Choices</td>
<td>This policy is concerned with directing development to the most accessible locations, stating that major developments should be located in areas of ‘high’ or ‘very high’ accessibility (so as a minimum no less than within 400m of a frequent bus service or 800m of a train or metrolink stop). In addition it requires schools provide a Travel Plan and Transport Assessment. The policy also highlights the importance of ensuring that new development locations are accessible by a choice of travel modes, including public transport, walking and cycling. This policy relates to all types of development.</td>
</tr>
<tr>
<td><strong>Policy 6</strong> Green Infrastructure</td>
<td>This policy states new developments must where appropriate, promote and enhance and make a positive contribution to the borough’s GI network (including nature conservation sites, strategic recreation routes, green corridors and links, canals and open spaces).</td>
</tr>
</tbody>
</table>
This policy is relevant due to the presence of the Huddersfield Narrow Canal SBI to the rear of the site.

**Policy 9 Local Environment**

This policy states that when determining planning applications, the council will protect and improve local environmental quality and amenity and promote community safety across the borough. It states that development should not be located in areas where it would be adversely affected by neighbouring land uses.

In addition development should not cause significant harm to the amenity of existing and future neighbouring occupants or users.

This policy relates to all types of development.

**Policy 13 Employment Areas**

This policy designates employment areas, including the Saddleworth Employment Areas (SEAs).

This policy is relevant as the majority of the site is designated as SEA 8 Shaw Pallets.

**Policy 14 Supporting Oldham’s Economy**

This policy outlines the types of uses that are permitted within the designated Employment Areas. It then goes to outline circumstances that the council may permit uses other than those uses listed.

The applicant needs clearly demonstrate that it is no longer appropriate or viable to continue the existing use. This can be demonstrated through a viability or marketing exercise or demonstrating that the development of the site for alternative uses would benefit the regeneration areas identified by the council as being in need of investment or would benefit the community of an area.

The policy also states that development proposals which result in the loss of an employment site to other uses should include measures to outweigh the loss of the site and support Oldham’s economy. Examples of the measures are listed within the policy.

This policy is relevant as the majority of the site is designated as SEA 8 Shaw Pallets.

**Policy 17 Gateways and Corridors**

This policy states that the council will support the Sustainable Modes of Travel (to school) Strategy, which includes proposals to improve existing infrastructure to facilitate more sustainable travel to school. This policy is relevant as although SMoTs may no longer be in place, the council still has a statutory duty in relation to this and the intention behind the policy remains.
Please liaise with Jennifer Anders (Transportation Policy Officer) for further advice regarding the Travel Plan.

**Policy 18 Energy**

The policy requires all development to follow the principles of the zero carbon hierarchy. All developments over 1,000 square metres or ten dwellings and above (until such time that all development is required by the Code for Sustainable Homes (63) to achieve zero carbon) are required to reduce energy emissions in line with the targets set out in Table 8. These targets are based on reductions over and above Part L of Building Regulations 2010 or 2013. Compliance with the targets must be demonstrated through an energy statement which must be assessed to the council’s satisfaction.

**Policy 19 Water and Flooding**

The policy is about ensuring development does not result in unacceptable flood risk or drainage. It states development proposals must carry out and pass the Sequential Test and, where necessary, the Exception Test and a site-specific flood risk assessment.

Consideration must be given to all sources of flooding and the vulnerability of development. An area of search must be agreed with the council. Evidence must be submitted to demonstrate how the tests have been passed.

In addition it states that:

- where possible SUDS should be implemented;
- culverting avoided and existing culverts removed, opened up or enhanced where appropriate;
- green corridors next to water courses retained where possible;
- new developments should have high standards of water efficiency; and,
- ensure potential capacity issues in the water supply and sewerage treatment works are taken into account.

This policy is relevant to all types of development and is especially relevant here as a school is a “more vulnerable” use and part of the site lies within Flood Zones 2 and 3.

**Policy 20 Design**

This policy states that the council will promote high quality design and sustainable construction of developments that reflect the character and distinctiveness of local areas, communities
This policy relates to all types of development.

Policy 21 Protecting Natural Assets

This policy states that the council will value, protect, conserve and enhance the local natural environment and its functions and provide new and enhanced Green Infrastructure. Its goes on to say that development proposals must protect, conserve and enhance biodiversity and geodiversity, designated nature conservation sites, legally protected species and their habitats and Local Nature Reserves.

In addition developments should have regard to the principal landscape objective for the relevant landscape character area and type found within the Oldham Landscape Character Assessment.

This Policy is relevant due to the location of the Huddersfield Narrow Canal SBI to the rear of the site and also according the Planning Statement there is also a range of bats and birds on site.

In addition developments should have regard to the principal landscape objective for the relevant landscape character area and type found within the Oldham Landscape Character Assessment.

Policy 22 Protecting Open Land

This policy states that development in the Green Belt will be permitted provided it does not conflict with national planning policy.

This policy is relevant as part of the site is Green Belt.

Policy 24 Historic Environment

This policy states that when determining applications for planning consents, the council will seek to protect, conserve and enhance the architectural features, structures, settings, historic character and significance of the borough’s heritage assets and designations. It goes on to say that development to, or within the curtilage or vicinity of, a listed building or structure must serve to preserve or enhance its special interest and its setting, also adding that the council will support heritage-led regeneration, including the reuse of historic buildings such as mills, to achieve economic, community and regeneration objectives, where appropriate.

This policy is relevant as there is a Grade II listed building on and sites.
site and a number of other listed building in the vicinity.
8.0 CONSULTATIONS

8.1 Application A (PA/337931/15) – Demolition Application

<table>
<thead>
<tr>
<th>Entity</th>
<th>Recommendation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Saddleworth Parish Council</td>
<td>Recommend Approval</td>
</tr>
<tr>
<td>Greater Manchester Ecology Unit</td>
<td>Protected Species – Bats:</td>
</tr>
<tr>
<td></td>
<td>No objections to the application on the grounds of impacts on bats.</td>
</tr>
<tr>
<td></td>
<td>From the survey results provided it would seem that small numbers of common</td>
</tr>
<tr>
<td></td>
<td>species of bat use parts of the building complex for (likely) occasional</td>
</tr>
<tr>
<td></td>
<td>roosting. Before any work can commence that may disturb bats a licence may</td>
</tr>
<tr>
<td></td>
<td>be required from Natural England. The three tests set out in the Habitats</td>
</tr>
<tr>
<td></td>
<td>Directive and the Conservation of Habitats and Species Regulations 2010 (as</td>
</tr>
<tr>
<td></td>
<td>amended) must be satisfied before planning permission is granted.</td>
</tr>
<tr>
<td></td>
<td>The bat roosts found are small and of a relatively common bat species.</td>
</tr>
<tr>
<td></td>
<td>Impacts on bats will therefore be low level and mitigation for any possible</td>
</tr>
<tr>
<td></td>
<td>disturbance to bats will be straightforward.</td>
</tr>
<tr>
<td></td>
<td>Condition recommended requiring a fully comprehensive method statement giving</td>
</tr>
<tr>
<td></td>
<td>details of measures to avoid possible disturbance to bats during demolition</td>
</tr>
<tr>
<td></td>
<td>and construction of new school.</td>
</tr>
<tr>
<td>Natural England</td>
<td>No comments to make on this application.</td>
</tr>
<tr>
<td>United Utilities Asset Protection</td>
<td>No comments received.</td>
</tr>
<tr>
<td>Greater Manchester Archaeological Advisory</td>
<td>GMAAS are satisfied that the submitted Archaeological Report on the buildings</td>
</tr>
<tr>
<td>Services</td>
<td>forms an appropriate archival record. GMAAS therefore have no further comment</td>
</tr>
<tr>
<td>The Council for British Archaeology</td>
<td>No comments received.</td>
</tr>
<tr>
<td>Health and Safety Executive</td>
<td>No comments received.</td>
</tr>
<tr>
<td>Organization</td>
<td>Comments/Notification</td>
</tr>
<tr>
<td>--------------------------------------</td>
<td>-----------------------</td>
</tr>
<tr>
<td>Greater Manchester Police Crime Prevention Team</td>
<td>No comments received.</td>
</tr>
<tr>
<td>Environment Agency</td>
<td>No comments made on this application</td>
</tr>
<tr>
<td>Historic England</td>
<td>It is for the LPA to determine the curtilage of the listed building and as the LPA has taken the view that the unattached buildings are not within the curtilage of the building, Historic England will not comment on their proposed demolition. However, unless specifically excluded from the listing under the new list descriptions from the Enterprise and Regulatory Reform Act 2013, those buildings which are physically attached to a listed building are listed. On this basis, Historic England considers that the building to the east of the listed office building is listed due to its physical attachment via the link bridge. The office building lies immediately adjacent to the application boundary and is physically attached to the industrial building to the east. Collectively, this is a Grade II listed building of national interest for the architectural quality of the office building, and both buildings’ illustration of life in the latter half of the 19th century, including its association with the widely exported Dobcross Loom. The industrial building to the east of the site offices lends understanding and context to the role and function of the offices and contributes to its significance. Whilst the buildings have undergone alteration, this reflects their industrial use and character and lends legibility to the historic use of the site. The loss of this building would therefore cause some harm to the significance of the listed building. The LPA should therefore weigh this, as well as any harm outside Historic England’s remit, against the public benefits of the proposal. Account should also be taken of the desirability of sustaining and enhancing the significance of heritage assets and the positive contribution this can make to sustainable communities.</td>
</tr>
<tr>
<td>Canal and River Trust</td>
<td>Works in close proximity to the canal have the potential to adversely affect the structural integrity of the canal retaining walls and embankments and it is</td>
</tr>
</tbody>
</table>
therefore essential that the structural integrity of the canal or associated retaining structures and embankments are not put at risk as part of any development proposal.

The Trust welcomes the proposed removal of the industrial water abstraction equipment and housing and the reinstatement of the canal washwall and towpath, details of which should be discussed and agreed with the Trust. It also notes the proposed measures for the protection of the canal during demolition works, in the submitted Construction Phase Plan and Canal Specific Method Statement as previously requested. The Trust would request imposition of a suitably worded condition requiring all works to be undertaken in accordance with this submitted information.

The applicant also references the need to undertake further inspection of the retaining structures following demolition works, prior to work commencing on site. The Trust would request that a detailed investigation of the condition of any retaining walls and embankments following demolition works is secured via a planning condition, to ascertain the extent to which improvements or strengthening is necessary to cope with the impact of any approved development. Informative note also recommended relating to the need to ensure that any necessary consents are obtained and that the works comply with the Canal & River Trust “Code of Practice for Works affecting the Canal & River Trust”.

<p>| Traffic Section | The existing access road, which at present adequately serves an industrial site, will be used by vehicles during demolition works. It can be expected that the intensity of use will increase temporarily and the Highway Engineer therefore recommends an informative note to remind the applicant that any additional traffic management that is required on Huddersfield Road as a result should be approved by the Traffic Section. The Highway Engineer anticipates that construction / demolition vehicles leaving the site may be muddy and a condition is therefore recommended that will ensure that wheel wash facilities are provided on site and used by vehicles before they leave site. |
| Environmental Protection | Recommend an informative note relating to control of |</p>
<table>
<thead>
<tr>
<th>Network Rail</th>
<th>No comments to make on this application.</th>
</tr>
</thead>
<tbody>
<tr>
<td>LLFA / Drainage</td>
<td>No comments received</td>
</tr>
<tr>
<td>Mineral, Waste and Energy</td>
<td>No comments to make on this application.</td>
</tr>
<tr>
<td>Planning Unit</td>
<td></td>
</tr>
<tr>
<td>Secretary of State / National</td>
<td>No comments received.</td>
</tr>
<tr>
<td>Planning Casework Unit</td>
<td></td>
</tr>
</tbody>
</table>

### 8.2 Application B (LB/337929/15) – Listed Building Application

<table>
<thead>
<tr>
<th>Saddleworth Parish Council</th>
<th>Recommend Approval.</th>
</tr>
</thead>
<tbody>
<tr>
<td>The Council for British</td>
<td>No comments received.</td>
</tr>
<tr>
<td>Archaeology</td>
<td></td>
</tr>
<tr>
<td>Historic England</td>
<td>Do not wish to make any comments on this occasion.</td>
</tr>
<tr>
<td>Canal and River Trust</td>
<td>No comments to make on this application.</td>
</tr>
<tr>
<td></td>
<td>Recommend informative note relating to the need to ensure that any necessary consents are obtained and that the works comply with the Canal &amp; River Trust “Code of Practice for Works affecting the Canal &amp; River Trust”.</td>
</tr>
<tr>
<td>The Society for the Protection</td>
<td>No comments received.</td>
</tr>
<tr>
<td>of Ancient Buildings (SPAB)</td>
<td></td>
</tr>
<tr>
<td>Ancient Monuments Society</td>
<td>No comments received.</td>
</tr>
<tr>
<td>The Georgian Group</td>
<td>No comments received.</td>
</tr>
<tr>
<td>The Victorian Society</td>
<td>No comments received.</td>
</tr>
<tr>
<td>20th Century Society</td>
<td>No comments received.</td>
</tr>
</tbody>
</table>

### 8.3 Application C (PA/337301/15) – School Planning Application

<table>
<thead>
<tr>
<th>Saddleworth Parish Council</th>
<th>Recommend Approval.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Greater Manchester Ecology Unit</td>
<td>The ecology surveys and assessments undertaken are generally of an appropriate standard and no further surveys need to be conducted prior to determining this application.</td>
</tr>
<tr>
<td>---------------------------------</td>
<td>------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td><strong>Designated Nature Conservation Sites:</strong></td>
<td>The proposed development will not have any harmful impacts on the special nature conservation interest of the South Pennine Moors Special Protection Area. Support the recommendation in the ES that no direct lighting of the Huddersfield Narrow Canal SBI should be permitted.</td>
</tr>
<tr>
<td><strong>Protected Species – Bats:</strong></td>
<td>No objections to the application on the grounds of impacts on bats. From the survey results provided it would seem that small numbers of common species of bat use parts of the building complex for (likely) occasional roosting. Before any work can commence that may disturb bats a licence may be required from Natural England. The three tests set out in the Habitats Directive and the Conservation of Habitats and Species Regulations 2010 (as amended) must be satisfied before planning permission is granted. The bat roosts found are small and of a relatively common bat species. Impacts on bats will therefore be low level and mitigation for any possible disturbance to bats will be straightforward. Condition recommended requiring a fully comprehensive method statement giving details of measures to avoid possible disturbance to bats during demolition and construction of new school.</td>
</tr>
<tr>
<td><strong>Impact on Birds:</strong></td>
<td>The fields within and surrounding the site have some local nature conservation value for birds, in particular lapwing, which have been found to breed on the fields where the new playing fields are proposed and in adjacent fields. The area as a whole has District value for breeding lapwing. No breeding lapwing appears to have been recorded on the site since</td>
</tr>
</tbody>
</table>
2010/2011 and the local population would appear to have declined recently. Alternative suitable breeding habitat is available for lapwing on nearby fields. Mitigation for possible harm to breeding birds should be adopted and implemented as part of the scheme and no vegetation clearance or groundworks should commence during the bird breeding season. New landscaping proposals should encourage provision for nesting birds.

**Other habitats:**

There are some locally important habitats present that will be affected by the scheme, including the Diggle Brook, open grassland and trees and shrub. Measures should be taken to prevent pollution of the brook and retain and protect trees and shrubs. Where trees are lost compensation should be sought in the form of new tree or shrub planting. An appropriate landscaping condition should be attached to any approval.

**Other species:**

Precautionary surveys for otters and badgers should be undertaken prior to construction in accordance with the recommendations of the ES.

**Invasive species:**

The applicant should take care to avoid the spread of invasive species, particularly Himalayan balsam.

<table>
<thead>
<tr>
<th>Natural England</th>
<th>No objection.</th>
</tr>
</thead>
<tbody>
<tr>
<td>The proposal is unlikely to have a significant effect on statutory nature conservation sites.</td>
<td></td>
</tr>
</tbody>
</table>

Protected landscapes (Peak District National Park) – no objection on the basis that:

- The development would be viewed against the backdrop of built form in Diggle;
- The majority of the proposed car parking is behind the building (as seen from the National Park); and
- The built form of the development would be located on the existing industrial site.

Natural England has not assessed the impact on protected species – the LPA should apply Natural England advice.
<table>
<thead>
<tr>
<th>Organization</th>
<th>Advice/Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td>United Utilities Asset Protection</td>
<td>In accordance with the NPPF and Building Regulations, the site should be drained on a separate system with foul draining to the public sewer and surface water draining in the most sustainable way. A number of public sewers cross this site and United Utilities will not permit building over them. An access strip width of 6 metres, 3 metres either side of the centre line of the sewer will be required. United Utilities will have no objection provided conditions are attached covering drainage and surface water discharge. A number of other technical issues are raised, relating to soil surveys, water supply, water mains, and public sewers.</td>
</tr>
<tr>
<td>The Coal Authority</td>
<td>No comments. The site does not fall within a defined coalfield.</td>
</tr>
<tr>
<td>Greater Manchester Archaeological Advisory Services</td>
<td>The archaeological and heritage desk based assessment has been submitted with the application. This has been produced in accordance with the NPPF paragraph 128. The most significant archaeological site is identified as Wrigley’s Mill. The majority of the mill lies within the proposal site and is sealed by hard standing and structures forming part of Shaw Pallet Works. It is considered that the site has good potential for revealing buried remains despite later development works. The submitted report recommends a scheme of archaeological mitigation for the mill site. This would take the form of a strip, map and sample excavation exercise prior to the construction phase of the new development, which would adversely impact the archaeological remains. The programme of works would include post-excavation analysis leading to a report on the results, deposition of the project archive and publication if warranted by the results. GMAAS concur with the proposed mitigation strategy and recommend that archaeological works are secured by condition should consent be granted. The submitted report states that it has not studied</td>
</tr>
</tbody>
</table>
The extant buildings on site relating to Shaw Pallet Works as these are being demolished through a separate arrangement by the current landowners. The Shaw Pallet Works was previously the Dobcross Loom Works. Architecturally, the most significant structure is the c 1890 Works Office building which lies outside the proposal site. Whilst the buildings have suffered from considerable degradation and change, they are nonetheless of industrial archaeological and historical interest. GMAAS have been consulted separately on a scheme of historic building recording which will be carried out prior to demolition.

GMAAS understand that buildings within the proposal site will be demolished to ground level. There is good potential for below-ground remains relating to power systems and processing to be preserved under current ground floor levels. These should be subject to archaeological investigation and recording to complement the extant building survey. It is anticipated that the historic building survey will allow identification of potential areas of below-ground archaeological interest associated with the original loom works. These potential remains will be destroyed by development grounds so GMAAS recommend that a scheme of archaeological recording is included in the planning condition.

The new school will be surrounded by landscaped grounds. GMAAS recommend that the unique history and archaeology of the site is commemorated through information panels which are accessible to both the students and the public. This would provide a sense of place and a legacy to the site’s history. GMAAS wish to see this incorporated into the landscape design.

The programme of archaeological works should be secured through an appropriately worded planning condition. The archaeological works should be undertaken by a suitably experienced and qualified archaeological contractor funded by the applicant. GMAAS will monitor the implementation of the work on behalf of Oldham Council.

<table>
<thead>
<tr>
<th>The Council for British Archaeology</th>
<th>No comments received.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Health and Safety Executive</td>
<td>No comments received.</td>
</tr>
<tr>
<td>Organization</td>
<td>Recommendation/Comment</td>
</tr>
<tr>
<td>------------------------------------------</td>
<td>----------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Greater Manchester Police Crime Prevention Team</td>
<td>The proposed school development should be designed and constructed in accordance with the recommendations of the Crime Impact Statement, and a planning condition should be added to this effect. Some concerns regarding covered external areas. Recommend installation of either shutters or full height railings and gates to prevent unauthorised access into these areas. The proposed sheltered areas have potential to cause issues such as loitering, nuisance and anti-social behaviour, as well as leaving the hidden windows and doors vulnerable to damage. Would like to see sheltered areas designed out to avoid creation of hiding places, but if this is not feasible then these areas need to be secured.</td>
</tr>
<tr>
<td>Environment Agency</td>
<td>No objection in principle to application. Recommend conditions dealing with contamination and remediation; infiltration of surface water drainage; and provision and management of a buffer zone alongside the Diggle Brook. Also recommend informative notes.</td>
</tr>
<tr>
<td>Historic England</td>
<td>Do not consider it necessary for application PA/337301/15 to be notified to Historic England and no comments on the amended proposals.</td>
</tr>
<tr>
<td>Canal and River Trust</td>
<td>The Trust notes the case made by the applicant. However, the Trust considers that the proposed design and layout of the proposed school buildings remain imposing, in terms of its scale and massing in relation to the canal. If the LPA is minded to approve the application then it is requested that the following issues are considered and conditions imposed to help mitigate its impact. Boundary Treatment The Trust previously raised concerns about the potential visual impact of long stretches of high fencing on the canal corridor and requested further details of the proposed boundary treatment. The Applicant has now submitted details of Site Access, Security and Boundary Treatments and provided additional sections for the northern part of the site. A 1.2m post and rail fence is proposed adjacent to the canal towpath to the southern half of the site (sports fields) which the Trust considers to be acceptable in</td>
</tr>
</tbody>
</table>
this location. The application proposes a continuation of this fence to the top of the retaining wall adjacent to the towpath bridge which the Trust would welcome. As this lies outside the application site the Trust would suggest the possible use of a suitably worded Grampian condition to secure erection of this fencing prior to the first use of the school.

Ball stop fencing is proposed to the 3G pitch, sections of grass pitch and the proposed MUGAs comprising 3m high weldmesh fencing. Whilst more intrusive than the post and rail fencing, its proposed use is understandable. This fencing is intended to be erected below the level of the canal which it is considered will go some way towards lessening its visual impact to users of the canal and towpath. Around the northern part of the site (the school buildings) a 2.4m high weldmesh boundary fence is proposed to provide security to the school. This fence will, in places, be partially screened and setback from the canal behind existing vegetation, elsewhere however it will be highly visible from the towpath and canal corridor. It is considered that the use of green weldmesh (for both the 2.4m and 3m fences) as suggested by the applicant would be most appropriate in this location and help to lessen its visual impact. This could be secured by condition requiring submission and approval of fencing detail including foundation details and methodology for its erection which may also have the potential to impact on the structural integrity of the canal.

The Trusts previous comments relating to landscaping works outside the application site have now been addressed. The Trust would however reiterate that any proposals likely to affect the embankment must be agreed with the Trust to avoid any impact on the structural integrity or operational effectiveness of the canal.

Structural Integrity of the Canal
The Trust has previously commented on the potential for construction work in close proximity of the canal to adversely affect its structural integrity and requested the imposition of two conditions relating to investigation of the canal wall and production of a construction method statement detailing all proposed earthmoving and construction works. The requirement for a construction methodology statement remains. There is now however a specific
application relating to the demolition of buildings on
the site, which indicates the applicant’s intention to
carry out a survey of retaining walls and structures
following completion of demolition works and prior to
development. The Trust has, in its response to that
application, requested that this be secured by means
of a suitably worded condition. It is considered that a
similar condition should be imposed on the current
application for completeness and to ensure such
work is undertaken prior to any new development
taking place.

Hydrology and Flood Risk
The Trust would re-iterate its previous comments
relating to the culvert which crosses the site and its
request for the imposition of a condition requiring a
detailed condition survey of the culvert to be
undertaken and any remedial works found to be
necessary undertaken as part of the main site
drainage works. The culvert passes under the canal
but is not fed from the canal and is not the
responsibility of the Canal & River Trust. It is
however important to ensure that its properties are
not adversely affected or changed by the proposed
development.

The Trust previously recommended construction of a
bund/low wall (300mm) at the back of the towpath to
ensure than any overtopping was diverted back into
the canal system rather than be allowed to discharge
into school premises. It is pleased to note that the
revised Environmental Statement which addresses
Flood Risk acknowledges this possibility and
proposes construction of a bund along the western
boundary of the new school building to mitigate such
an event. The Trust would request that this be
secured by condition requiring submission and
approval of details.

The submitted document also makes reference to a
Flood Evacuation Plan being prepared and
implemented by the School to ensure that in the
event of a warning of a potential failure of Diggle
reservoir that all staff and pupils can be evacuated
safely. The Trusts considers such an approach to be
appropriate.

Pedestrian and Cycle Linkages
The Trust has previously raised concerns relating to
the potential increase in use of the towpath arising
from the development. The Trust is however generally supportive of the use of canal towpaths as sustainable travel routes and is not opposed to the use of the towpath as a route to school in principle. The existing footpaths are not however considered to be of a standard appropriate to accommodate any significant increase in usage arising from the proposed development and as such would require works or a financial contribution towards appropriate resurfacing of paths and improvements to access points through the use of a planning obligation or section 106 agreement to mitigate the direct impact of the development if such use was intended.

The applicant however advises that use of the towpaths is to be discouraged and measures put in place through the management of the school and through the travel plan to implement this, with the use of towpaths to be monitored once the school is open and additional measures put in place if necessary to reduce usage if occurring in high volumes.

If contributions towards towpath improvements are not to be required, the Trust would request an appropriately worded planning condition requiring full details of how pupil use and access to the towpath is proposed to be managed by the school, with the inclusion of details and method of enforcement included in a travel plan to be submitted and approved prior to the opening of the school.

Ecology
The Trust recommends a condition requiring protection from pollution or other harm from the canal during the construction and operational phases of the development in order to prevent any detriment to the canal and its users and avoid damage to, or contamination of the waterways from wind blow, seepage or spillage.

Lighting
The Trust notes the information submitted in respect of future lighting of the scheme and the assessment of the canal corridor as a potential receptor. The proposed curfew of 22.00 hrs for the lighting of the sports pitch is welcomed in order to reduce any potential impact on bats along the corridor which should be secured by use of a suitably worded condition. It is noted that the proposed lighting
scheme is yet to be finalised and would reiterate its previous comments that submission and approval of full lighting details (including details of foundations) should be sought by means of a planning condition. Unnecessary light pollution should be avoided. The Trust would wish to be consulted in respect of future lighting details.

**Protecting the Operational Waterway Infrastructure**

The Trust would reiterate its previous comments relating to the need for access through the site to enable works to or changing of the lock gates in this location and inspection of the retaining walls and embankment.

<table>
<thead>
<tr>
<th>The Peak District National Park Authority</th>
<th>No objection. The proposed development is 840 metres from the boundary of the National Park and the visual and landscape impact upon the National Park would be limited because:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>• The development would be viewed against the backdrop of built form in Diggle;</td>
</tr>
<tr>
<td></td>
<td>• The majority of the proposed car parking is behind the building (as seen from the National Park); and</td>
</tr>
<tr>
<td></td>
<td>• The built form of the development would be located on the existing industrial site.</td>
</tr>
</tbody>
</table>

The National Park Authority’s Landscape Officers have viewed the site from the National Park and confirm that, where viewed from footpaths on higher ground from the east and within the National Park, visibility of the development would be limited.

The proposed development would not conflict in any significant way with the National Park Authority’s Management Plan.

The National Park Authority requests that consideration be given to good design and landscaping around the site and the potential to mitigate the impacts of light pollution through appropriate use of low powered downward facing lighting.

| Transport for Greater Manchester | Because the width of the existing road, pavements and bridge are not shown in the Transport Assessment, they are concerned over the access to the school. |
The left turn into the school after the bridge also raises concern because of visibility around the clock tower.

It is also not clear if there is provision for independent arrival and departure of the different school bus services and how bus boarding will be managed.

<table>
<thead>
<tr>
<th>Highways England</th>
<th>No objections on the basis that the development would not result in a significant impact on the strategic road network.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Pollution Control</td>
<td>Recommends conditions requiring landfill gas risk and land contamination site investigations and any necessary remedial measures.</td>
</tr>
</tbody>
</table>
| Network Rail      | Any discharge of water must be away from the railway and not into culverts that drain toward the railway.  
|                   | Requests that a condition be attached to require a risk assessment and method statement for vibro-impact works to be submitted to the LPA and Network Rail. This is in order to prevent any piling works and vibration from de-stabilising or impacting the railway.  
|                   | No comments on the amended plans. |
| Education and Culture | No comments received. |
| LLFA / Drainage | No comments received. |
| Environmental Policy Officer | No comments received. |
| National Grid Company PLC | Due to the presence of National Grid apparatus in proximity to the site, the developer should contact National Grid before any works are carried out to ensure the apparatus is not affected by any of the proposed works. |
| Electricity North West (ENWL) | Raise various technical issues. The proposed development could have an impact on ENWL infrastructure. The applicant must ensure that the development does not encroach over either the land or any ancillary rights of access or cable easements.  
|                   | It is envisaged that the existing distribution station on the site will either need to be removed or re- |
positioned. Should there be a requirement to divert apparatus because of the proposed works, the cost of such a diversion would usually be borne by the applicant. The applicant should be aware of ENWL’s requirements for access to inspect, maintain, adjust, repair, or alter any ENWL distribution equipment.

<table>
<thead>
<tr>
<th>The Ramblers Association</th>
<th>Footpath no. 106 is shown as coming in from the west, over the footbridge and in between two new retaining walls and then in between the sports pitches and the main school and then on to the towpath. Please ensure that the width between the new retaining walls and in between the two main school sites is wide enough (at least 3 metres wide) as there could be many pupils and other pedestrians using this area.</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Street Lighting</th>
<th>Advise on the level of information that will be required in order for an assessment to be made.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sport England</td>
<td>Have apologised for lateness of response, but have concerned they will be responding. Will be reported on the late list.</td>
</tr>
<tr>
<td>Mineral, Waste and Energy Planning Unit</td>
<td>No comment to make in regard to this application.</td>
</tr>
<tr>
<td>Secretary of State / National Planning Casework Unit</td>
<td>No comments received.</td>
</tr>
</tbody>
</table>

### 8.4 Application D (PA/337930/15) – Highways Application

<table>
<thead>
<tr>
<th>Saddleworth Parish Council</th>
<th>Recommend refusal of the proposal on highways grounds since the residual cumulative impacts of development are severe on the highways network.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Greater Manchester Ecology Unit</td>
<td>The area of grassland affected by the proposed new car park drop off facility and residents' parking area is not of substantive value and GMEU have no objections to this proposal on nature conservation grounds. A detailed landscaping scheme for this part of the site should be required by way of condition.</td>
</tr>
<tr>
<td>Natural England</td>
<td>No comments to make on this application.</td>
</tr>
<tr>
<td>United Utilities Asset Protection</td>
<td>No objection, subject to a condition requiring the site to be drained on a separate system, with only foul</td>
</tr>
</tbody>
</table>
drainage connected into the foul sewer. Surface water should discharge to the watercourse as detailed on the planning application.

Also recommend informative notes to the applicant.

<table>
<thead>
<tr>
<th>Organization</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>Greater Manchester Archaeological Advisory Services</td>
<td>Archaeological mitigation is not required for this scheme.</td>
</tr>
<tr>
<td>The Council for British Archaeology</td>
<td>No comments received.</td>
</tr>
<tr>
<td>Health and Safety Executive</td>
<td>No comments received.</td>
</tr>
<tr>
<td>Greater Manchester Police Crime Prevention Team</td>
<td>No comments received.</td>
</tr>
<tr>
<td>Environment Agency</td>
<td>No comments on this application</td>
</tr>
<tr>
<td>Transport for Greater Manchester</td>
<td>TfGM raise the following points:</td>
</tr>
<tr>
<td></td>
<td>• The maximum queuing could queue back during the peak periods and extend onto the Stanedge Road / Huddersfield Road junction;</td>
</tr>
<tr>
<td></td>
<td>• The possibility that vehicles waiting to turn right into the car park could block the car park egress;</td>
</tr>
<tr>
<td></td>
<td>• Vulnerable road users such as cyclists and horse riders could get caught within the single lane section of the shuttle run;</td>
</tr>
<tr>
<td></td>
<td>• There is potential for significant delays to emergency vehicles attempting to use this section of Huddersfield Road; and,</td>
</tr>
<tr>
<td></td>
<td>• That the mitigation measures outlined in the Traffic Statement</td>
</tr>
<tr>
<td></td>
<td>- road markings at the car park access points;</td>
</tr>
<tr>
<td></td>
<td>- an additional phase to control traffic exiting the car park; and,</td>
</tr>
<tr>
<td></td>
<td>- altering the timing of the traffic signals</td>
</tr>
<tr>
<td></td>
<td>could have an impact on the efficiency of the junction.</td>
</tr>
<tr>
<td></td>
<td>They conclude that it may be possible to mitigate the likelihood of the junction blocking and safety of</td>
</tr>
</tbody>
</table>
vulnerable road users. However, junction efficiency may be affected and increased queuing and delay experienced.

<table>
<thead>
<tr>
<th>Organization</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>Highways England</td>
<td>No objection on the basis that the development would not result in a significant impact on the strategic road network.</td>
</tr>
<tr>
<td>Environmental Protection</td>
<td>No comments.</td>
</tr>
<tr>
<td>National Grid Company PLC</td>
<td>Due to the presence of National Grid apparatus in proximity to the site, the developer should contact National Grid before any works are carried out to ensure the apparatus is not affected by any of the proposed works.</td>
</tr>
<tr>
<td>Electricity North West</td>
<td>No comments received.</td>
</tr>
<tr>
<td>Street Lighting</td>
<td>No comments received.</td>
</tr>
<tr>
<td>The Ramblers Association</td>
<td>No comments received.</td>
</tr>
<tr>
<td>LLFA / Drainage</td>
<td>No comments received.</td>
</tr>
<tr>
<td>Mineral, Waste and Energy Planning Unit</td>
<td>No comments to make on this application.</td>
</tr>
<tr>
<td>Secretary of State / National Planning Casework Unit</td>
<td>No comments received.</td>
</tr>
</tbody>
</table>
9.0 REPRESENTATIONS

COMMUNITY CONSULTATIONS

9.1 The design and layout of the proposed school and options for the highway works were subject to a four week consultation process during May and June 2015. The consultation strategy set out the detail for the consultation including:

- issuing of information through letters and press releases;
- a series of public exhibitions
- two websites (one for the school run by Interserve and one for the highways works run by Oldham Council); and,
- inviting feedback on the proposals.

9.2 The public exhibitions were attended by representatives of Interserve and Oldham Council and were carried out to inform local residents, pupils, parents / guardians and the wider community about the project. These gave interested parties the opportunity to provide written and verbal feedback to the project team, including suggested changes to the scheme in advance of the applications being submitted. The comments and findings received were fed into the design and planning process and have helped inform the final scheme layout.

9.3 There has also been specific consultation with the residents of 20-44 and 25-43 Huddersfield Road regarding the proposals to restrict parking on that stretch of Huddersfield Road and provide off road parking for residents.

9.4 The Council were invited to attend a meeting in Dobcross on 28th July 2015 to listen to the concerns of residents about existing traffic issues as well as additional concerns about traffic and should the school be built in Diggle. There was a high level of public concern and objection to the highways proposals and design principles.

9.5 Public exhibitions of the highways scheme - now the subject of application PA/337930/15 - took place on two dates in December 2015.

REPRESENTATIONS RECEIVED AGAINST THE FOUR APPLICATIONS

9.6 The four applications comprising ‘the project’ have been individually advertised by means of press notices, site notices, and neighbour notification letters. As a result of this publicity, a number of representations have been received, some of which comment on one of the applications in particular, whilst others comment on more than one, or all four.

9.7 Copies of the representations received may be viewed at the Planning Department by request.

9.8 As a result of the consultation / notification process carried out from 23rd December 2015 in response to the amended plans received and revised Environmental
Statement for application PA/337301/15, and receipt of the three further related applications (ref. LB/337929/15, PA/337930/15, and PA/337931/15), a total of 1303 objections have been received (of which 1228 were the 'standardised' letter, 75 were unique submissions).

9.9 The closing date for comments was 31st January 2016. The below summarises the comments received before 8th February 2016. Any late comments received will be considered in the late list report.

9.10 For each application the issues raised can be summarised under the following topic headings:

**Application A (PA/337931/15) – Demolition of 5 no. buildings**

*Impact on heritage assets*

- The surviving buildings are of significant (industrial) heritage and architectural interest and their loss would mean a unique and important element of 19th century textile industry in Saddleworth would be lost.

- The buildings have a key functional and historic relationship to the Grade II listed office building, which would be lost. The buildings are within the curtilage of the listed building and are therefore listed. No listed building consent has been sought for their demolition.

- Demolition would be contrary to Sections 16 and 66 of the Town and Country Planning Act 1990.

- Adverse impact on setting of listed office building due to removal of existing loom works buildings.

- Proposed school buildings will harm the setting and context of the Grade II listed building.

- Adverse impact on other historic properties in the locality, such as Middle Holly Grove and Holly Grove Conservation Area and Grade II listed properties.

- Stone from the demolished buildings could be used to build new boundary / retaining walls.

- Disturbance and damage to archaeologically significant remains of Wrigley Mill, with inadequate mitigation.

- The Statement of Significance contains omissions and contractions.

*Huddersfield Canal*
• Demolition of the buildings will have a detrimental impact on the character and history of the Huddersfield Canal. Proposed school buildings will harm the setting and context of the Huddersfield Canal and Grade II listed ‘Bridge 69’.

• The school buildings will interrupt the visual connection between the listed structure and the canal.

Land use / economic issues

• Loss of employment site.

• The site was allowed to fall into a state of dilapidation and the applicant has not clearly demonstrated that there is no realistic prospect of the existing buildings being used for business and industrial uses, thereby retaining the heritage asset.

Environmental impact

• The ecological and environmental impacts of the demolition have not been fully assessed and mitigation plans are inadequate.

Application B (LB/337929/15) – Demolition of link bridge

Impact on listed building / heritage assets

• Removal of the link bridge will be detrimental to the historical interest and interpretation of the way the site operated, and will jeopardize the future of the listed building.

• The applicant has not clearly demonstrated that there is no realistic prospect of the link bridge and other existing buildings being used for business and industrial uses.

• The link bridge is of considerable interest and may be unique as it is associated with the railway infrastructure of the period. Inadequate justification for its removal.

• The proposal to leave a remnant of the link bridge projecting from the rear elevation of the listed building would not enhance the appearance of the building.

• Materials proposed for sealing the section of the bridge left in situ are inappropriate and would not prevent water ingress.
The applicant seeks to justify demolition on the grounds that the link bridge prevents demolition of other buildings on the site and therefore re-development. However, inadequate marketing has been carried out and does not justify claims that only demolition will secure a future for the site. It could be developed as a local employment or heritage asset.

The applicant’s suggestion that the link bridge is listed by association is baseless and contrary to national planning policy guidelines. It is intrinsic to the Grade II listed office building.

The other buildings to which the bridge connects are valuable heritage assets. However, the justification presented by the applicant for the removal of the bridge centres around the low value of the connected buildings and this is at odds with the conclusions of the ES.

Ecology

Impacts on protected species and bat roosts have not been fully assessed and mitigation is inadequate.

Application C (PA/337301/15) – New school, sports pitches and associated works

Green Belt issues

Inappropriate development in the Green Belt.

The application fails to demonstrate that very special circumstances exist to allow this development.

Ground engineering, removal of natural contours, and introduction of artificial features, combined with associated car parking facilities and lighting, would severely degrade a large area of Green Belt.

Listed Building / Heritage assets

Adverse impact on setting of Grade II listed building due to:

- proposed school building (including proposed materials);
- new sporting facilities on open pasture and lighting;
- demolition of the buildings associated with Dobcross Loom Works;
- proposed new car park and drop off facility; and,
- removal of stone walls either side of the entrance to the site.
Several ancient hamlets with listed buildings e.g. Middle Holly Grove and Holly Grove Conservation Area will experience a negative impact on their setting.

There are no plans for the listed office building as part of the proposals and its future use will be compromised.

Impact on archaeological remains has not been properly considered.

**Huddersfield Canal**

- Setting of the canal (and views from it) will be seriously compromised (and urbanised) due to the proposals and loss of the Dobcross Loom Works buildings.
- The towpath is currently prone to erosion due to surface water flooding. This path is unsuitable for increased number of users.

**Flooding**

- Ground engineering and new artificial surfaces within open pasture will seriously compromise the flood storage capacity of the field. Part of the site is a functional floodplain and plays an important role in reducing flooding downstream e.g. Uppermill and beyond.
- Risk of overtopping or breach of canal banks.
- Risk of possible failure of dam to Diggle Reservoir with consequent risk of flooding.
- A culvert on the school site has caused flooding of the site in the past.
- Sports facilities are proposed in an area with a history of flooding and will therefore be of lower quality than current facilities.
- The ground investigation that took place in 2013 within the field for proposed sports facilities found elevated contamination levels and ground water encountered at shallow depths.
- Inadequate provision for the prevention of flooding.
- Inaccuracies and omissions in the Flood Risk Assessment.
- What will happen if Uppermill bridge is breached?
- No consideration of flood and contamination risk to Diggle Brook.
• The proposals should be withdrawn until the review of the recent floods has been carried out. The Flood Risk Assessment does not take into account recent flooding in the area.

• There is no impact assessment of the water management / dewatering proposals during construction of the floor alleviation basin. This could cause problems for local properties on spring supplies, affect local water based habitats and affect foundations.

Amenity

• Noise pollution - Loss of amenity through increased noise from playing fields and increased traffic congestion, including buses. Further attenuation measures are necessary.

• Light pollution - Loss of amenity through increased light pollution.

• Increased air pollution.

• The waste plan does not deal with the increased waste and litter deposited by students.

• Loss of privacy to existing residents (i.e. from buses).

Ecology

• Negative impact on bats due to increased light pollution.

• Loss of lapwing breeding habitat with no mitigation plans to compensate for this loss.

• Adverse impact on other species and habitats.

• Conflict between the proposed floodlights and ecological considerations.

• Disturbance, pollution and changes in hydrology, erosion and spread of invasive species will have adverse impacts on conservation status and protected species associated with Diggle Brook and Huddersfield Canal.

Landscape / Visual Impact

• The proposed school building is highly inappropriate for a rural environment / not in keeping with the village.

• Inappropriate design and materials.
• Loss of stone walls to either side of the entrance to the site will adversely affect the landscape character of the area.

• Stone cladding or detailing could soften the harshness of the current design.

• Loss of highly valued landscape and degradation to landscape.

• Adverse impact on setting and views out of the Peak District National Park.

• Insufficient landscaping / tree planting.

• Adverse visual impact from the proposed security fencing.

• Trees surrounding boundary adjacent to Lower Wrigley Green and footpath must be retained for privacy.

**Highways**

• Increased traffic congestion in Diggle and surrounding areas.

• Increased traffic will adversely impact on country lanes and historic hamlets.

• Impact of the traffic controls is not allowed for in driver delay and severance.

• Inadequate access provision and consequent safety issue for drivers, pedestrians and cyclists.

• Buses will have difficulty entering the site access.

• Road plans have no yet been finalised.

• The proposed school will be inaccessible in severe winter weather.

• The bridge over Diggle Brook is not wide enough and will be unsafe to use during drop off and pick up times.

• Inadequate provision (as well as potential loss) of parking for residents, in particular properties at 109-131 Huddersfield Road, and insufficient parking for parents dropping off students.

• Increased use of main access will impinge on access to and from neighbouring properties.

• Delays for emergency vehicles accessing the area.

• The Traffic Assessment has omissions and serious errors.
• Parking situation at Diggle School is already chaotic and the proposal will exacerbate the problem.

• The highways proposals described in the Mouchel Traffic Statement are out of specification and the road designed is inappropriate for the proposed usage.

• Pupils who currently walk from Greenfield, Uppermill and Dobcross will not walk to Diggle creating more expense for parents.

Recreation / local community

• Detrimental impact on local community due to inappropriate location of school, generating issues with school travel, on site contamination, and poor state of sporting facilities. Moving facilities from Uppermill to a less accessible location will decrease availability of facilities for community use.

• Inadequate expenditure on the school itself - schools of this type have a short lifespan.

• The proposals should be considered on the basis of the impact on the whole of Diggle and not just the Wool Road area.

• Community severance caused by road blockage and the barrier effect due to traffic overload has not been considered.

• Increased crime and anti-social behaviour.

• Damage to valued recreational facilities – enjoyment of surrounding footpath network will be adversely affected due to visual intrusion and noise.

• Proposed sporting facilities are inadequate and do not meet required standards (i.e. Football Association).

• Conditions and restrictions on the use of the sports facilities will result in facilities that are not attractive to the local community and that are not financially sustainable in the long term.

• Sporting facilities would not be improved as facilities already exist in Uppermill.

• The public right of way through the site should be moved to make the site safe.

Land use / economic issues

• Loss of Saddleworth Employment Area.
The applicant has not clearly demonstrated that there is no realistic prospect of the existing buildings being used for business and industrial uses.

Detrimental impact on tourism.

Relocation of the school would lead to a loss to small businesses in Uppermill and adverse impact on vitality and vibrancy of Uppermill.

No increase in jobs.

Where is the evidence that the building company will use local labour?

Waste of public money – the money spent on the all-weather pitches will have to be paid back.

The granting of this application is almost certain to be followed by an application for housing on further green land which is being retained by the current owner of the site.

Concerns around the ‘land swap deal’ and financial impropriety.

No information available on the estimated costs for the development for locating the school in Diggle to compare it with re-building on the existing site in Uppermill.

Loss of agricultural / grazing land.

**Sustainability and alternative site/s**

As the proposed development would degrade the economic, social and environmental conditions of the area it does not comprise sustainable development.

Schools and the Government encourage children to walk to school, but this plan is actually stopping more children walking.

The EFA feasibility study (Feb 2015) has shown that the school could be built in Uppermill within budget, without all the extra environmental issues, traffic problems and financial costs.

There are other alternative sites in Saddleworth (i.e. Fletcher’s Paper Mill).

Unlike the current site, Diggle village does not have the infrastructure or facilities required to support a school of this size.

The sports fields at the current Uppermill site are in the lowest flood category (Flood Zone 1).

Don’t see why a temporary re-location of students isn’t an option.
The EFA previously rejected this site so it must be inappropriate.

The existing school site in Uppermill will be developed for housing giving more rates to Oldham Council.

Application D (PA/337930/15) – Car park drop-off facility and associated works

Green Belt issues

- Inappropriate development in the Green Belt.
- Degradation of high quality, open land.
- Impact exacerbated by additional harm to the Green Belt that will occur with the proposed sports pitches.

Heritage impact

- Removal of stone wall along Huddersfield Road, together with construction of car park and associated works will have a negative impact on the setting and views of the Grade II WH Shaw office building, listed buildings at 25, 45, 47 and 49 Huddersfield Road, and Huddersfield Canal and associated listed structures.
- Adverse impact on the quiet setting of a number of listed buildings on Spurn Lane and Carr Lane due to increased traffic and parking.
- Adverse impact on Dobcross Conservation Area due to increased traffic through that village.

Landscape / Visual Impact

- The car park and associated development, including removal of stone wall, will have an urbanising and detrimental impact on the character of the area / Green Belt. To replace the wall with a fence would not be in keeping with the area.
- The stone wall to be removed has not been built long. What did that cost and will the money be refunded?
- Slow moving and stationary traffic will detract from the character of the village.
- Loss of green space in the village.
Highways

- Increased congestion, delays and risk of accidents. Traffic turning into car park will extend back to the traffic lights. Queues will occur at the Standedge Road junction with or without the change in junction priority.

- Inadequate visibility for traffic emerging from Standedge Road at the junction with Huddersfield Road generating a potential hazard.

- Delays for emergency vehicles accessing the area.

- Highway problems should be considered before the school is approved / built.

- Inadequate access provision and consequent safety issue.

- Huddersfield Road is not wide enough and does not meet the Highway Authority’s minimum requirements.

- Conflict between pedestrians and cars using the entrance/exit of car park.

- Pupils on foot will have to share a congested roadway with cars and buses and will have to negotiate a drop off that also operates as a turnaround and car park.

- Inadequate traffic surveys and no adequate computer modelling of traffic flows and movements.

- Changing the junction priority at the Huddersfield Road / Standedge Road junction will not solve traffic flow issues, but will create other problems and hazards.

- Adverse impact on surrounding transport network, which is not sufficient to support the traffic volumes and flows associated with the development. There is no realistic and cost effective way to improve them to limit the significant impacts on the wider area.

- No assessment has been made for the increase in traffic coming through Dobcross.

- The highways proposals described in the Mouchel Traffic Statement are out of specification and the road designed is inappropriate for the proposed usage.

- Failure to consider impacts on wider highway network, including Dobcross.

- The applicant’s failure to present a complete application means that the public and statutory bodies are not in a position to form an informed view and the application is therefore unlawful – it should be withdrawn.
Various ‘rat-runs’ will be created in and around Diggle. Some of these lanes are inadequate – narrow, steep, no pavements etc.

There should be a second road built behind the houses at the entrance to Huddersfield Road, and the land at the front of the site adjacent to the road should also be purchased and the used to enhance the scheme.

Off-road parking is not being provided for 119 to 133 Huddersfield Road, who will lose front of house parking and use of a small part of Shaw’s drive. Shaw’s used a patch to the left of their drive to hold 30-40 cars: can this be resurrected?

Diggle School has not been taken into consideration in terms of highway safety impact and parking.

Adverse impact on residents trying to leave village to go to work, and horse riders and cyclists will be at risk as no provision has been made of them.

Cyclists will be at danger when negotiating the phased traffic light system due to the phasing of the lights and variables in speed of cyclist(s). No modelling of this scenario has been provided.

The drop-off and parking facility is too small to meet demand and should be sited closer to the school.

Staff parking – some alternatives could be provided for this lost parking in the spiritualist facilities opposite the school and behind the Masonic Hall.

Many residents most affected are elderly, disabled, have serious chronic illnesses, have special needs to have young children. They would be unable to access their vehicles safely.

Vehicular access to some properties on Huddersfield Road will be hampered by the proposed traffic lights and road narrowing.

Residents will have difficulty using their designated parking because parents will have used it.

If visitors arrive at school start and finish times, where are they to park and how will this be monitored?

Disabled people may not be able to walk from the residents’ parking area.

More crime and damage to cars on the parking area. Increased insurance costs.

Deliveries / building workers need to park next to the properties – will car insurance increase?

Adverse weather conditions will affect accessibility to the proposed school.
What assurances are there that the land will be properly maintained in perpetuity?

Have bus companies been consulted?

Damage to roads and drains from heavy construction traffic.

**Sustainability**

- No incentive for sustainable forms of transport such as walking and cycling. Proposed location of school and difficulties in pedestrian access will deter walking to school.

**Amenity**

- Increased traffic, noise, vibration, congestion and light and air pollution will have a negative impact on existing residents and pedestrians.

**Land use / economic issues**

- Devaluation of nearby properties.

- Livelihoods could be affected by increased congestion (impact on commuting time) and loss of parking outside houses.

- Waste of resources and costs to tax payers.

**Flood risk and drainage**

- Pollution run-off and changes in hydrology adjacent to a floodplain will exacerbate flood risk, drainage issues and contamination issues for Diggle Brook.

- There are sewers and drains under the site, which are old and not in good repair. This will be exacerbated by the proposal.

**Ecology**

- Loss of wildlife, especially lapwing breeding habitat.

9.3 It is also important to note that a number of the objectors have raised concerns regarding the planning consultation process, including:
• Timing of the notification / consultation period over the Christmas holidays, when council offices were closed, giving insufficient time to consider the proposals and seek assistance from officers;

• Insufficient consultation with neighbouring residents e.g. some were not individually notified of the proposals;

• Poor quality of reports submitted with the applications.

• Inadequate access for residents to the planning documents, particularly those with disabilities;

• Incomplete set of documents available to view online on the Council’s website;

• The 100 character limit on the online comment section of the website prevents objectors from commenting in detail.

**Poor quality scanned documents on the website**

• Residents' views are not being properly taken into consideration / not being listened to.

• Failure to conclude the previous planning application.

• The applicants should not have been allowed to submit multiple and consuming applications when one unifying application would have been better.

**REPRESENTATIONS RECEIVED IN SUPPORT OF THE FOUR APPLICATIONS**

9.11 23 letters/emails of support have also been received in response to the consultation and notification carried out from 23rd December 2015, in which the following points are raised:

• Saddleworth needs a new school that is fit for purpose;

• The new traffic system will be better than we have at present.

• The proposal will improve the gateway to Diggle and breathe life back into the village.

• This site provides more space and flexibility for expansion if needed later.

• Existing building is an eyesore, outdated, and inaccessible.

• Building on the existing site would be a disaster for education of pupils.
• The proposal will provide a valuable community resource.

ORIGINAL REPRESENTATIONS AGAINST APPLICATION C (PA/337301/15)

9.12 As a result of the original consultation process carried out from August 2015 in relation to the main school application (ref. PA/337301/15), 661 objections were received (of which 522 were on the ‘standardised’ letter). The objections raised can be summarised under the following topic headings:

Highways

• Increased traffic and congestion in Diggle and across Saddleworth due to children previously within walking distance of the school now having to use buses or be brought by car to Diggle.

• Significant safety risk – Huddersfield Road carriageway and pavement are narrow and children will have to share the same route as vehicles and will therefore be put at risk.

• Some properties on Huddersfield Road are being given off road parking spaces, but the properties most affected are having their parking facilities removed without compensation.

• The proposed drop off facility does not appear to be sufficient to meet need.

• No highway improvements would be required if the school was rebuilt in Uppermill.

• It is unclear where parents attending open evenings will park.

• Disabled access to certain properties on Huddersfield Road will be restricted due to the related highway scheme, with no mitigation proposed.

• Siting the school in Diggle, on the edge of the catchment area, will generate increased road traffic, which is in direct conflict with OMBC’s objective of expanding the use of more sustainable modes of transport.

• Inadequate traffic surveys and no adequate computer modelling of traffic flows and movements.

• The application omits details of the access junction to the school site. There is inadequate visibility at this junction and the proposals do not demonstrate that vehicular movements can be safely accommodated.

• Various ‘rat runs’ will be created to avoid the Huddersfield Road junction with Standedge Road.
• Increased parking problems for residents.
• Inadequate road infrastructure to support bus journeys.
• Neighbouring roads will be used as drop-off points.
• Increased vehicle emissions and deterioration in air quality.
• Parents of children in areas currently within walking distance of the existing school will be forced to pay the cost of bus travel.
• Delays for emergency vehicles accessing the area due to narrow roads with consequent risks to public.
• Road plans have not yet been finalised. No consideration of traffic impacts on surrounding areas / villages.
• The proposed drop-off facility will be a nuisance and hazard to local residents.
• Best practice indicates that access roads to a new school development should be 12.5m wide. A new access road would be required from a roundabout on Wool Road between Huddersfield Road and Diggle Brook.
• Risk to pupils of walking along the canal (and railway line) to get to and from the site.
• Pupils may cut across private land to access the school with potential damage to drystone walls.
• Adverse weather conditions will affect accessibility of the proposed school.
• No consideration of transport provision for the homeward journey of pupils who stay behind after school.
• Any approval is predicated on a Grampian style condition for an off-site highway mitigation scheme that is reliant on third party land and separate planning application, the outcome of which cannot be guaranteed.
• The bridge over Diggle Brook is not wide enough and will be unsafe to use during drop off and pick up times.
• When WH Shaw was in operation, a car park was in use to the left of the factory’s drive. Can this not be made available again?
• Disruption to refuse collections.

**Green Belt issues**
Open pasture would be transformed by ground engineering necessary for sports facilities. Incongruous artificial features, such as floodlights, fencing, asphalt and concrete, will degrade the Green Belt and ruin views across valley.

The proposals conflict with the aim of Green Belt to keep land permanently open and safeguard countryside from encroachment.

Light pollution in a previously dark rural area.

Potential merging of Diggle and Uppermill.

**Flood risk, ground conditions and contamination**

- Serious risk of overtopping or breach of canal banks.
- Possible risk of failure of Diggle Reservoir dam with consequent risk of serious flooding.
- Sports facilities are proposed within an area (functional floodplain) with a history of river flooding. No consideration of impact that ground engineering, compaction and levelling will have in terms of increased flood and contamination risk downstream, arising from engineering works and change of use of land from pasture to school. No appropriate mitigation proposed.
- No further development should be permitted in areas at risk of flooding.
- Increased incidence of block drains.
- There is asbestos on the site.

**Ecology**

- Floodlighting adjacent to Huddersfield Canal and Diggle Brook will sever the routes used by bats and affect their ability to feed and survive. Bat surveys of the existing buildings are limited in extent and coverage. No adequate mitigation is proposed.
- Destruction of lapwing breeding site with no proposed mitigation / replacement habitat.
- Adverse impact on Huddersfield Canal Site of Biological Importance has not been properly considered.
- Adverse impact on wildlife habitats.
- Ecological issues have not been properly assessed.
• The site is infested with invasive plants and contamination by invasive species may increase due to demolition and other works.

**Heritage impact / listed building**

• Adverse impact on setting of Grade II listed clock tower and other designated heritage assets due to the proposed school development and loss of Dobcross Loom Works.
• Adverse impact on setting of other listed buildings in the area.
• Adverse impact on non-designated heritage assets in the surrounding area.
• Adverse impact on conservation area/s.
• Demolition has been excluded from consideration within the Environmental Statement and the full impact of the development has not been fully considered.

**Huddersfield Canal**

• No consideration of the impact on the setting of the canal, its listed features, and the impact on its users.

**Landscape / visual amenity**

• Inappropriate design and materials proposed. The stone from the Pallet Works could be used.
• Loss of new stone wall on Huddersfield Road and replacement with a fence is out of keeping.
• Adverse impact on views across the valley.
• Urbanisation of rural valley. Loss of peaceful environment.
• Negative impact on views into and out of the Peak District National Park.
• The proposals will detract from the enjoyment of surrounding public rights of way / bridleways.
• Traffic calming will detrimentally affect the appearance of the area.
• Overdevelopment of the site.

*More landscaping / tree planting required to soften the development.*
- Loss of trees.

**Amenity**

- Noise disturbance to nearby residents without sufficient mitigation.
- Light nuisance.
- Loss of privacy.
- Increased vibration to properties on Huddersfield Road from additional traffic movements and damage to foundations of houses.
- The development will affect water retention by the underlying clay – how will this effect current houses?
- Increased litter.

**Land use / economic issues**

- Loss of Saddleworth Employment Area / employment opportunities.
- Negative impact on businesses and economy of Uppermill.
- Businesses in Diggle may relocate out of the area due to increased traffic congestion.
- Financial implications for the Council with loss of business rates in Uppermill.
- Saddleworth will become a less attractive location to live with fewer services.
- Uppermill does not need or want more executive housing as envisaged for the current school site in Uppermill.
- Negative impact on tourism in the area.
- Loss of agricultural use.
- Lack of services / infrastructure in Diggle to meet expected demand from staff and pupils.

**Educational facilities**

- Proposed sports facilities are below those available in Uppermill, will be built on a flood zone, and do not meet Sport England’s requirements. Access to the sports facilities will be curtailed by restrictions on floodlights.
- The school would be too far away to walk from Greenfield, thus rendering Mossley Hollins in Tameside a better option for many.
- The proposed school will have a limited lifespan.
- Concerns regarding the internal layout of the school e.g. unisex toilets

**Alternative site/s**

- Flawed site selection procedure.
- An alternative feasible site is available in Uppermill.
- The site of the proposed school has been chosen because the building site in Uppermill is more valuable to builders.

**Anti-social behaviour / crime**

- Pupils 'loitering' around the canal will be intimidating to older users of the canal.
- The Crime Impact Statement raises the possibility of crime, graffiti and anti-social behaviour.
- Possible unauthorised access to the old railway tunnel

**Other**

- Some residents have been disenfranchised from the process due to large volume of documents and plans submitted.
- The consultation process has been misleading.
- The plans have been predetermined by the Council.
- The plans were virtually complete before certain technical reports had been completed thereby predetermining the planning process.
- Incomplete and unclear information available for public inspection.
- The Environmental Statement does not address of properly take into account the many issues and is incomplete.
- Lack of consultation with local community.
• Statement of community involvement makes no mention of strong local opposition to the scheme.

• Health and safety concerns regarding land slippage problems.

• Adverse impact on health due to children being encouraged to eat unhealthily.

• The planning application should be suspended until proper assessments / technical information has been provided.

• The LPA should be consistent in its determination of planning applications in the area.

• Concerns around the ‘land-swap deal’ and financial impropriety.

• In the future there will be a proposal to build on land at the front of site, which will no longer be suitable for industrial use because of its proximity to a school. This land could be used to mitigate the impact of the development.

• Loss of community feeling in the village.

ORIGINAL REPRESENTATIONS IN SUPPORT OF APPLICATION C (PA/337301/15)

9.13 9 letters / emails of support were received in response to the original consultation / notification carried out from August 2015. These raise the following points:

• The existing school is not fit for purpose and the current site is too small to accommodate a modern school of the quality needed.

• Building a new school on the existing site would be hazardous for children and disruptive to their education.

• The proposal will provide a modern facility that will serve the community well into the future.

• The Pallet Works site is an eyesore and detracts from the area.

• The proposed development will regenerate the area.

• There are some issues around access, parking and traffic, which require imaginative solutions.
10.0 PLANNING CONSIDERATIONS

APPLICATION A (PA/337931/15) - The planning application to demolish the existing buildings on the WH Shaw site within the red line boundary. It does not include the grade II listed office building and clock tower or link bridge.

10.1 Legislation relating to the protection of listed buildings and conservation areas is contained within the Planning (Listed Buildings and Conservation Areas) Act 1990. The relevant section concerning the regard that the Local Planning Authority should place on preserving listed buildings and their settings is contained within Section 66, whilst conservations areas are contained in Section 72.

10.2. Following its publication by the Government in 2012, the NPPF sets out national planning guidance concerning archaeological remains and other elements of the wider historic environment in Section 12: Conserving and Enhancing the Historic Environment (Paragraphs 126-141).

10.3 Current local planning policy is contained within the Oldham Joint Core Strategy and Development Management Policies, adopted in 2011. Relevant policies relating to the historic environment include Policy 1 (Climate Change and Sustainable Development); 6 (Green Infrastructure); and, 24 (Historic Environment). These policies make reference to the full range of heritage assets and historic environment.

Designated and Non-Designated Heritage Assets

10.4 There are 58 Listed Buildings and four Conservation Areas within the immediate area. The Conservation Areas are Dobcross, Holly Grove, Uppermill and St Chad’s Church.

10.5 The listed building in the immediate vicinity of the site is the former offices of the Dobcross Loom Works. It is located immediately west of the site but is not within the red line boundary of this application. The building was built in 1897 for Hutchinson and Hollingworth, owners of the Dobcross Loom Works. It was constructed in Gothic style from ashlar, with a Westmorland slate roof. The building retains a number of decorative features including a four-storey clock tower with Lombardic roof, topped with a decorative iron crown.

10.6 The office forms part of the Dobcross Loom Works complex, which extends into the site and is connected to the main factory via a raised link corridor. The majority of this link corridor is proposed to be demolished if application LB/337929/15 is allowed, although a small section will be retained on the eastern elevation of the listed building. Given the raised link corridor is attached to a listed building at the time of its designation, it is considered to be part of the listed building and its removal requires Listed Building Consent.
10.7 No other physical works are proposed to the principal listed building and the principal listed building itself is located outside the site boundary.

10.8 A number of other industrial buildings are to be demolished within the site and these are the subject of this application.

10.9 Officers view was that the listed office building was part of a substantial manufacturing complex, devoted first to the manufacture of looms and then the manufacture of pallets. The office provided the space in which administrative tasks supporting the manufacturing processes were carried out. In terms of scale and function the view taken was that the listed building was ancillary to the other principal buildings and structures around it at the time of listing in 1968, as the site was principally used for manufacturing purposes.

10.10 A legal opinion sought by the Council has confirmed that these buildings should not considered to be within the curtilage of the listed building. However, because of their context, proximity and previous relationship to the listed building, it was considered that they are non-designated heritage assets. This is a view Officers concur with, despite Historic England’s view that the factory building the link bridge is attached to is a designated heritage asset.

10.11 Paragraph 135 of the NPPF refers specifically to non-designated heritage assets. It states:

‘In weighing applications that affect directly or indirectly 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’.

Applicants View

10.12 The applicant has produced a ‘Statement of Significance’ by Mounteer Ltd (Historic Building Consultants). Having considered the buildings historical, aesthetic, communal and evidential values it concludes that the significance of the group of non-designated buildings here is low or negligible. As a result, it considers the impact of the proposed demolition to be minor to neutral.

10.13 Specifically, it states that when considering the significance of the buildings in question, the age of the asset can sometimes be an important criteria but that this can be adjusted to take into account the distinctive local characteristics of them. In this particular case, they consider that the distinctive local characteristics of these buildings are minimal in reflecting its importance.

10.14 They continue that the historical value of the site is recognised as being of a largely organically developed engineering works created by an in-house process from foundry to finished goods. It did not develop any specific unique processing in terms of machinery although they do accept that the looms were produced to be exported both in this country and abroad for the processing of Wosted cloth.

10.15 They do not consider that the buildings have a value in terms of rarity and they are not significant to the locality in relation to their specific design, layout and function.
Their intrinsic design value does not particularly reflect any local style, although they do feel that in places they do involve local materials. However, they do not have very specific characteristics associated with Saddleworth area.

10.16 The works themselves are not unique in that respect and there were other works in Huddersfield, Halifax and Bradford carrying out similar processing.

10.17 The sites historic value is limited in the respect that the works were commenced in 1863, the second part of the industrial development of the textile industry. At this time there were many works and engineering shops producing similar processes.

10.18 The applicant argues that the grouping of the buildings and the development of the site have now, in effect, been disjointed by the partial demolition of some of the works. It is accepted there is some low aesthetic value to “Building D” (the northern factory building), but this is not significant enough to warrant any higher value. To a certain extent this is borne out by the fact that the factory buildings are not listed or mentioned in the listing description.

10.19 The applicant agrees that the buildings have some social communal value in the sense that they have a collective memory of place, but that this is generally attributed to the more significant building in the factory complex (the listed building office). This building, which stands proud of other buildings surrounding it, is a very recognised building in the Saddleworth area.

10.20 The evidential value of the group of buildings has little in terms of local heritage. It is not connected with a particular mill type or design and its engineering layout is not a significant contributor to local history. However, the applicant’s agents accept that there is some evidence in the site with regard to the possible archaeological remains of Wrigley Mill.

10.21 Overall, the applicant argues that the group of buildings proposed to be demolished has very little or no surviving cultural heritage interest and the buildings are of no particular architectural or historical note. Furthermore, the landscape now that remains has been fragmented and the contextual associations are somewhat compromised. Nevertheless, it is accepted that the element of the site with regard to its setting against the canal has some value but the setting of the canal will not be compromised by the demolition of the buildings. As the significance of the group of buildings is low or negligible the outcome of demolition is intermediate minor to neutral.

10.22 The applicant also suggests the following should be considered in assessing this application.

10.23 Paragraph 136 of the NPPF states that:

“Local planning authorities should not permit loss of the whole or part of a heritage asset without taking all reasonable steps to ensure the new development will proceed after the loss has occurred.”
10.24 In this instance they argue an application for a new school is running concurrently with this application. If approved the redevelopment of the site will obviously follow. The proposal therefore meets this policy requirement.

10.25 Furthermore, they consider that it has to be recognised that the existing buildings are currently unoccupied and have been largely unoccupied for several years with the last tenant (who occupied approximately 60% of the site) moving out over 6 months ago. The buildings have suffered from vandalism and lack of maintenance which comes from lack of occupation of the site.

10.26 The site was subject to a continuous marketing exercise between September 2008 and June 2012 yet despite this marketing exercise no firm interest in the site has ever been identified.

10.27 The lack of interest from potential tenants means the site not producing income, nor is it likely to in the future, yet it still costs the applicant significant sums for security, insurance and water rates. As such, it is currently a financial drain on them.

10.28 The applicant argues that the current unoccupied buildings have created a poor quality setting for the listed building and that this has put off potential tenants of the listed building and has meant that it too has remained unoccupied and has suffered similar lack of maintenance and vandalism that comes with disuse. The demolition of the surrounding buildings will aid in ensuring the future of the listed building by separating it from the future of the surrounding buildings.

10.29 Several of the current buildings are in severe disrepair (due to age, vandalism and lack of use) with parts of several buildings marked as 'off-limits' for health and safety reasons due to the condition of the structure. Some buildings have areas that occasionally flood, and all buildings have recently been identified as having asbestos or asbestos containing products present.

Officers view
10.30 Officers views on the applicant’s case are as follows.

Significance of the individual buildings

10.31 The buildings proposed for demolition are of varying architectural and historic interest, ranging from Building A incorporating buildings and elements dating from the original Hutchinson and Hollingworth site of the 1890’s to Building G - a portal framed building constructed in 1979.

10.32 Officers have considered the significance of the buildings, individually and as a whole as follows.

Building A

10.33 Building A (incorporating B, C, F and H) is connected to the listed building by a link bridge. A separate application is being considered for its alteration to remove this link.
10.34 This building contains some of the oldest elements of the works and the foundry. The buildings have been heavily altered due to a fire in the earlier part of the 20\textsuperscript{th} century and, as a consequence, alterations to Building F. These alterations have resulted in the introduction of timber boarding and concrete frame construction. Whilst this does reflect a further period of development in the loom works, Officers consider that this has detracted from the overall aesthetic significance of the building. Nevertheless, the building holds some historic and associative interest, and the aesthetics of the remaining local stone elements of the external elevations of the building, the water tower and chimney, contribute somewhat to the significance of the site and its setting to the listed office building, and canal in particular.

10.35 Whilst some of the facing materials (stone elevations) show simplicity of design which reflects the materials prevalent in the local area, other elements are foreign to it. Nevertheless, Officers take the view that it does form a context to the listed building attached to it if not being architecturally significant itself.

**Building D**

10.36 This building was constructed in different stages from 1912 through to Building H in 1980 at the rear. This clearly reduces its architectural significance.

10.37 However, the architectural detailing used on the different phases of this building shows that design was a consideration at some time during the sites development. The semi octagonal bay, parapets, pediment and arched details of the north gables, and the pitched face local stonework express a level of design which ensured that, whilst these buildings did not compete with the office building for supremacy, they did exhibit a certain functional style. The stonework, is not of the same quality as the ashlar detailing of the office building, but does mean the building harmonises with the surrounding buildings somewhat. Nevertheless, by itself the building is not architecturally significant.

**Building E**

10.38 This building is the remains of the larger industrial building to the rear. It is understood that the two-storey element was constructed between 1893 to 1906, and the single storey element to the front, approximately 10 years later. The building that remains shows a very large range of materials to the rear, where part of the original building has been demolished. However, the front elevation, facing Huddersfield Road, retains the timber windows and local stone of the original construction. A single-storey addition has disturbed the original front elevation and appears to have cut through openings. However, the building does, to a certain extent, illustrate the development of the site over time and, whilst clearly not competing with the office for prominence, it does have some influence on its setting when considered from the Huddersfield Road. Nevertheless, it is not architecturally a significant building on its own.

**Building G**
10.39 Officers agree with the Statement of Significance analysis that this portal frame building has no heritage significance. We do not consider this a non-designated heritage asset as it is a post-1948 construction with little interest. Its removal would therefore have a positive impact on the setting of the designated and non-designated heritage assets.

**Building I**

10.40 This building does not appear to be described within the Archaeological Report. However, it would appear to be a small flat roofed masonry building of little significance, which houses industrial water abstraction equipment.

**Impact of the proposal**

10.41 The impact of the proposed works on the non-designated heritage assets (the factory buildings) would be high due to their proposed complete loss.

10.42 Officers have considered the ‘Statement of Significance’ accompanying the application. This has concluded that the significance of the group of buildings is low or negligible and the outcome of the demolition would be intermediate minor to neutral.

10.43 We consider that the applicant’s assessment has focused on the significance of the individual buildings. As stated above, we agree that the individual significance of the buildings is low, when considered in isolation, due to their various levels of alteration, lack of architectural merit and specialness in the main. However, we also take the view that the applicant has not considered the loss of these buildings as a group.

10.44 Officers consider, when considered as a group, the proposed total loss of the 5 factory buildings would have a negative impact. In reaching this conclusion, we have considered the applicant’s reports on the buildings proposed for demolition but do not believe they have fully considered the contribution these buildings taken together make to the context of the listed office building and therefore the impact of their loss on its significance and setting. Equally, similar concerns relate to the setting of the adjacent canal. Whilst noting the views of objectors, other designated heritage assets are not significantly affected because of their distance and context to the site.

10.45 We have come to this conclusion for the following reasons:

- The visual and aesthetic association of the works as a back drop to the grade II listed office building and canal, provide an important visual context to the role of the office within the loom works site. The understanding of the architectural relationship between the works and the offices would be lost through the proposed demolition works and therefore the significance of the setting of the remaining office would be affected.

- The mixture of materials and design of some of the factory buildings means that the works buildings do not integrate well in parts with the listed building in
some areas. Indeed, some buildings are a negative on its setting. However, where traditional facing materials are visible from surrounding areas and elements of the factory are prominent such as the water tower, chimney and stone walls, they form a positive setting in terms of materials and association, which enhances the historical appreciation of the role of the canal and factory site. Whilst the listed office building and its clock tower are often more prominent in some views, where features of the other factory buildings are prominent, the loss of them will be a negative.

- The transformation of the area, from the domestic production of woollen cloth, to the large scale production of looms and introduction of mills, exemplifies the industrialisation of the Saddleworth area, and therefore reflects the important historical development in the area.

- The archaeological report comments that the other engineering works in the Saddleworth area were on a smaller scale, and compares the Hutchinson and Hollingworth site to the larger engineering works of the Oldham area. Officers consider this fact increases the interest and significance of site in historical terms.

10.46 As a consequence of these perceived impacts, Officers believe the overall impact of the demolition will be intermediate adverse.

**Justification for the proposals**

10.47 As well as considering the Local Plan, Officers have considered Paragraph 135 of the NPPF which states:

> “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 affect directly or indirectly 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”. (Council’s emphasis)

10.48 In other words, a balanced consideration has to be undertaken between the positive aspects of demolishing the five buildings and the scale of any harm and loss of significance of the non-designated heritage assets – in this case the factory buildings.

10.49 The justification for demolition includes:

- evidence of marketing the site (which has been shown the building is unlikely to be let successfully);
- removing a derelict site which is subject to anti-social and criminal behaviour;
- clearing the site for potential development which will not happen if this is not done;
- regeneration of the factory building site which detracts from the character of the area and forms an important part of the setting of a listed building;
increasing the chances of finding a use for the listed building, by clearing poor quality vacant properties around it; and,

providing an opportunity to deal with site contamination and invasive plant species.

10.50 Whilst objectors to the scheme do not consider these to be valid reasons, Officers have no evidence before them that the buildings in question are likely to be gainfully used again for employment purposes in the short or long term in their current state.

10.51 Furthermore, it is also Officers view that the site has and will continue to fall into disrepair and sustain damage through vandalism if left as it is currently. Indeed, there is some evidence of this occurring already.

10.52 The clearing of the site is more likely to result in a positive use for the site, even if the accompanying school application is not approved and delivered. It may also help find a use for the listed office building in question.

10.53 Finally, dealing with site contamination and invasive plant species are all minor advantages in demolishing the buildings.

10.54 These factors obviously weigh heavily in favour of demolishing the buildings in question.

10.55 We have also considered Paragraph 137 of the NPPF which states:

“proposals that preserve those elements of the setting that make a positive contribution to or better reveal the significance of the asset should be treated favourably”.

10.56 In this instance, Officers do not object to the loss of the post 1948 portal frame structure and other mid to late twentieth century additions to the site as these do not add anything positive to designated or non-designated heritage assets.

10.57 However, a more balanced view has to be taken in relation to some of the older works buildings that do have some significance. Nevertheless, as stated earlier, none of these buildings by themselves are architecturally special and, as such, by themselves there is a justification for their demolition even though the loss of these buildings from a heritage perspective would affect the context and appreciation of the adjacent listed office building and how its development can be understood.

10.58 Whilst Officers accept that a significant part of the value of the factory buildings lies in providing the context and setting for the Grade II listed office building in particular, and the canal to a lesser extent, it has to be recognised that this quality will deteriorate if the building remains vacant and its current condition worsens - as seems likely if the site is kept as is.

10.59 Overall:

- the evidence of unsuccessful marketing of the site over many years and therefore unlikely use of the buildings,
- anti-social behaviour on site;
- the potential blighting of the site for any realistic future use,
- plus the deterioration of the site surrounding the listed building (thus detracting to the character of the area and the setting of a listed building)

ultimately means that officers consider that the demolition of the five buildings is recommended for approval as planning benefits to the area generally of the new development of the site outweigh the loss of the group value of 5 buildings in understanding the historical context of the former factories listed office building and canal’s setting.

10.60 In relation to the setting of the listed building, the NPPF states clearly that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use (paragraph 134).

10.61 Officers consider that this scheme will cause less than substantial harm to the designated asset since the listed building in question is not touched, other than in relation to the part demolition of the link bridge that is the subject of Application B.

10.62 In this instance, the setting of the listed building is currently a ‘wall’ of factory buildings behind it and two either side of it.

10.63 Should the school application be approved, the listed buildings setting will be a ‘wall’ of school buildings slightly further away from the listed office building and the removal of two side buildings of little architectural merit that do little to support its setting positively. As such, the school redevelopment would have a neutral impact on its setting if it is allowed.

10.64 Alternatively, if it is not allowed, the planning benefits of demolishing the buildings, in the opinion of Officers, outweigh the less than substantial harm to the listed building, particularly since their demolition could secure a viable use for the site and the office building in question.

10.65 Officers have raised concerns that demolition of the existing buildings could lead the listed building being isolated, meaning its future use could an issue. However, the Council’s regeneration team have informed Officers that the Cadets are interested in occupying the listed building as a base for their Squadron based in Diggle and also as a residential centre for other groups based around the North West. It has been intimated that they can potentially bring £400k to the table and the School are happy to accommodate them particularly as they will use the property outside of school times and therefore are seen as a good fit. Moreover, if part of the listed building is set up as ‘dorms’, the School also see the benefit for foreign exchanges when the School sometime struggle to get parents to accommodate other children.

10.66 To make this happen, the Council are likely to have to contribute a minimum of £500k as well as the cadets funding in order to get the Grade II listed building up to standard. As a consequence, the Council’s regeneration team have been considering grant funding opportunities and these will be developed to coincide with progress of the school build.
They also note that the listed building in the ownership of the Council is a significant advantage when considering the future for the building as this will ensure it will not be left to deteriorate, as could be the case otherwise.

Moreover, Officers accept that the listed building is not included in any of the applications being considered concerning the new school and therefore its jurisdiction in relation to the listed buildings use is limited. Therefore, in these circumstances, Officers feel that the benefit of the doubt has to be given to the applicant in this instance, although Officers still have some concerns about the usability of listed building if the factory buildings are demolished and/or the new school use is allowed.

**Landscape and Visual Impact**

Policies 6 ‘Green Infrastructure’ and 9 ‘Local Environment’ are particularly relevant to the assessment of the landscape and visual impact of the proposed demolition.

Landscape and visual impact have been assessed following guidelines set by the Landscape Institute. Baseline information was collected from a desk based study followed by a site visit.

From the information collected landscape features of the site were identified; alongside information from landscape character studies and relevant landscape planning policies. Information on the visual aspects of the site was collected through visiting a number of viewpoints within the study area to gain an understanding of the visual baseline of the site and study area. The Landscape and Visual Impact Assessment identifies the existing mill buildings occupying the northern section of the site as a landscape feature of the area.

In the surrounding landscape, panoramic views are available towards the site, set within the wider context of the Diggle valley. The Peak District National Park lies to the east but is some 840m away from the site. Photomontages were produced, in accordance with Landscape Institute guidelines, for two of the views considered within the assessment. These aided interpretation of the visual change the development may result in.

The assessment identified that there would be a variety of effects on the landscape features, landscape character and landscape designations within the study area. Of these effects, changes during demolition and construction are anticipated to be the main effects on the landscape elements of the site.

The Public Right of Way (SADD 106) running through the site will run through a construction site during the development and adjacent to a demolition site when the buildings are being demolished. The footpath along the west of the canal (SADD 77) will also run adjacent to a demolition and construction site, and part within it where it lies within the site boundary.

Views of the development are likely to be available from all the surrounding viewpoints assessed. Once these demolition and construction activities have been completed, the effects are likely to reduce, with the school building potentially
replacing the mill buildings, and the associated playing fields and lighting being viewed as new features within the view. These new features, although resulting in some adverse change, are not anticipated to result in significant effects at the majority of the viewpoints assessed.

10.76 The water abstraction building will be removed from adjacent to the PRoW SADD 77 and the boundary treatment alongside the school building will have been constructed. This consists of a 2.4m high weld mesh fence which fully encloses the northern section of the site. The boundary of the site adjacent to the PRoW currently comprises temporary heras fencing, and the overall nature of the weld mesh fencing will not be dissimilar to this. The water abstraction building does not add to the character of this path, and its removal is therefore seen as an improvement to the immediate area.

10.77 The demolition of the mill buildings and construction of the school building is anticipated to be an improvement on the setting of this short section of the path, which currently lies adjacent to derelict buildings and fencing, and assuming a sensitive boundary treatment is adopted on either side of the fencing the overall development is likely to result in an improvement to the short section of path within the site.

10.78 The existing mill buildings on the site will be replaced by the proposed school buildings and when viewed from the Peak District National Park, this will not represent a significant change to landscape character.

10.79 The impact on the landscape and visual amenity resulting from the demolition of the industrial buildings will not be significantly detrimental and it is therefore considered that the proposed demolition complies with the requirements of Policies 6 and 9 of the Joint DPD.

**Air Quality**

10.80 The submitted air quality assessment provides an assessment of the potential effects and their significance of the development during the demolition, construction and operational phases. The effects have been considered for relevant sensitive residential and ecological receptors.

10.81 The effects during demolition phase include fugitive dust emissions from site activities, such as earthworks, construction and track out.

10.82 During the demolition phase it is anticipated that dust sensitive receptors will potentially experience increased levels of dust and particulate matter. However, these are predicted to be short term and temporary impacts. Throughout this period, the potential impacts from demolition on air quality will be managed through site specific mitigation measures outlined within the assessment. With these mitigation measures in place, the effects from the demolition phase are predicted to be not significant.
The detailed air dispersion modelling determined that the National Air Quality Objectives are not exceeded at any of the modelled receptor locations in any of the modelled scenarios, baseline or future years.

Changes in emissions to air because of additional traffic due to the development, during the demolition phase are predicted to be not significant at all the modelled sensitive receptor locations.

Although the impacts during the demolition phase are adjudged to be not significant, recommendations are provided for mitigation measures that would assist to further improve air quality.

It is concluded that the proposals are acceptable from an air quality perspective and that the proposed development thereby complies with the relevant part of Policy 9 of the Joint DPD.

**Flood Risk and Drainage**

In respect to Flood Risk the site of the existing industrial buildings is within Flood Zone 1. However, the area immediately adjacent to Diggle Brook is located within Flood Zone 3.

During the demolition phases there will be no increase in the surface water run-off and the existing drainage infrastructure will remain in place to drain the existing hard standings and former roof areas and therefore there should be no impact on the surface water run-off.

As part of the proposed demolition works to the existing former industrial buildings, some of the existing walls which currently provide structural support to the Huddersfield Narrow Canal are to be removed. These demolition works are to be the responsibility of the applicant. The proposed demolition method statement is to be agreed in advance with the Canal & River Trust and Oldham Council and the demolition works will be monitored by all parties and a full structural assessment will be undertaken following the demolition works to demonstrate the long term stability of the retaining walls. By retaining the existing retaining walls, the existing protection against any failure of a canal breach will be maintained. The Canal and River Trust will also be responsible for the future monitoring of the upper canal embankment and this is to be reinforced by the School maintenance department undertaking a regular walkover of the canal embankment and retaining structures to monitor for any movement of leakage and should any be identified then the Canal and River Trust will be informed so that they can inspect the matters further.

The Canal and River Trust welcomes the proposed removal of the industrial water abstraction equipment and housing and the reinstatement of the canal washwall and towpath, details of which should be discussed and agreed with the Trust. It also notes the proposed measures for the protection of the canal during demolition works, in the submitted Construction Phase Plan and Canal Specific Method Statement. The Trust also request a detailed investigation of the condition of any retaining walls and embankments following demolition works (secured via a
planning condition), to ascertain the extent to which improvements or strengthening is necessary to cope with the impact of any approved development.

Ecology

10.92 In considering the ecological impact of the proposed demolition, regard must be had to local and national planning policies, including LDF Joint Development Plan Document Policies 6 ‘Green Infrastructure’, and 21 ‘Protecting Natural Environmental Assets’, and the NPPF.

10.93 There are a number of statutory and non-statutory designated sites within 2km of the site. The statutory designated sites include the South Pennine Moors SAC, South Pennine Moors SPA, and Dark Peak SSSI. The non-statutory designated sites include 7 Sites of Biological Importance (SBI), one of which, the Huddersfield Narrow Canal, is located directly adjacent to the site boundary. There are also a number of priority habitats within 2km of the site.

10.94 The development proposals will take place outside of the boundaries of the designated sites and they will not, therefore, be significantly affected. A buffer of least 10m will be maintained between the Huddersfield Narrow Canal SBI and any development. The buffer will be fenced to prevent encroachment of traffic, windblown litter and storage of materials. An 8m buffer and fence to Diggle Brook will also be observed.

10.95 An impact assessment for ecology has been carried out and is provided within the ES. The comments received from Natural England and the Greater Manchester Ecology Unit (GMEU) at Scoping Opinion stage have been included within the scheme design and impact assessment.

10.96 The site has been subject to a number of desk based ecological surveys, full details of which are provided in the ES appendices. They include an Extended Phase 1 Habitat Survey, Breeding Bird Survey, and bat surveys. GMEU confirm that the ecology surveys and assessments undertaken are generally of an appropriate standard and no further surveys need to be conducted prior to determination of the applications.

10.97 Bat roost assessment of buildings on the site was carried which identified that six buildings offered between low and high potential to support roosting bats. Nocturnal bat emergence / return surveys were completed for these six buildings between May and June 2015. A single common pipistrelle bat was observed to return to building D. All works to disturb / destroy / modify a bat roost would need to be completed under a Natural England licence and such works would be supervised by a licensed bat worker. Desk study records also indicate that low numbers of pipistrelle bats roost within the retained Grade II listed office building, which is outside the site but is linked via a footbridge. Based on the results of the surveys the buildings proposed to be demolished are considered to be of value at local level for roosting bats. There is potential for demolition works to impact foraging, commuting and roosting bats due to light spill.

10.98 GMEU raise no objections to the application on the grounds of impacts on bats.
GMEU comment that, based on the submitted survey results, it would appear that small numbers of common species of bat use parts of the building complex for (likely) occasional roosting. Impacts on bats will therefore be low level and mitigation for any possible disturbance to bats will be straightforward. A condition is recommended by GMEU requiring a fully comprehensive method statement giving details of measures to avoid possible disturbance to bats during demolition and construction of the proposed new school.

10.99 The wider site has habitat with potential to support several species of birds classed as UK Biodiversity Action Plan Priority Species. However, these habitats are within the wider greenfield and watercourse areas of the site and the demolition of the non-listed buildings will not affect those natural habitats. No other species or wildlife habitat is to be affected by the demolition of the existing non-listed buildings.

10.100 The ES covers avoidance and mitigation measures that will seek to avoid or mitigate impacts during demolition, construction and operational phase of the school to ensure that any short adverse effects are minimised. Ecological mitigation includes the provision of 20 bat boxes which will provide additional roosting features and have a positive impact on local populations of bats. These mitigation measures will be ensured via condition.

Waste

10.101 An assessment of Waste Management has been undertaken. The assessment considered the management of waste arising both during the construction phase and operational phase. The proposed development will generate small quantities of construction and demolition waste, for which there are a number of waste facilities and sites in Greater Manchester and Oldham with sufficient capacity to manage the predicted arisings.

10.102 The assessment did not identify any significant effects. Mitigation measures are proposed in the waste strategy to ensure that the demolition waste is managed in an efficient way, in accordance with the waste hierarchy which promotes avoidance, re-use, recycling and recovery over disposal.

Highways

10.103 The existing access road, which at present adequately serves an industrial site, will be used by vehicles during demolition works. It can be expected that the intensity of use will increase temporarily and the Highway Engineer therefore recommends an informative note to remind the applicant that any additional traffic management that is required on Huddersfield Road as a result should be approved by the Traffic Section.

10.104 The Highway Engineer anticipates that construction / demolition vehicles leaving the site may be muddy and a condition is therefore recommended that will ensure that wheel wash facilities are provided on site and used by vehicles before they leave site.
Overall Conclusion

10.105 The planning benefits to the area of allowing the demolition of the factory buildings, to enable the redevelopment of the site, outweigh the loss of the group value of the buildings in understanding the historical context of the former factory’s listed office building and the canal’s setting.

10.106 Officers consider that this scheme will cause less than substantial harm to the listed office building as it is not touched by this application, other than in relation to the partial demolition of the link bridge that is the subject of Application B.

10.107 The setting of the listed building is currently a ‘wall’ of factory buildings behind it and two either side of it. Should the school application be approved, the listed buildings setting will be a ‘wall’ of school buildings slightly further away from the listed office building and the removal of two side buildings of little architectural merit that do little to support its setting positively. As such, the school redevelopment would have a neutral impact on its setting if it is allowed.

10.108 In officer’s opinion, there are no other material planning concerns that would warrant the refusal of the application to demolish the factory buildings. As such, the application is considered acceptable and in line with principles set out in the relevant national and local planning policy.

Recommendation

10.109 The application is recommended for approval subject to the following conditions.

1. The development hereby permitted shall be begun before the expiration of three years from the date of this permission.

   Reason: To comply with the provisions of Section 91 of the Town and Country Planning Act 1990 as amended by the Planning and Compulsory Purchase Act 2004.

2. The development hereby approved shall be fully implemented in accordance with the approved plans and specifications which are referenced as follows:

   - Drawing number: 1073/DEM-001 Rev.A – “Building References for Demolition Purposes” – Received 21 December 2015;
   - Drawing number: 1073/SLP Rev.B – “Site Location Plan” – Received 21 December 2015;
   - Drawing number: 1073/DEM-003 – “Description of Demolition Works” – Received 21 December 2015.

   unless otherwise agreed in writing by the Local Planning Authority.

   Reason: For the avoidance of doubt and to ensure that the development is carried out in accordance with the approved plans and specifications.

Restrictions
3. No demolition shall commence on site until a Demolition Method Statement, which shall include the following:

   a) the parking of vehicles of site operatives and visitors;
   b) loading and unloading of plant and machinery;
   c) storage of plant and materials used in demolition;
   d) the erection and maintenance of security hoarding including decorative displays and facilities for public viewing, where appropriate;
   e) wheel washing facilities;
   f) measures to control the emission of dust and dirt during demolition;
   g) a scheme for recycling / disposing of waste resulting from demolition works;
   h) measures for the protection of the natural environment; and,
   i) hours of construction, including deliveries;

   has been submitted to, and approved in writing by, the Local Planning Authority. The approved Statement shall be adhered to throughout the demolition period. It shall not be carried out otherwise than in accordance with the approved demolition method statement without the prior written permission of the Local Planning Authority.

   Reason: To minimise detrimental effects to the neighbouring residents and the area in general and the detriment to the natural environment through the risks of pollution and dangers to highway safety, during the demolition phase.

4. Demolition works shall be limited to the hours of 8am and 7pm on Mondays to Fridays, 8am and 1pm on Saturdays, and at no time on Sundays and Bank or Public Holidays.

   Reason: To ensure an environment free from intrusive levels of noise and activity and in the interests of the amenity of the area.

Contamination

5. No development shall commence unless and until a site investigation and assessment in relation to the landfill gas risk has been carried out and the consultant's report and recommendations have been submitted to and approved in writing by the Local Planning Authority. Written approval from the Local Planning Authority will be required for any necessary programmed remedial measures and, on receipt of a satisfactory completion report, to discharge the condition.

   Reason: In order to protect public safety, because the site is located within 250m of a former landfill site.

6. No development shall commence unless and until a site investigation and assessment to identify the extent of land contamination has been carried out and the consultant's report and recommendations have been submitted to and approved in writing by the Local Planning Authority. Written approval from the Local Planning Authority will be required for any necessary programmed remedial measures and, on receipt of a satisfactory completion report, to discharge the condition.
Reason: In order to protect public safety and the environment.

Ecology
7. The mitigation measures detailed in the Ecological Assessment [Chapter 6 of the ES] shall be carried out in full prior to the demolition.

Reason: To mitigate against the loss of existing biodiversity and nature habitats.

8. Prior to the commencement of development a comprehensive Method Statement for protecting bats during the proposed works shall be submitted to and approved in writing by the Local Planning Authority. The Method Statement shall provide full details of measures to be taken to avoid any possible disturbance to bats during the demolition and construction of the proposed school. The development shall thereafter be carried out strictly in accordance with the approved Method Statement.

Reason: To protect bats from the proposed development

9. Notwithstanding the plans hereby approved no vegetation clearance or groundworks shall take place in the months of March, April, May, June and July since this is the optimum period for bird nesting.

Reason: To minimise the impact of the proposed development on breeding birds.

Archaeology
10. No demolition shall commence until:

   a) A written programme of archaeological investigation, which should include on-site work and off-site work such as the analysis, publishing and archiving of the results, has been submitted to and approved by the Local Planning Authority; and,

   b) The approved programme of archaeological work has been carried out in accordance with the approved details.

Reason: To enable the recording of any matters of archaeological interest.

11. No demolition shall commence on site until a scheme for allowing access at all reasonable times to any archaeologist nominated by the Local Planning Authority, has been submitted to and approved by the Local Planning Authority. Thereafter, the nominated archaeologist shall be allowed to observe the excavations and to record items of interest and finds, in accordance with the approved scheme.

Reason: To safeguard the site of archaeological interest.

Survey
12. No works shall commence on site until a full survey, including analysis, and photographic record of the factory building(s) has been submitted to and approved in writing by the Local Planning Authority.

Reason: To secure the proper recording of the non-designated heritage assets.
Construction Contract

13. No works for the demolition of the building(s) or any part thereof shall commence on site until a valid construction contract has been entered into under which one of the parties is obliged to carry out and itself complete the school development of the site for which planning permission has been granted under application reference PA/337301/15) or such other application(s) approved by the Local Planning Authority; and; evidence of the construction contract has first been submitted to and approved by the Local Planning Authority.

Reason: In the interests of the visual amenity of the locality.

Protection of Listed Building

14. No works shall commence on site until a scheme for the protection of the adjacent historic office building has been submitted to and approved in writing by the Local Planning Authority. The works shall be carried out in accordance with the approved details.

Reason: In the interests of preserving the character and appearance of the listed building and its setting.

Canal Protection

15. The protection measures detailed in the Construction Phase Plan and Canal Specific Method Statement shall be carried out in full prior to the demolition

Reason: In order to protect the canal, public safety and the environment.

Waste

16. The mitigation measures detailed in the Waste Strategy shall be carried out in full prior during the demolition.

Reason: To ensure waste is managed in an efficient way in accordance with the waste hierarchy which promotes re-use, recycling and recovery over disposal.
11.0 PLANNING CONSIDERATIONS

APPLICATION B (LB/337929/15) - Listed building consent application to demolish the link bridge

Proposal
11.1 This application seeks listed building consent for the demolition of the link bridge attached between the Grade II listed office building and one of the existing factory buildings. The main issues to consider relate to the demolitions impact on the special interest and setting of the listed building and the design of the proposal.

Background
11.2 The applicant states that removal of the link bridge will enable the redevelopment of a site which forms a part of the setting of the Grade II listed office building. It will allow the opportunity to regenerate a site which presently detracts from the character of the wider area and which is currently subject to anti-social behaviour and crime. It will also give the opportunity to deal with site contamination and invasive plant species around the listed building. Clearance of the site also enables the recording of possible archaeological remains which could be of local historical importance.

Applicants View
11.3 The applicant considers that the link bridge:

- is not particularly old or rare;
- is of no special architectural or historic interest;
- has no historic association with nationally important people or events; and,
- is not part of an important architectural or historic group of buildings.

As such, they consider the link bridge by itself would not qualify as a listed building in its own right, and its current status is granted purely by its physical connection to a Grade II listed building. They therefore consider it would be more accurate to describe the link bridge as 'listed by association' than by any other designation.

11.4 They add that the Historic England listing description includes a detailed description of the exterior details, materials and proportions of the office building, and includes descriptions of notable interior fixtures, but makes no reference to the attached link bridge. Whilst they note this not in itself is conclusive evidence of the non-listed status of the link bridge, they feel it is notable that such a feature attached to the host building is omitted in the listing description.

11.5 A full Statement of Significance has been produced by Mounteer Ltd (Historic Building Consultants) on behalf of the applicant. It found the link bridge to be:

- of low aesthetic value;
- of low historic value;
- of medium communal value; and,
- of low evidential value.
11.6 The applicant then goes on to assess the loss of the link bridge against the NPPF. Where a proposed development will lead to "substantial harm to or total loss of significance of a designated heritage asset" paragraph 133 states local planning authorities should refuse consent, unless it can be demonstrated that:

a) the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss or;

b) all of 4 criteria can be demonstrated.

11.7 The criteria and the applicant’s response on how this scheme meets it are noted below:

The nature of the heritage asset prevents all reasonable uses of the site. The applicant argues that the link bridge provides a functional link between the Grade II listed office building and a workshop (an unlisted, non-designated heritage asset).

The marketing exercise showed that the Grade II listed office and the nearby non-listed building (at the other end of the link bridge) were of no interest to potential buyers or tenants in any form. It is therefore unlikely that a future tenant would want both buildings (listed and non-listed) which would be required in order to return the link bridge to its original function. As such, the link bridge is unlikely to have a future as a functional link between the two existing buildings.

Furthermore, even if the link bridge was retained as some form of monument (i.e. supported in its current position by columns / props) it would be functionless (a bridge to nowhere) and have no viable use.

Moreover, they argue it would render a large part of the centre of the factory site unusable for re-development, due to its position, size and inability to be re-used or converted for alternative uses. As such, they consider that the retention or restoration of the link bridge would prevent reasonable uses of the immediate and wider site.

No viable use of the heritage asset can itself be found in the medium term.

In this case, the applicant argues that the whole site was subject to a continuous marketing exercise between September 2008 and June 2012 and no prospective tenants were found for any of the buildings. Since that time the last remaining tenant has moved out.

The Grade II listed office building was already unoccupied and has not been in use for several years. As such, the link bridge does not appear to have been used for a significant length of time and its current condition does not suggest it can be used as is. Moreover, regardless of the condition of the link bridge, they argue that it will never have a viable use unless a tenant / purchaser requires a functioning first floor link between the listed office building and the non-listed workshop building, both of which they would also have to buy or lease. Overall, they consider it is unlikely that any tenant would ever come forward who would require such an arrangement of buildings. As such, they feel the link bridge has no viable use.
Conservation by grant-funding or some form of charitable donation or public ownership is demonstrably not possible.

The applicant considers the link bridge to be of low historic and aesthetic value. As such, they feel there is little chance of receiving heritage asset grant funding or a charitable donation for its restoration or retention.

The harm or loss is outweighed by the benefit of bringing the site back into use

The applicant believes the vacant premises across the site - including the Grade II listed building and attached link bridge - leaves the site prone to vandalism and disrepair.

Again, they note that the buildings have been subject of a marketing exercise and no prospective tenants have been found. Therefore, without occupants and subsequent repairs and general maintenance, the buildings will fall further into disrepair and continue to be an economic drain on the owners.

Clearance of the listed-link bridge (and the non-listed buildings under the concurrent demolition application) would allow the site to be redeveloped for a new use and potentially a new school. This in turn would improve the setting of the site and would greatly improve the likelihood of finding a new use for the Grade II listed office building to which the link bridge is attached, thereby ensuring the future of the main heritage asset on the site. Furthermore, they note that the Statement of Significance report confirmed that the harm or loss (of the link bridge) is classed as neutral in terms of its effect on the main Grade II listed building. For these reasons, they feel that the harm or loss of the link bridge is outweighed by the benefits of bringing the site back into use.

11.8 The applicant then goes on to consider the link bridge against paragraph 134 of the NPPF that states:

“Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use”.

11.9 They argue that the Statement of Significance has confirmed that the harm or loss (of the link bridge) should be classified as ‘less than substantial’ and therefore paragraph 134 should apply.

11.10 They argue the public benefits of the proposal to remove the link bridge are:

- Removal would allow the wider site (in conjunction with the separate demolition application) to be re-developed. Retention of the link bridge will severely restrict potential development options.
- Improvement to the setting of the main / host Grade II listed office building, potentially ensuring its future.
- Re-development of the site would eliminate opportunities for vandalism and anti-social behaviour at the site.
- The removal / demolition of the link bridge would restore the main Grade II listed building to something akin to its original intended design.
- Removal of a dilapidated building with low heritage value.
- Opportunity to redevelop for new uses (new school or other future development) by bringing a large unused site back into use.

and that these benefits outweigh the ‘less than substantial harm’ to the significance of the link bridge.

**Officers Views**

**Extent of Listing**

11.11 Officers consider the link bridge to be part of the listed building. This decision is based on the age, ancillary nature, and ownership of the bridge and the legal advice provided to the Council.

11.12 The legal advice provided was that the listed office building was part of a substantial manufacturing complex, devoted first to the manufacture of looms and then the manufacture of pallets. The office provided the space in which administrative tasks supporting the manufacturing processes were carried out. In terms of scale and function, the view taken was that the listed building was ancillary to the other principal buildings and structures around it at the time of listing in 1968.

11.13 As a result, applying case law and the guidance from Historic England, it was Counsel’s view that the listed building is likely to have had a restricted curtilage, not extending to any other building or structure in its vicinity (unless those buildings and structures could be said to have been ancillary to the office building). If anything, it was more likely that the office building was within the curtilage of the primary manufacturing buildings (particularly the large building to which it was linked by a footbridge) than the other way round.

11.14 As a consequence of this advice, it was concluded that the factory buildings, attached to the end of the bridge, are not within the curtilage of the listed building and are not listed by association. However, the link bridge because of its attachment is.

**Policy Position**

11.15 Development Management Policy 24 (Historic Environment) of the LDF Joint DPD together with Part 12 (Conserving and enhancing the historic environment) of the National Planning Policy Framework (NPPF) are relevant to the assessment of this matter.

11.16 Specifically Paragraph 133 of the NPPF states:

“Where a proposed development will lead to substantial harm to or total loss of significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:
● the nature of the heritage asset prevents all reasonable uses of the site; and

● no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and

● conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and

● the harm or loss is outweighed by the benefit of bringing the site back into use”.

11.17 It continues at paragraph 134 that:

“Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use”.

Design

11.18 The proposal is for the removal of the link bridge attached to the Grade II listed building (formerly used as offices). The proposed demolition will remove the link bridge but will not otherwise affect the design of the existing Grade II listed building. Where the link bridge is to be removed a cut will be made at the point of contact with the roof of the lower ground floor of the building leaving a 2-3m length of footbridge remaining attached to the listed building. This will leave a section of bridge in position in order to show the previous existence of a structure in its original form and context.

11.19 The demolition of the adjacent workshop building to which the link bridge is attached is subject to a separate application (Application A). The main point of access to the Grade II listed building will remain as existing and will be unaffected by these proposals.

11.20 The method for finishing the edge of the bridge after the demolition is argued to be sympathetic to the existing building and is proposed to consist of the end of the bridge being boarded with vertical timber boards painted black. Officers consider this could be a somewhat short term fix to sealing off the end of the link bridge. As such, a condition is proposed to ensure this treatment is suitable for a part of a listed building.

The character and significance of the structures

The Office Building

11.21 The office building is of national significance, reflected in its Grade II status. The offices are understood to be late Victorian and demonstrate Gothic styling, characterised by the high gables, bays, prominent chimneys and tall mullioned window sets. The ashlar stone and Westmorland slate roof visible to the prominent
front and side elevations support the architectural quality of the building. The advanced entrance bay with clock tower, ensure this building is a landmark within the local area where it faces the ‘Foundry View’ Terrace and the clock appears to be directed towards ‘Moordale’ the residence of the former owner of the works, situated on Huddersfield Road.

11.22 The decorative and high quality materials and details used on the front and side elevations of the building diminish on the rear elevation. Here the type of stonework changes from ashlar to hammer dressed and plain head and cills are used. The porch, which supports the end of the bridge, contains greater detailing, with chamfered corners. Officers would not disagree with the conclusion in the Statement of Significance, that this is likely to have been an addition to the original design concept.

11.23 The aesthetic significance of this building is supplemented by its historical associations with the loom works, which played an important role in the production of looms for the woollen industry.

11.24 The buildings to the rear provide a context for the listed building and this is reflected by its specific inclusion in the Historic England designation guidance for Commercial and Exchange Buildings, where it is noted that “many otherwise utilitarian and industrial buildings were given some architectural panache by the design of their offices and administration buildings”.

11.25 The office building is of high significance as a consequence of these characteristics.

**The non-listed buildings to the rear**

11.26 We have considered the impact of the proposed change on the character of the non-designated heritage asset which forms the works building to the rear, as required by paragraph 135 of the NPPF.

11.27 The building, noted as Building A in the application documents, has been heavily altered due to a fire. However, the part of the building to which the bridge is attached pre-dates the listed office and is thought to have been constructed around 1893 as part of the foundry building. It has a markedly different style to the listed office. The pitched faced local stone and slated hipped roof of this element provide an example of the utilitarian aesthetic of the works building when compared to the gothic office. It, along with the other pre-1948 buildings, also provides the historical context for the development of the site as the important loom works.

11.28 In these circumstances, we would agree with the conclusion of the applicant that the non-listed designated assets, taken individually have only some architectural merit and taken individually, the buildings have elements of low significance. However, when taken as a whole, we consider the factory buildings to be of some significance.

**The bridge**
11.29 The bridge between these two buildings has utilised the riveted bolt sections prevalent in railway bridges. Officers agree with the Statement of Significance that this is likely to have been a slightly later addition to the office building as the architectural detailing used to connect it to the building lacks the considered approach one would expect if it had been part of the original design. Nevertheless, to assess significance it is important to establish the use of this type of construction in this context. It is stated that this is typical of railway construction and photographs are provided which show similar sections on nearby road bridges and at a railway station. However, it is not shown where this type of construction has been used in the setting of an industrial complex and the significance which may be attributed to its use in such a setting.

11.30 Additionally, Officers agree that the bridge is not visible from the prominent view of the works taken from Huddersfield Road. It is more apparent in views from the canal to the rear, but from its location and construction, it would not appear to have been conceived as an important element of the setting of the gothic listed building.

11.31 The aesthetic qualities, whilst differing from those of the listed building, remain interesting in themselves and highlight another period of development of the site. This difference does not diminish its historic interest in forming the connection between the two different elements of the same works.

11.32 Nevertheless, whilst the link bridge has some historic interest it is clearly of low aesthetic value; little communal value (the communal value here is in the factory and office building use predominantly) and low evidential value. As such, overall, the link bridge has little significance outside its historic interest and because its attachment means it forms part of a listed building.

Conclusion

11.33 The removal of part of the bridge would sever the physical link between the listed building and the utilitarian factory buildings, which provides the historical context for its construction. However, it has to be noted that:

- The link bridge is not in any way mentioned in the listed description;
- The design is markedly different from the public facing facades it is attached to; and,
- It retains its original purpose, materials and position.

11.34 Moreover, we consider the link bridge itself to be of:

- low aesthetic value;
- some historic value;
- low communal value; and,
- low evidential value.

11.35 Overall, whilst this is a finely balanced decision, the Department considers that the demolition of the link bridge results in less than substantial harm to the significance of the designated heritage asset as the link bridge is not an original element of the listed building and the office’s special architectural and historic interest is not affected by its removal.
The test that consequently has to be applied is that the less than substantial harm to the significance of a designated heritage asset has to be weighed against the public benefits of the proposal, including securing its optimum viable use.

In this respect, we concur with the applicant’s view that the public benefits of the proposal to remove the link bridge are significant enough to outweigh the ‘less than substantial harm’ to the significance of the link bridge and listed building.

Moreover, even if we took the view proposed development will lead to ‘substantial harm to significance of a designated heritage asset’, it can be demonstrated that the substantial harm is necessary to achieve substantial public benefits – in terms of the potential opening up of the site up to development and potentially a new school - that outweigh that harm or loss and that:

- the nature of the link bridge would impede reasonable uses of the site;
- no viable use of the link bridge could be found in the medium term through appropriate marketing that will enable its conservation;
- conservation by grant-funding is not possible; and,
- the loss of the link bridge is outweighed by the benefit of bringing the site back into use.

In these circumstances, it is clear that the proposal would still be acceptable even if this test were applied.

As such, whichever relevant test is applied, there are no ‘in-principle’ grounds that could sustain a refusal against the proposal to demolish the link bridge in question.

Ecology

A bat assessment has been carried out to ascertain bat presence on the site and the likelihood of bat usage within the existing buildings, including the main listed building and link bridge. This report recommended several further studies to ascertain the presence of bat roosts. As a result, bat emergence and re-entry surveys were carried out in May and June 2015. The initial inspection was not afforded full access to the main listed building but observed a high probability for bat roost potential. The emergence and re-entry studies however observed no bat activity within the listed building. No work is proposed to the main listed building itself (only work to the link bridge).

GMEU have recently provided additional bat records from the 2015 survey season (which were not available at the time of the original assessment) and which indicate several other potential bat roosts in and around the site. Full details are included in the Environmental Statement and also the Ecological Mitigation Survey. Several potential roosts were indicated to the southern end of the main listed building. No roosts were indicated within the link bridge itself. The link bridge was also subject to an initial inspection which was not afforded full access due to health & safety restrictions, but observed a low probability (due to small number of suitable features) for bat roost potential. The emergence and re-entry studies observed no bat activity within the link bridge. The bat report concluded that the link bridge is not suitable for use as a hibernation roost. As no disruption to bats is attributable to this
specific listed building application, no mitigation measures are proposed or required.

11.44 The Huddersfield Narrow Canal and Diggle Brook are within close proximity of the site. However, the limited amount of work required under this listed building application to remove the link bridge will not affect the canal or brook. As such, mitigation measures will not be required. The wider site has habitat with potential to support several species of birds. However, these habitats are within the wider greenfield and watercourse areas of the site and the demolition of the link bridge under this listed building application will not affect those natural habitats.

**Recommendation**

This application is recommended for approval, subject to the following conditions:

1. The works for which Listed Building Consent is hereby granted shall be begun before the expiration of three years from the date of this consent.
   
   Reason: To comply with the provisions of Section 18 of the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended by the Planning and Compulsory Purchase Act 2004.

2. The development hereby approved shall be fully implemented in accordance with the approved plans and specifications, which are referenced as follows:

   *Drawing number 1073/LO-201 – ‘Existing rear elevation’ – Received 21 December 2015*
   *Drawing number 1073/LO/501 – ‘Proposed Works to Bridge – Details’ – Received 21 December 2015*
   *Drawing number 1073/LO-202 – ‘Listed Office Building: Proposed Elevation Works’ – Received 21 December 2015*

   unless otherwise agreed in writing by the Local Planning Authority.

   Reason: For the avoidance of doubt and to ensure that the development is carried out in accordance with the approved plans and specifications.

3. Notwithstanding the approved drawings, no works shall commence until details and drawings of the following matters have been submitted to and approved in writing by the Local Planning Authority:

   (i) Full details of the proposed timber boards and damp proof treatment at the end of the link bridge and its finish.

   The works shall be carried out in accordance with the approved details.

   Reason: In the interests of preserving the character and appearance of the listed building and its setting.
4. No works shall commence on site until a full survey, including analysis, and photographic record of the link bridge has been submitted to and approved in writing by the Local Planning Authority.

Reason: To secure the proper recording of the listed building.

5. Prior to the commencement of development a comprehensive Method Statement for protecting bats during the proposed works shall be submitted to and approved in writing by the Local Planning Authority. The Method Statement shall provide full details of measures to be taken to avoid any possible disturbance to bats during the demolition and construction of the proposed school. The development shall thereafter be carried out strictly in accordance with the approved Method Statement.

Reason: To protect bats from the proposed development.
12.0 PLANNING CONSIDERATIONS

APPLICATION C (PA/337301/15) - Planning application for new school, sports pitches, playing fields and areas for play and parking

Policy Background

12.1 The application site is allocated within the Local Development Framework partially for employment use as Saddleworth Employment Area 8 (Shaw Pallets), and partially as Green Belt.

The Diggle Brook and some of the adjacent areas are designated as flood zones. In the northern part of the site, the Diggle Brook is designated as a Green Corridor and Link.

To the east of the site, the Huddersfield Narrow Canal is designated as a Recreational Route and a Site of Biological Interest.

The railway is designated as railway network.

The fields between the northern, previously developed part of the site and Huddersfield Road are designated as a Business and Industrial Allocation.

12.2 The proposed development must be determined against local and national planning policy, including the relevant policies of the Core Strategy and Joint Development Plan Document and the National Planning Policy Framework (NPPF), and any other material planning considerations.

12.3 In determining this application, the main issues to consider are:

- Principle of development, including Green Belt
- Sports provision
- Landscape and Visual Amenity
- Design
- Heritage and Archaeology
- Transport, Access, and Highway Safety
- Amenity
- Air Quality
- Ecology
- Lighting
- Flood Risk and Drainage
- Ground conditions
- Waste
- Energy / Sustainability

Principle of Development, including Green Belt
12.4 The two main considerations relating to the principle of the development relate to the loss of employment land in the case of the proposed school buildings, and development on the Green Belt in the case of the school sports facilities and the separate planning application for the drop-off facility and residents’ car park on land adjacent to Huddersfield Road. It is also necessary to consider the proposals against other relevant considerations, including the benefits arising from the proposed scheme.

**Loss of Employment Land**

12.5 The site of the proposed school building is allocated as a Saddleworth Employment Area (SEA 8 Shaw Pallets) in Policy 13 of the Joint DPD.

12.6 The proposed use as a school falls into Use Class D1, which is not one of the uses listed in Policy 14 of the Joint DPD as being permitted in the Saddleworth Employment Area. Uses other than those listed in Policy 14 will be permitted on sites currently or most recently used for employment purposes, provided that the applicant can clearly demonstrate that it is no longer appropriate or viable to continue the existing use. This can be demonstrated by the applicant through a marketing exercise, a viability exercise, or by demonstrating that the development for alternative uses would benefit the regeneration areas identified by the Council as being in need of investment or would benefit the community of an area.

12.7 Between September 2008 and June 2012 the site was subject to a marketing exercise, the method of which was previously agreed. A letter from Morris Dean Chartered Surveyors sets out the marketing exercise undertaken, which consisted of marketing of the site for sale or to let as a new development of high specification B1 office, light industrial and hybrid unit, together with the proposed refurbished existing office / clock tower building. The marketing exercise failed to identify any firm interest in the site and the requirements of the first part of Policy 14 have therefore been met.

12.8 It is also apparent that there are wider community benefit of having a school building with associated facilities which are fit for purpose and which can deliver education to allow children a full opportunity to achieve their highest learning potential.

12.9 Policy 14 also requires, in cases where employment land is to be lost to other uses, that proposals should include measures to outweigh such loss and support Oldham’s economy. In this case, the following points weigh in favour of the proposed development and demonstrate compliance with Policy 14:

- The site will continue to provide employment for a significant number of people (170 at present);
- The development will provide a net increase of 20-25 permanent jobs;
- 185 temporary, full time construction jobs will be created, as well as supporting employment in the supply chain;
• The proposed school is directly related to advancement of education to the wider benefit of the economy;
• The wider economy will benefit from use of the school for night classes;
• Interserve Construction Ltd will adopt initiatives to use local labour / local suppliers.

12.10 For the above reasons, the principle of the loss of employment use is considered acceptable against Policies 13 and 14 of the Joint DPD.

**Green Belt**

12.11 Policy 22 of the Joint DPD and Section 9 of the NPPF relate to consideration of development on the Green Belt land.

12.12 The Green Belt land to the south of the proposed school buildings is proposed to be used for a grass football pitch, running track, cricket wickets, shot put, and long jump pit with run up. In addition, an artificial grass all weather sports pitch is proposed. The embankment to the canal to the eastern boundary will remain as existing and be used as an informal spectator area. The linked application for parental drop off facility and residents’ parking areas is also proposed on Green Belt land.

12.13 Paragraph 81 of the NPPF requires local planning authorities to plan positively to enhance the beneficial use of the Green Belt, including provision of opportunities for outdoor sport and recreation. It is considered that development of the Green Belt land for the proposed sports facilities is consistent with this aim as enhancing the beneficial use of the site and improving access to it for students and the wider community is a significant positive consideration.

12.14 Paragraph 89 of the NPPF states that provision of appropriate facilities for outdoor sport and recreation are not inappropriate in the Green Belt provided they preserve the openness of the Green Belt and do not conflict with the purposes of including land within it.

12.15 Paragraph 90 states that engineering operations and local transport infrastructure which can demonstrate a requirement for a Green Belt location are also not inappropriate in the Green Belt provided they preserve openness and do not conflict with the purposes of including land within it.

12.16 The proposed sports facilities and highway proposals will impact on the appearance of the Green Belt due to the addition of man-made features, such as fences, floodlights and artificial surfaces, and essentially by changing it from a natural environment to one more intensively used. The key considerations are whether the proposed sports facilities and highways proposals retain the openness of the Green Belt and whether they conflict with the purposes of including land within it.
12.17 The sites are on the edge of the built up area and are seen within the context of the industrial site and residential properties, and against the backdrop of man-made features such as the canal and railway line embankments. The existing landscape around the sites of the sports facilities and highway proposals is not therefore entirely natural due to these features, which currently impact on openness.

12.18 The nature of the proposals is such that a largely open appearance will remain due to the visual permeability of the proposed fences, and no buildings are proposed on the sites which would block views. Site levels change in some areas and retaining walls are proposed, but these would not significantly affect the open character of the Green Belt. The Landscape and Visual Impact Assessment chapter of the ES concludes that the playing fields will remain relatively open, with only lighting columns and fencing adding to the constructed elements to the area.

12.19 The proposed lighting of the sports pitches and drop-off facility / car park will result in some impact on the character, visual amenity and openness of the Green Belt. However, mitigation is proposed in that glare from floodlighting is to be minimised and lighting positioned to reduce upward light spill.

12.20 The main purpose of Green Belt is to check unrestricted urban sprawl and safeguarding the countryside from encroachment. The proposed sports facilities lie between Diggle and Uppermill and could be interpreted as encroaching into the countryside between these two built up areas. However, there would remain a distance of approximately 450 metres between the closest part of the defined development boundary of Uppermill with the edge of the sports field, although in reality there are limited views between the two settlements due to the topography of the area. Although the development would result in mad-made features on a site between settlements, it is not considered that this would significantly impact on the Green Belt in terms of the settlements merging together.

12.21 Notwithstanding the applicant’s conclusion that the proposed sports facilities do not represent inappropriate development in the Green Belt, it is considered that very special circumstances exist in that there is an acknowledged need for a replacement Saddleworth School and there is a lack of alternative sites. A robust assessment of alternative sites took Green Belt issues into account in the site selection process and it was concluded that the most suitable site for the location of the new school was the application site.

12.22 Due to the size of the site required for the new school, it is not possible for the previously developed part of the site to accommodate the proposed sports facilities. There is a clear need for the sports pitches to be developed adjacent the school buildings in order principally to achieve a standard of sports pitch provision as required by Sport England. Land to the north is used as public open space and would not be capable of accommodating sports pitches due to the topography of the area and its narrow width. The site to the west is capable of accommodating the sports pitches but in this location the sports pitches would be close to existing residential properties, thereby resulting in potential adverse impacts on amenity. That site is also allocated for employment use, which increases its value to a prohibitively high degree. In summary, it is not possible to construct the proposed school on the application site without using the adjacent Green Belt land for sports pitches. The development of the school and associated sports facilities would not
significantly affect the openness of the Green Belt nor the reasons for including land within it.

12.23 It is also relevant that one of the purposes of including land within the Green Belt is ‘to assist in urban regeneration, by encouraging the recycling of derelict and other urban land’.

12.24 The development of the Green Belt land would directly enable the regeneration and recycling of the derelict industrial site which may otherwise not be regenerated. Any change to the character of the Green Belt as a result of the proposed school sports facilities and associated drop off / car park must be balanced against the improvement to the setting of the Green Belt as a consequence of the re-use of an industrial site which has been derelict for a number of years.

12.25 There is an identified need for the drop off facility / car park to be located close to the school and for replacement parking for local residents close to their properties. The impact on the Green Belt resulting from that development is considered under Application D (PA/337930/15).

12.26 The cumulative impact on the Green Belt arising from the proposed sports pitches and the proposed drop-off facility / car park has been considered. Overall the Green Belt would appear less natural in character but it is not considered that the proposals would result in its urbanisation in the way that developing the sites for other uses potentially would. Although the two areas of the site are separated by a field and Diggle Brook, the two areas are seen in the same view. However, given existing adjacent built form and the physical separation of the two areas, it is not considered that the proposals would result in significantly increased urban sprawl, the merging of settlements, encroachment of countryside, or significant impact on the character of historic towns or villages.

12.27 In summary, it is considered that the applications comply with Policy 22 of the Joint DPD and Section 9 of the NPPF.

Other considerations

12.28 Policy 1 ‘Climate Change and Sustainable Development’ of the Joint DPD requires that development should adapt to and mitigate against climate change and address the low carbon agenda, contribute towards sustainable development, help create a sense of place, improve the quality of life for residents and visitors, and enhance the borough’s image. Improvements that benefit the health and well-being of people in Oldham will be supported. Development must be in sustainable and accessible locations within the built up area, and must not prejudice the development of other land or regeneration areas.

12.29 The proposed development of the school complies with Policy 1 as it seeks adapt to and mitigate against climate change, particularly in respect of reducing the risk of flooding on the site and downstream.

12.30 The re-use of a vacant, previously developed site will involve the remediation of contaminated land.
12.31 It contributes to sustainable development by providing a school which is fit for purpose and will provide facilities which will help to enable students to reach their full potential.

12.32 The proposed building is energy efficient in that it is highly insulated, maximises the use of daylight and makes use of natural ventilation.

12.33 The new school buildings should give students and the local Saddleworth community a sense of pride when compared to the existing buildings, and this should improve the image of the area.

12.34 The proposed sports facilities will provide higher quality facilities than those at the existing school and will provide the opportunity to improve the health and well-being of the local community through increased participation in sport.

12.35 The site is not as centrally located to the wider Saddleworth community as the existing school. However, the proposed new school is not a significant distance away and is located in an accessible location adjacent to the built up area.

12.36 The development will not prejudice regeneration areas. The development will likely result in a slight reduction in staff and student spending within Uppermill. However, this is anticipated to be around 2%, which is not significant.

12.37 Policy 2 ‘Communities’ states that the Council will support improvements to the education and skills of the borough’s population by working with education partners to facilitate the development of new and improved education facilities. The proposed new school will address the needs of the Saddleworth area through provision of new school buildings and improved sports facilities.

12.38 The development therefore complies with Paragraph 72 of the NPPF, which states that the Government attaches great importance to ensuring that a sufficient choice of school places is available to meet the needs of communities, and goes on to state that LPAs should take a proactive, positive and collaborative approach to meeting this requirement.

12.39 The proposed development also complies with the joint policy statement by the Secretaries of State for Communities and Local Government and Education, issued in August 2011 (Planning for Schools Development), which set out the Government’s commitment to support the development of state-funded schools and their delivery through the planning system. The statement goes on to state that there should be a presumption in favour of the development of state funded schools and that local authorities should make full use of their planning powers to support state funded schools applications.

12.40 The proposed school complies with the requirements of Policy 23 ‘Open Spaces and Sports’ as the proposals include the provision of open space and new sporting facilities which are superior to those at the existing school. In addition, the introduction of sports uses will open up the Green Belt land for use to a greater number of people and encourage greater participation in sports and recreation by both students and members of the public.
Socio-economics

12.41 An assessment of the effects on socio-economics has been undertaken for the proposed development. The assessment looked at the potential impacts on:

- local employment;
- the vitality and viability of local centres;
- on educational attainment;
- participation in sport; and,
- the availability and demand of employment land.

12.42 The potential effects were assessed in the context of local planning and economic development policies. Also of particular relevance to the assessment of the socio-economic effects are the "positive improvements" identified by NPPF which the planning system should seek to achieve, including making it easier for jobs to be created in cities, towns and villages and improving the conditions in which people live, work, travel and take leisure.

12.43 The assessment demonstrates that the scheme is likely to cause a number of positive impacts on the local community, including the creation of approximately 185 construction jobs created during the expected two year construction period, and between 20 and 25 full time additional employment jobs will be created in the local area as a result of employment at the school and local multiplier effects.

12.44 The development is likely to cause a small loss of income to local retailers in Uppermill, but this is not expected to be more than 2% for the town as a whole. This is not, therefore, likely to have a material effect on the viability and vitality of the town centre as a whole and the magnitude of impact is therefore considered to be low. The Oldham Core Strategy and Joint DPD recognises the viability and vitality of local centres as a priority for the borough. However, the latest evidence indicates that Uppermill is not in a vulnerable position, with a range of independent shops and few vacant units. The significance of effect is therefore assessed as minor adverse which is not significant in EIA terms.

12.45 In addition, the development will lead to the loss of approximately 2.5% of Oldham’s employment land supply. Given that a marketing exercise has concluded that there is no firm interest in the site for employment uses and given that the site is currently vacant, it is considered that its loss to alternative uses would result in a low magnitude of impact. The loss of the WH Shaw Pallet site from employment use is therefore assessed as being minor adverse which is not significant in EIA terms.

12.46 The investment in new educational and sports facilities will have the potential to both improve educational attainment and participation in sport, which has a wide range of health and social benefits. The provision of improved, high quality sports facilities at the proposed development is likely to increase interest and participation in sport amongst students at Saddleworth School, and also add to the choice of facilities available locally which could increase participation amongst local communities.
12.47 Overall, it is considered that the socio-economic benefits of the development weigh in favour of the proposed development.

**Agricultural Land**

12.48 The proposals would result in the loss of the grazing land in the southern part of the site. As such, an agricultural land classification assessment has been undertaken to establish whether the proposals would result in the loss of the Best and Most Versatile Agricultural Land.

12.49 The grading of land is affected by climatic criteria and through interactions with soil characteristics. The combination of rainfall and temperature at this site result in a significant limitation to the agricultural quality of the land restricting such land to a maximum of Subgrade 3b. As such, no ‘Best and Most Versatile Land’ would be affected by the proposals. The proposal therefore accords with Policy 1 of the Joint DPD and the NPPF (Paragraphs 109 and 143).

**Conclusion**

12.50 Taking all of the above considerations into account, including the benefits of the scheme, it is concluded that the overall land use principle of the applications is acceptable against the relevant local and national planning policy framework.

**Sports provision**

12.51 Policy 23 ‘Open Spaces and Sports’ is relevant in considering the sports provision proposed as part of this application.

12.52 The proposed sports facilities are located towards the south of the site with the internal sports facilities and changing rooms, MUGAs, all weather pitch and playing field all being adjacent to each other. This has benefits in terms of efficiencies in the operation of the school, but also makes out of hours community use easier to manage. The self-contained sports facilities benefit from adjacent parking.

12.53 The proposed sports provision seeks to re-provide those of the current Uppermill school site and to provide enhanced facilities wherever possible. Although there is no direct loss of sports facilities as a result of this application, the relocation of the school will inevitably result in the existing facilities being lost and therefore in assessing the acceptability of the new school proposals, Policy 23 is relevant.

12.54 Policy 23 states that the loss of open space will be permitted where a replacement facility which is at least equivalent in terms of usefulness, attractiveness, quality and accessibility, and where appropriate quantity, to existing and future users is provided.

12.55 The proposed sports facilities will replace and improve upon the existing facilities at the Uppermill site. The sports facilities at the existing school suffer from a number of problems. For example:

- Neither the all-weather pitch nor the grass pitch are square;
The all-weather pitch does not meet with Sport England standard sized pitch requirements;  
Both pitches lie beneath overhanging tree canopies which causes problems with leaf fall and does not meet Sport England standards;  
The playing field and sports hall are regularly subject to flooding; and,  
The playing field surface is poor.

Due to the deficiencies of the current facilities, students usually have to walk half a mile to the Churchill playing fields in Greenfield to use the facilities there for football, rugby and athletics. In contrast, the proposed school offers the following improvements and additions:

- An U15-U16 grass football pitch in line with FA requirements and incorporating drainage;  
- An all-weather pitch of standardized proportions, with the required 3m run-off areas with no overhanging tree canopies;  
- Additional sports provision;  
- One additional informal MUGA;  
- A basketball practice key;  
- 100m grass running track;  
- Practice cricket wickets;  
- An area for throwing events; and,  
- Pitches which are not subjected to regular flooding.

The provision of the proposed new all-weather pitch and playing field / grass pitch would enable various school sports, which are in the school curriculum, to take place on the new school site, except for running events which would require use of an off-site 400 running track. Football matches will now be able to take place at the school given that new pitch will conform to competition standard. The new sports facilities will be located immediately adjacent to the school buildings and changing rooms where they are easily accessible by the disabled.

In summary, the proposed replacement sports facilities at the school are at least equivalent in terms of usefulness, attractiveness, quality, accessibility, and quantity and this element of the proposals thereby complies with Policy 23 of the Joint DPD.

### Landscape and Visual Impact

Policies 6 ‘Green Infrastructure' and 9 ‘Local Environment' are particularly relevant to the assessment of the landscape and visual impact of the proposal.

Landscape and visual impact have been assessed following guidelines set by the Landscape Institute. Baseline information was collected from a desk based study followed by a site visit.

From the information collected, landscape features of the site were identified alongside information from landscape character studies and relevant landscape planning policies. Information on the visual aspects of the site was collected through visiting a number of viewpoints within the study area to gain an understanding of the
visual baseline of the site and study area. The Landscape and Visual Impact Assessment identifies a number of features on the site, including existing vegetation around the boundaries and agricultural grazing land to the southern part of the site. Existing mill buildings occupy the northern section of the site. The Huddersfield Narrow Canal runs adjacent to the eastern boundary of the site.

12.62 In the surrounding landscape, panoramic views are available towards the site, set within the wider context of the Diggle valley. The Peak District National Park lies to the east but is some 840 metres away from the site. Photomontages were produced, in accordance with Landscape Institute guidelines, for two of the views considered within the assessment. These aided interpretation of the visual change the development may result in.

12.63 The assessment identified that there would be a variety of effects on the landscape features, landscape character and landscape designations within the study area. Of these effects, changes during demolition and construction are anticipated to be the main effects on the landscape elements of the site. The Public Right of Way (SADD 106) running through the site will run through a construction site during the development and adjacent to a demolition site when the buildings are being demolished. The footpath along the west of the canal (SADD 77) will also run adjacent to a demolition and construction site. Huddersfield Road will also be affected during construction.

12.64 Once the school site is operational, some negative effects on the landscape features, landscape character and landscape designations are likely, but these are mainly anticipated to be minor or negligible, with moderate adverse effects anticipated on the agricultural land and SADD 106. Beneficial effects are anticipated on the short section of the footpath (SADD 77) that runs within the site boundary where its immediate surroundings are anticipated to be improved.

12.65 Views of the development are likely to be available from all the surrounding viewpoints assessed. Once these construction activities have been completed, the effects are likely to reduce, with the school building replacing the mill buildings, and the associated playing fields and lighting being viewed as new features within the view. These new features, although resulting in some adverse change, are not anticipated to result in significant effects at the majority of the viewpoints assessed.

12.66 The water abstraction building will be removed from adjacent to the PRoW SADD 77 and the boundary treatment alongside the school building will have been constructed. This consists of a 2.4m high weld mesh fence which fully encloses the northern section of the site. The boundary of the site adjacent to the PRoW currently comprises temporary heras fencing, and the overall nature of the weld mesh fencing will not be dissimilar to this.

12.67 The water abstraction building does not add to the character of this path, and its removal is therefore seen as an improvement to the immediate area.

12.68 The demolition of the mill buildings and construction of the school building is anticipated to be an improvement on the setting of this short section of the path, which currently lies adjacent to derelict buildings and fencing, and assuming a sensitive boundary treatment is adopted on either side of the fencing the overall
development is likely to result in an improvement to the short section of path within the site.

12.69 The proposed school will replace existing mill buildings on the site. Viewed from the Peak District National Park, the proposed development would be largely seen against the backdrop of existing built form. The impact on the Peak District National Park would therefore be minimal. Consideration will need to be given to the impact of the proposed lighting, which will be mitigated through the use of low powered, downward facing lighting.

12.70 It is acknowledged that landscape and visual impacts will occur, but these will be mitigated wherever possible through the layout, form and design of the development, such as through the use of the proposed colour palette, retaining the openness of the sports fields, and retention of many of the existing boundary trees. The impact on the landscape and visual amenity will not be significantly detrimental and it is therefore considered that the development complies with the requirements of Policies 6 and 9 of the Joint DPD.

Trees

12.71 An Arboricultural Impact Assessment and Tree Protection Plan has been submitted with the application. An Arboricultural Method Statement has also been submitted which describes the measures to be put in place to protect retained trees during construction.

12.72 The overall tree quality of the site is low in terms of sustainability and the report concludes that no tree on the site is of such high quality as to be retained on its own merits. However, the trees do provide established screening and therefore will be largely retained and protected.

12.73 Selective thinning is recommended to improve the overall quality of the groups of retained trees. Additional tree planting will also take place where appropriate, particularly from a landscape perspective. In order to minimise the open landscape character of the southern part of the site, no significant tree planting is proposed on the southern part of the site. The adjacent tree groups off site were considered and the proposed development will no direct impact on these.

12.74 Overall, the proposed development accords with saved UDP Policy D1.5 in relation to retaining trees on development sites.

Design

Background

12.75 The existing school is made up of 11 blocks of accommodation, most of which are in a poor state of repair:

- All classrooms suffer from draughts, poor acoustics and those on the top floor, from water ingress;
- Most windows are single glazed and need replacing;
Effective regulation and control of lighting and heating is prevented by the condition of the mechanical and electrical systems;

All electrical safety systems require replacing;

There is no single fire management system;

The existing school site is very constrained, with limited external play space;

The existing site constraints and topography would severely compromise any potential new school buildings or development on the site; and,

Any new school building of the required capacity would not meet the current site area guidelines for the size of a secondary school.

12.76 The school buildings were previously considered necessary to be replaced under the Building Schools for the Future stopped in 2010.

**New School**

12.77 Following careful consideration from 4 design options it was decided to develop a building that has an E-shape footprint located between the existing culvert that crosses the site to the north and the public footpath that splits the existing pallet works site from the green belt element of the site to the south.

12.78 The proposal locates the playing fields to the south of the public footpath and east of the Diggle Brook, on the Green Belt land.

12.79 The teaching block is based on the a “finger” baseline design which has been identified as cost and performance efficient delivering the design brief in a contemporary but also sustainable manner.

12.80 The building consists of a 3-storey block running north-south and three ‘fingers’ of 2 storeys height to suit the topography of the site.

12.81 The Sports Hall is adjacent to the main building to make use of a single access, also covering community use, and benefiting from being located to the south with direct access to outdoor sports facilities.

12.82 Staff, disabled and visitor parking is located south of the main school building immediately after crossing the bridge into the site. Located at this position it will be available for out-of-hours community use while enabling security of the main school site to be maintained.

**Applicants View**

12.83 The applicant argues that the proposed building fits in well with the existing vernacular, maintains a lower height than the clock tower building and the sports hall steps down towards the open fields to the south.

12.84 The external materials have been chosen to blend into the surroundings. At ground level on the west facade there are three distinct stone elements reflecting the clock tower. The three teaching fingers are clad in neutral colours of greys, greens and
beige, over a darker plinth. The sports block is clad with a mix of smooth and textured darker grey panels, not dissimilar to the weathered and aged stone of the previous buildings.

12.85 As the building sits within a valley, the colour and material of the roof have also been taken into consideration to minimise glare and obstructions. They argue that the impact on the distant views is negligible as the building sits in the bottom of the valley.

Appearance

12.86 In terms of appearance, the applicant argues that external materials have been chosen to blend into the surroundings, with neutral colours, in greens and beige, over a darker plinth. This takes the eye off the building mass and positions it well within the landscape. The impact on the distant views is negligible as the building sits in the bottom of the valley.

12.87 They continue that the brick plinth to ground floor gives the building a solid base and offers a robust and resistant surface. Buff stone has also been introduced to match the character of the surrounding buildings in the area and provide robustness.

12.88 Large panels of green, grey and beige insulated cladding for the respective fingers give the building a clean and fresh appearance creating a welcoming environment. The colour scheme would work as a camouflage effect within the natural background.

12.89 For the sports hall, insulated metal panels are a common and simple modern building material solution, offering good robustness and fast construction whilst being long lasting and cost effective. Two textures of the same colour will break down the large areas of the façade and carry the vertical language of the teaching block through into the metal panel area. The main roof of the sports hall will be standing seam whilst the teaching block will be shallow pitch dark grey single ply membrane, allowing easy maintenance and overlaying at the end of their long lifespan.

Layout

12.90 The applicant outlines that, whilst responding to the accommodation and individual department’s space requirements, from the outset they have looked to create a highly legible plan form with a simple programme of spaces to respond directly to the School’s key adjacencies and requirements. The simple layout of teaching spaces around circulation and central atria and support spaces on a compact footprint is easy to navigate and creates close proximities.

12.91 The finger layout enables each year group to have an identified ‘home base’ in which general teaching areas and form spaces are located. The pupils would only need to leave these home bases to be taught for practical lessons in areas such as science, technology and PE. Each home base will look and feel different, becoming increasingly adult and sophisticated in feel and providing pupils with a sense of progression as they move up through the school.
12.92 Passive supervision from staff spaces and circulation routes ensure not only fitness for educational purpose and serving student social needs but also supports safeguarding and security.

12.93 The pupil toilets follow anti-bullying design guidance and are located on each floor.

### Access

12.94 All access to the site is controlled via one principal point of entry utilising an existing access road to the west of the new school grounds serviced from Huddersfield Road. The access road is carried on an existing bridge over the Diggle Brook.

12.95 A footpath will extend from the existing access road directly to the main arrival area outside the principal building entrance. Access for staff and visitors is via this building entrance on the western elevation. Two raised crossings are proposed to carry this footpath over vehicle access points into the car park providing greater safety priority to pedestrians. The arrival footpaths are to be surfaced in concrete paving flags providing an instantly recognisable, direct and safe route from the site boundary to the main entrance.

12.96 The footpath link turns left at the main arrival area and follows the western elevation of the building to the pupil’s entrance into their secure external learning environments. Pupil access points into the main spine of the building and the teaching wings are from these areas.

12.97 To the east of the building, pedestrian circulation occurs at two levels externally. An access route is provided at ground level running the full length of the main spine of the building and onwards to the sports block utilising the under crofts beneath the first floor teaching wings.

12.98 Circulation is also achieved outside at first floor level linking the active play and teaching environments to the north of the building past each of the teaching wings and onwards to the hard surfaced games courts to the south. Both the southern and northern courtyards between the three teaching wings benefit from stepped access connecting the two levels of access.

12.99 Wide access gates are to be provided in the new fence along the canal tow path. Use of these gates will be carefully managed by the school for both pedestrian and vehicular use. The access is to be gated and entry may be seasonal. The existing ramp from this perimeter access down into the school is at a steep gradient and would not be suitable for wheelchair use or less able bodied students.

12.100 The hard surfaced games courts [MUGA’s] are located on a higher plateau of the site to the sports block. Access to these from the internal sports provision and changing rooms is via external steps for able bodied students. Less able bodied students will seek access via the internal building elevator by the main entrance and exit onto the MUGA’s via the southern-most teaching wing at first floor level.

12.101 A footpath link is proposed to take students from the changing rooms to the grass and all weather pitches to the south. This path leads to a secure gate before crossing over the maintained Public Right of Way.
A total provision of 60 cycle parking places have been proposed for visitors, pupil’s and staff within the secure line to the north of the building. This provision is based on discussions of current cycle usage by staff and students.

Vehicle access has been constrained to the northern half of the school site, providing access for parking, bus drop-off, building servicing, including waste storage, deliveries and grounds maintenance.

122 car parking bays with 5 accessible bays are located closest to the main entrance. A further two parking bays have been provided for mini buses immediately adjacent to the sports block.

A supporting plan has also been included in the submission to demonstrate the overflow capacity of the other areas of hard standing to accommodate event days. It is estimated that the proposals could carry a total of 289 car park bays in a compliant highways format for events.

 Provision has been made to allow for 14 school buses to enter and exit the site and park-up within allocated drop-off bays.

The road building between the listed office building / clock tower and main entrance to the new building has been widened significantly to allow for a bus to wait whilst the other passes on the corner. The bus lay-by provision allows all 14 buses to stack up; one behind the other but it will not be possible for them to leave independently.

Access for a fire appliance has been provided along the western side of the sports hall with turning space within the car park to the south of the building. Access has also been provided along the remaining western elevation heading north in the site. Turning is provided within the bus drop off.

Provision has also been made for a fire appliance to gain access to the upper level of the school grounds and northern teaching wing. Turning is provided over the informal MUGA. Further access to the canal tow path can potentially be granted by the school to enable canal maintenance.

Grounds maintenance access to the sports fields is provided via a hatched out area between parking bays on the southern boundary of the northern half of the site. A gate on this fence line provides access across the Public Right of Way onto the grass fields.

The sports block, synthetic pitch and natural turf playing fields to the south are for use by the community out of school hours. The community has shared access to the school car park and onwards to the sports facilities and changing. However, the main external teaching space is secured from entry.

Sustainability

The building has a well-insulated envelope that ensures energy efficiency and conservation of fuel. Natural ventilation, wherever feasible, together with spacious
and interconnected circulation areas allow natural daylight to penetrate the building, support health and well-being in the new learning environment.

**Landscaping**

12.113 Landscape proposals for the school have been developed to create a clear site layout with regards to site access, circulation and integration of the briefing requirements whilst recognising the numerous site constraints the site has.

12.114 The new school grounds remain divided in two by the retained public right of way linking the footbridge over the canal to the east with the footbridge over the Diggle Brook to the west.

12.115 The southern portion of the site has been developed solely for sports use. Earth works and new retaining walls are necessary to accommodate pitch sizes and gradients to Sport England standards.

12.116 The northern half of the site is where the majority of the developments are proposed including the construction of the new buildings and associated servicing arrangements, car parking, MUGA’s and secure external learning areas.

12.117 The proposals look to work with the existing levels where possible and re-use existing retaining walls.

12.118 Where it is possible, the existing green infrastructure of boundary trees and riparian planting along the Diggle Brook and to the north eastern boundary is to be retained to provide a mature green framework to the new development. New native woodland, structure planting is proposed to enhance the existing boundary planting, and to aid with ‘softening’ the development and integrating it to the surrounding landscape character. The new structure planting has the extra benefit of providing wildlife habitat study areas.

12.119 Strategic felling of some areas of existing trees will be necessary to facilitate the proposals in particular the re-levelling of the northern part of the site to accommodate car-park and bus turning areas. Some trees will also be lost to facilitate the demolition of the existing buildings and removal of waste and treatment of invasive species.

12.120 General organisational principals for the external teaching and social spaces have been informed by the form of the building and the need to respond to the challenging site levels. The over sailing teaching wings of the building have provided for development courtyards and covered external areas both between and partly beneath the three teaching wings.

12.121 A series of flexible hard and soft social spaces have been created to the east and north of the building. Quieter learning and social spaces have been provided closest to the building and more active play performance and wildlife study areas take place to the north of the building.

12.122 The two courtyards each extend its function from the adjacent internal use. The southern courtyard spills out from the dining hall. Here the difference in level between ground and first floor has been bridged in part with tiered seating and includes a paved terrace for setting out picnic benches for external dining or quiet
study. The northern courtyard extends from the main hall. Here the applicant has proposed to utilise the full extent of level change using tiered seating like an auditorium facing the building and have provided an informal performance space to the ground level.

12.123 The proposed materials for the tiered seats are pre-cast concrete with brick uprights and artificial grass turf for the wider terrace.

12.124 The areas below the teaching wings have been developed as external covered teaching and social spaces. Here table tennis tables could be set out or the space utilised as informal dance or fitness class space or drama practice area.

12.125 Up at the canal level, a quiet seating area has been created which has views across the school grounds and beyond.

12.126 Through utilising the natural changes of level of the site, a natural turf amphitheatre has been proposed to the far north-eastern corner of the site. The steep sections of the grass terraces are to be reinforced to provide a stepped form.

12.127 The second floor circulation corridor above the teaching spine provides access out onto first floor roof terraces which the school wish to develop for a horticultural area as science and food studies.

**Sports Provision**

12.128 New sports facilities have been accommodated within the school grounds which match or exceed the provision of the current school site in Uppermill.

12.129 On the southern half of the site, a floodlit synthetic football pitch has been provided. Also in this area is an U15-U16 natural turf football pitch, 100m natural turf 6-lane running track, an area for practise cricket wickets, a synthetic long jump run-up and sand pit and area for throwing events.

12.130 On the northern half of the site, two formal, fully fenced porous macadam multi-use games courts have been provided to the south of the building. To the north of the building is an additional informal MUGA.

**Officers views**

12.131 Policy 20 – ‘Design’ states that the Council will promote high quality design and sustainable construction of developments that reflect the character and distinctiveness of local areas, communities and sites. This policy relates to all types of development.

12.132 Also particularly relevant to the assessment of design is Policy 24 ‘Historic Environment’. This policy states that when determining applications, the Council will seek to protect, conserve and enhance the architectural features, structures, settings, historic character and significance of the borough’s heritage assets and designations. It goes on to say that development to, or within the curtilage or vicinity
of, a listed building or structure must serve to preserve or enhance its special interest and its setting.

12.133 The relevant NPPF sections and Planning (Listed Building and Conservation Areas) Act 1990 also apply here.

12.134 The Council’s design policies recognise that design is as much about how a building functions as the way it looks.

12.135 In Officers opinion, the proposed school is designed to high standards of educational design in terms of its layout, function, flexibility and efficiency and responds to the schools brief and current educational design standards and would deliver the highest quality educational facility. Its design also responds to considerations including safety and inclusion, legibility, adaptability and sustainability in terms of construction and future maintenance.

12.136 Because the site has a history of large-floorplate, multi-storied industrial buildings, the mass of the school is considered appropriate, particularly since it would remain lower than the listed office building and clock and subsequently the listed building retains its prominence. Similarly, the bulk of the building on the canal elevation of the site is not over dominant.

12.137 The proposed materials are considered appropriate and typical of a building of this function and size. However, whilst some stone has been introduced in response to consultation feedback to add some visual interest and emphasise the main entrance, the overall look of the building is uninspiring architecturally and somewhat bland.

12.138 The impact of demolishing the existing factory buildings on the listed office building is covered in detail in Application A and Application B.

12.139 In summary, replacing a ‘wall’ of factory buildings on the previously developed land in front of the listed building by a wall of new school buildings that are slightly further way from the listed building has a neutral effect on it design wise. However, the loss of the factory buildings does means that the grade II listed buildings historic setting and context is impacted adversely. Nevertheless, the public benefits of developing the new school building and the advantages of removing increasingly deteriorating buildings that have no realistic chance of being gainfully used in the future (and will there outweigh this loss of historic setting and context in Officers opinion. As such, this element of the scheme is considered acceptable.

12.140 Equally, the setting of the Huddersfield Canal’s historic context is also detrimentally affected in a similar way. Further away, this impact becomes less visible and therefore lessens from other designated and non-designated heritage assets and views. Again, the benefits of allowing the site to be developed outweigh the loss of setting and historic context in this instance.

12.141 Overall, the scheme scores highly in terms of its functionality but less so in terms of its form. Nevertheless, in the absence of any alternative school site, the proposal in design terms is considered, on balance, acceptable and in line with the relevant national and local design policies and guidance.
Crime Prevention and Security

12.142 New boundary fencing has been proposed to the entire site perimeter.

12.143 The northern school site is to be fully enclosed by 2.4m high weld-mesh fencing creating a secure and private educational environment.

12.144 To the south, the playing field area is de-marked and access is controlled via 1.2m high post and rail fencing.

12.145 Access to and along the public right of way has been retained uninterrupted.

12.146 The synthetic turf pitch is fully enclosed with 3m high ball stop fencing. Further 3m high weld-mesh fencing sections have been proposed to aid ball control from the elevated natural turf pitch to the lower level of the Diggle Brook and adjacent field.

12.147 Within the site, secondary fencing lines are proposed to be introduced to divide the ‘private’ from the ‘public’ and supervised zones as follows:

   i) The elevations of the new school building forms part of the secondary secure line.
   ii) 1.8m high weld-mesh fencing is proposed to extend the secure line west wards to the site perimeter to provide a division between the visitor car park, main entrance area, listed building and servicing and deliveries from the staff car parking, external play and teaching areas.
   iii) 1.2m high railings are proposed to secure the staff car park areas from the pupil areas.
   iv) 2m high timber close board fencing is proposed to secure and screen views of the bin store and sprinkler tank and pump (located to the west of the new school building).
   v) 3m high ball stop weld-mesh fencing is proposed to enclose both the MUGA and synthetic pitch.

12.148 Positive aspects of the proposed development are:

   • The new building will benefit from natural surveillance and overlooking to some degree from Huddersfield Road to the west;
   • The single access point into the site and limited number of other entry points allow surveillance and security to be focused on these locations;
   • The location of the main entrance provides a clear and direct route for visitors.
   • The footprint and design of the building has no deep recesses within the building line, where partially hidden doors and windows could be vulnerable to attack.
   • Access to the sides and rear of the site is restricted with a secondary secure boundary; and,
   • The development includes security features built into the design so that retro-fitted security measures will not need to be fitted.

12.149 Greater Manchester Police has been consulted on the proposals and their report (Crime Impact Statement) has been submitted with the planning application.
report identifies a number of positive aspects of the scheme and concludes that the design is acceptable, subject to a number of points being addressed. GMP make a number of recommendations, including:

- the need for the whole school to be enclosed with high level rigid panel, welded mesh fencing/railings;
- that care should be taken to ensure level changes do not facilitate climbing over boundaries or leave space underneath that could leave the perimeter vulnerable to unauthorised access;
- that the design should not enable easy, unauthorised access on to roof areas; and,
- that covered external areas to the east of the spine are secured with shutters or full height railings and gates to prevent unauthorised access.

12.150 GMP is satisfied that the majority of the recommendations made have been addressed in the proposed design. However, they have concerns regarding the covered external areas to the rear of the building and therefore recommend the installation of either shutters or full height railings and gates since these sheltered areas have the potential to cause a number of issues, such as loitering, nuisance and anti-social behaviour out of hours, as well as leaving the windows and doors vulnerable to damage. Whilst these concerns are acknowledged, it is considered that the covered areas are very large and installing shutters or full height railings would be infeasible and would lead to significant visual intrusion. It is not considered that the windows / doors would be significantly more vulnerable in that area compared to other window and doors at ground floor on the site. To gain access to these areas, 2.4m high boundary fences would need to be overcome. In addition, it is proposed to cover these areas with CCTV.

12.151 The Crime Impact Statement also states that the existing pedestrian tunnel to the east of the site, running underneath the railway line on the opposite side of the canal, could be used more frequently and could foster anti-social behaviour. GMP recommends that it be improved through installation of lighting, provision of even surface and adequate drainage. However, the tunnel is outside of the application site and outside of the applicant’s control. Undertaking such works would be beyond the affordability of the project and the applicant does not consider that the proposed development would lead to an increase in pedestrian use of the tunnel since it does not link the site to any residential areas. As such, it would be unreasonable to require these works.

Heritage

12.152 A cumulative assessment of all the applications in respect of heritage does increase the reporting of impacts as, instead of these been confined to either demolition or the setting of Listed Buildings, it incorporates both aspects. Chapter 12 of the ES fully considers the cumulative aspects of the Project.

12.153 The applicant notes that the site contains a number of buildings of historic interest. The link bridge between the listed office building and the site will be demolished. No further mitigation is considered appropriate for this asset and therefore the residual significance of effect will remain significant. This is a view Officers agree with.
Both Officers and the applicant also feel that other buildings located within the site contribute to the setting and context of the listed office building, although in themselves they are not particularly significant, and have a medium group value from forming part of the same industrial complex.

An archaeological watching brief to record the inaccessible parts of the buildings will be maintained during demolition to lessen the impact of their loss. Furthermore, a programme of archaeological investigation will be undertaken in respect of the former Wrigley’s Mill in the north of the site and in respect of any possible buried remains associated with the Dobcross loom works.

The effects of the development on the settings of designated heritage assets in the wider area have also been considered. Officers feel that the mitigation measures proposed in relation to materials, lighting and landscaping for the proposed new school will partially mitigate effects from these assets but would also not result in a reduction in the magnitude or types of identified impacts and effects. The residual impact on the listed Dobcross Loom Works office building would remain intermediate adverse, a view shared by WYG on the applicants side.

The residual magnitude of impact of the development on the settings of six Grade II Listed Buildings: 45-9 Huddersfield Road, 25 Huddersfield Road, canal footbridge, Hollin Grove, Holly Grove Cottages and Holly Grove Farm Cottage would remain intermediate-minor adverse which isn’t significant.

Impacts on other assessed Listed Buildings and Conservation Area would be negligible.

The impact on the setting of the Huddersfield Narrow Canal would remain minor adverse.

The cumulative aspects of the proposed development will therefore result in impacts of varying significance with the greatest impacts experienced on the listed clocktower building, existing site buildings and the footbridge link.

In accordance with paragraph 133 of the NPPF, in relation to the listed link bridge and clock tower building, substantial harm to or the total loss of such an asset should be refused unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss.

Paragraph 135 of the NPPF applies in relation to the harm to or loss of non-designated assets. This states that the effect of a proposal on the significance of a non-designated heritage asset should be taken into account in determining the application.

In weighing applications that affect directly or indirectly non-designated heritage assets, Officers consider that a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

In response to both of these NPPF policy tests, it is considered that the individual and cumulative harm is outweighed by the strong and clear public benefits of providing the proposed school development, together with the associated
demolition and highways works. In these circumstances, it is therefore considered that the NPPF and Joint DPD policies on heritage are complied with.

**Transport, Access, and Highway Safety**

12.165 The main vehicular and pedestrian access to the school will be gained from an existing access road off Huddersfield Road that has adequately served the industrial use of the site for many years.

12.166 The amended access road is intended for use by school buses, staff, service vehicles and visitors. It is not intended for use by parents as a drop off facility. It will also be the main pedestrian route to the site. To enable this, a footway will be constructed to allow safe pedestrian access for pupils, parents and visitors.

12.167 The specific works are that the current main access road will be widened to allow two-way vehicular traffic and a 3m wide footway for pedestrians. A give-way system will operate over the bridge, which is wide enough to only allow one-way traffic. Improvements to the access road form part of the separate application for the highway works (PA/337930/15).

12.168 The access road will lead directly to a dedicated bus waiting and turnaround area, the main pupil entrances, service delivery area and a car park. Pupils will be able to alight and wait safely for buses within the school grounds with no need to use the adopted highway.

12.169 A car park with 117 spaces for staff, 5 spaces for disabled users, and 2 spaces for minibuses will be provided. Secure cycle parking will also be provided for staff, pupils and visitors.

12.170 Parents taking their children to school will be discouraged from using the access road unless there is a specific need. The management of this will be dealt with in a parking management plan, the requirement of which is ensured by condition.

12.171 The bus turnaround area will provide invaluable additional off-street parking when events are held at the school and the availability and management of this facility will also be covered by the parking management plan.

12.172 The access road is directly off Huddersfield Road which gives access to the wider residential area of Diggle. It has a speed limit of 30mph and the carriageway width varies between 5.3 and 6.5m. The footway widths are between 0.9 and 1.5m from the junction of Stanedge Road to the access road.

12.173 The residential properties along Huddersfield Road vary in type, with some having dedicated off-street parking and others having to rely on on-street parking.

12.174 As a result, cars regularly park on the carriageway. In places this has the effect of reducing the running lane to a single width, and an informal give-way system takes
place. This is often over a long length and can subsequently give rise to conflict between drivers.

12.175 Huddersfield Road forms a priority junction with the A670 Stanedge Road / Wool Road 380m south of the access road to the proposed school.

12.176 The speed limit on Stanedge Road is 40 mph southbound approach nearing the junction with Huddersfield Road reducing to 30mph and 30 mph on the approach northbound rising to 40mph past the junction.

12.177 Bus stops are located along Huddersfield Road and there are several public rights of way in the vicinity of the site.

12.178 Analysis of existing accident data in the area has revealed that the accident rate is low with no obvious accident hot spots.

12.179 One of the main considerations in the assessment of this application for a school in terms of highway safety is the access to the school by pupils.

12.180 Their main modes of travel to the school will be by bus, on foot, or by car.

12.181 Officers are satisfied that they will have the opportunity to safely travel to school by bus without the need to interact with other users of the highway. Use of public transport will be encouraged by the provision of school buses that will use the access road and dedicated bus turning area within the site.

12.182 The main access on foot will be from Wool Road / Stanedge Road and the surrounding residential areas of Diggle along Huddersfield Road and the access road.

12.183 The footway provision along Stanedge Road / Wool Road is adequate with wide footways which in places are separated from vehicular traffic by grassed verges.

12.184 Similarly, the nearby residential areas of Diggle are served by adequate footways which will allow the safe use by pedestrians.

12.185 The footways along Huddersfield Road leading to the access road vary between 0.9 and 1.5m wide. This is not acceptable in terms of highway safety and Officers have attached a condition that will ensure that the highway works required to allow safe use by pedestrians and pupils travelling to the school on foot are carried out prior to the opening of the school.

12.186 The planning application for the highway improvements has sought to address this problem by providing alternative off-street parking for residents of the terraced properties in two areas. These new parking areas mean that the footway can then be widened and traffic signals introduced which will allow the safe running of one-way traffic through this relatively short length of highway. This will be discussed in more detail in the consideration of the highways works application (PA/337930/15).

12.187 Officers have attached conditions that will ensure compliance. The associated planning application for the highway works (PA/337930/15) addresses the area in
closest vicinity to the site and those measures are discussed in detail in Officer’s assessment of that application.

12.188 Despite the efforts of the Council to encourage and facilitate more sustainable modes of travel to the site, it is inevitable that some children will travel to and from school by car. To this end, the car parking area which will allow parents to drop their children off safely will be provided. This forms part of the highways works application (PA/337930/15) and will be discussed in more detail in the consideration of that application.

12.189 A number of concerns have been raised about the amount of traffic that will be generated by a new school at this location and the effect on the wider highway network.

12.190 A Transport Assessment was submitted as part of the application in which the existing and proposed situations were analysed and mitigation measures suggested as appropriate.

12.191 The study included analysis of Huddersfield Road, the Huddersfield Road / A670 Stanedge Road / Wool Road junction, Sugar Lane, A6052 Dobcross New Road / Woods Lane junction and A670 Wool Road / A6052 Dobcross New Road. The Transport Assessment looked at the sustainability of the site in terms of its location and access to sustainable modes of transport.

12.192 The demographic of the pupils attending the existing school site were related to the location of the proposed school. Officers acknowledge that the addresses will change annually, but they are an excellent indication of the general catchment area that the school will attract and any changes will not have a significant impact on the assessment.

12.193 The majority of pupils attending the new school could be expected to live within three miles, which is within the Governments requirements set out in the 1996 Education Act - a maximum of three miles for pupils aged 8+ who are not from low income families. However, there will - as with the existing school - potentially be a number of pupils that will live outside of the recommended three mile walking boundary of the proposed site. It is therefore proposed that school buses will be provided directly to the new site.

12.194 Seven school buses currently serve the existing site which serve the local villages and the wider areas of Ashton, Mossley, Oldham and Manchester.

12.195 Preliminary discussions and consultations have taken place with TfGM and they are aware of the potential for changes to the services they provide if the school is granted planning permission.

12.196 Diggle is already served by bus, with stops located within 400 metres of the site. Discussions will continue with TfGM to ensure that school buses continue to be provided to the school, and that children outside of the walking catchment area have access to this more sustainable mode of transport.
12.197 The Transport Assessment also compared the amount of traffic generated by the existing school and that expected to be generated by the new school. Additionally, it identifies the modal split of the existing and proposed sites. The study concluded that there will be an increase in pupils using sustainable modes of transport and car use, which is unsurprising given that numbers of pupils and staff will increase.

12.198 WYG has assumed that the same percentage of children and staff that currently travel to school by car will continue to do so. Using this assumption, the number of two-way trips to the new school is expected to generate an increase of 11% of two-way trips which equates to an increase of 63 two-way trips in the morning peak and 18 in the evening peak period.

12.199 Due to the change of the location of the school, Officers consider that pupils and staff may change their modes of travel. Children who live closer to Diggle, for example who are currently driven to school will walk to the new site. Conversely, those who currently walk to school may live too far away from the new site and will have to travel by bus or car. Officers do not expect the overall effect on the traffic generated at the proposed site to be significantly different to that generated by the existing school site. Nevertheless, WYG are re-examining the modal split and reassigning the modes of travel to the new site according to the demographics of the existing school pupils.

12.200 Traffic counts were undertaken on the surrounding highway network and it was established that the weekday peak hours were between 8.00 - 9.00 am and 3.15 - 4.15 pm.

12.201 The data collected for traffic generated by the school was distributed out onto the local highway network and growth factors have been applied which give a forecast of future traffic flows in 2020 and 2025. Using this information, junction capacity assessments have been undertaken at the four main junctions under consideration:

- Huddersfield Road and the access road;
- Huddersfield Road / Stanedge Road;
- Woods Lane / Dobcross New Road; and,
- High Street/ Dobcross new Road.

12.202 Although additional queuing will occur at some of the junctions during the identified am and pm peak periods, they were still shown to be operating within capacity.

12.203 A Travel Plan has also been submitted as part of the application for the school. Although it gives a good indication of the measures that will be implemented, the figures contained within it do not relate directly to the current intake of children. A condition has therefore been attached that will ensure up-to-date information is used and that it can be implemented upon the opening of the school.

12.204 Nine months prior to the occupation of the development hereby approved, a detailed School Travel Plan for the whole premises shall be submitted to and approved in writing by the Local Planning Authority (LPA). The School Travel Plan will be prepared in advance of the opening of the school, so that measures can be
identified and enforced in readiness for children, parents and staff travelling to the school.

12.205 The School Travel Plan will include as a minimum:

- A named Travel Plan Co-ordinator and the set-up of a Travel Plan Steering Group;
- A pupil and staff travel survey completed prior to occupation (response rate to be agreed with the LPA);
- Evidence of consultation;
- Clearly defined modal split targets and objectives to reduce single-occupancy car use (to be agreed with the LPA);
- A detailed action plan of measures including timescales, funding source and clearly defined responsibilities; and,
- A monitoring and review plan, including the date of the next travel survey.

12.206 The Transport Assessment has identified areas where improvements and mitigation measures may be required which will improve highway safety and ensure the efficient operation of the highway network as a result of the development.

12.207 Additional work is required on Huddersfield Road and the wider highway network which don’t form part of the separate application for the highway works (PA/337930/15) which will facilitate safe journeys to school by the children but also all other users of the highway.

12.208 The additional work required consists of:

- a School Safety Zone, which will include a speed limit review;
- traffic calming features; and,
- pedestrian crossings points, waiting restrictions and associated signing and lining.

12.209 The bus stops will need to be relocated and pedestrian crossings will be required to ensure that passengers can cross the road safely.

12.210 The modelling exercise undertaken revealed that traffic queuing on Huddersfield Road at the traffic could extend onto Stanedge Road. This will occur only during the peak periods and mitigation measures have already been identified in order to ensure that the junction will operate safely in the future.

12.211 Officers consider that additional highway improvements could be carried out on Wool Road which would reduce the amount of traffic using Huddersfield Road and thereby reduce the length of the queue of traffic, reduce congestion on Huddersfield Road, and improve the journey to school and other highway users.

12.212 This additional work would include the provision of a mini roundabout at the Sugar Lane / Woods Lane junction and associated works. This would allow any parent, on seeing a queue waiting to turn into Huddersfield Road, to drop their children off on Wool Road and turn at the mini roundabout. This would also discourage them from turning left onto Sugar Lane and driving through Dobcross.
12.213 It is acknowledged that the amount and pattern of traffic along Huddersfield Road and the surrounding area will change as a result of a school being built in this location. At certain periods of the day, there will be increased congestion concentrated in the area of Huddersfield Road and the Stanedge Road junction.

12.214 Officers consider that further work will be necessary to ensure the continued safe use of this junction and the wider highway network in order to accommodate the different patterns of travel that will result directly from the construction of a new school.

12.215 The works we have identified at this stage are:

- Improvements to the access road to the school - this will allow safe use by buses, staff and pedestrians;
- A School Safety Zone on Huddersfield Road - this will slow traffic down and improve pedestrian facilities for children and other users of the highway;
- Highway improvements outside 20-44 Huddersfield Road - this will allow the construction of footways and with the introduction of traffic signals will regularise the one-way system that currently takes place informally;
- Provision of a car park for residents and parents, and a parental drop off facility;
- Highway improvement along Huddersfield Road from its junction with Stanedge Road - this will ensure the continuation of a minimum width footway, and widen the carriageway to aid the movement of traffic in the area;
- Highway improvement at the Sugar Lane / Wool Road junction - this will discourage drivers from using the route through Dobcross for turning, and will improve pedestrian crossing facilities; and,
- Highway Improvement at the Stanedge Road / Huddersfield Road junction - this could include the reprioritisation of the junction, road signs, lines and a speed limit review.

12.216 The Council are committed to ensuring that the effects on the highway network as a direct result of the school are kept to a minimum. Although Officers consider the measures outlined above - which will be implemented by way of condition - are robust, monitoring will take place in the future. If any additional problems arise, an assessment will be made of their severity and any action that is considered necessary will be explored in mitigation.

12.217 Officers accept that congestion will occur during peak periods when the school is open. There will be an impact in particular on Huddersfield Road and the Huddersfield Road / Stanedge Road junction. However, the short periods of time during which this will occur are outweighed the benefits that the highway improvements will bring to the surrounding highway network at all other times and allowing the use of the site to function as a new school. Indeed, all users of the highway will benefit by being able to travel safely along Huddersfield Road. Moreover, the cumulative impact the scheme will have on the highways network will not be ‘severe’. As such a reason for refusal could not be sustained against the required NPPF test.
12.218 Officers are satisfied that, if the measures outlined above are implemented prior to the school being brought into use, all users of the highway and the development will be able to use the highway safely.

Use of Canal towpaths

12.219 The Canal and River Trust has previously raised concerns relating to the potential increase in use of the towpath arising from the development.

12.220 The towpath in this area is unbound and rural in nature with no lighting and whilst suitable for the existing level of usage would not be appropriate in its current state for any significant increase in pedestrian or cycle usage arising from this development, which would quickly lead to a deterioration in the state of the paths.

12.221 The Trust is however generally supportive of the use of canal towpaths as sustainable travel routes and is not opposed to the use of the towpath as a route to school in principle. However, the existing footpaths are not considered to be of a standard appropriate to accommodate any significant increase in usage arising from the proposed development. As such, the Trust recommend works or a financial contribution towards appropriate resurfacing of paths and improvements to access points through the use of a planning obligation or section 106 agreement to mitigate the direct impact of the development if such use was intended. The Trust considers this as being necessary to offset potential harm to the towpaths arising from increased usage directly related to the development and fairly and reasonably related in scale and kind to the development.

12.222 However, the applicant advises that use of the towpaths is to be discouraged and measures put in place through the management of the school (such as securing gates to the rear of the school site) and through the travel plan to implement this, with the use of towpaths to be monitored once the school is open and additional measures put in place if necessary to reduce usage if occurring in high volumes. The submitted details of site access, security and boundary treatments identify secured areas of the school and restrictions on access outside of the northern part of the site.

12.223 Given the above, it is considered that a contribution towards towpath improvements, along the lines suggested by the Canal and River Trust is not required, but a condition is required detailing how pupil use and access to the towpath is proposed to be managed by the school, with the inclusion of details and method of enforcement included in a travel plan to be submitted to and approved by the LPA in consultation with the Trust, prior to the opening of the school.

Amenity

12.224 An assessment on noise and vibration has been undertaken by the applicant. It found impacts to be low at most sensitive locations and consequently little impact is expected on residents on a day-to-day basis.

12.225 The technique suggested for piling in connection with new foundations should ensure noise and vibration is kept to a minimum.
12.226 Subject to limited noise conditions being set (against background noise levels), noise from plant should not be a problem for existing residents.

12.227 In relation to road noise and vibration, changes to noise levels will be barely perceivable largely due to the relatively high traffic flows on the existing road network.

12.228 In relation to noise from sports pitches, the level of noise will be low throughout the daytime, but will increase slightly in the evening (7pm-10pm) due to increased noise during these hours.

12.229 Because of the schools distance away from the nearest residents and its hours of operation, it is not expected that it will cause any issues in terms of loss of privacy, overlooking or sense of enclosure. Similarly no loss of daylight or sunlight will occur.

12.230 Overall, it is not considered that the school will create any amenity issues that will affect residents to such an extent that it would sustain a reason for refusal, particularly in view of the fact that the proposal could potentially replace an unrestricted industrial use.

Air Quality

12.231 The submitted air quality assessment provides an assessment of the potential effects and their significance of the development during the demolition, construction and operational phases. The effects have been considered for relevant sensitive residential and ecological receptors.

12.232 The effects during demolition and construction phases include fugitive dust emissions from site activities, such as earthworks, construction and track out. The impacts during the operational phase take into account exhaust emissions from additional road traffic generated due to the proposed development.

12.233 During the demolition and construction phase, it is anticipated that dust sensitive receptors will potentially experience increased levels of dust and particulate matter. However, these are predicted to be short term and temporary impacts. Throughout this period, the potential impacts from construction on air quality will be managed through site specific mitigation measures outlined within the assessment. With these mitigation measures in place, the effects from the demolition / construction phase are predicted to be not significant.

12.234 The detailed air dispersion modelling determined that the National Air Quality Objectives are not exceeded at any of the modelled receptor locations in any of the modelled scenarios, baseline or future years.

12.235 Changes in emissions to air because of additional traffic due to the development, during the operational phase are predicted to be not significant at all the modelled sensitive receptor locations.

12.236 Although the impacts during the operational phase are adjudged to be not significant, recommendations are provided for mitigation measures that would assist to further improve air quality.
12.237 It is concluded that the proposals are acceptable from an air quality perspective and that the proposed development thereby complies with the relevant part of Policy 9 of the Joint DPD.

**Ecology**

12.238 In considering the ecological impact of the proposed development, regard must be had to local and national planning policies, including LDF Joint Development Plan Document Policies 6 ‘Green Infrastructure’, and 21 ‘Protecting Natural Environmental Assets’, and the NPPF.

12.239 There are a number of statutory and non-statutory designated sites within 2km of the site. The statutory designated sites include the South Pennine Moors SAC, South Pennine Moors SPA, and Dark Peak SSSI. The non-statutory designated sites include 7 Sites of Biological Importance (SBI), one of which, the Huddersfield Narrow Canal, is located directly adjacent to the site boundary. There are also a number of priority habitats within 2km of the site. The development proposals will take place outside of the boundaries of the designated sites and they will not, therefore, be significantly affected. A buffer of least 10m will be maintained between the Huddersfield Narrow Canal SBI and any development. The buffer will be fenced to prevent encroachment of traffic, windblown litter and storage of materials. An 8m buffer and fence to Diggle Brook will also be observed.

12.240 An impact assessment for ecology has been carried out and is provided within the ES. The comments received from Natural England and the Greater Manchester Ecology Unit (GMEU) at Scoping Opinion stage has been included within the scheme design and impact assessment.

12.241 The site has been subject to a number of desk based ecological surveys, full details of which are provided in the ES appendices. They include an Extended Phase 1 Habitat Survey, Breeding Bird Survey, and bat surveys. GMEU confirm that the ecology surveys and assessments undertaken are generally of an appropriate standard and no further surveys need to be conducted prior to determination of the applications.

12.242 The south of the site is dominated by pasture fields whilst the northern section of the site is dominated by buildings, hard standing. The Extended Phase 1 Habitat Survey has identified a number of habitats on the site, including the following:

- Improved grassland;
- hard standing with buildings;
- species poor semi-improved grassland;
- plantation broadleaf woodland;
- tall ruderal vegetation;
- species poor hedgerow;
- scattered scrub;
- marshy grassland; and,
- ‘dry pond’.
Offsite habitats include the Diggle Brook which flows immediately adjacent to the western boundary of the site and a small pond, which is located approx. 40m to the south west of the site. A number of invasive plant species are present on and adjacent to the site.

12.243 Great Crested Newts surveys were carried out between April and June 2014 and these included surveys of the pond to the south of the site. No Great Crested Newts were recorded and are not currently considered to be present on the site.

12.244 The Phase 1 Extended Habitat Survey has identified that badgers are not currently present on the site. Other protected species, such as otter and water vole, are also absent. Other species were recorded on the site, including common toad, whilst brown trout were recorded within the adjacent Diggle Brook.

12.245 Three breeding bird surveys were carried out on the site and within 50m of the site boundary between April and June 2014. 15 species were recorded within the survey area with 6 of these being recognised as being of conservation concern.

12.246 One lapwing was observed during the surveys and it was therefore concluded that lapwing were not present breeding on the site. GMEU acknowledge that no breeding lapwing appears to have been recorded on the site since 2010/2011 and the local population would appear to have declined recently. GMEU consider that alternative suitable breeding habitat is available for lapwing on nearby fields.

12.247 The overall breeding bird assemblage of the site is likely to be of low ecological value, based on the diversity and numbers recorded during the surveys. The development proposals will result in the loss of an area of improved grassland approximately 3.5ha as well as approx. 0.2ha of woodland and scrub habitat. All works affecting potential bird breeding habitat will be completed outside the main breeding season, but where such works cannot avoid the breeding season, the vegetation, building and / or areas of grassland will be checked in advance of any works taking place to prevent disturbance. GMEU advise that mitigation for possible harm to breeding birds should be adopted and implemented as part of the scheme. New landscaping proposals should encourage provision for nesting birds.

12.248 In relation to bats, the site has been assessed as having medium to high habitat quality. Bat activity surveys were completed on a monthly basis between April and September. During bat activity transects and automated surveys six species of bat were recorded using the habitats within the site boundary. Survey work indicated that the brook is used by foraging and commuting bats. The transect which passed along the rear of residential properties on Huddersfield Road and the transect which passed alongside the access road from Huddersfield Road to the site also recorded bat commuting activity. The site was assessed as of local value for commuting and foraging bats.

12.249 Bat roost assessment of buildings on the site was carried (in February 2015), which identified that six buildings offered between low and high potential to support roosting bats. Nocturnal bat emergence / return surveys were completed for these six buildings between May and June 2015. A single common pipistrelle bat was observed to return to building D. All works to disturb/destroy/modify a bat roost would need to be completed under a Natural England licence and such works would
be supervised by a licensed bat worker. Desk study records also indicate that low numbers of pipistrelle bats roost within the retained Grade II listed office building, which is outside the site but is linked via a footbridge. Based on the results of the surveys the buildings proposed to be demolished are considered to be of value at local level for roosting bats. There is potential for construction works and the operation phase of the development to impact foraging, commuting and roosting bats due to light spill.

12.250 GMEU raises no objections to the application/s on the grounds of impacts on bats. GMEU comment that, based on the submitted survey results, it would appear that small numbers of common species of bat use parts of the building complex for (likely) occasional roosting. Impacts on bats will therefore be low level and mitigation for any possible disturbance to bats will be straightforward. A condition is recommended by GMEU requiring a fully comprehensive method statement giving details of measures to avoid possible disturbance to bats during demolition and construction of the proposed new school.

12.251 The Huddersfield Narrow Canal SBI is located adjacent to the eastern boundary of the site, but is situated at a higher level than the site. A survey has been carried out for floating water plantain in a section of the Huddersfield Narrow Canal. A single piece of floating water plantain was recorded, which had probably been brought down the canal through boat activity. The ES concludes that this species is unlikely to become permanently established and is therefore not considered to represent a major constraint. GMEU support the recommendation in the ES that no direct lighting of the Huddersfield Narrow Canal SBI should be permitted.

12.252 Invasive species have been recorded on and adjacent to the site, including Japanese Knotweed along the eastern and western banks of the Diggle Brook and Himalayan balsam in patches as well as continuous cover throughout the extent of the watercourse. Invasive species would need to be eradicated and a management plan would be prepared which detail the control and monitoring of all recorded invasive species.

12.253 The ES covers avoidance and mitigation measures that will seek to avoid or mitigate impacts during demolition, construction and operational phase of the school as well as the associated highway works to ensure that any short adverse effects are minimised. These measures would be detailed in an Ecological Mitigation and Management Plan.

12.254 The proposed development will retain features of ecological value such as the tree line along the Diggle Brook, whilst including ecological enhancements through habitat creation, such as wildflower planting and bat friendly planting schemes. The proposed lighting layout and specification will be designed with consideration to bats, including a reduction in lighting at the edge of trees, the brook and the canal, and avoiding light spill directly onto the canal. The Canal and River Trust notes the information submitted in respect of future lighting of the scheme and the assessment of the canal corridor as a potential receptor. The proposed curfew of 22.00 hrs for the lighting of the sports pitch is welcomed in order to reduce any potential impact on bats along the corridor which the Trust considers should be secured by use of a suitably worded condition. Low level lighting will be used at the proposed drop off and parents’ car park along Huddersfield Road. Although neither
species has previously been recorded on the site, pre-commencement surveys for badgers and otters would be undertaken and appropriate mitigation measures implemented. Additional ecological mitigation includes the provision of 20 bat boxes and 20 bird boxes. These will provide additional nesting / roosting features and have a positive impact on local populations of bats and birds.

12.255 Pollution to the Diggle Brook and SBI will be prevented during construction by way of measures outlined in the Construction Environmental Management Plan (CEMP).

12.256 In summary, the development proposals seek to retain and enhance existing habitats where possible, with new habitats proposed to mitigate for unavoidable loss and enhance ecological value in the long term. The cumulative impact of the development proposals with other nearby development will not result in major adverse impacts on ecology, but will allow for improvements to be made to habitats. In this respect the four applications comprising the Project comply with the requirements of Policies 6 and 21 of the Joint DPD and the NPPF.

Lighting

12.257 A Lighting Assessment has been submitted with the application to assess the impact of the proposed lighting, particularly the proposed floodlighting of the all-weather sports pitch.

12.258 The proposed external lighting design, as well as meeting the statutory design standards, will meet a number of criteria to ensure that the environmental effects of artificial lighting are managed. All external lighting schemes will not have an upward lighting ratio of more than 0.5%. All new column mounted car park luminaires shall be fitted with flat glass where appropriate to aid 0% upward light discharge. Luminaires on the site boundary will be fitted with light baffles to prevent light spill. Car park lighting will be controlled via CMS time and light level sensor.

12.259 Following an environmental lighting survey, it was concluded that the proposed development and surrounding area should be classified as Environmental Zone E2 – Low district brightness (in accordance with the ILP guidance limits). This is representative of relatively dark outer suburban location. Impacts associated with the proposed design were predicted at receptor locations and compared with the relevant guideline values. The effects on the night sky have also been considered.

12.260 The assessment concluded that the proposed scheme will not affect the existing residents to the western, northern and eastern boundaries. Potentially sensitive ecological receptors were identified on and adjacent to the site. With appropriate mitigation in place, the impact of lighting associated with the proposals is not expected to significantly affect habitats and wildlife. The assessment also concluded that the sky glow levels will not have a significant effect on the surrounding dark sky landscape.

12.261 The lighting associated with the proposed development will be clearly visible. However, following adoption of appropriate mitigation measures, it has been demonstrated that the proposals do not conflict with national and local planning policies on lighting.
Flood Risk and Drainage

12.262 A Flood Risk Assessment (FRA) was undertaken to assess the existing flood risks to the site and identify flood mitigation works required to ensure that the development does not increase the flood risk off site, particularly to Diggle Brook and, through a suitable surface water management strategy, ensure that the development can be drained catering for all storm events up to and including the 1 in 100 plus 20% allowance for climate change storm event. The findings of the FRA were incorporated in the ES along with consideration of wider hydrological issues.

12.263 The application site is predominantly located within Flood Zone 1 with small sections of the site immediately adjacent to Diggle Brook being within Flood Zone 2 and 3. The FRA states that the site is considered to be at low risk of flooding from fluvial flooding, sewer and groundwater flooding. The site is considered to be at low to medium risk of surface water flooding as a result of overtopping from the Huddersfield Narrow Canal and a very low residual risk of flooding as a result of a breach of the canal and failure of the Diggle Reservoir dam. Nevertheless, The Canal and River Trust welcomes the proposals for construction of a bund along the boundary of the proposed school building to ensure that any overtopping of the canal is diverted back into the canal system rather than be allowed into the school premises.

12.264 In accordance with Policy 19 of the Joint DPD, surface water run-off from the existing site is to be released by 50% with a volume of 499m3 of on-site attenuation being provided to store the associated volumes for all events up to the 1 in 100 plus 20% allowance for climate change storm event. It is also proposed to set the first floor level of the main building at 179.7m AOD, which will provide freeboards of 1,310mm, 1,160mm and 810mm above the respective 1 in 100, 1 in 1,000 year, and 1 in 100 year plus climate change.

12.265 The proposed development is classified as ‘More Vulnerable’ in accordance with the NPPG (Flood Risk and Coastal Change) and is located entirely within Flood Zone 1 according to the current EA Flood Map with the exception of a small area associated with the proposed sports facilities which, if flooded, would not impact on the operation of the proposed school.

12.266 It has been demonstrated within the FRA that the development complies with the requirements of Table 3 of the NPPG by locating all the relevant development within the Flood Zone 1 areas and therefore the NPPF Sequential Test is considered to have been passed and there is no requirement to apply the Exception Test.

12.267 In relation to the Diggle Brook, an assessment was undertaken which identified this as being a high sensitivity due to the existing flood risk immediately adjacent to the site and further downstream in Uppermill and its current moderate ecological and chemical water quality. The Huddersfield Narrow Canal is at a raised level relative to the site and is identified as being low sensitivity and surface water flooding, ground water and sewer flooding and reservoir failure were assessed as being low sensitivity.
Potential pollution to Diggle Brook will be mitigated through the use of measures to be outlined in a Construction Environmental Management Plan reducing the potential impact to negligible. Mitigation measures proposed include the incorporation of oil/petrol by pass interceptors and the possible use of permeable paving, which will ensure that there is minimal impact on the water quality of Diggle Brook.

During the operational stage of the proposed school, following the introduction of the mitigation measures, it is considered that flood risk is of negligible in the long term.

In terms of the concerns raised by many of the objectors relating to potential flooding downstream, it is noted that the surface water drainage strategy proposed for the developed parts of the site would ensure that surface water run-off is attenuated and released from the site at the pre-development brownfield discharge rate reduced by 50%. The impact of flooding on downstream receptors resulting from increases in surface water run-off is considered to be negligible. Within the southern part of the site where there will be no development and the existing greenfield discharge rates applied, there will also be negligible impact. No attenuation is proposed for the southern part of the site as this is to remain as grassed areas and utilised as sports pitches (such as the all-weather pitch which is permeable) or training areas and therefore will continue to discharge at the existing green field run off rates.

The Canal and River Trust has commented on the potential for construction work in close proximity to the canal to adversely affect its structural integrity and requested the imposition of a condition relating to investigation of the canal wall and production of a construction method statement detailing all proposed earthmoving and construction works consistent. The Trust also recommends a condition requiring a detailed survey (and any remedial works) to the culvert which crosses the site to be undertaken to ensure that its properties are not adversely affected. The Trust also considers the proposed preparation and implementation of a Flood Evacuation Plan to be appropriate. The Trust also recommends a condition requiring protection from pollution or other harm from the canal during the construction and operational phases of the development. It is noted that the proposed lighting scheme is yet to be finalised and submission and approval of full lighting details (including details of foundations) should be sought by means of a planning condition.

The impact from the proposed development on surface water run-off and flood risk, both on site and off site, would be insignificant and the proposal thereby complies with Policy 19 of the Joint DPD and the NPPF.

An assessment of the cumulative effects of the proposed development and other adjacent proposed developments, has identified that the overall cumulative impact, in terms of flood risk, surface water, and surface quality, would be negligible.

Ground conditions
A series of studies have been undertaken in order to establish any potential risks derived from the ground conditions on the site. A full impact assessment in relation to ground conditions is provided within the ES.

The northern part of the site is previously developed with possible contamination of soils and or shallow groundwater. Landfill to the north of the site, elevated concentrations of some potential contaminants and the presence of ‘made ground’ have also previously been identified. The southern part of the site has been mainly agricultural grazing land and as such is not considered to pose a significant risk to human health and water resources.

The development will require a remediation strategy to reduce the potential effects to future site users and the surrounding environment. Supplementary site investigation and assessment would be required by way of conditions and earthworks/geotechnical design will put in place measures to mitigate impacts during the construction and operational phases ensuring that any adverse impacts are minimised. Construction activity impacts will be minimised through standard construction environmental management practices.

It is concluded that the site can be redeveloped without contributing to, or being putting at risk from, unacceptable levels of ground contamination or land instability. The proposal will enable any potential contamination to be reduced thereby providing an overall benefit to the local environment. The development thereby satisfies Policy 1 of the Joint DPD and paragraphs 109, 120 and 121 of the NPPF.

Waste

An assessment of Waste Management has been undertaken. The assessment considered the management of waste arising both during the construction phase and operational phase. The proposed development will generate small quantities of construction and demolition waste, for which there are a number of waste facilities and sites in Greater Manchester and Oldham with sufficient capacity to manage the predicted arisings.

The operational phase impact on the local waste management infrastructure will only be caused by the difference in the amount of waste generated by the current and proposed schools, which is considered to only be a slight increase, as a consequence of the additional 150 pupils. The assessment concludes there is sufficient capacity within the local waste management facilities to cater for the additional volumes of commercial waste generated during the operational phase.

The assessment did not identify any significant effects. Mitigation measures are proposed in the Waste Strategy to ensure that construction phase and operational phase waste is managed in an efficient way, in accordance with the waste hierarchy which promotes avoidance, re-use, recycling and recovery over disposal.

Energy / Sustainability

The design of the proposed school is capable of meeting the requirements of Policy 18, which would require a 15% reduction in CO2 emissions than Part L Building Regulations. Carbon reduction is achieved by applying the principles of the zero
carbon hierarchy. These are to maximise energy efficiency through the design and fabric of the building, minimise carbon usage through the use of energy efficient plant and low and zero-carbon technologies and finally to adopt a range of measures or allowable solutions to further reduce carbon levels.

12.282 It should also be noted that Policy 18 recognises the financial implications of achieving the carbon reduction targets set out in the policy and, as such, provision is made for exceptions to be made where meeting the requirements would not be financially viable and could prejudice the proposed development.

12.283 In general terms the building has been designed to be as energy efficient as possible and the design will seek to use specific materials to maximise insulation and seek to address air leakage. The orientation of the building has sought to exploit passive solar gain and natural ventilation will be used wherever possible.

12.284 The feasibility of installing low and zero carbon technologies will explored with consideration being given to solar photovoltaic, solar thermal, wind turbines, biomass boilers, ground source heat pumps, air source heat pumps, district heating, and Combined Heat and Power (CHP).

12.285 It is considered that the details required to demonstrate compliance with Policy 18 could be agreed by way of an appropriately worded condition.

Conclusion
12.286 The loss of employment land is acceptable as the applicant has shown the site is no longer viable as an employment use and the new school would benefit the community.

12.287 The use of the Green Belt for outdoor sport and recreation purposes is considered appropriate and the visual amenity and openness of the Green Belt is largely unaffected. Moreover, there are very special circumstances that justify the use of the Green Belt land for new school purposes. Finally, none of the overarching purposes of the Green Belt are significantly affected by this proposal.

12.288 Numerous benefits are gained from using the site for school purposes including remediating a contaminated site, providing a fit for purpose school with better facilities than the existing one and significant socio-economic benefits in terms of jobs and new facilities. The school will also be more energy efficient.

12.299 No best and most versatile agricultural land is lost by this proposal.

12.300 The proposed replacement sports facilities are at least equivalent in terms of usefulness, attractiveness, quality, accessibility and quantity as the existing school.

12.301 It is acknowledged that landscape and visual impacts will occur, but these will be mitigated wherever possible and the impact on the landscape and visual amenity will not be significantly detrimental to sustain a reason for refusal.

12.302 In design terms, the scheme scores highly in terms of its functionality but less so in terms of its form. Nevertheless, the proposal in design terms is considered, on
balance, acceptable and in line with the relevant national and local design policies and guidance.

12.303 In Crime Prevention terms, GMP are generally supportive of the proposals but, in relation to external covered areas to the rear of the building and their subsequently suggested shutters / railings, we do not feel that this is the right design treatment for the school. Equally, the suggested works outside the application site cannot reasonably be required.

12.304 In heritage terms, it is considered that the individual and cumulative harm to the designated and non-designated heritage assets is outweighed by the strong and clear public benefits of providing the proposed school development, together with the associated demolition and highways works.

12.305 In highways terms, Officers accept that congestion will occur during peak periods when the school is open. However, the short periods of time during which this will occur are outweighed by the benefits that the proposed highway improvements will bring to the surrounding highway network at all other times and allowing the new school to function effectively. Moreover, the cumulative impact on the scheme on the highways network is not ‘severe’. As such, there are no grounds that would sustain a reason for refusal in this instance.

12.306 It is not considered that the school will create any amenity issues that will affect residents to such an extent that it would sustain a reason for refusal, particularly in view of the fact that the proposal could potentially replace an unrestricted industrial use.

12.307 The development proposals seek to retain and enhance existing habitats where possible, with new habitats proposed to mitigate for unavoidable loss and to enhance ecological value in the long term. The cumulative impact of the development proposals with other nearby development will not result in major adverse impacts on ecology, but will allow for improvements to be made to habitats.

12.308 The lighting associated with the proposed development will be clearly visible. However, following adoption of appropriate mitigation measures, it has been demonstrated that the proposals do not conflict with national and local planning policies on lighting.

12.309 The impact from the proposed development on surface water run-off and flood risk, both on site and off site, would be insignificant. An assessment of the cumulative effects of the proposed development and other adjacent proposed developments, has identified that the overall cumulative impact, in terms of flood risk, surface water, and surface quality, would be negligible.

12.310 There are no tree, air quality, ground condition, waste and energy concerns raised by this proposal.

12.311 In these circumstances, the proposal is considered acceptable across a range of planning considerations.
Recommendation

The application is recommended for approval subject to the following conditions.

General

1. The development hereby permitted shall be begun before the expiration of three years from the date of this permission.

   Reason: To comply with the provisions of Section 91 of the Town and Country Planning Act 1990 as amended by the Planning and Compulsory Purchase Act 2004.

2. The development hereby approved shall be fully implemented in accordance with the approved plans and specifications, which are referenced as follows:

   5334_L(0)001 Rev J - Location Plan – JM Architects
   5334_L(0)010 Rev R - Proposed Ground Floor Plan - JM Architects
   5334_L(0)011 Rev Q – Proposed First Floor Plan - JM Architects
   5334_L(0)012 Rev P – Proposed Second Floor Plan - JM Architects
   5334_L(0)013 Rev P – Proposed Roof Plan - JM Architects
   5334_L(0)050 Rev K – Proposed Elevations 1 - JM Architects
   5334_L(0)051 Rev F – Proposed Elevations 2 of 2 - JM Architects
   5334_L(0)060 Rev E – Section 1 - JM Architects
   5334_L(0)061 Rev J – Section 2 - JM Architects
   5334_L(0)062 Rev E – Section 3 - JM Architects
   5334_L(0)063 Rev E – Section 4 - JM Architects
   5334_L(0)064 Rev E – Section 5 - JM Architects
   5334_L(0)100 Rev A – Proposed 3D Visuals 01 - JM Architects
   5334_L(0)101 Rev B – Proposed 3D visuals 02 – JM Architects
   L-1283-EXP-002 Rev 03 - Existing Block Plan - Colour Urban Design Limited
   L-1283-PRP-003 Rev 15 – Site Access, Security and Boundary Treatments- Colour Urban Design Limited
   L-1283-PRP-005 Rev06 – Landscape Strategy – Colour Urban Design Limited
   L-1283-PRP-006 Rev 15 – Landscape Masterplan – Whole Site – Colour Urban Design Limited
   L-1283-PRP-007 Rev 16 – Landscape Masterplan Area around the Building - Colour Urban Design Limited
   L-1283-PRP-012 Rev 04 – South Courtyard Site Section - Colour Urban Design Limited
   L-1283-PRP-013 Rev 04 - North Courtyard Site Section - Colour Urban Design Limited
   L-1283-PRP-016 Rev 08 – Landscape Masterplan Areas beneath 1st floor teaching wings- Colour Urban Design Limited
   L-1283-PRP-021 Rev 07 – Site Sections Sheet 3 - Colour Urban Design Limited
   L-1283-PRP-025 Rev 01 – Site Sections Sheet 4 - Colour Urban Design Limited
Materials and Design

3. No development shall commence on site until all the existing buildings on site have been permanently demolished and all of the demolition materials and debris resulting therefrom has been removed from the site.

Reason: In the interests of the character and appearance of the area.

4. No development shall commence on site until details and samples of the materials to be used for the external walls and roofs have been submitted to and approved in writing by the Local Planning Authority. Development shall be carried out in accordance with the approved details.

Reason: In the interests of visual amenity and the character and appearance of the area.

5. No development shall commence on site until details of the external stonework, including type, coursing and bedding of the natural stone, type of pointing and mortar mix, have been submitted to and approved in writing by the Local Planning Authority. The external stonework shall be constructed in accordance with the approved details.

Reason: In the interests of visual amenity and the character and appearance of the area.

6. No development shall commence on site until details of the design, external appearance and decorative finish of all railings, fences, gates, walls, bollards and other means of enclosure have been submitted to and approved in writing by the Local Planning Authority. Development shall be carried out in accordance with the approved details prior to the development being occupied.
Reason: In the interests of visual amenity and the character and appearance of the area.

Landscaping

7. No development shall commence on site until a scheme of hard and soft landscaping has been submitted to and approved in writing by the Local Planning Authority, the details of which shall include:

(a) indications of all existing trees and hedgerows on the land;
(b) details of any to be retained, together with measures for their protection in the course of development;
(c) all species, planting sizes and planting densities, spread of all trees and hedgerows within or overhanging the site, in relation to the proposed buildings, roads, and other works;
(d) finished levels and contours;
(e) means of enclosure;
(f) car park layouts;
(g) other vehicle and pedestrian access and circulation areas;
(h) hard surfacing materials;
(i) structures (e.g. furniture, play equipment, refuse and other storage units, signs, lighting etc);
(j) planting plans;
(k) written specifications (including cultivation and other operations associated with plant and grass establishment);
(l) Schedules of plants (noting species, planting sizes and proposed numbers / densities where appropriate);
(m) Implementation timetables; and,
(n) Measures to encourage provision for nesting birds.

Reason: To ensure a satisfactory landscaped setting for the development and the protection of existing important landscape features.

8. All soft landscaping comprised in the approved details of landscaping shall be carried out in the first planting and seeding season following the first occupation of the buildings or the completion of the development whichever is the sooner; All shrubs, trees and hedge planting shall be maintained free from weeds and shall be protected from damage by vermin and stock. Any trees or plants which, within a period of five years, die, are removed, or become seriously damaged or diseased shall be replaced in the next planting season with others of a similar size and species, unless otherwise agreed in writing by the local planning authority. All hard landscaping shall also be carried out in accordance with the approved details prior to the occupation of any part of the development or in accordance with a programme to be agreed in writing with the Local Planning Authority.

Reason: To ensure a satisfactory landscaped setting for the development and the protection of existing important landscape features.

9. No development shall commence on site until details of all earthworks have been submitted to and approved in writing by the Local Planning Authority. These details shall include the proposed grading and mounding of land areas including the levels and contours to be formed, and the nature of the material, showing the relationship
of proposed mounding to existing vegetation and surrounding landform. Development shall be carried out in accordance with the approved details.

Reason: To ensure a satisfactory landscaped setting for the development.

10. No development shall commence on site until a landscape management plan, including long-term design objectives, management responsibilities and maintenance schedules for all landscape areas has been submitted to and approved in writing by the Local Planning Authority. The landscape management plan shall be carried out as approved in accordance with the approved details.

Reason: To ensure the proper management of the landscaped areas in the interests of visual amenity.

Highways, Access and Parking

11. The development hereby approved shall not be brought into use until the bus turnaround area and car parking spaces have been provided in accordance with the approved plan received on 21 December 2015 (Ref: Dwg No. L-1283-PRP-006). The details of construction, levels and drainage shall be submitted to and approved in writing by the Local Planning Authority prior to the commencement of any development. Thereafter the parking spaces shall not be used for any purpose other than the parking and manoeuvring of vehicles.

Reason: To ensure that adequate off-street parking facilities are provided and remain available for the development so that parking does not take place on the highway to the detriment of highway safety.

12. The development hereby approved shall not be brought into use unless and until the access road leading to the school from Huddersfield Road has been widened to include a footway, minimum 3m wide. The details of construction, levels and drainage shall be submitted to and approved in writing by the Local Planning Authority prior to the commencement of any development. Such work that forms part of the approved scheme shall be retained thereafter.

Reason: To ensure that adequate off-street parking facilities are provided and remain available for the development so that parking does not take place on the highway to the detriment of highway safety.

13. No development shall take place unless and until a detailed scheme of School Safety Zone, including the provision of all appropriate signs, markings and construction on the approach to the site along Huddersfield Road has been submitted to and approved in writing by the Local Planning Authority. Thereafter, such works that form the approved scheme shall be completed before any part of the development is brought into use.

Reason: To facilitate the safe movement of pedestrians, cyclists and other highway users in the vicinity of the development.

14. The development hereby approved shall not commence until a highway improvement to Huddersfield Road outside properties 20-44, including the provision
of footways, carriageway narrowing and associated traffic signal control and parking spaces for the residents at 20-44 Huddersfield Road have been carried out in accordance with details that should be submitted to and approved in writing by the Local Planning Authority. Such works that form part of the approved scheme shall be retained thereafter.

Reason: To facilitate the movement of traffic and all other users of the highway generated by the development in the interests of highway safety.

15. The development hereby approved shall not be brought into use until a car park for use by residents of 29-43 Huddersfield Road and parents of children attending the school and associated parent drop off facilities has been carried out in accordance with details that should be submitted to and approved in writing by the Local Planning Authority. Such works that form part of the approved scheme shall be retained thereafter.

Reason: To facilitate the movement of traffic and all other users of the highway generated by the development in the interests of highway safety.

16. No development shall take place unless and until a highway improvement, including the provision a 2m wide footway, improvements to pedestrian crossing facilities and carriageway widening on Huddersfield Road near its junction with Stanedge Road has been submitted to and approved in writing by the Local Planning Authority. Thereafter, such works that form the approved scheme shall be completed before any part of the development is brought into use.

Reason: To facilitate the movement of traffic and all other users of the highway generated by the development in the interests of highway safety.

17. No development shall take place unless and until a highway improvement, including the improvements to pedestrian crossing facilities and the reprioritisation of the Sugar Lane / Wool Road junction has been submitted to and approved in writing by the Local Planning Authority. Thereafter, such works that form the approved scheme shall be completed before any part of the development is brought into use.

Reason: To facilitate the movement of traffic and all other users of the highway generated by the development in the interests of highway safety.

18. Within the first three months of the operation of the school, monitoring of the Stanedge Road / Huddersfield Road junction should take place and a report detailing the effects of the development on the junction should be submitted to the Local Planning Authority. If it is shown that there is a significant and severe impact on the highway, a highway improvement scheme should be carried out which could include the reprioritisation of the junction, a speed limit review and additional signing and lining. Details of such a scheme shall be submitted to and approved in writing by the Local Planning Authority and all works that form part of that scheme shall be complete within six months of the submission of the report.

Reason: To facilitate the movement of traffic and all users of the highway generated by the development in the interests of highway safety.
19. No development shall take place unless and until a detailed scheme for the provision of adequate secure cycle storage facilities have been submitted to and approved by the Local Planning Authority. Thereafter, the development hereby approved shall not be brought into use unless and until the secure cycle storage facilities have been provided in accordance with the approved scheme and shall always remain available to users of the development.

Reason: To ensure adequate cycle storage facilities are available to users of the development

20. No work on site shall commence unless and until adequate wheel cleaning equipment, the details of which shall be submitted to and approved by the Local Planning Authority, has been installed on the site. Thereafter, all vehicles, which leave the site, and which have travelled over a non-tarmac surface shall use the wheel cleaning equipment provided, before leaving the site, such that all vehicles are in such a state of cleanliness that they do not foul the highway with mud or other material. The equipment shall, for the duration of the construction works, be maintained in good working order and shall not be removed unless agreed by the Local Planning Authority.

Reason: In the interests of highway safety (It is an offence under the Highways Act 1980 to deposit mud on a public highway)

21. Nine months prior to the occupation of the development hereby approved, a detailed School Travel Plan for the whole premises shall be submitted to and approved in writing by the Local Planning Authority (LPA).

Reason: To ensure the development accords with the Council’s sustainable transport policies.

22. No development shall commence unless and until a Parking Management Plan, showing the operation and availability of the school car park during events held by the school involving the attendance of parents or other visitors has been submitted to and approved by the Local Planning Authority. Thereafter all measures that form part of the approved management plan shall be implemented and remain available for users of the school.

Reason: To ensure that adequate off-street parking facilities are provided for the development so that parking does not take place on the highway to the detriment of highway safety.

23. No pedestrian access for pupils shall be gained to or from the school to the canal tow path.

Reason: In the interests of pedestrian safety.

24. The development hereby approved shall not be brought into use until Public Footpath 106 Saddleworth has been improved to include Details of a scheme which shall include a 2.0 metre wide path, storm drain, work to divert water around the bridge abutment and improvements to the steps shall be submitted to and approved
in writing by the Local Planning Authority and works that form part of the approved
scheme shall be retained thereafter.

Reason: To facilitate the movement of pedestrians in the vicinity of the site.

Restrictions

25. The delivery of goods to and from the site shall be limited to the hours of 8am and
    7pm on Mondays to Fridays, 8am and 1pm on Saturdays, and at no time on
    Sundays and Bank or Public Holidays.

Reason: In the interests of the amenity of the area.

26. The floodlight(s) hereby approved shall not be illuminated outside the hours of 8am
    and 10pm from Mondays to Fridays and between 8am and 10pm on Saturdays,
    Sundays and Bank or Public Holidays.

Reason: To minimise the impact of the floodlight(s) and in the interests of the
    amenity of the area.

27. No development shall commence on site until details showing ventilation and
    extraction equipment within the site (including details of its position, appearance
    and details of measures to prevent noise emissions) have been submitted to and
    approved in writing by the Local Planning Authority. The ventilation/extraction
    equipment shall be installed prior to the building/extension hereby approved is first
    occupied and shall thereafter be maintained in accordance with the approved
details.

Reason: In the interests of adjacent resident’s amenity.

28. Prior to the use of any vibro-impact equipment being used on any part of the site in
    connection with the planning permission hereby approved a detailed Method
    Statement for its use shall be submitted to and approved in writing by the Local
    Planning Authority. The use of such equipment shall thereafter be undertaken in
    full accordance with the approved Method Statement.

Reason: In the interests of land stability and protecting the railway assets from the
    development of the site.

Lighting

29. No external lighting shall be installed on site until plans showing the type of light
    appliance, the height and position of fitting, illumination levels and light spillage
    have been submitted to and approved in writing by the Local Planning Authority.
    The lighting approved shall be installed and shall be maintained in accordance with
    the approved details.

Reason: In the interests of the amenity of the area and to minimise unnecessary
    light spillage above and outside the development site.

30. No development shall commence on site until details of external cowls, louvers or
    other shields to be fitted to the floodlights to reduce light pollution have been
    submitted to and approved in writing by the Local Planning Authority. The approved
measures shall be put in place before the floodlights are first brought into use and shall be maintained in accordance with the approved details.

Reason: To minimise light pollution and in the interests of the amenity of the area.

Waste
31. No development shall commence on site until details of the storage of refuse and recycling facilities including details of location, size and means of enclosure have been submitted to and approved in writing by the Local Planning Authority. The development shall not be first brought into use until the approved refuse storage and recycling facilities has been completed and made available for use in accordance with the approved details and it shall be subsequently maintained in accordance with the approved details thereafter.

Reason: In the interests of public health and safety.

Construction Management Statement
32. No development shall commence on site (including any works of demolition), until a Construction Method Statement, which shall include the following:

a) the parking of vehicles of site operatives and visitors;
b) loading and unloading of plant and materials;
c) storage of plant and materials used in constructing the development;
d) the erection and maintenance of security hoarding including decorative displays and facilities for public viewing, where appropriate;
e) wheel washing facilities;
f) measures to control the emission of dust and dirt during construction;
g) a scheme for recycling / disposing of waste resulting from demolition and construction works;
h) measures for the protection of the natural environment; and,
i) hours of construction, including deliveries;

has been submitted to, and approved in writing by, the Local Planning Authority. The approved Statement shall be adhered to throughout the construction period. The development shall not be carried out otherwise than in accordance with the approved construction method statement without the prior written permission of the Local Planning Authority.

Reason: To minimise detrimental effects to the residents amenity and detriment to the natural environment through the risks of pollution and dangers to highway safety, during the construction phase.

Drainage and Flooding
33. No development shall commence on site until a scheme for the discharge of surface water from the site incorporating sustainable drainage details, has been submitted to and approved in writing by the Local Planning Authority. The development shall not be occupied until surface water drainage has been constructed in accordance with the approved scheme.

Reason: To ensure that the development can be adequately drained.
34. No development shall commence on site until details of the works for the disposal of sewerage have been submitted to and approved in writing by the Local Planning Authority. No dwelling shall be first occupied until the approved sewerage details have been fully implemented in accordance with the approved plans.

Reason: To ensure that the proposal is provided with a satisfactory means of drainage.

35. The mitigation measures detailed in the approved Flood Risk Assessment (FRA) (Interserve on behalf of the Secretary of State for Education July 2015) shall be carried out in full prior to occupation of the development.

Reason: In the interests of flood prevention.

Contamination

36. No development shall commence unless and until a site investigation and assessment in relation to the landfill gas risk has been carried out and the consultant's report and recommendations have been submitted to and approved in writing by the Local Planning Authority. Written approval from the Local Planning Authority will be required for any necessary programmed remedial measures and, on receipt of a satisfactory completion report, to discharge the condition.

Reason - In order to protect public safety, because the site is located within 250m of a former landfill site.

37. No development shall commence unless and until a site investigation and assessment to identify the extent of land contamination has been carried out and the consultant's report and recommendations have been submitted to and approved in writing by the Local Planning Authority. Written approval from the Local Planning Authority will be required for any necessary programmed remedial measures and, on receipt of a satisfactory completion report, to discharge the condition.

Reason - In order to protect public safety and the environment.

38. No development approved by this planning permission shall take place until a remediation strategy that includes the following components to deal with the risks associated with contamination of the site shall each be submitted to and approved, in writing, by the local planning authority:

i) A preliminary risk assessment which has identified:

   - all previous uses;
   - potential contaminants associated with those uses;
   - a conceptual model of the site indicating sources, pathways and receptors;
   - potentially unacceptable risks arising from contamination at the site.

ii) A site investigation scheme, based on (i) to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off site.
iii) The results of the site investigation and the detailed risk assessment referred to in (ii) and, based on these, an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken.

iv) A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy in (3) are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action.

Any changes to these components require the express written consent of the local planning authority. The scheme shall be implemented as approved.

Reason: To protect the environment and comply with the National Planning Policy Framework.

39. No occupation shall take place until a verification report demonstrating completion of works set out in the approved remediation strategy and the effectiveness of the remediation shall be submitted to and approved, in writing, by the local planning authority. The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met. It shall also include any plan (a "long-term monitoring and maintenance plan") for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action, as identified in the verification plan. The long-term monitoring and maintenance plan shall be implemented as approved.

Reason: To protect the environment and comply with the National Planning Policy Framework.

40. If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the local planning authority) shall be carried out until the developer has submitted a remediation strategy to the local planning authority detailing how this unsuspected contamination shall be dealt with and obtained written approval from the local planning authority. The remediation strategy shall be implemented as approved.

Reason: To protect the water environment and comply with the National Planning Policy Framework.

41. No infiltration of surface water drainage into the ground on land affected by contamination is permitted other than with the express written consent of the local planning authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to controlled waters. The development shall be carried out in accordance with the approval details.

Reason: To protect the water environment and comply with the National Planning Policy Framework.
42. The mitigation measures detailed in the Ecological Assessment [Chapter 6 of the ES] shall be carried out in full prior to the first occupation of the development.

Reason: To mitigate against the loss of existing biodiversity and nature habitats.

43. Prior to the commencement of development a comprehensive Method Statement for protecting bats during the proposed works shall be submitted to and approved in writing by the Local Planning Authority. The Method Statement shall provide full details of measures to be taken to avoid any possible disturbance to bats during the demolition and construction of the proposed school. The development shall thereafter be carried out strictly in accordance with the approved Method Statement.

Reason: To protect bats from the proposed development.

44. Notwithstanding the plans hereby approved no vegetation clearance or groundworks shall take place in the months of March, April, May, June and July since this is the optimum period for bird nesting.

Reason: To minimise the impact of the proposed development on breeding birds.

Archaeology

45. Prior to the commencement of development the applicant or their appointed agent shall have secured the implementation of a programme of archaeological works. The works are to be undertaken in accordance with a Written Scheme of Investigation (WSI) submitted to and approved in writing by Oldham Planning Authority. The WSI shall cover the following:

a) A phased programme and methodology of investigation and recording to include;
   - Archaeological strip, map and targeted excavation of Wrigley’s Mill site;
   - Targeted archaeological investigation of below-ground remains relating to Dobcross Loom Works;

b) A programme for post investigation assessment to include:
   - Analysis of the site investigation records and finds;
   - Production of a final report on the significance of the archaeological and historical interest represented.

c) Deposition of the final report with the Greater Manchester Historic Environmental;

d) Record and publication of the results in a manner commensurate with their significance;

e) Provision of information panels to commemorate the site’s history and archaeology; and,

f) Provision for archive deposition of the report and records of the site investigation.

Reason: In accordance with the NPPF Section 12, Paragraph 141 - to record and advance understanding of heritage assets impacted on by the development and to make information about the archaeological heritage interest publically accessible.

46. No development shall commence until:
a) A written programme of archaeological investigation, which should include on-site work and off-site work such as the analysis, publishing and archiving of the results, has been submitted to and approved by the Local Planning Authority; and,
b) The approved programme of archaeological work has been carried out in accordance with the approved details.

Reason: To enable the recording of any matters of archaeological interest.

47. No development shall commence on site until a scheme for allowing access at all reasonable times to any archaeologist nominated by the Local Planning Authority, has been submitted to and approved by the Local Planning Authority. Thereafter, the nominated archaeologist shall be allowed to observe the excavations and to record items of interest and finds, in accordance with the approved scheme.

Reason: To safeguard the site of archaeological interest.

Crime Impact

48. The proposed development should be constructed in accordance with the recommendations contained within section 3.3 of the submitted Crime Impact Statement (dated 14/05/2015 – URN: 2015/0295/CIS/01 Version A) and reflect the physical security specification listed within section 4 of the submitted Crime Impact Statement.

Reason: To ensure that the potential for crime is minimised and the site is secure.

Canal Protection

49. An inspection of the retaining structures and embankments following the demolition works, prior to the occupation of the site, shall be carried out to ascertain the extent to which improvements or strengthening are necessary to cope with the impact of the new school and recommendations submitted to and approved in writing by the Local Planning Authority. Written approval from the Local Planning Authority will be required for any necessary programmed remedial measures and, on receipt of a satisfactory completion report, to discharge the condition.

Reason: In order to protect public safety and the environment.

50. The protection measures detailed in the Construction Phase Plan and Canal Specific Method Statement shall be carried out in full prior to the demolition.

Reason: In order to protect the canal, public safety and the environment.

Diggle Brook Buffer Zone

51. No development shall take place until a scheme for the provision and management of a buffer zone no narrower than that which currently exists alongside the Diggle Brook shall be submitted to and agreed in writing by the local planning authority.
Thereafter the development shall be carried out in accordance with the approved scheme and any subsequent amendments shall be agreed in writing with the local planning authority. The buffer zone scheme shall be free from built development including lighting, parking spaces and formal landscaping; and could form a vital part of green infrastructure provision.

The schemes shall include:

- plans showing the extent and layout of the buffer zone;
- details of any proposed planting scheme (for example, native species);
- details demonstrating how the buffer zone will be protected during development and managed/maintained over the longer term including adequate financial provision and named body responsible for management plus production of detailed management plan;
- details of any proposed footpaths, fencing, lighting etc.

Reason: Development that encroaches on Diggle Brook has a potentially severe impact on its ecological value. This watercourse has a broadly natural character which offers a good wildlife corridor. Land alongside watercourses is particularly valuable for wildlife and it is essential this is protected.

The Brook has the potential to support white-clawed crayfish, and whilst the survey did not find evidence of this species the survey effort was not intensive enough to pick up small populations. We would normally have turned 200 stones per reach rather than 50. White-clawed crayfish are sensitive to siltation and changes in water quality so the retention of a vegetated buffer zone during and after construction would be incredibly valuable.

This condition is supported by the National Planning Policy Framework (NPPF), paragraph 109 which recognises that the planning system should aim to conserve and enhance the natural and local environment by minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government’s commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures. The Natural Environment and Rural Communities Act which requires Local Authorities to have regard to nature conservation and article 10 of the Habitats Directive which stresses the importance of natural networks of linked corridors to allow movement of species between suitable habitats, and promote the expansion of biodiversity.

Paragraph 118 of the NPPF also states that opportunities to incorporate biodiversity in and around developments should be encouraged.

Energy

No development shall take place unless and until a detailed energy statement has been submitted to and agreed in writing by the Local Planning Authority. The statement shall set out how the development will accord with the Energy Infrastructure Target Framework set out in Policy 18 of the Oldham Local Development Framework Joint Core Strategy and Development Management

- a target area has been determined; and
• how the development will meet this target.

The development shall be carried out in accordance with the approved scheme and phasing arrangements and retained as operational at all times thereafter.

Reason: To ensure that the development accords with the provisions of Policy 18 of the Oldham LDF Joint Core Strategy and Development Management Policies DPD.
PLANNING CONSIDERATIONS

APPLICATION D (PA/337930/15) - Planning application for an off-site parental drop off facility, two residents’ parking areas, highways alterations and works to the access road to the former factory site

Background

13.1 The application site is largely within the Green Belt as indicated on the LDF Proposals Map.

13.2 However, the part of the site proposed for footway widening along Huddersfield Road and along the access road to Shaw Pallet Works is within a Business and Industrial Allocation.

13.3 The proposed development must be determined against local and national planning policy, including the relevant policies of the Core Strategy and Joint Development Plan Document and the National Planning Policy Framework (NPPF), and any other material planning considerations.

13.4 In determining this application, the main issues to consider are:

- Principle of development, including Green Belt;
- Landscape and Visual Amenity;
- Design;
- Crime Prevention;
- Heritage and Archaeology;
- Transport, Access, and Highway Safety;
- Impact on Amenity;
- Air Quality;
- Ecology;
- Lighting; and,
- Flood Risk and Drainage.

Principle of Development, including Green Belt

13.5 Policy 1 ‘Climate Change and Sustainable Development’ of the Joint DPD requires that development should adapt to and mitigate against climate change and address the low carbon agenda, contribute towards sustainable development, help create a sense of place, improve the quality of life for residents and visitors and enhance the borough’s image.

13.6 The development will provide for off-street parking and will also facilitate the safer and easier movement of transport of various forms (cars, buses, bikes) making the locality less congested, helping to create a sense of place and improving the quality of life for residents and visitors.

13.7 Policy 5 ‘Promoting Accessibility and Sustainable Transport Choices’ guides development to the most accessible locations, and promotes and encouraged the
use of public transport, Metrolink, walking and cycling. All development, particularly that which is likely to generate a large number of journeys, must be accessible by a choice of transport modes and must not impede the strategic and local road networks or compromise pedestrian or highway safety.

13.8 In this regard the proposed development is located in a sustainable location on the edge of the village that is served by a bus route. The provision of the car park will facilitate a safer and less congested Huddersfield Road that will be of benefit to all forms of road based transport, including buses, pedestrians and cyclists.

**Business and Industrial Allocation**

13.9 Under these proposals:

- a narrow strip of the land along Huddersfield Road between the proposed drop-off facility and the access road to the school; and,
- together with a strip of land alongside the existing access road,

are proposed to be used for the provision of new / widened footways. These strips of land are within land allocated for Business and Industry (B1.1.28) under saved UDP Policy B1.1 ‘Business and Industrial Allocations’.

13.10 Whilst the proposed highways improvement works do not relate to business and industrial use - and hence do not strictly comply with the requirements of saved Policy B1.1 - it is not considered that the loss of these relatively narrow strips of the allocated site would prejudice the overall potential of the site to be used for business and industrial uses. Indeed, the proposals may have a beneficial impact on the business and industrial allocation in that vehicular and pedestrian access to the site would be improved on the current arrangements. As such, the works are considered acceptable in this context.

**Green Belt**

13.11 There is an identified need for the drop-off facility / car park to be located close to the school and for replacement parking for local residents close to their properties.

13.12 The site of these proposed highway proposals are within the Green Belt in land that is currently used as open grazing land, although it is bounded by a stone wall to the Huddersfield Road side.

13.13 This site forms a gap between the block of residential properties comprising of 20-44 Huddersfield Road and the allocated employment site. The loss of this relatively small section of land would not impact significantly in terms of preventing unrestricted urban sprawl. The site directly abuts the built-up area of Diggle and makes a very limited contribution to the purpose of preventing neighbouring settlements merging into one another.

13.14 The proposed drop off facility and car park will encroach into what is currently an open field bounded by walling. However, the site is relatively small and the countryside will not be encroached upon to any significant degree. The openness is already compromised to some extent by the adjacent highway and nearby built
form, and its character is consequently affected. It is not considered that this modest site serves to protect the setting and special character of historic towns to any significant extent.

13.15 Although the drop off facility / car park is ‘inappropriate’ development in the Green Belt, it is considered that the harm to the Green Belt is outweighed by the very special circumstances that exist.

13.16 The proposed development supports the linked application for the proposed new school, which, as stated elsewhere, would enable increased access to the Green Belt and opportunities for outdoor sport within it. The proposals will deliver highway and access improvements in association with the school. In addition, there are local economic benefits associated with the creation of additional jobs during construction and subsequent operation of the proposed school.

13.17 The cumulative impact on the Green Belt arising from the proposed sports pitches and the proposed drop off facility / car park has been considered. Overall, the Green Belt would appear less natural in character, but it is not considered that the proposals would result in its urbanisation in the way that developing the sites for other uses potentially would. Although the two areas of the site are separated by a field and Diggle Brook, the two areas are seen in the same view. However, given existing adjacent built form and the physical separation of the two areas, it is not considered that the proposals would result in significantly increased urban sprawl, the merging of settlements, encroachment of countryside, or significant impact on the character of historic towns or villages.

13.18 In summary, it is considered that the application complies with Policy 22 of the Joint DPD and Section 9 of the NPPF since there are very special circumstances that outweigh the limited impact of openness and visual amenity the scheme has on the Green Belt. The principle of this development is therefore considered acceptable for the reasons given above.

Landscape and Visual Amenity

13.19 The proposals for landscaping are set out in submitted drawing no. 1068035-100-B-14 Rev A. Low shrub planting is proposed along with a grassed embankment, some timber fencing and a grasscrete car parking area. Overall, the applicant argues that the proposal would be in keeping with the area and would support ongoing biodiversity. There are no trees within the area of the site due to be cleared. Trees along the northern and southern boundary are to be retained.

13.20 Policies 6 ‘Green Infrastructure’ and 9 ‘Local Environment’ are particularly relevant to the assessment of the landscape and visual impact of the highways works.

13.21 Landscape and visual impact have been assessed following guidelines set by the Landscape Institute. Baseline information was collected from a desk based study followed by a site visit.

13.22 From the information collected landscape features of the site were identified, alongside information from landscape character studies and relevant landscape planning policies. Information on the visual aspects of the site was collected through
visiting a number of viewpoints within the study area to gain an understanding of the visual baseline of the site and study area. The Landscape and Visual Impact Assessment identifies the existing mill buildings occupying the northern section of the site as a landscape feature of the area.

13.23 In the surrounding landscape, panoramic views are available towards the site, set within the wider context of the Diggle valley. The Peak District National Park lies to the east but is some 840m away from the factory site and slightly further from the highways works.

13.24 The assessment identified that there would be a variety of effects on the landscape features, landscape character and landscape designations within the study area. Of these effects, changes during demolition and construction are anticipated to be the main effects on the landscape elements of the site.

13.25 Views of the highways development are likely to be available from the surrounding viewpoints assessed and particularly from Huddersfield Road. Once the demolition and construction activities have been completed, the effects are likely to reduce, with just the drop-off area, residents parking areas, lighting and new fences being viewed as new features within views. These new features, although resulting in some adverse change, are not anticipated to result in significant effects at the majority of the viewpoints assessed, although clearly there will be a significant impact from Huddersfield Road itself.

13.26 Officers views are that the impact on landscape and visual amenity resulting from the highways works will not be significantly detrimental enough to sustain a reason for refusal and that the need for the works to ensure highways safety and the operation of the new school, outweigh the limited landscape and visual impact the proposed works will have on the adjacent area. Consequently, whilst there is clearly some detrimental impact of the new highways works on the openness and visual amenity of the Green Belt in particular, it is considered that the proposed works are necessary and limited enough to comply with the requirements of Policies 6 and 9 of the Joint DPD.

Design

13.27 Policy 20 ‘Design’ of the Local Plan recognises the contribution that high quality design can make to regeneration and sustainable development adding that high quality design brings economic, social and environmental benefits, adding to quality of life, attracting new business and investments and reinforcing civic pride. It adds that high quality design is as much about the way buildings and environments function as with their appearance.

13.28 The development largely comprises of the resident’s car parking / drop-off areas for the proposed school but care has been taken to minimise visual intrusion through careful use of design. This in turn will limit the impact on the openness and visual amenity in the Green Belt. Officers consider that the proposal respects the local character, considers safety and inclusion, ease of movement, legibility and is properly designed for future maintenance as well as providing properly designed parking and drop-off spaces.
13.29 However, the proposed loss of the stone walls, because of the widening of the highway and access road, is regarded as unfortunate as it would result in the replacement of the existing traditional stone walls with new timber and post fences. The applicant’s rationale for doing this is for cost purposes. It is accepted, because of the change of levels and subsequent need for a retaining wall, that it would significantly more expense to rebuild it than normal. However, Members may consider that this loss is unacceptable and that, whilst moving the stone walls is acceptable to allow the widening of the footpaths and visibility splays, there is no design reason why they could not be replaced. Moreover, in view of the cost of the new school development, Members may have sympathy that funds should be found to carry out the rebuilding works in the school development.

13.30 Overall, it is considered that the proposed works are acceptable in design terms. Officers take the view that, on balance, the replacement timber and post fences are acceptable and that an alternative arrangement would eat into the new schools construction budget. However, we could prepare an amending condition requiring that the stone walls on the widened footpath to the school and access route into the school to be replaced if required by Members.

Crime Prevention

13.31 A Crime Impact Assessment has been prepared in respect of this planning application. The layout of the parking facilities and drop-off zone are designed not to inherently increase risk of crime.

13.32 The open design for parking and drop off is intended to maximise the benefit from natural surveillance and the overlooking from properties on Huddersfield Road thereby having regard to staff, pupil and parent safety.

Heritage and Archaeology

13.33 There are no heritage assets within or adjacent to the application site although the Dobcross office works is listed at Grade II and lies north east of the site. It is anticipated that archaeological issues can be addressed through appropriate planning conditions.

Transport, Access, and Highway Safety

13.34 This application seeks to address:

- the highway issues which currently exist in Diggle;
- those which will change as a result of the potential introduction of a Secondary School in this location; and,
- issues which will allow the continued safe operation of the highway.

13.35 As discussed in the highways consideration of the school application (PA/337301/15), the existing highway conditions would not allow users of the development to access the site safely. Therefore, a number of mitigation measures have been identified, the majority of which will be dealt with by condition.
13.36 Huddersfield Road will provide the main route for the majority of users of the proposed school. The assessment of current highway conditions, informed by transportation work carried out by the Council and the Transport Assessment submitted as part of PA/337301/15 (The School application), identified that mitigation works are required to safely accommodate the level and patterns of travel expected to the site.

13.37 The proposals included in this application comprise of:

- Improvements to the access road leading to the school site from Huddersfield Road;
- Widening of the footways along Huddersfield Road;
- Provision of Traffic Signals on Huddersfield Road; and,
- Provision of Residents car parking and a parental car park and drop-off facility on Huddersfield Road.

13.38 The details of these are outlined below.

**Access Road**

13.39 The proposal includes improvements to the existing access road which leads from Huddersfield Road into the site. The carriageway will now accommodate two-way traffic, with a one-way system operating across the bridge across the brook where it reduces to one lane running width. A 3m wide footway will be provided along the length of the access road. The access road is intended for use by staff, visitors to the school and service vehicles. It leads to the bus parking and turning facilities.

13.40 Parents will be discouraged from using the access road on a daily basis unless there is a specific need, but they will be allowed access for parking on the bus turn-around area during events held by the school. The management of this is required by a condition attached to PA/337301/15 (The School).

13.41 The access road has served the industrial premises for many years and has operated safely. There is already adequate visibility, but this proposal will improve that further by the provision of pedestrian crossing points.

**Footway Widening**

13.42 A major concern was that pupils walking to school from Stanedge Road / Wool Road along Huddersfield Road would be unable to do so safely due to the existing sub-standard footway provision.

13.43 It was considered that the absolute minimum allowable width on the approaches to the school should be 2m, but only if other measures were also undertaken to ensure that this would be safe.
13.44 The current footways along Huddersfield Road vary in width between 0.9 and 1.5m. In some places, there is no footway provision.

13.45 Currently cars belonging to the terraced properties on Huddersfield Road park on the road itself. This causes:

- Congestion;
- Reduces the carriageway width;
- Slows traffic down; and,
- Leads to an informal give way system taking place over a relatively long length. This sometimes gives rise to conflict between drivers.

13.46 The provision of the new footways will displace this on-street parking and further reduce the carriageway width.

13.47 Dedicated parking spaces will be provided at the rear of the properties for the residents of 20-44 Huddersfield Road. Off-street parking will also be made available for the residents of 29-43 Huddersfield Road and others on the road.

13.48 The introduction of the footways will result in a carriageway width of 3m, which will effectively allow one-way traffic flow. In order to ensure the safe operation of this, the introduction of traffic signals has been proposed.

**Traffic Signals**

13.49 The traffic signals will allow traffic to travel safely in one direction at a time. This will improve highway safety by regularising what already happens on a daily basis, and will further increase highway safety by slowing traffic down on the approaches. This will benefit all users of the highway at all times, not only the users of the proposed school.

13.50 In order for the traffic signals to operate effectively, other measures will be required, such as the introduction of waiting restrictions, relocation of the bus stop and additional signs and lining.

13.51 The timing of the traffic signals will be set so that the volume of traffic passing through the signals in the northbound direction is restricted to the available space between the southbound stop line and the access to the car park. This should ensure that the southbound traffic is not blocked.

13.52 The signals will incorporate a network of detector loops in the carriageway surfacing which will enable the signal controller to assess demand and will work in conjunction with MOVA software which will make traffic control more efficient and will enable the reduction of traffic delays.

13.53 Traffic modelling was undertaken by TfGM which ensured that the traffic signals would operate effectively with the other measures proposed. For consistency, the work was undertaken using the figures supplied by WYG in their Transport Assessment for the concurrent school application (PA/337301/15).
Initially, it was shown that extensive queuing would take place and that traffic could potentially queue back from Huddersfield Road to block the Stanedge Road / Wool Road junction. As a result, the scheme was modified to ensure that traffic waiting to access the car park did not queue back into the single lane section of carriageway and the internal layout of the car park was modified to include the express drop-off laybys.

The assumptions made by WYG assumed that all those who drive to the existing site will continue to drive to the new site, which showed an over estimate of parental demand for the parking and drop-off facility.

Given that pedestrian access to the site will be safer and more attractive for children to use, it has now been assumed that parents are more likely to allow their children to walk along Huddersfield Road from Stanedge Road / Wool Road rather than deliver them as closely as possible.

There are other available areas for them to drop-off including the existing bus turnaround on Wool Road and the laybys near the Navigation Inn, Stanedge Road or Sugar Lane.

The subsequent modelling undertaken by TfGM showed that queuing will still occur during the concentrated periods of time when demand will be at its highest, but that it should not have a detrimental impact on highway safety.

Additional measures have been identified that will mitigate the effect of unexpected queuing. These include:

- the provision of additional road markings;
- changes to the priority junction at Huddersfield Road / Stanedge Road / Wool Road; and,
- the monitoring and alteration of the timing of the traffic signals to ensure they operate at optimum capacity.

Officers have attached two conditions that will deal with this.

The capacity at the Stanedge Road / Huddersfield Road junction and at the junction of the car park and Huddersfield Road will only be revealed once drivers have been using it for a period of time. The Council’s Highways Engineer has suggested some mitigation measures that will realistically have an effect on the operation of the network from the outset – including additional road markings at the entrance and exit to the car park. However, Officers consider that there should be a short period of time when the situation is monitored so that the correct action can be taken once the real effects of the implementation of the scheme are known.

Officers have attached a condition for monitoring to be carried out on the junctions from the opening date of the school, and for a report to be produced so that mitigation measures can be introduced if necessary.
Overall, the introduction of the traffic signals on Huddersfield Road will have a beneficial effect on highway safety for all other users of the highway at most times during the day without causing further delay.

A representation has been received from TfGM in which they raise the following points:

- The maximum queuing could queue back during the peak periods and extend onto the Stanedge Road / Huddersfield Road junction;
- The possibility that vehicles waiting to turn right into the car park could block the car park egress;
- That vulnerable road users such as cyclists and horse riders could get caught within the single lane section of the shuttle run;
- That there is potential for significant delays to emergency vehicles attempting to use this section of Huddersfield Road; and,
- That the mitigation measures outlined in the Traffic Statement:
  - road markings at the car park access points;
  - an additional phase to control traffic exiting the car park; and,
  - altering the timing of the traffic signals

would likely have an impact on the efficiency of the junction.

In response, Officers acknowledge that, for very concentrated periods of time, the junction will not operate at its maximum efficiency and that there will be congestion on Huddersfield Road. However, it is unlikely that vehicles waiting to turn right into the car park will block egress from the car park, as the majority of users of the car park are expected to turn left out of the car park onto Huddersfield Road.

Cyclists and horse riders may be caught up in the single lane of the shuttle run - this length of carriageway is straight and drivers will have good visibility of them. There will also be adequate room to accommodate both sets of users on the highway should the situation arise.

Emergency vehicles attempting to use this section of Huddersfield Road should only experience delay during peak periods. This could potentially happen at every set of traffic lights. However, if this does occur, there is adequate room on the adopted highway for cars to pull over and the emergency vehicle to pass.

There is a possibility that the mitigation measures proposed could have an impact on the efficient operation of the junction.

In conclusion, the situations described by TfGM will only possibly occur during peak periods when demand is at its highest. Most of the points raised can be overcome, and the main consideration must be highway safety. Nevertheless, Officers consider that the mitigation measures if carried out with the wider highway improvement work outlined in the separate application for the school (PA/337301/15) will not have a detrimental impact on highway safety.
13.70 Additional measures have been identified that will mitigate the effect of unexpected queuing. These include:

- the provision of additional road markings;
- changes to the priority junction at Huddersfield Road / Stanedge Road / Wool Road; and,
- the monitoring and alteration of the timing of the traffic signals to ensure they operate at optimum capacity.

**Car Park and Parent Drop-off Facility**

13.71 A car park and parent drop-off facility will be provided off Huddersfield Road.

13.72 20 spaces will be provided for use by residents of 29-43 Huddersfield Road and others nearby. They currently rely on on-street parking where demand is already high. The residents of 20-44 Huddersfield Road will receive 2 dedicated spaces each which will be accessed through the car park. They also currently rely on on-street parking.

13.73 Overall, the provision of adequate car parking for existing residents and moving their vehicles off Huddersfield Road is welcomed as it removes potential obstruction of the public highway along Huddersfield Road.

13.74 15 spaces will be provided for parents delivering or collecting their children from the proposed school, and 10 express parking bays will be provided for parents wishing to drop off or collect their children without waiting.

13.75 There are separate entry and exit points to the car parks and drop-off areas and the facility will be adopted by the Council and will therefore remain the responsibility of the Council.

13.76 Footpaths and crossing facilities will be provided within the car park which will allow children to travel safely to and from their cars to and from school.

13.77 Parents will have the opportunity to travel closely to the school to allow their children to continue safely on foot as possible. The ability for them to park and turn safely within the car park will discourage them from using Huddersfield Road or the surrounding residential areas for parking, dropping off, turning or picking up, which is what happens at most other sites near schools in the Borough – including the current Uppermill School - causing problems and nuisance for local residents.

13.78 The Transport Assessment carried out by WYG and the Transport Statement carried out by Mouchel / Unity Partnership has identified that queuing is likely to occur at the traffic lights and through the car park during peak periods which could potentially result in gridlock.

13.79 This has already been discussed. In the short term, the introduction of ‘Keep Clear’ road markings and additional signs will remind drivers of the locations of the entrance and exit points. If drivers queuing on Huddersfield Road are courteous and
allow drivers using the car park to enter the traffic flow out of the car park onto Huddersfield Road, the congestion problems will be less severe.

13.80 The condition that Officers have attached in respect of monitoring the operation of the car park exit and Huddersfield Road will ensure that mitigation measures are implemented in the future if the perceived issue becomes a problem.

**Conclusion**

13.81 The measures proposed have been developed to enable children and staff to travel to the proposed school site safely. Officers are confident that the proposals will allow this but only with the implementation of other measures. We have discussed the other measures in more detail in the assessment of the school application (PA/337301/15) because the need for them arises as a direct result of the provision of a school and not as a direct result of the measures proposed with this application for highway works.

13.82 Officers acknowledge that there will be delays and congestion in the area during concentrated periods of time during the peak period. However, we believe this can be managed and that further mitigation measures can be taken if required.

13.83 The implementation of the highway works proposed will result in a safer environment for all users of the highway. We therefore recommend that this application is approved on highway safety grounds, subject to highway conditions being attached.

**Impact on Amenity**

13.84 Policy 9 of the Joint DPD states that development should not cause significant harm to the amenity of the occupants and future occupants of the development or to existing and future neighbouring occupants or users through impacts on privacy, safety and security, noise, pollution, the visual appearance of an area, access daylight or other nuisances.

**Privacy**

13.85 There will be no new buildings or structures in close proximity to the existing residential development and no adverse impacts will accrue in respect of privacy to neighbouring properties. There will be some increased activity to the frontage and rear of properties on Huddersfield Road, but this will not be of a degree to be harmful or sustain a reason for refusal.

**Crime and Security**

13.86 Subject to conditions and adequate lighting being provided, the works in question are expected to cause no issues in this respect.

**Noise**

13.87 The nearest properties on Huddersfield Road are approximately 5-10m from the boundary of the proposed car park. This may give potential for some noise and disturbance to these properties. However, given the modest number of spaces and
the likely times of use, it is not considered that the impacts would be significantly detrimental.

13.88 The submitted noise assessment with the main application for the new school concludes that there will be no substantial adverse impact on residential amenity or other receptors in respect of noise and vibration during construction or once the school is operational. The modest additional area of parking proposed would not alter this conclusion.

**Pollution**

13.89 Emissions from idling vehicles at the proposed drop-off point and car parks have been considered but are deemed not significant based on the scale of development.

**Light and Outlook**

13.90 The nearest properties to the development are those to the south-west and west on Huddersfield Road. It is not considered that the development would give rise to any significant impact on light or outlook to these properties. There will be no structures, other than lighting / street works and modest timber rail fencing as part of the development. As such, there will be very impact on sunlight or daylight given the separation distances involved.

**Conclusion**

13.91 Overall, the proposed development is considered to have no significant amenity problems that would sustain a reason for refusal. As such, the scheme is considered to be compliant with Policy 9 of the Local Plan.

**Air Quality**

13.92 The submitted air quality assessment provides an assessment of the potential effects and their significance of the development during the demolition, construction and operational phases. The effects have been considered for relevant sensitive residential and ecological receptors.

13.93 The effects during demolition and construction phases include fugitive dust emissions from site activities, such as earthworks, construction and track out. The impacts during the operational phase take into account exhaust emissions from additional road traffic generated due to the proposed development.

13.94 During the demolition and construction phase it is anticipated that dust sensitive receptors will potentially experience increased levels of dust and particulate matter. However, these are predicted to be short term and temporary impacts. Throughout this period, the potential impacts from construction on air quality will be managed through site specific mitigation measures outlined within the assessment. With these mitigation measures in place, the effects from the demolition / construction phase are predicted to be not significant.

13.95 The detailed air dispersion modelling determined that the National Air Quality Objectives are not exceeded at any of the modelled receptor locations in any of the modelled scenarios, baseline or future years.
13.96 Changes in emissions to air because of additional traffic due to the development, during the operational phase are predicted to be not significant at all the modelled sensitive receptor locations.

13.97 Although the impacts during the operational phase are adjudged to be not significant, recommendations are provided for mitigation measures that would assist to further improve air quality.

13.98 It is concluded that the proposals are acceptable from an air quality perspective and that the proposed development thereby complies with the relevant part of Policy 9 of the Joint DPD.

**Ecology**

13.99 An Ecological Mitigation and Management Plan (EMMP) will be produced for the main school development, which will detail the management and mitigation of habitats and species at that site. The plan will include full details of all the necessary ecological mitigation measures that must be implemented during each phase of the development. It is anticipated that the EMMP can equally be applied to this site if required and can be secured by planning condition requiring its submission prior to commencement of development.

13.100 With regard to the area of grassland affected by the proposed new car park drop off facility and residents’ parking area, GMEU consider that it is not of substantive value and they have no objections on nature conservation grounds to the proposals for this area. GMEU advise that a detailed landscaping scheme for this part of the site should be required by way of condition.

13.101 There are no trees within the area of the highways works site due to be cleared. Trees along the northern and southern boundary are to be retained. Additional tree planting is proposed.

13.102 Overall, the scheme is considered in line with Policy 21 –‘Protecting Natural Environmental Assets’ that seeks to ensure that new development and growth pressures are balanced by protecting, conserving and enhancing local natural environments, green infrastructure, biodiversity, geodiversity and landscapes to ensure a high quality of life is sustained and relevant other legislation and guidance.

**Lighting**

13.103 The operational lighting for the car park and drop-off area is based on the use of Compound Path Optics (CPO) light source and minimal column heights. The lighting design shall be based on current lighting standards and guidance for minimising the effect of obtrusive light in line with ILP Guidance Notes for the reduction of obtrusive light (GN01) and requirements of the Oldham & Rochdale Street Lighting PFI Output Specification for the future adoption of the proposed apparatus.

13.104 Artificial lighting is to be installed at the ingress and egress road and on the proposed car park. The section of highway adjacent to the proposed site (Huddersfield Road) is currently lit and subject to assessment in accordance with
Oldham & Rochdale Street Lighting PFI. Specification requirements take into consideration the new road layout and any traffic calming measures to be proposed. Consultations will be undertaken as necessary during the detailed design process. Nevertheless, overall the lighting scheme proposed appears to be both practical and sympathetic to its surroundings.

**Flood Risk and Drainage**

13.105 The site is located in Flood Zone 1 and is at low risk of flooding.

13.106 A surface water drainage system is to be provided to serve the site. For the new parental drop-off and resident’s car park, the peak discharge rate has been set at 5 l/s and on site attenuation provided by means of an open attenuation pond with the surface water discharge drained by a new sewer laid to Diggle Brook. The attenuation pond has been sized to store surface water run-off from the 1 in 100 year + 20% climate change storm event.

13.107 Associated with the proposed car park, it is proposed to extend the existing 600mm diameter United Utilities surface water sewer which discharges within the footprint of the car park to a point downhill of the car park boundary.

13.108 The improved access road into the site is to be drained by a gravity surface water drainage system discharging to a below ground cellular storage tank which will discharge at a peak rate of 5 l/s into Diggle Brook. The below ground attenuation tank has been sized to store surface water run-off from the 1 in 100 year + 20% climate change storm event.

13.109 It should also be noted that within the south-western part of the new parental drop-off and residents’ car park, the parking areas are to be surfaced with a permeable material (e.g. grasscrete) to allow the run-off to either drain into the underlying ground or overland towards Diggle Brook reflecting the current drainage regime in the area.

13.110 The proposed attenuation pond will utilise suitable aquatic planting within the base of the attenuation pond to minimise any potential pollution of Diggle Brook.

13.111 The proposed development complies with the requirements of Policy 19 of the Joint DPD.

**Conclusion**

13.112 In summary, the highways works, new drop-off area and resident’s car parks are all considered acceptable, subject to conditions. Paragraph 32 of the NPPF states that development should only be refused on transport grounds where the residual cumulative impacts of development are “severe”. Despite the fact that officers acknowledge that there will be some minor delays and congestion in the area during very concentrated periods of time, this can be managed and mitigated effectively.

13.113 The very minor loss of business and employment land will not prejudice the potential use of the adjacent site for these purposes.
13.114 There are very special circumstances that outweigh the limited impact of the proposal would have on the visual amenity and openness of the Green Belt.

13.115 The proposal’s limited impact on landscape and visual amenity would not sustain a reason for refusal when weighed against the positives of the works to ensure highway safety and the operation of the new school.

13.116 No concerns are raised on design grounds, barring the loss of the existing stone walls to Huddersfield Road and to the access road to the factory site. On balance, this is considered acceptable because of the site levels and subsequent cost of rebuilding them.

13.117 There are no heritage or crime prevention issues raised and air quality, ecology and lighting issues are all adequately dealt with.

13.118 Finally, there are no amenity issues raised by the application in terms of loss of privacy, noises, pollution and light grounds.

13.119 In view of the above, the application is recommended for approval by Officers.

**Recommendation**

The application is recommended for approval, subject to the following conditions:

1. The development hereby permitted shall be begun before the expiration of three years from the date of this permission.

   **Reason:** To comply with the provisions of Section 91 of the Town and Country Planning Act 1990 as amended by the Planning and Compulsory Purchase Act 2004.

2. The development hereby approved shall be fully implemented in accordance with the approved plans and specifications, which are referenced as follows:

   1068035-100-B-01 rev A Planning Location Plan – Received 21 December 2015
   1068035-100-B-02 rev B Planning General Arrangement - Received 21 December 2015
   1068035-100-B-03 rev A Existing Survey - Received 21 December 2015
   1068035-100-B-04 rev A Cross Sections Details Sheet 1 of 3 - Received 21 December 2015
   1068035-100-B-05 rev A Cross Sections Details Sheet 2 of 3 - Received 21 December 2015
   1068035-100-B-06 rev A Cross Sections Details Sheet 3 of 3 - Received 21 December 2015
   1068035-100-B-07 rev A General Details Sheet 1 of 2 - Received 21 December 2015
   1068035-100-B-08 rev A General Details Sheet 2 of 2 - Received 21 December 2015
   1068035-100-B-09 rev B Drainage Layout - Received 21 December 2015
   1068035-100-B-10 rev B Vehicle Tracking - Received 21 December 2015
   1068035-100-B-11 rev B Location of Sections & Key Dimensions - Received 21 December 2015
unless otherwise agreed in writing by the Local Planning Authority.

Reason: For the avoidance of doubt and to ensure that the development is carried out in accordance with the approved plans and specifications.

**Design**

3. No development shall commence on site until details of the various means of enclosure have been submitted to and approved in writing by the Local Planning Authority. Development shall be carried out in accordance with the approved details prior to the development being occupied.

Reason: In the interests of visual amenity and the character and appearance of the area.

**Landscaping**

4. No development shall commence on site until a scheme of hard and soft landscaping has been submitted to and approved in writing by the Local Planning Authority, the details of which shall include:

   (a) Proposed finished levels or contours;
   (b) Planting plans and written specifications of plants and grass;
   (c) means of enclosure;
   (d) car park layouts;
   (c) other vehicle and pedestrian access and circulation areas;
   (e) hard surfacing materials;
   (f) structures (e.g. furniture, play equipment, refuse and other storage units, signs, lighting etc);
   (g) Detailed design of the attenuation pond close to the car parks; and,
   (h) Implementation timetable.
   (i) Schedules of plants (noting species, planting sizes and proposed numbers / densities where appropriate);
   (j) Measures to encourage provision for nesting birds.

Reason: To ensure a satisfactory landscaped setting for the development and the protection of existing important landscape features.

5. All soft landscaping comprised in the approved details of landscaping shall be carried out in the first planting and seeding season following the first occupation of the buildings or the completion of the development whichever is the sooner; All shrubs, trees and hedge planting shall be maintained free from weeds and shall be protected from damage by vermin and stock. Any trees or plants which, within a period of five years, die, are removed, or become seriously damaged or diseased shall be replaced in the next planting season with others of a similar size and species, unless otherwise agreed in writing by the local planning authority. All hard landscaping shall also be carried out in accordance with the approved details prior to the occupation of
any part of the development or in accordance with a programme to be agreed in writing with the Local Planning Authority.

Reason: To ensure a satisfactory landscaped setting for the development and the protection of existing important landscape features.

Restrictions

6. The delivery of goods to and from the site shall be limited to the hours of 8am and 7pm on Mondays to Fridays, 8am and 1pm on Saturdays, and at no time on Sundays and Bank or Public Holidays.

Reason: In the interests of the amenity of the area.

7. No external lighting shall be installed on site until plans showing the type of light appliance, the height and position of fitting, illumination levels and light spillage have been submitted to and approved in writing by the Local Planning Authority. The lighting approved shall be installed and shall be maintained in accordance with the approved details.

Reason: In the interests of the amenity of the area and to minimise unnecessary light spillage above and outside the development site.

8. No development shall commence on site until details of external cowls, louvers or other shields to be fitted to the floodlights to reduce light pollution have been submitted to and approved in writing by the Local Planning Authority. The approved measures shall be put in place before the floodlights are first brought into use and shall be maintained in accordance with the approved details.

Reason: To minimise light pollution and in the interests of the amenity of the area.

9. No development shall commence on site (including any works of demolition), until a Construction Method Statement, which shall include the following:

   a) the parking of vehicles of site operatives and visitors;
   b) loading and unloading of plant and materials;
   c) storage of plant and materials used in constructing the development;
   d) the erection and maintenance of security hoarding including decorative displays and facilities for public viewing, where appropriate;
   e) wheel washing facilities;
   f) measures to control the emission of dust and dirt during construction;
   g) a scheme for recycling / disposing of waste resulting from demolition and construction works;
   h) measures for the protection of the natural environment; and,
   i) hours of construction, including deliveries;

has been submitted to, and approved in writing by, the Local Planning Authority. The approved Statement shall be adhered to throughout the construction period. The development shall not be carried out otherwise than in accordance with the approved construction method statement without the prior written permission of the Local Planning Authority.
Reason: To minimise detrimental effects to the residents amenity and detriment to the natural environment through the risks of pollution and dangers to highway safety, during the construction phase.

Highways and Access Conditions

10. The details of construction, levels and drainage of the car parking areas and parental drop-off facility shall be submitted to and approved in writing by the Local Planning Authority prior to the commencement of any development. Thereafter the parking spaces shall not be used for any purpose other than the parking and manoeuvring of vehicles.

Reason: To ensure that adequate off-street parking facilities are provided and remain available for the development so that parking does not take place on the highway to the detriment of highway safety.

11. Within the first three months of the operation of the school, monitoring of the junction to the car park and Huddersfield Road should take place and a report detailing the effects of the development on the junction should be submitted to the Local Planning Authority. If it is shown that there is a significant and severe impact on the highway, a highway improvement scheme should be carried out which could include the signalisation of the junction and additional signing and lining. Details of such a scheme shall be submitted to and approved in writing by the Local Planning Authority and all works that form part of that scheme shall be complete within six months of the submission of the report.

Reason: To facilitate the movement of traffic and all users of the highway.

12. Within the first three months of the operation of the traffic signals on Huddersfield Road, monitoring of the Stanedge Road/ Huddersfield Road junction should take place and a report detailing the effects of the development on the junction should be submitted to the Local Planning Authority. If it is shown that there is a significant and severe impact on the highway, a highway improvement scheme should be carried out which could include the reprioritisation of the junction, a speed limit review and additional signing and lining. Details of such a scheme shall be submitted to and approved in writing by the Local Planning Authority and all works that form part of that scheme shall be complete within six months of the submission of the report.

Reason: To facilitate the movement of traffic and all users of the highway.

13. No development shall take place unless and until a highway improvement, including the improvements to pedestrian crossing facilities and the reprioritisation of the Sugar Lane/ Wool Road junction has been submitted to and approved in writing by the Local Planning Authority. Thereafter, such works that form the approved scheme shall be completed before any part of the development is brought into use.

Reason: To facilitate the movement of traffic and all other users of the highway generated by the development in the interests of highway safety.

14. The car park and drop off facility shall not be brought into use until a Parking Management Plan, showing the operation and availability of the car park and drop off facility for parents and residents during normal school opening hours and during
events held by the school involving the attendance of parents or other visitors has been submitted to and approved by the Local Planning Authority. Thereafter all measures that form part of the approved management plan shall be implemented and remain available for users of the car park and drop off facility.

Reason: To ensure that adequate off-street parking facilities are provided for the development so that parking does not take place on the highway to the detriment of highway safety.

15. The car park and drop off facility shall not be brought into use until Keep Clear Markings and associated signs have been provided in accordance with a drawing that shall be submitted to and approved in writing by the Local Planning Authority prior to commencement of the development. Works that form part of the approved scheme shall be retained thereafter.

Reason: To ensure the safe and efficient operation of the highway in the interest of highway safety.

16. The development hereby approved shall not be brought into use until the bus stops located on Huddersfield Road have been relocated in accordance with a scheme that shall be submitted to and approved in writing by the Local Planning Authority prior to commencement of the development. Works that form part of the approved scheme shall be retained thereafter.

Reason: To facilitate the safe use of the development in the interests of highway safety.

17. No work on site shall commence unless and until adequate wheel cleaning equipment, the details of which shall be submitted to and approved by the Local Planning Authority, has been installed on the site. Thereafter, all vehicles, which leave the site, and which have travelled over a non-tarmac surface shall use the wheel cleaning equipment provided, before leaving the site, such that all vehicles are in such a state of cleanliness that they do not foul the highway with mud or other material. The equipment shall, for the duration of the construction works, be maintained in good working order and shall not be removed unless agreed by the Local Planning Authority.

Reason: In the interests of highway safety (It is an offence under the Highways Act 1980 to deposit mud on a public highway).

Drainage

18. No development shall commence on site until a scheme for the discharge of surface water from the site incorporating sustainable drainage details, has been submitted to and approved in writing by the Local Planning Authority. The development shall not be occupied until surface water drainage has been constructed in accordance with the approved scheme.

Reason: To ensure that the development can be adequately drained.

Ecology
19. The mitigation measures detailed in the Ecological Assessment [Chapter 6 of the ES] shall be carried out in full prior to the first occupation of the development.

Reason: To mitigate against the loss of existing biodiversity and nature habitats.

20. Prior to the commencement of development a comprehensive Method Statement for protecting bats during the proposed works shall be submitted to and approved in writing by the Local Planning Authority. The Method Statement shall provide full details of measures to be taken to avoid any possible disturbance to bats during the demolition and construction of the proposed school. The development shall thereafter be carried out strictly in accordance with the approved Method Statement.

Reason: To protect bats from the proposed development.

21. Notwithstanding the plans hereby approved no vegetation clearance or groundworks shall take place in the months of March, April, May, June and July since this is the optimum period for bird nesting.

Reason: To minimise the impact of the proposed development on breeding birds.