

Rochdale Metropolitan Borough Council
Economy and Environment,
Planning Service,
Rochdale,
OL16 1XU

24th June 2024

Dear Sir or Madam

FULL PLANNING APPLICATION FOR CHANGE OF USE TO RENTAL VEHICLE PREMISES (SUI GENERIS), INCLUDING ALTERATIONS TO 'SHOPFRONT', INSTALLATION OF A RENTAL VEHICLE WASH BAY, CAR PARKING (INCLUDING RENTAL VEHICLE STORAGE), DEMOLITION OF EXISTING STRUCTURES TO THE REAR OF THE SITE AND ASSOCIATED WORKS; AND ADVERTISEMENT CONSENT FOR THE DISPLAY OF SIGNAGE ASSOCIATED WITH THE PROPOSED USE

**LAND AT 190 ROCHDALE ROAD MIDDLETON, ROCHDALE, MANCHESTER, M24 2QA
APPLICATION ON BEHALF OF ENTERPRISE RENT-A-CAR UK LTD**

Please find enclosed an application for full planning permission and advertisement consent relating to 190 Rochdale Road, Middleton, to facilitate use as a vehicle rental premises (Sui Generis) but by a single occupier (Enterprise Rent-A-Car UK Ltd, herein referred to as 'Enterprise').

The proposals seek to reuse the existing building fronting onto Rochdale Road as Enterprise's rental vehicle office and to install a new purpose-built rental vehicle wash bay within the rear yard of the site. To facilitate Enterprise's occupation of the site will require removal of existing structures including walls and gates and demolition of workshop / buildings within the rear yard area of the site, and site reconfiguration to facilitate car parking (rental vehicle storage) predominantly within the rear part of the site but with retention of some parking to the front of the office also. The existing two-way access / egress direct onto Rochdale Road will be retained without amendment and the existing access to the rear of the property onto Clough Road will be utilised as an exit only. Existing boundary treatments, including fencing, gates and bollards will be retained where possible but there will be some new droppable bollards installed at each of the access points to secure the site when the rental vehicle branch is closed. The site generally comprises hard-surfacing (tarmac) which will be improved where necessary, together with associated works necessary to deliver the proposed development. Generally speaking however, the proposals will retain a commercial use of the site and will deliver investment to ensure its continued commercial use going forward.

In addition, the application seeks advertisement consent for display of signage associated with Enterprise's use of the Site and will predominantly see a new fascia and a new monument sign at the site's Rochdale Road frontage to replace existing signage associated with the numerous previous users of the site. Signage will also be provided within the rear yard area to direct customers to relevant parking areas and for the general operation of the rental vehicle premises.

The application has been submitted through the Planning Portal on behalf of Enterprise Rent-A-Car UK Ltd under reference **PP-13171874**.

The application includes the following:

- Application Forms and Ownership Certificates
- Application Fee of £743.00¹ - for full planning permission and display of advertisement relating to a business (based on the proposed change of use and the floor area created by the proposed wash bay) – paid through the Planning Portal;
- CIL Questions Form;
- Site Location Plan – drawing ref. PP-ERAC-MID-001
- Site Plan - Existing – drawing ref. ERAC-MID-002
- Site Plan – Proposed – drawing ref. sk.UK99.08
- Demolition Plan – drawing ref. ERAC-MID-004
- Existing Elevation Drawing – drawing ref. ERAC-MID-010
- Proposed Elevation Drawing – drawing ref. ERAC-MID-011
- Signage Design Pack – drawing ref. 44064v1 Middleton
- Proposed Wash Bay Elevations – drawing ref. MSB002
- Proposed Wash Bay Floor Plan – drawing ref. MSB003
- This Planning Statement (incorporating Design and Access Statement and Flood Risk and Drainage Strategy²)
- Transport Statement - prepared by PJA
- Activity Noise Assessment - prepared by Syntegra
- Preliminary Ecology Appraisal – Survey Report (including Biodiversity Net Gain Assessment) – prepared by Ecologylink; and
- Lighting Assessment – prepared by Strenger
 - Residential Receptor Location Plan – SK-01
 - Assessed Scheme of Lighting – SK-02
 - Light Spill Plan – SK-03

Site Description and Context

The application site ('the Site') comprises around 0.24ha of brownfield land off Rochdale Road in Middleton, Manchester. The site is currently in a relatively dilapidated state and it is understood has been vacant for around 2 years. However, it has a long history of commercial use and comprises a single storey building with forecourt area fronting onto Rochdale Road and a large yard area with numerous single storey structures, including workshops and warehouses to the rear.

The site's principal access and egress is provided direct from Rochdale Road into the west of the site. A secondary access and egress is provided into the rear of the site (at its south eastern corner) direct from Clough Road.

Images of the single storey building and forecourt area fronting onto Rochdale Road, of the Rochdale Road access and of the Clough Road access are provided below for reference.

¹ Plus £70 Planning Portal Service Charge

² noting that existing accesses and existing drainage connections will be utilised, and Enterprise's wash bay will operate in accordance with a Trade Effluent Licence to be obtained from the statutory undertaker



Image 1: Rochdale Road Frontage (Google Street View)



Image 2: Access and egress onto Rochdale Road (Google Street View)



Image 3: Access and egress onto Clough Road

The former use of the Site appears to be mixed and often with numerous occupiers at any one time, with the building fronting onto Rochdale Road (190 Rochdale Road) divided into multiple 'offices' with Middleton Tyres and Autocare, Higgys Tattoo Parlour, Middleton Cars (Taxi office), First4property Solutions (Property's Managed) and Blackbull Fencing all having signage on the office in image provided above. A sign is also advertising Christmas trees for sale.

The area to the rear (east) of the site, including the rear yard area, also appears to have comprised a number and variety of uses. The most recent uses appear to have comprised a tyres and auto care use, a fencing company use (manufacture and storage of fencing) and a builder's merchant (or yard) utilising the rear yard as open storage and distribution of building materials and products.

The area surrounding the site is predominantly residential including a recent residential development to the immediate south of the site (16 homes) approved by the Council under reference 18/00536/FUL. To the west is Rochdale Road with residential use on the opposite side and to the west and north east is residential fronting onto Smithies Avenue and Lulworth Road.

To the north west of the site is a former pub (Black Bull Inn) which is now a veterinary surgery (Vets for Pets) with a further commercial use (picture framing shop and gallery) to the north of that.

The site is not located within a Conservation Area and does not contain, or sit in the setting of, any locally or statutorily Listed buildings.

The significant majority of the site comprises hardstanding (tarmac) and buildings / structures. There are no existing trees or hedges on the site, and it is not noted for any special landscape or townscape character. There is some ruderal planting within the site which would appear to have self-established.

The site is secured by a series of gates, walls and fences, including around the site boundary and within the site itself to restrict access into the rear part of the site. Access into the forecourt area is currently unrestricted.

The location generally, and sustainable accessibility, of the Site is set out in detail in the submitted Transport Statement prepared by PJA.

Relevant Site History

The planning history for the site is not entirely clear. There are numerous historic applications (and permissions) referenced on the Council's Public Access planning search system, indicating that various parts of the site have been used for various commercial purposes over the years, including:

- car sales (in 1977 - ref. 77/D04835),
- trailer repair and tyre depot (in 1977 - 77/D05226); and
- office (in 1989 - ref. 89/D23221 for change of use to office and ref. 89/D23150 for office extension)
- builders' yard (in 2004 – ref. 04/D44437)
- taxi booking office / call centre (in 2012 – ref. 12/55608/FUL)

However, details of these applications (and permissions) are not available on the Council's website given their age – albeit there is no indication that more recent applications have been submitted (or approved).

Overall, the planning history for the entire Site is relatively limited but it would appear that the building fronting Rochdale Road has been used most recently in part as offices and this follows an original planning permission for office use in 1989. Middleton Tyres & Autocare also used this front building and there is a 1977 planning reference which would support this their use.

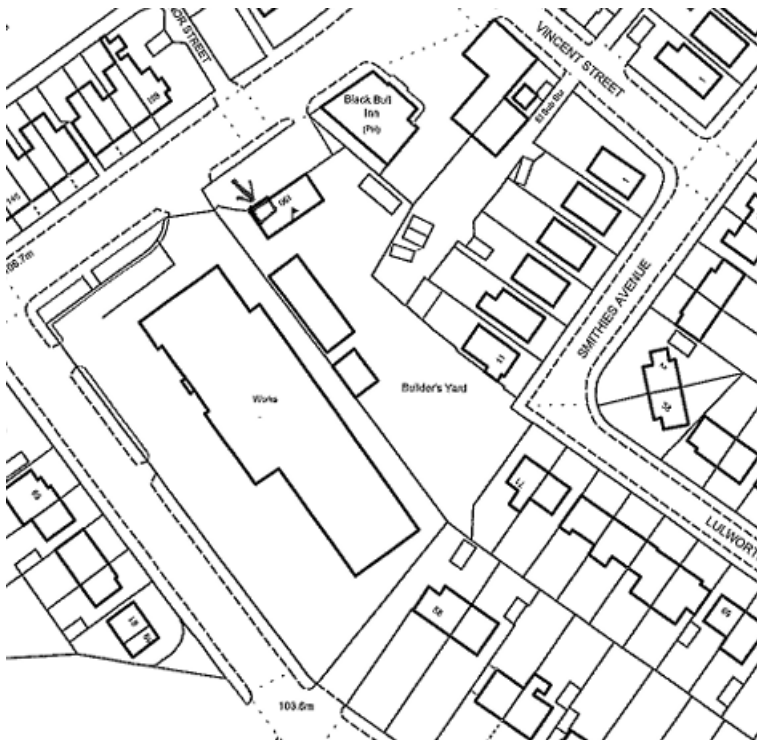
The rear part of the site appears to have been used by a fencing company to manufacture, store and distribute fencing and the planning history of the site suggests that the site has also historically been used as a builders' merchant to store and distribute building materials.

In December 2004 an application for 'use of land and building as a garden centre' at 'builders yard rear of 190 Rochdale Road' was refused by the Council. There is no information available online for this application, but it suggests that land to the rear of 190 Rochdale Road was being used as a builders' merchant at that time. The reasons for refusal are unknown.

Some further background for the site's planning history is also provided through planning permission reference 12/55608/FUL for 'Part change of use of premises to form taxi booking office / call centre' which was granted May 2012. Correspondence was received through this application from First4Property Solutions who, as landlord, supported the application and provided some further insight into the uses at the wider site which included:

- the (then) proposed taxi / private hire call centre
- vehicle body repair centre
- mechanics / vehicle garage
- tyre bay; and
- “numerous other businesses” at the site.

The approved plan for this 2012 change of use suggests that this was for the southernmost office as can be seen below:



What is clear from the planning history available is that the site has been used for numerous and various commercial premises over the years and often numerous and various commercial uses at any given time.

As such, and generally speaking, the benefits from Enterprise’s proposals to deliver investment, job creation and re-use of an underutilised and vacant brownfield site by a single commercial occupier should be recognised in this context.

Top the south of the site, in the area shown as “works” in the plan from 2012 above, a relatively recent development of 16 dwellings (including access, estate road, boundary walls and fences and associated landscaping) was approved by the Council in 2018 under ref. 18/00536/FUL.

The Applicant

This application is being submitted on behalf of Enterprise Rent-A-Car UK Ltd, a global vehicle rental company. Enterprise is one of the largest transportation solution providers in the world offering customers local and airport car rentals, car sharing, exotic car hire and van hire, along with a Flex-E-Rent service, providing business solutions

for specialised vehicle needs, for example, temperature-controlled vans and accessible minibuses for example. The company operates in more than 9,500 locations across nearly 100 countries.

The proposed development will support the sustainable expansion of Enterprise's business and provide a sustainable transport solution for local residents and workers as an alternative to private car ownership.

Enterprise employs nearly 80,000 people in nearly 100 countries, with training and development of employees, and 'promoting from within', at the core of its culture. As such Enterprise have won numerous employment awards and are a Times Top 100 Graduate Employer (2022), a Times Top 50 Employer for Women (2022), a Stonewall Top 100 LGBTQ+ Inclusive Employer (2023) and a Top 75 Social Mobility Employer (2022) – to name but a few.

Proposed Development

The proposal here is focussed on facilitating Enterprise's use of the site as a rental vehicle premises (Sui Generis use).

Enterprise will use the existing building fronting Rochdale Road as its rental vehicle office to administer its rental vehicles. Enterprise proposes to improve the appearance of the existing building's western elevation fronting onto Rochdale Road, by replacing the existing double door and two of the existing windows with a large glazed entrance and a large window and by rendering the brickwork, delivering an improved frontage and one more befitting of their commercial use and the building's presence on Rochdale Road.

They will store their rental vehicles in the external areas of the site, but predominantly within the rear yard area. Only limited parking, including DDA compliant parking, and potentially provision for its Car Club, will be available within the forecourt area to the front of the building and fronting onto Rochdale Road. They will wash and generally prepare their rental vehicles, including hoovering and valeting, in the rear area of the site within a new purpose-built rental vehicle wash bay which will replace the existing workshop and warehouse buildings in the rear of the site, previously used to store and manufacture fencing, building materials and to repair vehicles also. Washing equipment such as jet washer and vacuum cleaner will be housed within noise attenuated cabinets.

Enterprise will generally maintain existing boundary fencing where possible but will remove the bricked walls either side of the existing building, and associated gates, to improve vehicle circulation. Droppable bollards will be installed at the Rochdale Road entrance / egress to secure the site out of opening hours and further droppable bollards will be installed at the rear entrance / egress to Clough Road to supplement the existing swing gate which will also be retained.

The existing access / egress from Rochdale Road will be retained without amendment. Pedestrians and cyclists can continue to access the site direct from Rochdale Road also. The existing access / egress to Clough Road will also be retained without amendment, albeit will only be used as an egress by Enterprise.

The proposal will see no additional floor area created save for the rental vehicle wash bay but this will see a net reduction in floor space when the existing buildings that are being removed through the proposals are taken into account.

The site can comfortably store around 40 rental vehicles externally in the rear yard area, including 9 van spaces albeit more vehicles could be accommodated subject to Enterprise's management of their rear yard. There is also provision for three vehicles proposed to the front of the retained office building within the site's forecourt,

including a DDA compliant bay where this is close to the office entrance. However, for this site to operate effectively Enterprise would expect that around 90% of rental vehicles available from this site to be in use, and away from site, at any one time.

It should be emphasised that the significant majority of “car parking” will continue to be used by Enterprise for storage of its rental vehicles, rather than for vehicle parking in its traditional sense. Some provision can be made available for staff should it be needed.

Enterprise’s required hours of operation operating hours will be Monday to Friday 08:00 to 18:00 and Saturday 09:00-12:00. The branch will be closed on Sundays and Bank Holidays. They intend to employ six full time staff at the site initially with the potential for additional employment opportunities going forward for this new branch.

Generally speaking, the proposal will see further investment at the site from Enterprise, and in doing so will improve and expand access to Enterprise’s rental and Car Club vehicles locally.

Planning Policy

Development Plan Policy

Section 38 (6) of the Planning and Compulsory Purchase Act 2004 requires all planning applications to be determined in accordance with the Development Plan unless material considerations indicate otherwise.

Adopted Plans

The Development Plan for Rochdale comprises:

- The Core Strategy (adopted October 2016) - which is the lead document of the Rochdale Borough Local Plan, and provides an overview of strategic planning objectives for the whole of the Borough.
- The 1996-2016 Local Plan - the Unitary Development Plan from the 1996-2016 Local Plan is still in place until the Allocations Development Plan is adopted.
- Places for Everyone Plan (PfEP) - a long-term plan for new jobs, homes, and sustainable growth prepared by the Greater Manchester Combined Authority (GMCA) for Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan. The Places for Everyone plan was adopted on the 21 March 2024 as part of the Development Plan for Rochdale. The Site is not allocated in the Plan for employment or any other use.

Emerging Plans

- Allocations Plan - a plan which outlines several sites and areas of land which can be used for new developments in the Borough.

The Site is not allocated in the Development Plan.

The Site is located within the defined settlement boundary of Middleton which lies south west of Rochdale, adjoining Manchester (with strong connections to the city in relation to jobs, leisure, culture and shopping) and is surrounded by a ‘green ring’ of countryside. The Core Strategy confirms that ‘Much of the workforce travels

outside Middleton for work, particularly to Manchester, and therefore transport improvements to Manchester, including rail connections, must be a priority' (page 12).

Chapter 7 of the Core Strategy regards delivering a more prosperous economy in line with Strategic Objective 1.

Specifically, **Policy E2** relates to increasing jobs and prosperity. Stating that the Council will 'ensure a sufficient supply of suitable land, buildings and infrastructure in the right places to support the creation and retention of successful businesses and increase the number and quality of jobs to create a more prosperous lower carbon economy'.

Furthermore, **Policy E4** regards meeting future employment needs. It states that in considering sites for development brownfield sites within the urban area will be top of the sequential approach.

In light of the above, the employment and economic development benefits of Enterprise's proposed use of an otherwise vacant brownfield site is consistent with Development Plan policy and should be supported in principle.

The following Core Strategy policies are also considered relevant:

Policy P1- improving image

Policy G1 – tackling and adapting to climate change

Policy T1 – delivering sustainable transport

Places for Everyone (PfE)

Places for Everyone is a long-term plan of nine Greater Manchester districts (Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan) for jobs, new homes, and sustainable growth. It has been prepared by the GMCA on behalf of the nine districts.

The plan will determine the kind of development that takes place across the city-region, maximising the use of brownfield land and urban spaces while protecting green belt land from the risk of unplanned development.

The Places for Everyone plan was adopted on the 21 March 2024 as part of the Development Plan for Rochdale and must be considered by the proposals.

The following policies of the plan are considered relevant:

- **Policy JP-Strat14: A Sustainable and Integrated Transport Network** – emphasises the need to move towards reducing the number of private cars on the network.
- **Policy JP-S5: Clean Air** – sets out a range of comprehensive measures that will be taken to support improvements in air quality, including but not exclusive of the following; determining planning applications with regard to the most relevant development and planning control guidance published jointly by the Institute of Air Quality Management and Environmental Protection UK; restricting developments that would generate specific point source pollution such as some types of industrial activity and energy generation; significantly expanding the existing commercial network of electric vehicles charging points, both for public and private use, including part of new developments; and stating that development should be located in areas that maximise

the use of sustainable travel modes and be designed to minimise exposure to high levels of air pollution, particularly for vulnerable users.

- **Policy JP-J1: Supporting Long-Term Economic Growth** – Sets out that a thriving, inclusive and productive economy will be sought in all our boroughs, this includes and an emphasis on a very high level of economic diversity across boroughs and grasping the economic opportunities from the global transition to a low carbon economy.
- **Policy JP-P1 Sustainable Places** – sets out the importance that development should amongst other points, respect and acknowledge the character and identity of the locality, in terms of design, sitting, scale and materials used, durable and make efficient use of land.
- **Policy JP-C1 An Integrated Network** – Notes the support of a range of measures which include, delivering a pattern of development that minimises both the need to travel and the distance travelled by unsustainable modes to jobs, housing and other key services, including healthcare, education, retail, recreation and leisure facilities, green space and green infrastructure.
- Objective 7 of the PfEP centralises around the need to play a part in ensuring that Greater Manchester is a more resilient and carbon neutral city-region. To do this, the plan states that they will ‘facilitate the provision of infrastructure for cleaner vehicles.

National Planning Policy Framework (2023)

The National Planning Policy Framework (NPPF) sets out the Government’s required approach to planning and is material to the determination of planning applications. At the heart of the NPPF is the presumption in favour of sustainable development. The Framework states applications for sustainable development should be approved where possible and local planning authorities should approach decisions on proposed development in a positive and creative way (paragraph 38).

A key objective of the Framework is to build a strong, competitive economy. It outlines that significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development (paragraph 85) (our emphasis underlined).

Another overarching objective of the NPPF is to make effective use of land to meet development needs whilst improving the environment (paragraph 123). It attaches substantial weight to the value of using suitable brownfield land within settlements and supports the development of under-utilised land and buildings (paragraph 124) (our emphasis underlined).

In addition, Chapter 9 of the NPPF sets out to promote sustainable transport. The definition of Sustainable Transport Modes set out in Annex 2 of the NPPF includes “*car sharing*” which is being proposed in this instance and “*ultra-low and zero emission vehicles*” which also form part of Enterprise’s proposals here.

Paragraph 114 of the NPPF sets out that in assessing specific applications for development, it should be ensured that appropriate opportunities to promote sustainable transport modes can be – or have been – taken up. Paragraph 115 sets out that development should only be prevented or refused on highway grounds if there would

be an unacceptable impact on highway safety or the residual cumulative impacts on the road network would be severe.

Paragraph 191 of the NPPF sets out that planning policy and decisions should ensure that new development is appropriate for its location taking into account likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should (inter alia):

- a) Mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life;
- b) Identify and protect tranquil areas which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason; and

Enterprise's proposed use of the longstanding commercial site which has been vacant for some time complies with Development Plan and NPPF policies considered most important to the determination of Enterprise's proposals here, and significant and / or substantial weight should be given to these benefits in line with policy set out in the NPPF.

Planning Assessment

Key Benefits of Enterprise's Proposals

- Reuse of a vacant brownfield site for an employment generating commercial use
- Retention of the Site's key features and structures
- Investment into the application site to deliver modern, active and commercially viable efficiencies and to secure the site's long-term future
- Employment creation
- Flexible provision of alternative sustainable transport modes for the benefit of local residents and businesses – including shared cars and vans – by the hour or day
- A modern, evolving fleet keeping pace with environmental technology, supporting the ambition for a modal shift away from the private car towards healthy and sustainable transport initiatives and choices
- Reducing local parking pressure by promoting a reduction in private vehicle ownership.

Viable Active Employment Generating Use

The proposal site has longstanding use for various commercial uses albeit has been vacant for some time. As a result of these proposals Enterprise will deliver much-needed investment into the site and provide a modern, active and commercially viable use that will provide six new jobs initially with the potential for more. Further jobs and investment in supporting industries will also be supported by Enterprise's proposals here.

In doing so, the proposals will generally tidy up the Site and positively address the public realm. In this regard the proposal accords directly with local and national planning policies.

Enterprise's continued use of the site will not require any additional floor area as they will use the existing building that has previously accommodated various commercial uses, to administer their rental vehicles.

A rental vehicle wash bay is proposed in the external yard to the rear of the site which will replace the now dated existing buildings, including workshops and warehouses, in the rear yard of the site.

The majority of the Site's external areas will be used to store rental vehicles on areas of existing hardstanding. As such, the proposals can help reduce the pressure for on street parking.

Vehicular access to the Site will be unchanged in principle from existing provision taken from Rochdale Road and Clough Road albeit the Clough Road access will be used as an egress only by Enterprise. No changes to these access points are proposed from their existing configurations. Pedestrians and bicycles can continue to access the site direct from Rochdale Road also.

As part of their investment, Enterprise will install droppable bollards at the entrances into the site to secure the site out of opening hours. Elsewhere the existing boundary fences and gates will be retained where possible, with the exception of the existing bricked walls and entrance gate restricting access into the rear yard area from the Rochdale Road frontage. Ultimately, these measures will improve the security of Enterprise's proposed branch and will bring the site into line with their exacting operational requirements consistent with their wider branch network. They will also improve the operational circulation around the site and facilitate more rental vehicles, including rental vans, being accommodated on Site, whilst also opening up the Rochdale Road frontage to the benefit of the street scene.

Enterprise's required hours of operation are 08:00 hours to 18:00 hours Monday to Friday and 09:00 hours to 12:00 hours on Saturdays, with no opening on Sundays and Bank Holidays.

Generally speaking, the proposal will see some significant investment at the site.

In particular recognition of the NPPF's economic development policies, Enterprise's use at the site represents an employment generating Sui Generis use and the proposals here will create jobs at the branch as well as in supporting services. Significant weight should be placed on supporting economic growth and productivity as set out in the NPPF.

Another overarching objective of national and local planning policy is to make effective use of land to meet development needs whilst improving the environment. The NPPF in particular attaches substantial weight to the value of using suitable brownfield land within settlements and supports the development of under-utilised land and buildings. Enterprise's proposals will deliver a commercially viable use at this otherwise vacant brownfield site.

Sustainable Neighbourhood Use

Enterprise's rental vehicle premises will continue to directly provide an alternative, sustainable, mode of transport to private car ownership and will help reduce the need for local residents and employees to own a car – and as a result of their proposed works they can make more sustainable rental vehicles available to the wider community. "Daily rental" vehicles operate as shared vehicles with multiple customers sharing the same vehicle in any given week, month or year, helping to reduce congestion and improve air quality versus private car ownership. In this regard the proposal accords directly with Development Plan policy as well as national policy set out in the NPPF.

The site is accessible by walking and cycling, therefore allowing people to travel to the site by sustainable modes in order to access a rental vehicle, and the development is compliant with local standards and supports the ambitions of Rochdale in promoting sustainable transport. The sustainable accessibility of the Site is set out in more detail in the submitted Transport Statement.

The average age of Enterprise's fleet is less than 12 months old, meaning emissions standards and efficiencies are best in the industry and significantly better than the average vehicle emissions at large. In addition, Enterprise's hybrid fleet is increasing all the time and Enterprise anticipate that within 12 months they will have doubled the number of hybrid and electric vehicles within their fleet; and the number of hybrid and electric vehicles will continue to increase as demand, and supply, requires.

The site can comfortably store 40 rental vehicles externally within marked bays, plus additional provision within the secure yard area if necessary which will be managed by Enterprise as needed. However, for this site to operate effectively Enterprise would expect that around 90% of rental vehicles available from this site to be in use, and away from site, at any one time.

It should be emphasised that the significant majority of "car parking" will be used by Enterprise for storage of its rental vehicles, rather than for vehicle parking in its traditional sense. That said, a DDA space will be provided as close to the rental office as possible, and some provision can be made available for staff should it be needed.

Enterprise's proposed use of the Site could also include provision for its Car Club vehicles. Enterprise's Car Club provides members with 24/7 access to a choice of new cars and vans parked locally to where they live, work and study. Enterprise has the largest Car Club network in the UK providing its members with 24/7 access to its cars and vans without the need to own their own. It has been estimated that car clubs produce 72% lower emissions than the average UK car and each of Enterprise's Car Club vehicles takes around 20 private cars off the road.

The proposals also include passive provision for electric vehicle charging initially, with active provision to follow as demand for electric rental vehicles requires. However, it should be noted that the proposed chargers will be available for use for Enterprise rental vehicles only and not available for general use. Enterprise's staff can move electric vehicles around the Site to utilise the chargers as needed.

In terms of customer parking requirements, Enterprise offer a Pick-Up/Drop-Off service to every customer. In addition, Enterprise does not permit customers to park on site (reflective of in most instances its customers using Enterprise to rent a vehicle because they do not have alternative means of access to one).

Similarly, in the significant majority of instances, Enterprise's employees will not need to park their own vehicles at branch as they routinely move Enterprise's rental vehicles between branches at the beginning and end of each working day, as part of Enterprise's 'Fluid Fleet' – and use those rental vehicles to get to and from work.

The submitted Transport Statement demonstrates that the site benefits from access to local amenities within acceptable walking and cycling distance. The closest bus stop is located on the frontage of the site and offers services to Middleton town centre and local residential areas. Mills Hill Railway Station can be reached within circa eight-minute cycle from the site and offers services into local and regional areas.

Enterprise's use will also improve the contribution to the Council's ambition to promote sustainable transport provision in compliance with Rochdale and national planning policy.

Transport and Accessibility

As referenced above, Enterprise's planning application is supported by a Transport Statement which has been prepared by PJA.

There are very good opportunities to access the Site by sustainable modes of travel and the site is well located for accommodating access by sustainable modes and, together with its own function as a car rental premises, strongly supports a reduction in car dependency in Rochdale. The nature of Enterprise's use is, in itself, a form of sustainable transport. The Enterprise car rental facility provides an alternative to private car ownership for local residents and is therefore likely to reduce vehicle trips made in the area.

The proposed development at this longstanding rental vehicle premises will have a negligible impact, if any, on the local highway network. Based on an assessment of similar sites using TRICS, the site is forecast to generate 25 two-way vehicle trips in the AM peak and 18 two-way vehicle trips in the PM peak. However, the net trip generation is expected to be considerably lower, and thus the transport impact of the proposals would be negligible. It is further worth noting that the land uses on the site have the potential to reduce wider vehicle ownership and use.

Furthermore, it is likely that the Enterprise facility will continue to catalyse a behaviour change away from private car ownership and therefore reduce traffic generated by local residents.

Ultimately, in accordance with the requirements of the NPPF, the submitted Transport Statement has demonstrated that safe and suitable access to the site can be achieved for all users and there will be no significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety. The submitted Transport Statement in particular concludes that the development would not adversely impact on highway safety or result in a severe residual impact on the highway network and that the site is in a highly sustainable location. As such, the proposed scheme is acceptable in regard to transport and highways matters in line with paragraph 115 of NPPF.

Residential Amenity

In this instance, Enterprise's use of the site would operate within normal working hours associated with any commercial use, albeit their rental vehicle branch will not open on Sundays or Bank Holidays and will only open between 9:00 and 12:00 on Saturdays.

Their use will not involve odours or fumes and extractors. Enterprise will be storing its rental vehicles in the rear yard and within the rear areas of the site generally. They will wash and generally prepare their rental vehicles, including hoovering and valeting, in a purpose-built rental vehicle wash bay in the rear area of the site in the same location as former B2 and B8 uses – providing betterment. Washing equipment such as jet washer and vacuum cleaner will also be housed within noise attenuated cabinets.

It is also noted that the planning application resulting in the recently delivered residential properties to the south of the site was supported by a Noise Assessment which identified that there could have been adverse impacts arising from the then neighbouring uses and set out some mitigation measures. These included suitable windows and ventilation to the residential properties themselves but also for external areas sets out that *"provided 2m closed board timber fencing with a minimum density of 10kg/m³ is installed around the perimeter of all external garden areas the amenity of all future residents can be protected and the criteria set out in BS8233:2014*

achieved.” Condition 8 of the permission required the Noise Assessment’s recommendations to be followed and a verification report submitted prior to occupation. Condition 8 was discharged under ref. 20/00660/DOC.

The above notwithstanding, Enterprise has instructed an Activity Noise Assessment (ANA) to consider the potential for impact arising from its proposed rental vehicle wash bay. The ANA prepared by Syntegra concludes that the wash bay as proposed would be below the level where a low impact may be expected upon the residents at the nearest noise sensitive receptors. Given the context of the noise source, no adverse impacts from noise would be expected.

A Lighting Assessment has been prepared by Strenger which demonstrates the proposal’s compliance with the relevant criteria set out in the Institute of Lighting Professionals (ILP) Guidance Note 01/21: The Reduction of Obtrusive Light.

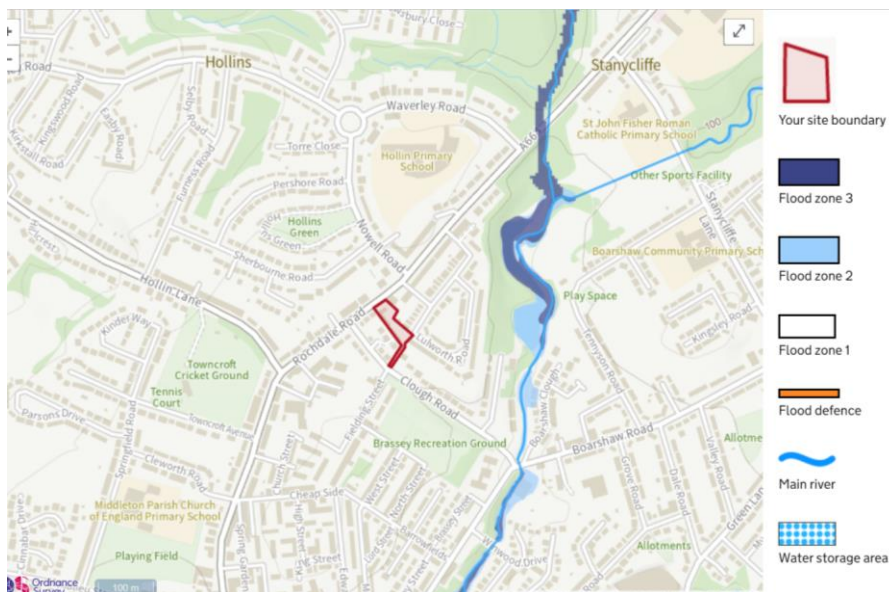
The proposals have no potential to intensify any impact in respect of light, outlook or privacy.

In such circumstances, where there is no conflict, Development Plan policies and those set out in the Framework around amenity protection are permissive and provide no justification to withhold planning permission in this instance.

Advertisement consent is also required for replacement signage needed by Enterprise for its effective operation of the application Site. This will replace existing signage and deliver a lower number of signs in total but will deliver the required presence for Enterprise on the Rochdale Road frontage. Signs that will be illuminated will be turned off outside of opening hours and will also be controlled by light sensor – meaning they will only be turned on when it is dark and when the branch is open. Additionally, the majority of the signage is black in colour and will therefore not be illuminated in any event.

Flood Risk and Drainage

The Site is located entirely in Flood Zone 1 (lowest risk of flooding) as shown on the E.A Flood Map for planning (see below).



This means it is in an area at the lowest risk of flooding as set out in the NPPF. In reference to the requirement for a Sequential Assessment, the NPPF requires that new development is steered toward areas with lowest probability of flooding (paragraph 168). As it is entirely within Flood Zone 1, the proposal accords with the sequential approach set out in the NPPF.

In general terms the proposal is for re-use of a brownfield, or previously developed, site for the same use that the site is in now. The use remains a 'Less Vulnerable Use' in flood risk terms. It will not result in any additional risk of flooding of the site or its surroundings and will utilise existing drainage arrangements including existing connections for the existing rental vehicle wash bay.

Enterprise will operate their wash bay under a trade effluent licence which will be obtained from the statutory undertaker meaning its use, and drainage connection, will be subject of control outside of the planning process, and the appropriate drainage of the proposals does not need to be duplicated through the planning process.

Ecology and Habitat

The proposals are supported by a Preliminary Ecological Appraisal (PEA) survey report prepared by Ecologylink to assess the conservation value of the site, including the likely presence of rare or protected species. Any features, habitats or species constituting potential constraints to the development were identified, with recommendations for appropriate further surveys and mitigation where necessary.

No habitats warranting any specific protection were recorded. Overall, the PEA concludes that the site is a small and previously developed site which is of negligible intrinsic value to wildlife. There is limited opportunity to enhance the site due to lack of space and poor connectivity to other habitats on an already fully developed semi-industrial site.

No further surveys are recommended but some precautionary measures are suggested for the timings for demolition and site clearance outside of the bird nesting season and hibernation season for amphibians. The PEA also recommends that the development should incorporate two bird boxes or bricks across the site by way of enhancement.

Some Japanese Knotweed has been identified which will need to be removed under a bespoke eradication programme by a suitably qualified specialist contractor.

Signage

Advertisement consent is also required for signage needed by Enterprise for its effective operation at the application site.

The proposals will predominantly see a new fascia and a new monument sign at the site's Rochdale Road frontage to replace existing signage associated with the numerous previous users of the site. The proposals will therefore deliver some de-cluttering of signage at the site's frontage and on the Rochdale Road street scene.

Signage will also be provided within the rear yard area to direct customers to relevant parking areas and for the general operation of the rental vehicle premises.

Details for the proposed signage are provided in the submitted Signage Pack which has been prepared by Brand.

Summary

There are significant and tangible benefits associated with Enterprise's proposals at the site; not least making significant investment to deliver a viable and active employment generating use there.

Enterprise's use of the Site complies with Development Plan and NPPF policies considered most important to the determination of Enterprise's proposals here, and significant and / or substantial weight should be given to these benefits in line with policy set out in the NPPF.

The amenity of neighbouring residents will not be adversely affected and in such circumstances Development Plan and national planning policy is permissive and there are no reasons to withhold planning permission in this instance.

In addition, Enterprise's use will contribute to a modal shift away from the private car towards healthy and sustainable transport initiatives and choices and to promote sustainable transport provision in compliance with Development Plan policies, and national policy as set out in the NPPF.

We look forward to discussing the proposals and hope that Officers share our enthusiasm to facilitate Enterprise's earliest occupation of the Site. As such, we look forward to confirmation of the application's validation as soon as possible.

Yours faithfully



**Chris Dodds, MRTPI – Associate Director
For and on behalf of Planning Prospects Ltd**

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