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Cassel & Fletcher

1 Drake Street, Rochdale, OL16 1RE

Planning Statement

08 May 2025

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1. Introduction

1.1 This Planning Statement has been prepared by Paul Butler Associates on behalf of Cassel & Fletcher. The statement has been provided in support of an application for planning permission and listed building consent for a residential development at 1 Drake Street, Rochdale, OL16 1RE. The application proposes the change of use of vacant upper floor levels to 10no. residential apartments, together with insertion of rooflights and window openings. The application building is Grade II listed and is located within the Rochdale Town Centre Conservation Area.

1.2 To provide a clear understanding of the application proposal this statement includes:

- A description of the application site and surrounding area;
- A review of the planning history of the application site;
- A description of the proposed scheme;
- A review of national and local planning policies of relevance to the scheme;
- An appraisal of the scheme against relevant planning policies; and,
- A conclusion.

2. The Application Site and Surrounding Area

The Application Site

- 2.1 The application site relates to 1 Drake Street, Rochdale, OL16 1RE (see figure 2.1 below). The site occupies a prominent location in Rochdale Town Centre, situated to the southeast of the junction of Smith Street and Drake Street, overlooking the public realm at South Parade to the west. To the south, the site is bounded by a row of commercial properties which extend southwards along Drake Street. To the east the site is adjoined by 4 Smith Street which is currently occupied by a taxi company and an estate agents, and an associated surface car park. Beyond this is the bus interchange, while Rochdale tram stop is situated just north of the site. The application building is Grade II listed and located within Rochdale Town Centre Conservation Area.



Figure 2.1: Application site boundary identified in red.

- 2.2 The application building comprises an L-shaped three storey building constructed of brick with a slate roof, with one and two storey elements infilling the L-shape. The Historic England listing description notes that it was built in the latter half of the 18th century as a wealthy mill owner's residence, later converted to a school, and from 1818 it operated as the 'Wellington Hotel', a use that continued into the 20th century.
- 2.3 The application floorspace relates to the upper floors of the part of the building fronting Drake Street, and the first floor of the infill development to its rear. The element of the building fronting Drake Street retains a good degree of architectural integrity, including a classical stone surround with a pediment to the main entrance, moulded stone window surrounds, projecting stone string courses, and a modillion eaves cornice. Windows are one over one sliding sashes, frames are timber with horns and possibly a reproduction of a Victorian style window frame. The listing notes that the brick frontages may have been refaced, this is corroborated by the stretcher bond to the front elevation, while the return of the gable to Smith Street is in Flemish bond. The gable elevation also indicates previous alterations where there are variances in brickwork inserted windows and the gauged brick lintels where former openings have been bricked up. This element of the building is currently vacant, it was most recently in use as 'Bombay Brew' restaurant on the ground floor but this is now vacant. The upper floors were most recently in use as 'The Nile' nightclub/bar but have been vacant for several years. Internally, the upper floors are in a significant state of disrepair and in need of significant investment to be brought back into a usable condition.
- 2.4 The application floorspace is internally linked at first floor to the three-storey element of the building which fronts onto Smith Street. This element of the building is understood to have been built as an extension to 1 Drake Street and is of a later phase of construction, apparent from the more contemporary appearance of the brickwork. The time of construction is unclear, but it likely dates from the mid-late 20th century. The submitted Heritage Statement prepared by Paul Butler Associates provides an account of the historic development of the site. This element of the building is currently occupied by Rochdale Housing Solutions on the ground floor and residential apartments on the upper floors.

- 2.5 The application building sits back of pavement on Drake Street and Smith Street. There are various entrances to the building including two on Drake Street, a large entrance on the gable return onto Smith Street, and also a personnel entrance to the rear accessed from Faulkner Street.
- 2.6 The site is occupied by built form and there are no trees or vegetation within the site. The site is located partly within flood zone 2 and 3.
- 2.7 In addition to its Conservation Area designation, the site is also located in the boundary of the Town Centre.

The Surrounding Area

- 2.8 The surrounding area is predominantly mixed use / commercial development typically found in town centre locations and includes shops, cafes, drinking establishments, leisure uses and banks. Residential uses exist on the upper floors of some properties.
- 2.9 The site is located within a highly sustainable location in Rochdale's Town Centre and benefits from the array of shops, amenities, services, facilities, and employment opportunities that this brings. The site is also very accessible by public transport, being adjacent to Rochdale Town Centre metrolink tram stop which provides frequent services to various stops, including those within Manchester City Centre. The site is also in close proximity to Rochdale Interchange, which offers regular bus services to various destinations including Bury, Bolton, Milnrow, Manchester City Centre, Accrington, Ashton-under-Lyne and Littleborough. In addition the site is 850m (12 minutes' walk) from Rochdale train station which offers services to a range of destinations including Manchester City Centre, Blackburn, Clitheroe, Leeds, Wigan, Kirby and Chester.

3. Planning History

- 3.1 In accordance with best practice a review of the site's planning history was undertaken on 26.02.2025. The applications identified are provided in the table below.

Application Reference	Proposal	Decision and Date
13/00166/FUL	Change of use of the ground floor into three retail units and a bar/restaurant/café and the conversion of the upper floors to provide 19 apartments. Four new shop fronts, first and second floor rear extensions and external alterations to the building to include the partial rebuilding of the rear outbuilding.	Approved 04 Nov 2013
13/00199/LBC	Listed Building Consent to change of use of the ground floor into three retail units and a restaurant/café and to convert the upper floors to provide 19 apartments. Four new shop fronts, first and second floor rear extensions and external alterations to the building to include the partial rebuilding of the rear outbuilding.	Approved 04 Nov 2013
14/00844/FUL	Change of use from nightclub to two retail units (use class A1) together with new shop fronts to elevation on Smith Street and installation of an Automated Teller Machine including reconstruction of boundary wall to car park elevation and alterations to the rear elevation to provide loading doors	Approved 29 Aug 2014
14/00845/LBC	Listed building consent for new shop fronts to elevation on Smith Street and installation of an Automated Teller Machine including reconstruction of boundary wall to car park elevation and alterations to the rear elevation to provide loading doors together with internal alterations	Approved 29 Aug 2014
14/01267/LBC	Application to replace three windows at second floor level (marked W3, W4 and W5 on submitted plan)	Withdrawn 12 Jan 2015
15/00033/LBC	Application to replace eleven windows and first and second floor levels	Approved 10 Mar 2015
15/00077/DOC	Submission of details reserved by conditions 4 and 5 of planning permission 14/00844/FUL	Request Completed 27 Jan 2015
15/00078/DOC	Submission of details reserved by conditions 4 to 7 of planning permission 14/00845/LBC	Request Completed 27 Jan 2015
17/00072/FUL	Change of use and conversion of existing nightclub to form 9 self contained apartments at first and second floor levels, with a restaurant/bar at ground and first floor levels, including alterations and refurbishment of external elevations	Approved 07 Aug 2017
17/00073/LBC	Listed building consent for internal alterations and refurbishment of external elevations to provide 9 self contained apartments at first and second floor levels, with a restaurant/bar at ground and first floor levels.	Approved 07 Aug 2017
18/00554/FUL	Change of use of part first floor to bar/restaurant/function room; formation of outdoor seating area; insertion of recessed door, iron gates, replacement double doors and replacement of existing	Approved 07 Jun 2018

	door with window to front of building; and erection of external fire escape to rear including new openings	
18/00555/LBC	Change of use of part first floor to bar/restaurant/function room; formation of outdoor seating area; insertion of recessed door, iron gates, replacement double doors and replacement of existing door with window to front of building; and erection of external fire escape to rear including new openings	Approved 28 Sep 2018
24/00882/CPL	Certificate of lawfulness for confirmation of upper floor to deliver 12 additional flats (19 in total) is lawful in accordance with permissions 13/00166/FUL and 13/00199/LBC	Withdrawn 19 Nov 2024

- 3.2 Permissions 13/00166/FUL and 17/00072/FUL and their associated listed building consents were for change of use of the first and second floor levels to residential apartments. These permissions establish that the provision of apartments on the upper floors of the building is acceptable in principle and has previously been considered appropriate by Rochdale Council. Permission 17/00072/FUL for the creation of nine apartments has been partially implemented with the floorspace within the element of the building fronting Smith Street having been built out and occupied. This consent is therefore extant and the remaining apartments in the Drake Street element of the building could be built out.

4. The Proposed Scheme

Application Proposals

- 4.1 The application is for the change of use of vacant floorspace on the upper levels of the building to residential use. The application proposals relate to the part of the building fronting onto Drake Street, and the lower rise elements to the rear. The later element of the building which fronts onto Smith Street is not included within the proposals.
- 4.2 The proposed development will provide 10no. one bedroom apartments. The units will be provided across the upper floors as follows:
- First floor: 6no. one bedroom apartments
 - Second floor: 4no. one bedroom apartments (including one studio apartment)
- 4.3 The apartments will all be in accordance with nationally described space standards, in a mix of 1 bed 1 person and 1 bed 2 person apartments.
- 4.4 The primary access to the proposed residential units will be via the existing access door on the gable elevation of the building which grants access to the stairwell. This route will be shared with the existing residential apartments in the element of the building fronting Smith Street. Refuse storage will be in the enclosed yard to the rear of the site accessed via the alley off Faulkner Street / River Street. Storage for up to eight bikes will be provided using bike hangers on the ground floor, accessed via the former bar entrance on the right hand side of the Drake Street elevation.
- 4.5 External alterations involve the insertion of windows to the rear and side elevations, and two roof lights to the two storey element to the rear. Internally, some limited alteration to the internal subdivision is required to facilitate the conversion. The building has been heavily altered internally to facilitate previous changes of use, and as such there has already been a significant level of removals and modification. Nonetheless, the proposals have sought to limit the removal of historic fabric as far as possible.

5. Planning Policy Context

5.1 Planning policy guidance of relevance to the proposed scheme, and which provides the context for its assessment, is set out within the following:

- The National Planning Policy Framework (NPPF); and,
- The Development Plan for Rochdale.

National Planning Policy Framework

5.2 The National Planning Policy Framework (NPPF) was revised in December 2024 and sets out the government's planning policies and how these are expected to be applied. It replaces the Framework published in December 2023, however a presumption in favour of sustainable development continues to be at the heart of the NPPF which ensures that development is pursued in a positive way.

5.3 Development proposals that accord with an up-to-date Development Plan should be approved without delay. Where there are no relevant development plan policies, or the policies which are most important for determining the application are out of date, permission should be granted unless:

The application of policies in the Framework that protect areas or assets of particular importance provides a clear reason for refusing the proposed development; or

Any adverse impact of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination.

- 5.4 Paragraph 8 confirms that there are three dimensions to sustainable development; economic, social and environmental. To achieve sustainable development, economic, social and environmental gains should be pursued in mutually supportive ways through the planning system.

Delivery Sustainable Development

- 5.5 The NPPF explains that the purpose of the planning system is to contribute to the achievement of sustainable development. Planning policies and decisions should play an active role in guiding development towards sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area. These sustainable objectives should be delivered through the preparation and implementation of plans and the application of the policies in the framework. The NPPF is split into 17 chapters, the chapters of relevance to this development are discussed below.
- 5.6 Delivering a sufficient supply of homes (Chapter 5) – paragraph 61 explains that in order to support the government’s commitment to significantly boosting the supply of homes, it is important that a sufficient amount and variety of land comes forward for development where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.
- 5.7 Paragraph 73 highlights that small to medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly. Paragraph d) emphasises the importance of windfall sites and states that local authorities should support their development through giving great weight to the benefits of using suitable sites within existing settlements for homes.
- 5.8 Building a strong and competitive economy (Chapter 6) - emphasises that the government is committed to ensuring that the planning system should help to support economic growth. It recognises that a poor environment and a lack of housing can act as a potential barrier to investment.

- 5.9 Promoting healthy communities (Chapter 8) - the planning system should aim to achieve healthy, inclusive and safe communities. Planning decisions should aim to achieve places which promote, amongst other things, safe and accessible developments, where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion.
- 5.10 Promoting sustainable transport (Chapter 9) - to protect and exploit opportunities for the use of sustainable transport modes, development should be located and designed to give priority to pedestrian and cycle movements and have access to high quality public transport facilities.
- 5.11 Paragraph 116 advises that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios.
- 5.12 Making effective use of land (Chapter 11) – the NPPF recognises the need for the planning system to promote an effective use of land in meeting the need for homes and other uses. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or ‘brownfield’ land. Paragraph 125 (c) explains that the planning system should specifically give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, proposals for which should be approved unless substantial harm would be caused. Further, sub-section (d) of this paragraph explains that planning should also promote and support the development of under-utilised land and buildings especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively.
- 5.13 The chapter goes on to discuss how appropriate densities can be achieved. Paragraph 129 sets out that the planning system should support development that makes efficient use of land, taking into account the following:

5.14 the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;

- local market conditions and viability;
- the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;
- the desirability of maintaining an area’s prevailing character and setting or of promoting regeneration and change; and
- the importance of securing well-designed, attractive and healthy places.

5.15 Achieving well-designed places (Chapter 12) - this chapter sets out at paragraph 135 that planning policies and 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.
- Are visually attractive as a result of good architecture and appropriate landscaping.
- Are sympathetic to local character and history including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation.
- 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 and sustain an appropriate amount and mix of development and support local facilities and transport networks.
- 5.16 Create places that are safe, inclusive and accessible and which promote health and well-being.
- 5.17 Meeting the challenge of climate change, flooding and coastal change (Chapter 14) - this chapter emphasises the importance of securing reductions in greenhouse gas emissions, minimising vulnerability and providing resilience to the impacts of climate change; and, in terms of flooding, development should be made safe without increasing flood risk elsewhere.
- 5.18 Conserving and enhancing the natural environment (Chapter 15) - the planning system should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes, recognising the wider benefits of ecosystem services and minimising impacts of biodiversity and providing net gains in biodiversity where possible. It should also prevent new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability.
- 5.19 Conserving and enhancing the historic environment (Chapter 16) - the NPPF builds upon the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and requires at paragraph 207 that 'In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting'.
- 5.20 Paragraph 215 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, where appropriate, securing its optimum viable use'.

- 5.21 Paragraph 216 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 directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset'.
- 5.22 Decision making – guidance in paragraph 39 states that local planning authorities should approach decisions in a positive and creative way, making use of the full range of planning tools available, including brownfield registers and permission in principle, and work proactively with applicants. Decision-makers at all levels should seek to approve applications for sustainable development where possible.

The Development Plan for Rochdale

Rochdale Council Core Strategy

- 5.23 The Core Strategy was formally adopted by Rochdale Council on the 19 October 2016. The following policies are of relevance to the proposals.
- 5.24 Policies SO1 to SO5 in Chapter 4 of the Core Strategy set out the strategic objectives of the Council. These are centred on the themes of: economy; healthy and successful communities; design and quality place; greener environment; and accessibility and sustainable transport. The detailed policies for the Core Strategy are then grouped under these key themes.
- 5.25 In accordance with the guidance contained in the National Planning Policy Framework, Policy SD1 states that the Core Strategy is centred around delivering and supporting sustainable development. To this effect, the policy repeats the presumption in favour of sustainable development set out in paragraph 10 of the NPPF and what this means for decision-taking.

- 5.26 Chapter 6 presents the spatial strategy for the borough. Policy SP1 states that the borough will contribute to the success of the Manchester city region and the North West by playing its part in the delivery of sustainable development and investment that meets national and sub regional objectives for housing and employment growth.
- 5.27 The following detailed policies of the Core Strategy have been considered in the preparation of this planning application.
- 5.28 Policy C1 'Delivering the right amount of housing in the right places'. The policy states that the Council will identify sufficient land to deliver at least 460 net additional dwellings per year up to 2028. To do this the Council will:
- i. Ensure there is always a deliverable five year supply of land for new homes. This will include an additional buffer of 20% which would be reduced by 5% if delivery of the annual target is achieved;
 - ii. Maximise the potential of previously developed sites, including empty homes and buildings, within the urban area to achieve a target of 80% of new housing on previously developed land; and
 - iii. Ensure that sites are sustainable with good access to local services, facilities, green infrastructure, shops, jobs, schools and public transport.
- 5.29 The policy explains that: "New homes will be delivered through existing commitments and identified sites, mixed use developments and specific site allocations in the Allocations Development Plan Document. The supply of housing land is set out in the Council's latest strategic housing land availability assessment (SHLAA).
- 5.30 Policy C3 'Delivering the right type of housing'. The policy seeks housing which is designed and built to appropriate densities, recognising the need to make an efficient use of land and respond to local housing priorities.

- 5.31 Policy C6 'Improving health and well-being'. The policy supports the creation of an economic, social and physical environment which promotes and supports healthy lifestyles and outlines a number of policy objectives to achieve this.
- 5.32 Policy P1 'Improving Image'. The policy requires design which is of a high standard in all developments, which is particularly important in various locations including town centres. The policy also promotes the development and re-use of under-used land and buildings, maximising the potential for heritage assets to provide a sense of place and image.
- 5.33 Policy P2 'Protecting and enhancing character, landscape and heritage'. The policy seeks to protect and enhance the borough's valued and distinctive landscape and heritage assets.
- 5.34 Policy P3 'Improving the design of new development'. All new development including landscaping should adhere to high standards of design. The policy therein sets out design principles which development should comply with.
- 5.35 Policy G7 'Increasing the value of biodiversity and geodiversity'. The policy seeks the protection and enhancement of the borough's wildlife habitats, species and key natural resources and features.
- 5.36 Policy G9 'Reducing the impact of Pollution'. The policy requires that new development does not lead to an increase in air, water, noise, light or other pollution. New development should also not be adversely affected by existing sources of pollution.
- 5.37 Policy T2 'Improving Accessibility'. The policy states that the Council will improve accessibility by locating development where good access to public transport is available or can be provided, and will ensure that development is located to minimise the need to travel by car. Development proposals should also satisfy the accessibility hierarchy.

- 5.38 Policy DM1 'General Development Requirements'. The policy sets out a number of basic planning and design considerations which development proposals will be expected to demonstrate compliance with.

Rochdale Borough Council Unitary Development Plan (saved policies)

- 5.39 Upon adoption of the Core Strategy, the majority of policies within the Rochdale Unitary Development Plan were deleted, those policies which were saved will be replaced through the Site Allocations DPD or other DPD. The saved policies of relevance to this application are outlined below.
- 5.40 Policy S/5 'Development Elsewhere In Town Centres'. This saved policy advises that housing development in parts of the town centre that are not identified as Primary, Secondary or Central Shopping Areas will be permitted providing it will be appropriate in scale and character, compatible with neighbouring uses, and not harm the vitality or viability of the centre.
- 5.41 Policy BE/17 'New Development Affecting Conservation Areas'. This policy advises that development proposals will be permitted that preserve or enhance the character or appearance of a conservation area, and outlines various principles that will be considered in applying the policy.
- 5.42 BE/18 'Changes Of Use To Buildings In Conservation Areas'. This policy advises that Proposals for the change of use of unlisted buildings in Conservation Areas will be permitted provided the new use is compatible with adjoining uses, the conversion respects the significance of the buildings and their settings, and the provisions of policy BE/17 are satisfied.

Places for Everyone

- 5.43 PfE is a joint Development Plan Document covering nine Greater Manchester districts (Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan). It

identifies the quantum of new housing and employment development, supports the delivery of key infrastructure, and protects environmental assets. The joint plan determines the kind of development that takes place in their Boroughs, 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 took effect and became part of the statutory development plan for each of the nine PfE authorities on 21 March 2024.

- 5.44 The policies which are relevant to the application proposals are listed below:
- 5.45 Policy JP-S1: Sustainable Development: To help tackle climate change, development should aim to maximise its economic, social and environmental benefits simultaneously.
- 5.46 Policy JP-P1: Sustainable Places: This policy sets out various criteria including that development should be socially inclusive, safe, functional and convenient and well connected.
- 5.47 Policy JP-S2: Carbon and Energy: This policy sets out objectives for meeting Manchester's carbon neutrality commitments.
- 5.48 Policy JP-C8: Transport Requirements of New Development: This policy states that new development will be required to be located and designed to enable and encourage walking, cycling and public transport use.
- 5.49 Policy JP-H1: Scale, Distribution and Phasing of New Housing Development: Rochdale Council needs to deliver 10, 472 homes during the plan period, with an annual average of 616 homes per year.
- 5.50 Policy JP-H3: Type, Size and Design of New Housing: Development across the plan area should seek to incorporate a range of dwelling types and sizes to meet local needs and deliver more inclusive neighbourhoods. Residential developments should provide an

appropriate mix of dwelling types and sizes reflecting local plan policies, and having regard to masterplans, guidance and relevant local evidence.

- 5.51 Policy JP-H4: Density of New Housing: New housing development should be delivered at a density appropriate to the location, reflecting the relative accessibility of the site by walking, cycling and public transport and the need to achieve efficient use of land and high-quality design.

Supplementary Planning Documents

- 5.52 The Council have also adopted a number of Supplementary Planning Documents (SPDs) which the scheme will have to be assessed against, these include the Guidelines and Standards for Residential Development SPD; Rochdale Town Centre East Area Framework SPD; Biodiversity and Development SPD; Climate Change Adaption SPD; and Energy and New Development SPD.

Guidelines and Standards for Residential Development SPD (2016)

- 5.53 This SPD was adopted in June 2016. It provides a set of standards to be considered in the design of new housing to ensure that the impact on neighbouring residents is limited and that the design and appearance of new homes makes a positive contribution to the local environment.

Biodiversity and Development SPD (2008)

- 5.54 Rochdale Borough Council adopted the Biodiversity and Development SPD in January 2008. The SPD explains the level of information that should be provided with a planning application and the principles that should be adhered to in the design and implementation phases of development.

Climate Change Adaption SPD (2012)

- 5.55 Adopted in June 2012, the Climate Change Adaption SPD outlines guidance for developments in order to assist climate change adaption. The SPD addresses eight broad categories: location; layout and orientation; materials / structure; environmental performance; green roofs and walls; rainwater harvesting; Sustainable Drainage Systems; and green and blue infrastructure.

Energy and New Development SPD (2008)

- 5.56 The Borough Council adopted this SPD in 2008, the document sets out the Council's requirement in terms of Code for Sustainable Homes and BREEAM standards.
- 5.57 The proposed redevelopment scheme has been designed in accordance with the policies of the UDP, and the above SPDs.

6. Planning Appraisal

6.1 Having regard to the relevant planning policy guidance in the previous section, the key material considerations against which the proposed scheme should be considered, and which are discussed in this section, include:

- Principle of Development
- Residential Amenity
- Design and Heritage Considerations
- Highways, Accessibility and Parking
- Environmental Considerations
- Crime and Security
- Waste Management
- Sustainable Development: Economic, Social and Environmental Benefits

Principle of Development

6.2 The application proposals are for conversion of vacant floorspace on the upper floors of a commercial building to residential use. This is regarded to be acceptable in principle given that permission has previously been granted for the conversion of the first and second floor levels of the building to residential use (see permissions 13/00166/FUL and 17/00072/FUL). Permission 17/00072/FUL and its associated listed building consent have been partially implemented with apartments being built out and occupied on the upper floors of the Smith Street element of the building. The permission is therefore extant and the applicant could deliver the approved apartments on the first and second floor of the Drake Street element of the building. This application involves slight changes to the approved layout as well as conversion of the roof space, and therefore a fresh application has been submitted.

- 6.3 Paragraph 124 of the NPPF states that planning should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Paragraph 125(d) of the NPPF states that planning should promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively. Paragraph 90(f) states that planning policies should recognise that residential development often plays an important role in ensuring the vitality of centres and encourage residential development on appropriate sites. The proposals are wholly in accordance with national policy objectives by delivering homes in an under-utilised building within an exceptionally sustainable location in Rochdale Town Centre. The commercial use on the ground floor is to be retained. The proposals will enhance the vitality and viability of the town centre by bringing this floorspace back into active use and increasing footfall and the customer base to nearby shops and facilities.
- 6.4 PfE policy JP-H1 sets out that Rochdale needs to deliver 616 homes per year and 10,472 over the plan period. The proposals will deliver 11 residential units and will make a small but meaningful contribution to Rochdale's housing targets, whilst at the same time assisting in the regeneration of this part of the Town Centre. The proposed dwelling mix is also considered acceptable given the Town Centre location of the site which warrants more dense development, together with the constraints associated with reusing an existing building. PfE Policy JP-H4: 'Density of New Housing' advises that new housing development should be delivered at a density appropriate to the location which in this instance means promoting a density that makes efficient use of land. The proposals constitute the redevelopment of previously developed land with much needed housing, thereby representing an efficient use of land and relieving pressure to build on more valuable and potentially less sustainable greenfield locations.
- 6.5 Saved UDP Policy S/5 advises that housing development in parts of the town centre that are not identified as Primary, Secondary or Central Shopping Areas will be permitted providing it will be appropriate in scale and character, compatible with neighbouring uses, and not harm the vitality or viability of the centre. The proposed residential use will be compatible

with neighbouring town centre uses, with increased footfall helping to boost custom and trade to local businesses. Retail use will be retained at ground floor level.

6.6 In addition to the above, the proposed development will be associated with a range of planning benefits, including:

- Making a positive contribution to Rochdale's housing supply;
- Providing housing in a highly sustainable and accessible location, which involves the re-use of an existing vacant building;
- Increasing footfall in Rochdale Town Centre and thereby having a positive impact on the custom of nearby commercial uses; and,
- Increasing surveillance thereby helping to minimise the risk and fear of crime.

6.7 Overall, the principle of the proposed development is considered to be acceptable and in accordance with local and national planning policy.

Residential Amenity

6.8 The Guidelines and Standards for the Residential Development SPD provides parameters regarding the development of housing. The proposed development relates to the conversion of an existing building. The design of the apartments has been based on the 'Technical housing standards – nationally described space standard' document. All apartments meet or are in excess of the requirements for a one bed apartment. Habitable rooms within all of the apartments will be served by windows and will benefit from a good level of outlook and natural lighting. The apartments will also be designed and fitted to meet current building regulations in terms of energy efficiency.

6.9 The site is not in close proximity to other residential uses and will be free from overlooking. The arrangement of the building and surrounding built form means that there is a good degree of separation between most habitable room windows and surrounding development. It is noted that the windows serving apartment 4 on the first floor may fall short

of the standards set out in section 4 of the SPD, however the SPD notes that exceptions may be made where the character and density of the surrounding area would be best preserved by reduced distances and this would not detract from the general levels of privacy and amenity typical in the area. The application building is located in a Town Centre where buildings are densely developed in a tight urban grain. Furthermore, windows are not directly facing towards the rear of the terrace properties on Drake Street and there is an oblique relationship which lessens any impact. To mitigate this, rooflights have also been proposed to serve this apartment and increase the level of natural light and outlook.

- 6.10 The neighbouring uses, which comprise mostly Class E office, retail, and services, are wholly compatible with the proposed residential use and there would be no loss of amenity in this regard. The submitted Noise Impact Assessment recommends the installation of secondary glazing to the habitable room windows, it is anticipated that the details of this can be secured via planning condition.
- 6.11 Overall, the scheme is acceptable in terms of impact to residential amenity of existing and future occupiers. The proposals are in accordance with the Guidelines and Standards for Residential Development SPD, and Core Strategy Policy DM1, and the relevant provisions of the NPPF.

Design and Heritage Considerations

- 6.12 The external alterations proposed involve the insertion / reinstatement of windows to the rear and side elevations of the lower rise elements to the rear. The submitted Heritage Statement prepared by Paul Butler Associates provides a robust appraisal of the heritage impact from the proposed alterations upon the significance of the listed building and the Rochdale Town Centre Conservation Area. The report concludes that the public benefits of the proposals outweigh the less than substantial harm in accordance with paragraph 115 of the NPPF. In design terms, the proposed windows and rooflights are considered to be acceptable when considering their siting, scale and the number proposed.

- 6.13 The proposals are consistent the relevant local and national policies relating to design and heritage.

Highways, Accessibility and Parking

- 6.14 The site is located in an exceptionally sustainable and accessible location in the centre of Rochdale Town Centre. Within a short walk, future residents will have access to a range of shops, amenities, leisure facilities, services and job opportunities. The site benefits from good public transport links, being located in close proximity to Rochdale Town Centre Metrolink tram stop and Rochdale Interchange, both offering regular services to a wide range of destinations. Rochdale train station is also within walking distance of the site.
- 6.15 The application proposals do not involve provision of car parking spaces. This is considered appropriate given the highly sustainable, town centre location of the site. Indeed, the level of provision proposed within the scheme will also help to support a reduction in reliance upon the private car and help to encourage use of more environmentally friendly and sustainable modes of transport amongst future residents. Provision of secure cycle storage for eight bikes will be provided internally within the building, which will also help to encourage sustainable, healthy transport modes. This level of provision exceeds the policy requirement set out in the Core Strategy for 1 space per 5 dwellings.
- 6.16 It has been demonstrated that the scheme accords with the transport requirements of the NPPF; and Core Strategy Policy T2.

Environmental Considerations

Ecology

- 6.17 A Daytime Bat Survey has been undertaken by Rachel Hacking Ecology and has been submitted in support of this application. The report confirms that the site offers **low** potential to support roosting bats and recommends further survey work is required to establish the

status of roosting bats and inform mitigation requirements. One dusk emergence survey must be carried out during the bat active season between May and August.

Flood risk

- 6.18 The application site is located within a flood zone 3 area, and therefore has been supported by a Flood Risk Assessment prepared by TJ Booth Associates. The report undertakes a review of the proposals in light of Environment Agency flood data. The report concludes that the proposals are for a change of use of the upper floors of an historic building. The proposed residential apartments will be safe in flood events up to and including the design 100yr+35% flood event. The principal issue affecting the proposed tenants is access/egress in flood events, and signing up to the flood warning scheme. The submitted report provides guidance and details of an Emergency Evacuation Plan to mitigate this issue. The report concludes that providing this is followed, then no other residual risks remain.

Air Quality

- 6.19 The development is partly located within the AQMA. As such, there is the potential for the exposure of future residents to poor air quality and any emissions associated with the proposals to cause air quality effects within this sensitive location. An Air Quality Assessment has been submitted in support of the application to consider this. The report confirms that based on the assessment results, air quality factors are not considered a constraint to planning consent for the development.

Crime and Security

- 6.20 The vacancy of the application building means it is vulnerable to vandalism and unauthorised occupation. The proposed development will reduce the opportunity for crime by bringing the building back into use, and increasing natural surveillance in the area. A Crime Impact Statement (CIS) has been prepared by Design for Security and is submitted in support of this planning application. The CIS highlights the positive aspects of the scheme from a security perspective and makes some general recommendations of security

measures which are considered to enhance the security of the development. These will be considered at the detailed design stage once planning approval has been obtained.

Waste Management

Residential Use

- 6.21 Bin storage will be located within the enclosed external yard located to the rear of the property, accessed off River Street / Faulkner Street. Provision of separate bins will allow for the segregation of refuse and recyclable waste. Residents will be responsible for transferring waste to the communal bin store as per the route identified on the submitted site plan. Waste operatives will have access to the bin store, or the building management will present bins on River Street / Faulkner Street on the morning of waste collection and return bins to the store following collection.

Sustainable Development: Economic, Social and Environmental Benefits

- 6.22 Economic: It is well documented that a shortage of housing can result in economic barriers. The provision of 11 residential units will make a meaningful contribution to Rochdale's housing delivery targets. Nearby shops and businesses will also benefit as a result of the proposals increasing the customer base. Retention of the commercial use at ground floor level for future occupation by a new commercial operator will bring back an active use to this frontage, helping to protect the vitality and viability of this key part of the town centre.
- 6.23 Social: The proposals will provide much needed housing in the town centre which has a full range of amenities, services and employment opportunities on the doorstep, also being well served by public transport. The proposed development will deliver good quality housing and contribute to the creation of a mixed and sustainable community.
- 6.24 Environmental: The proposals will provide 11 residential units within an existing building, in a sustainable urban location. The scheme will provide much needed accommodation, which

will help ease pressure on more sensitive greenfield and Green Belt sites. Future residents will benefit from the highly sustainable and accessible nature of the development, thereby reducing the need to travel by car and helping to reduce carbon emissions and deliver improved air quality in contrast to a development with car parking.

- 6.25 On the basis of the above it is demonstrated that the proposals will deliver economic, social and environmental benefits and thereby constitute sustainable development, in accordance with chapter 2 of the NPPF.

7. Conclusion

- 7.1 This Planning Statement has been prepared by Paul Butler Associates on behalf of Cassel & Fletcher. The application proposes the change of use of vacant upper floor levels to 10no. residential apartments, together with insertion of rooflights and window openings. The application building is Grade II listed and is located within the Rochdale Town Centre Conservation Area.
- 7.2 This Statement demonstrates that the proposals accord with national and local planning policy guidance. The scheme will also deliver a series of planning benefits including:
- Making a positive contribution to Rochdale's housing supply;
 - Providing housing in a highly sustainable and accessible location, which involves the re-use of an existing vacant building;
 - Increasing footfall in Rochdale Town Centre and thereby having a positive impact on the custom of nearby commercial uses;
 - Increasing surveillance thereby helping to minimise the risk and fear of crime; and,
 - Bringing vacant floorspace within a Grade II listed building back into its original use. The active use of the building will ensure the future maintenance of this important listed building in Rochdale Town Centre, while if left vacant it would be at risk of further deterioration
- 7.3 As evidenced in this statement, the site has been shown to be located in a suitable and sustainable location for residential development with no known adverse impact arising from the development that would significantly and demonstrably outweigh its benefits. Indeed, it is our view that no material planning considerations exist that would justify refusal of planning permission. On this basis Paul Butler Associates are pleased to submit this application for planning permission and listed building consent and look forward to working with the council on progressing it through to a positive determination.