



Supporting Planning Statement Addendum

Residential and Care planning application (reference:
23/00335/FUL)

Parkfield House, Middleton
July 2025

CONTENTS

1	INTRODUCTION	1
2	THE EXISTING SITE AND BACKGROUND TO THE 2023 PROPOSALS...	2
3	POST-SUBMISSION CONSULTATION AND ENGAGEMENT	5
4	THE REVISED 2025 PROPOSED DEVELOPMENT.....	9
5	PLANNING POLICY AND UPDATED ASSESSMENT	15
6	SUMMARY AND CONCLUSIONS.....	34

Prepared By: Jamie Lynch, Consultant

Reviewed By: Jon Suckley, Managing Partner

Asteer Planning LLP, Mynshulls House, 14 Cateaton Street, Manchester, M3 1SQ

Version Final

Date: 2 June 2025

1 INTRODUCTION

1.1 This Supporting Planning Statement (“SPS”) Addendum has been prepared by Asteer Planning on behalf of Muller Property Group (‘the Applicant’) in relation to a full planning application on land at Parkfield House, Manchester Old Road Middleton, M24 4DY (‘the site’).

1.2 A full planning application (ref. 23/00335/FUL) was submitted and subsequently validated on 21 April 2023. The description of development remains unchanged and comprises:

“Residential development comprising of 20 dwellings (Use Class C3) and a 80 bed care home development (Use Class C2) including creation of new access, car parking, landscaping, open space and other associated works following demolition of Parkfield House.”

1.3 A Planning Performance Agreement (“PPA”) has been agreed and a clear programme set out to update the scheme and address key concerns raised previously.

1.4 The purpose of this Addendum is to present the revised proposals - prepared in consultation with Officers at Rochdale Metropolitan Borough Council (“RMBC”) - to address consultee comments. In addition, the application addresses any new planning policy which will inform the decision making process. The remainder of this Addendum comprises:

- Chapter 2: The Existing Site and Background to the 2023 Proposals.
- Chapter 3: The Revised 2025 Proposed Development.
- Chapter 4: Key Post-submission Consultation Responses.
- Chapter 5: Planning Policy Update and Assessment.
- Chapter 6: Summary and Conclusions.

2 THE EXISTING SITE AND BACKGROUND TO THE 2023 PROPOSALS

The Existing Site

- 2.1 The site is approximately 1.1 hectares in size and is located directly to the west of the town of Middleton within the Borough of Rochdale.
- 2.2 The site comprises a 4 storey 'L' shaped, former commercial building in the form of Parkfield House, which is now vacant and is located within spacious grounds of a large car park. The site is accessed from Manchester Old Road 'A576', via two entrances with one adjacent to Middleton Cenotaph and the other adjacent to Middleton Skatepark.
- 2.3 The site has been vacant since February 2020 and is the subject of consistent trespassing and vandalism since then. The below images illustrate the current on-site conditions.

Figure 2.1: Site Photo)



Heritage Baseline

- 2.4 The site is within the Manchester Old Road Conservation Area. There are no listed buildings within the site; however the site is adjacent to and within the setting of a listed building - War Memorial, Perimeter Walls and Loggia, Garden of Remembrance (NHE ref. 1415410).

- 2.5 The Council maintains a list of Non-Designated Heritage Assets ("NDHA") which it believes have some significance to local heritage by making important contributions to local distinctiveness, settlement formation, traditional character or history of the borough but do not meet the criteria for formal designation. Assets are assigned non-designated status in line with selection criteria - architectural significance, historical significance, positive contribution and designed landscape. Parkfield House is included on the Council's list of NDHAs.
- 2.6 The three key heritage assets for consideration as part of this application comprise Parkfield House as an NDHA,; Grade II Listed Garden of Remembrance; and the Manchester Old Road Conservation Area.

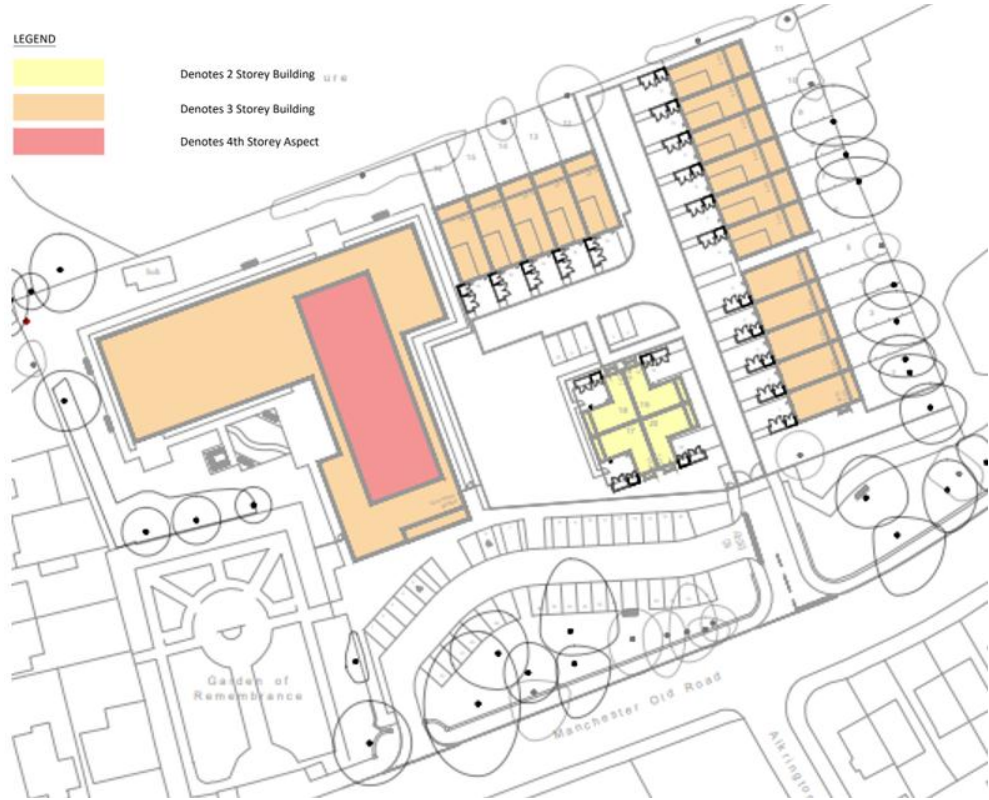
The 2023 Proposals

- 2.7 The 2023 proposals sought to deliver the following key elements:
- Demolition of Parkfield House.
 - Replacement of Parkfield House with an 80-bed care home (use class C2) extending up to 3 and 4 storeys in height.
 - Delivery of 20no. residential dwellings (use class C3) principally extending up to 3 storeys in height, with a small proportion (4 dwellings) extending up to 2 storeys in height.
 - Gated access into the residential areas.
 - A one-way vehicular access in the western extent of the site; and a two-way vehicular access in the eastern extent of the site.
 - Car parking at the site frontage.
- 2.8 The below plans illustrate the 2023 site layout and scale of development.

Figure 2.2: 2023 Proposed Site Layout



Figure 2.3: 2023 Scale of Development



3 POST-SUBMISSION CONSULTATION AND ENGAGEMENT

3.1 The Applicant has engaged proactively with RMBC since submission of the planning application. The following bodies have been consulted on the proposals.

- Highways And Engineering.
- Strategic Planning.
- Env Health - Air Quality.
- Tree Officer.
- Conservation And Design.
- United Utilities.
- Environment Agency.
- Greater Manchester Archaeological Advisory Service.
- Transport For Greater Manchester.
- Playing Pitch Strategy Implementation Andy Quinn.
- Joint Committee Of National Amenity Societies.
- Schools Service.
- Adult Care.
- Strategic Housing-Affordable Housing.
- Lead Local Flood Authority/Drainage.
- Environmental Control (Landfill Gas).
- Natural England (North West Planning).
- Gtr Manchester Ecology Unit.
- GMP - Design For Security.
- Historic England.

- Open Space - Environmental Management.
- GM Fire Service.
- Env Health - Noise/Odours.

3.2 The vast majority of consultees did not object to the proposals and recommended conditions to secure certain measures. Design comments were provided by the Twentieth Century Society, Historic England, RMBC highways officer and RMBC arboricultural officer. These comments form the principal basis to revisit the proposals submitted in 2023. A summary of each consultees comments are provided below.

Key Consultee Design Feedback

Trees

3.3 The Council's tree officer raised two key queries:

- Loss of category A and B trees.
- The feasibility of tree retention in the gardens of residential dwellings within the site's eastern extent.

Built Heritage

3.4 The principal consultee comments associated with Built Heritage have been issued by the Twentieth Century Society and Historic England. The Twentieth Century Society object to the demolition of Parkfield House. Historic England made the following observations:

- The principle and level of the proposed development is acceptable from a heritage point of view. The site has been previously developed, though not as extensively, and efforts have been made to draw influence from the 1960's building in terms of form and mass.
- The designs should be revisited as they could do more to reflect the 20th century building to be lost. The current proposals don't adequately reflect the solid to void ratios, and the articulation and activation of the elevations are too simple. Particularly when considering the existing building but also the wealth and variety of the built environment surrounding the site.

Highways

3.5 Highways officers had a number of detailed comments on the 2023 layout:

- The road width of 4.1m may prove difficult for cars parking.
- Queries regarding pedestrians using the vehicular access in order to access a pedestrian path on the site's western boundary.
- Request for swept path analysis including refuse; minibuses and ambulances. Parking should be available for a minibus / ambulance.
- Vehicle parking provision for care home (27 spaces) is considered acceptable.
- The Council intend to adopt roads which serve more than five dwellings. Adequate turning facilities should be demonstrated as part of tracking to demonstrate the roads have been designed to an adoptable standard. The swept path analysis needs to be based on a 11.1m vehicle.
- The gated access may restrict servicing access into the site and turning facilities.
- Parking bays do not appear to meet required dimension standards.
- Concerns regarding the new access in regards to junction proximity and the conflicting turning movements with the existing junction of the A576 and Alkrington Park Road.
- Updated accident data requested to inform road safety analysis.
- The site is in a sustainable location in terms of access to amenities and public transport links.

Strategic Housing and Adult Social Care

3.6 Requested further clarification on several matters including mix, affordable housing; and care need.

Planning Performance Agreement

3.7 Over the past few months a positive PPA process has been undertaken. This has resulted in the following meetings and engagement with Officers:

- Application Review Session 1 (MS Teams): 3 July 2024.

- Application Review Session 2 (MS Teams): 24 January 2025.
- Site visit: 2 April 2025.
- Design Workshop 1 (RMBC Offices): 2 April 2025.
- Design Workshop 2 (RMBC Offices): 15 May 2025.

4 THE REVISED 2025 PROPOSED DEVELOPMENT

- 4.1 As a result of consultee feedback and engagement with RMBC Officers, a revised site layout is illustrated below and a detailed commentary of the key changes implemented by the revised scheme are set out later in this Chapter in Table 4.1.

Figure 4.1: Proposed Site Layout



Quantum and Use

- 4.2 The proposed development remains unchanged and comprises an 80-bed care home (use class C2) and 20 residential dwellings (use class C3).

Scale

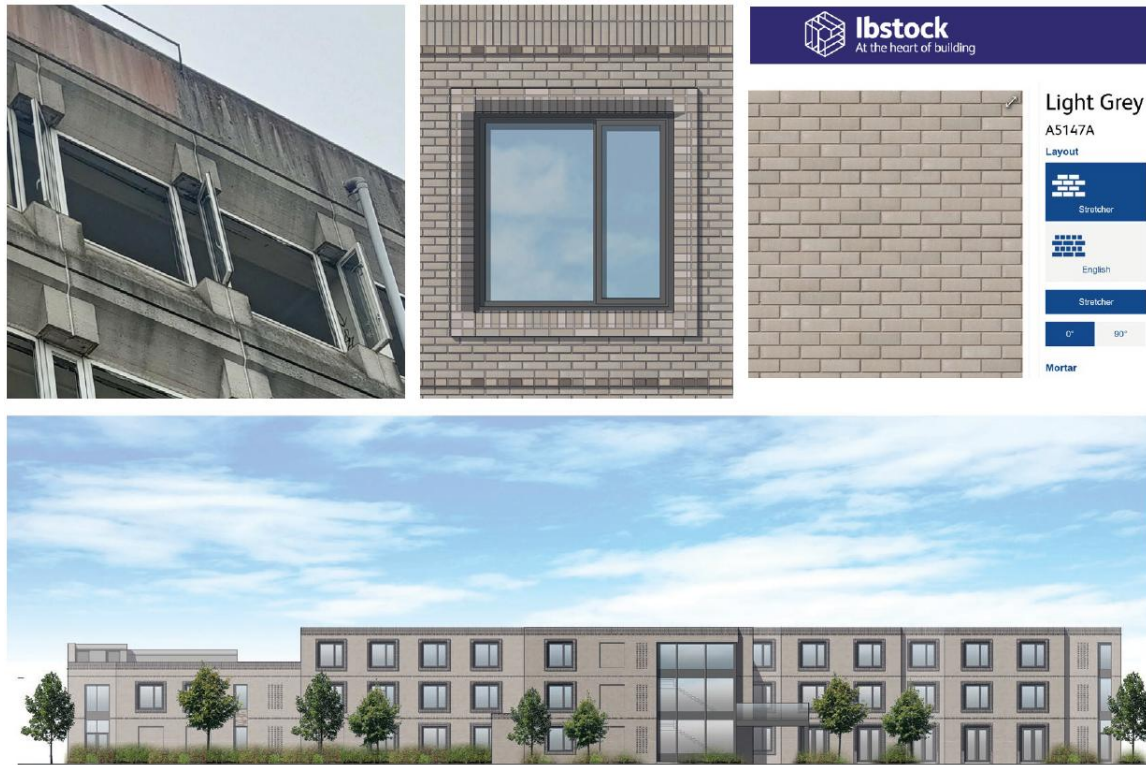
- 4.3 The maximum building heights have been reduced to 3 storeys for the care home and 2.5 / 3 storeys for the residential dwellings.

Access and Parking

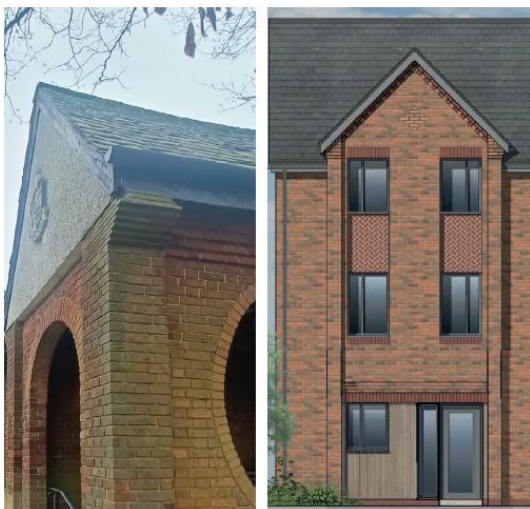
- 4.4 A single vehicular access is proposed in the western extent of the site. This extends to 5.37m in width between the existing pillars (retained on heritage grounds) and provides 2.4x43m visibility splays. The road widens to 5.5m as it enters into the site.
- 4.5 In terms of pedestrian access points, there are three locations proposed including:
- A separate pedestrian access alongside the vehicular access in the western extent of the site.
 - A pedestrian access in the eastern extent of the site via the new public footpath provided in an east-west direction.
 - A pedestrian access into Limefield Park to the north of the site.
- 4.6 The care home parking layout provides 27no. car parking spaces. RMBC Highways Officers previously confirmed this level of parking is acceptable. Each residential dwelling is provided with 2no. car parking spaces. Cycle parking storage is provided in the rear gardens of each residential dwelling, and a secure cycle store is provided within the curtilage of the care home for residents.

Design Drivers, Appearance and Materiality

- 4.7 The care home is smaller in mass, yet similar in form to the existing Parkfield House with simple, elegant elevations. The building uses light grey ibstock brickwork in lieu of concrete, providing a softer appearance and reference to traditional materials found in the Conservation Area elsewhere. There is careful elevational treatment design to improve the solid to void ratio when compared with the 2023 scheme. The below image illustrates the existing Parkfield House alongside the brickwork and material detailing for the new care home. This includes patterned brickwork detailing, recessed windows and material palette informed by Parkfield House.
- 4.8

Figure 4.2: Extract of Care Home Elevational Treatment and Design Response

- 4.9 The residential dwelling designs have been amended to reflect the local townscape and the work of Edgar Wood, a locally prominent architect in the area. Strong gables are proposed with a clear verticality grounding the buildings in the townscape.

Figure 4.3: Extract of Residential Elevational Treatment and Design Response

Amenity, Trees and Landscaping

- 4.10 A significantly improved landscaping strategy has been prepared which ties into the pedestrian movement network. The scheme delivers direct access to Limefield Park for on and off-site residents.
- 4.11 The care home has a new sensory garden and there is a terraced external amenity space on the first floor off a residents' lounge.
- 4.12 The revised designs reduce the effects on Category A and B trees compared with the previous scheme. The 2025 scheme will result in the loss of 1no. Category A tree (T3), and 2no. Category B trees (T34 and T36). 5no. Category C trees and 7no. Category U trees are also proposed for removal.

Design Response to Consultees

Table 4.1: Overview of Design Response to Consultees

Item	Information
RMBC Planning and Urban Design Officers	
Housing Standards	
Compliance with Part M4(2)	The revised scheme demonstrates 100% of dwellings comply with Part M4(2)
Compliance with nationally described space standards	100% comply with 4b5p standards.
Highways, Access and Parking	
Removal of the secondary access	This has been removed and a pedestrian/cycle only access is provided in the eastern extent of the site.
Provision of pedestrian access into Limefield Park.	This has been incorporated into the northern site boundary.
Review of the vehicle access arrangement	The existing boundary wall has been largely retained, with the pillars remaining in-situ. An opening is provided on the eastern extent of the pillars to provide a pedestrian/cycle only access location.
Southern bank of parking is a detracting feature	Removal of the bank of parking within the southern extent of the site.
East-west pedestrian infrastructure	A clear legible route for pedestrians is provided in the southern extent of the site which is separated from Manchester Old Road through the retained vegetation and enhanced landscape planting.
Parking	The proposals comply with local parking standards.
Boundary Features and Infrastructure	
The boundary wall for the care home should be reduced and comprise a mix of wall, fence and hedgerow.	This has been addressed on the boundary treatment plan.
Incorporate bin and cycle stores into the layout	These have been included within rear gardens for each residential property. The care home has a

Item	Information
	bespoke communal bin store and cycle storage facilities on-plot.
Historic England	
Impacts on the Conservation Area – Scale of development	Relocation of Parkfield House further to the north and east, reducing the impact of development to the setting of the Garden Remembrance. Reduction in the maximum height of the care home from 4 storeys to 3 storeys. As a result, the proposed scheme is a substantial reduction when compared with the existing Parkfield House development. The residential uses have also been reduced from a maximum height of 3 storeys to 2.5 / 3 storeys.
Impacts on the Conservation Area – Materiality and Fenestration	A revised materials palette has been selected for the care home to better reflect the Parkfield House elevations and tone. These measures include appropriate grey brick tones; brick; and glazing improvements to adjust the solid to void ratios.
Arboricultural Officer	
Loss of category A and B trees	All of the Category A trees previously identified for removal have been retained. However, 1no. Category A tree (T3) now requires removal compared with 2no. trees under the previous scheme. 2no. Category B trees require removal under the current proposals compared with 4no. trees under the previous scheme.
Query whether trees on the eastern boundary can be feasibly retained	The arboricultural consultant has updated the AIA and confirmed the trees which can be feasibly retained on the eastern boundary.
Highways Officer	
Visibility splays	The access proposals illustrate the visibility splays which can be achieved and comply with relevant standards.
Vehicle tracking	Vehicle tracking is provided within the Transport Statement based on an 11.34m refuse vehicle.
Parking for minibus and ambulance at care home	3no. bays are provided near the entrance of the care home which could be used by a minibus / ambulance.
Parking dimensions	The parking space dimensions for the residential dwellings are 2.5mx5m (2.9m width adjacent to wall). The parking space dimensions for the care home are: • Standard – 2.5mx5m • Blue badge – 2.5mx5m (1.2m buffer between spaces) • Minibus / ambulance – 8.5mx4m

Item	Information
Road and footpath designed to adoptable standard	Road width internally within the development is 5.5m. The footpaths are predominantly 2m wide (with minimum widths of 1.5m at select points).

5 PLANNING POLICY AND UPDATED ASSESSMENT

Updated Planning Policy

- 5.1 Since submission of the 2023 planning application there have been updates to national and local planning policy.
- 5.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires Local Planning Authorities to determine planning applications in accordance with a statutory Development Plan unless material planning considerations indicate otherwise. For the purpose of these planning applications, the statutory Development Plan comprises:
- Rochdale Core Strategy (adopted on 19 October 2016).
 - Saved Policies of the Rochdale Borough Unitary Development Plan ('UDP') (1996).
 - Places for Everyone Joint Development Plan (took effect 21 March 2024).
- 5.3 Other material considerations include:
- National Planning Policy Framework ("NPPF") (December 2024).
 - Planning Practice Guidance ("PPG").
 - Building for a Healthy Life.
 - National Model Design Code.
 - National Design Guide.
 - Affordable housing SPD (March 2008).
 - Provision of recreational open space in new housing SPD (updated January 2017).
 - Guidelines and standards for residential developments SPD (June 2016).
 - Biodiversity and development SPD (updated February 2017).
 - Climate Change Adaptation SPD (June 2012).
 - Residential Design Guide SPD.
- 5.4 The December 2024 NPPF and PfE are new policy documents since the 2023 application was submitted.

Planning Policy Assessment

5.5 A comprehensive assessment of the proposed development has been presented within the SPS submitted in 2023. However, due to the design changes and policy updates, an updated assessment has been undertaken on the following key areas which will inform the Council's planning balance exercise:

- Matter 1: Principle of Development.
- Matter 2: Built Heritage.
- Matter 3: Housing.
- Matter 4: Design, Character and Appearance.
- Matter 5: Highways.
- Matter 6: Trees.
- Matter 7: Other Material Considerations.

Matter 1: Principle of Development

5.6 The principle of development for both the care and residential uses remains largely as presented in the March 2023 SPS. However, with regards to the residential uses, PfE establishes revised housing targets over the Plan period, with a requirement for Rochdale to deliver 10,472 dwellings over the plan period to 2039, at an average of 616 dwellings per year, increasing periodically, with the delivery target at 568 dwellings over 2022-25.

5.7 The changes to the NPPF made in December 2024 also revised the standard method for calculating housing requirements, which places an uplift in the requirement for new houses of 1,031 per year once transitional arrangements end on 1st July 2026.

5.8 Revisions to the NPPF have also placed a greater significance on the development of brownfield sites for housing, with PfE also establishing a clear aspiration to focus development on previously developed, or brownfield sites such as the application site. Taken collectively, additional weight is afforded to the overall principle of development of this site to provide new housing.

Matter 2: Built Heritage

- 5.9 As set out previously, there are three key heritage assets which relate to the site including the NDHA Parkfield House; Grade II Listed War Memorial, Perimeter Walls and Loggia, Garden of Remembrance; and the Conservation Area. There are a number of other heritage assets in the wider area but these are not affected by the proposed development so are not considered further here.
- 5.10 A Heritage Statement was prepared by Nexus Heritage in support of the application with an Addendum provided by Kathryn Sather & Associates based on the revised proposals. Each heritage asset is addressed in turn below following a brief review of key policy tests.
- 5.11 The Heritage Assessment has assessed the effects associated with the alterations to the existing access. The stone wall and gate posts are not historically associated with the Garden of Remembrance or Parkfield House. The access works will have a neutral impact to the Grade II Listed war memorial, conservation area and Parkfield House and are, therefore, not discussed further.

Key Heritage Policies and Legislation

- 5.12 The NPPF states that heritage assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance (paragraph 202). Applicants should describe the significance of any heritage assets affected by proposals.
- 5.13 Local authorities should take the significance of an asset into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal (paragraph 208). When considering the impact of proposals on the significance of an asset, great weight should be given to the asset's conservation and the more important the asset, the greater the weight should be, irrespective of the level of potential harm (paragraph 212). Any harm to, or loss of significance requires clear and convincing justification (paragraph 213).
- 5.14 In determining applications, local planning authorities should take account of:
- a) The desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
 - b) The positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and

- c) The desirability of new development making a positive contribution to local character and distinctiveness (paragraph 210).

5.15 With regards to designated heritage assets, paragraph 215 states that:

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

5.16 With regards to non-designated heritage assets, paragraph 216 states that:

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

5.17 Paragraph 220 of the NPPF states:

“Not all elements of a Conservation Area or World Heritage Site will necessarily contribute to its significance. Loss of a building (or other element) which makes a positive contribution to the significance of the Conservation Area or World Heritage Site should be treated either as substantial harm under paragraph 214 or less than substantial harm under paragraph 215, as appropriate, taking into account the relative significance of the element affected and its contribution to the significance of the Conservation Area or World Heritage Site as a whole.”

Assessment of the Setting impacts to War Memorial, Perimeter Walls and Loggia, Garden of Remembrance

5.18 There are no direct effects to the Grade II Listed asset, hereafter known as the Garden of Remembrance. Therefore the potential effects are principally associated with impacts to the setting. The following assessment identifies the impact of the proposals on the setting and significance of the listed structures that have been discussed above. This assessment will consider the siting and location of the proposed development in relation to the setting of the listed structures, and consider the potential impact upon how this site is experienced and understood.

- **The Location and Siting of the Development:** The proposed development is located to the north and east of the listed structures. There are views of the War Memorial from the proposal site, although as the structures are reasonably self-contained and single storey, the listed structures are not readily visible generally. Due to the intended design, the key views of the War Memorial are from the road, and from the interior of the Garden of Remembrance. The proposed development site will not physically or visually isolate the heritage asset and will have no impact on the key views.
- **The Form and Appearance of the Development:** The proposed development will not affect the significance of the listed War Memorial and will not distract or compete with the heritage asset. The proposed care home is one storey lower than the existing office block, and both the care home and townhouses will be a similar scale and proportion to the houses in the area. In addition the height of the proposed care home has been reduced further to two storeys adjacent to the memorial gardens. The materials proposed are sympathetic and appropriate to the local area. Therefore, the new development will not appear prominent or dominant within the setting of the heritage asset.
- **Wider Effects of the Development:** The proposed development will slightly alter the general character of the application site, from a derelict office use to residential uses. The new use will create additional movement of people and interaction with the environment, particularly through the accessibility to the park. The significance of the War Memorial and associated structures is not dependent on the land use of the application site. The proposal retains the existing pedestrian side access to the development site, and creates pedestrian access to the road and through the residential development to the park to the rear thus increasing accessibility and amenity in the wider area.
- **The Permanence of the Development:** The proposed new development will become a permanent feature within the area.

5.19 The below images illustrate the changes to the setting between the existing site conditions and the proposed development.

Figure 5.1: Existing View from Garden of Remembrance



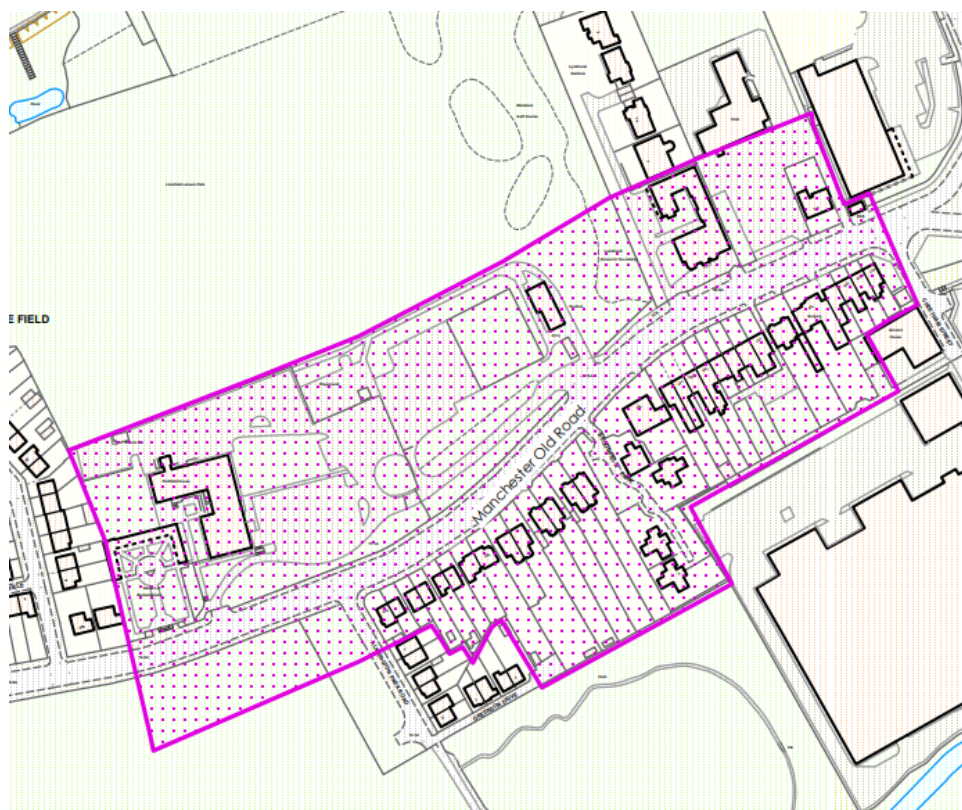
Figure 5.2: Proposed View from Garden of Remembrance



- 5.20 Overall, the proposed development will have no impact on the setting of the listed War Memorial and associated structures.

Assessment of the Impact on the Significance of the Manchester Old Road Conservation Area

- 5.21 There is a statutory duty in section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas.
- 5.22 There are two distinct elements which need to be considered when determining effects to the Conservation Area including:
- i. **Demolition of Parkfield House NDHA** – The first element is the contribution of Parkfield House to the Conservation Area and the effects associated with its demolition to the character and appearance of the Conservation Area.
 - ii. **Proposed Residential and Care Development** – The second element is the effects associated with the new built form proposed on site, and its impact to the character and appearance of the Conservation Area.
- 5.23 The Heritage Assessments confirmed the Conservation Areas significance as Medium (Regional). The extent of the Conservation Area is illustrated below. Historic England's consultation response (17 May 2023) confirmed *"the original boundary wall and entrance gates survive in a relatively good condition and are important contributors to the character and appearance of the conservation area."* These features have been retained as part of the proposals, with the eastern vehicular access removed from the proposed development.

Figure 5.3: Conservation Area Extent

5.24 Historic England's consultation response (17 May 2023) states that the loss of the bold white concrete building would have a moderate level of harm on the significance of the Conservation Area.

5.25 However, Historic England's response continues (Aster emphasis in bold and underlined):

"The principle and level of the proposed development is acceptable from a heritage point of view. The site has been previously developed, though not as extensively, and efforts have been made to draw influence from the 1960's building in terms of form and mass. We do not consider that development of the site will negatively impact on the conservation area character."

5.26 Importantly Historic England did not object to the proposed redevelopment of the site, nor the demolition of Parkfield House specifically.

5.27 It must be acknowledged that Parkfield House makes at most a low level contribution to the Conservation Area and it is in poor condition and derelict after sitting vacant for years and incapable of use. The new care home has been designed to reflect some of the character of Parkfield House in colour; materiality; in the form of the flat roof; and other

design characteristics. The design allows the retention of the role that Parkfield House currently plays, as a counterpoint to the more historic character of the structures in the Conservation Area. Following the comments on the previous scheme, the care home has been reduced to three storeys and the design has been revised to provide stronger references to the existing Parkfield House. The proposed design details of the façade have also been revised in consideration of the comments. The below image illustrates the fenestration detailing which has been influenced by Parkfield House.

Figure 5.4: Fenestration Detailing



- 5.28 The revised proposals remove the eastern vehicular access, thus preserving the boundary walls. A minor opening is proposed for the western access to deliver a safe pedestrian access point into the site from Manchester Old Road. This design intervention has been discussed with Officers as part of the PPA process and is understood to be acceptable from a heritage and urban design perspective.

- 5.29 Overall, the proposed works will have no impact on the historic significance, architectural quality or built form of the Conservation Area. The proposed development will have no impact upon any significant views within the Conservation Area. Manchester Old Road Conservation Area is assessed as having a medium value in line with the heritage impact assessment guidance, as it is a Conservation Area containing buildings that contribute significantly to its historic character.
- 5.30 The proposed development will overall have a negligible magnitude of change upon the Conservation Area, as the current building will be replaced with a well-designed structure of appropriate materials that will preserve the architectural quality and built form of the Conservation Area. This assessment is in accordance with the definition of 'preserving' as summarised by Lord Justice Lewison in *Palmer v Herefordshire Council & Anr* [2016] EWCA Civ 1061: 'In this context the concept of "preserving" the building or its setting means "doing no harm"'. Following the heritage impact assessment methodology, the significance of a change of a negligible magnitude to a heritage asset of medium value would constitute a neutral impact. As the proposed demolition and replacement will not cause harm to the Conservation Area, paras 213 to 216 of the NPPF, which discuss substantial harm or less than substantial harm do not apply here.
- 5.31 Relevant case law (High Court Judgement *Dorothy Bohm vs SSCLG* [2017] EWHC 3217) supports this assessment of impact. The High Court Judgement *Bohm vs SSCLG* provides a clear judgement regarding the proposed demolition of a structure which is identified as a positive contributor within a Conservation Area.
- 5.32 The High Court Judgement clarified that unless it is a designated asset in its own right, the demolition of a building identified as a positive contributor cannot be assessed as harmful in isolation; the entire proposal must be considered. Demolition of a positive contributor does not inevitably cause harm to a Conservation Area. The High Court Judgement supports the earlier Inspectors decision that no harm arises if the replacement dwelling is of an acceptable design which preserves the character and appearance of the Conservation Area.
- 5.33 In para 36, the High Court Judgement states that the Inspectors decision that 'the existing building made a limited positive contribution to the CA, and the net effect of the new building would at worst be neutral and that the CA would not be harmed' was 'an entirely correct approach.' This is the same situation as the proposals for Parkfield House. Although identified as a positive building in the Conservation Area Appraisal, nevertheless, the Heritage Statement has confirmed that Parkfield House makes a very limited and low

positive contribution to the Conservation Area, specifically identified as a low positive contribution predominantly limited to the obvious difference of the concrete flat roofed 4 storey office building compared with the more traditional uses and materials of the other historic buildings in the Conservation Area. The net effect of the demolition of the existing office building and replacement new care home and houses, together with the proposed landscaping, will be a neutral impact as the new structures are built of appropriate contextual materials and to appropriate heights which reflects the character and appearance of the buildings in the Conservation Area. Additionally, the perimeter planting will not be altered, so that views will not be adversely impacted. Therefore, the Conservation Area will not be harmed by the proposals.

Assessing the loss of Parkfield House as a NDHA

- 5.34 The locally listed building, Parkfield House, is assessed as having a very low value, as it is a non-designated heritage asset, very altered and in very poor condition. The proposed demolition of Parkfield House is clearly an adverse impact on the significance of the building. However, recording of the building prior to demolition is considered a mitigation to the total loss of the structure. Additionally, in mitigation, the new care home has been designed to reflect some of the character of the existing office building, in colour, in the form of the flat roof and other design characteristics. Following the comments on the previous scheme, the care home has been reduced to three storeys and the design has been revised to provide stronger references to the existing Parkfield House.
- 5.35 Saved Policy BE/16 'Demolition of Buildings in Conservation Areas' of the UDP states that when considering proposals for the demolition of unlisted buildings in a Conservation Area, the desirability of preserving or enhancing the character or appearance of the Conservation Area in which the building is situated will be considered. Proposals to demolish such buildings will be assessed against the same broad criteria as proposals to demolish Listed Buildings (see Policy BE/12). Consent to demolish will only be granted where it can be demonstrated that the building cannot be beneficially used and all possible efforts have been made to find a use for the building.
- 5.36 Saved Policy BE/12 'Demolition of Listed Buildings' of the UDP has been deleted and replaced by Core Strategy Policy P2 'Protecting and Enhancing Character, Landscape and Heritage'.
- 5.37 Policy P2 of the Core Strategy sets out the Council's intention to conserve and enhance statutory and non-statutory designated heritage assets.

- 5.38 Policy JP-P2 'Heritage' of PfE states that development proposals affecting designated and non-designated heritage assets and/or their settings will be considered having regard to national planning policy.
- 5.39 Paragraph 216 of the NPPF states that the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset. In this case the scale of the harm or loss would be at the highest level as the existing Parkfield House building would be completely lost. Whilst the building will be lost, Parkfield House is assessed as having a very low value, as it is a non-designated heritage asset, very altered and in very poor condition. To mitigate the harm, a building record can be undertaken prior to demolition and the proposed care home design draws inspiration from Parkfield House.
- 5.40 There are a series of compelling economic, social and environmental benefits of the proposed development that need to be balanced against the harm including:
- i. The creation of a high-quality care facility for the elderly to meet an identified quantitative and qualitative shortfall in the borough;
 - ii. The creation of 20no. new 4 bedroom homes to meet the need for family housing;
 - iii. The creation of a variety of jobs including 89 net construction jobs and 112 operational jobs associated with the care home (direct and indirect);
 - iv. Other fiscal benefits including circa £42,000 council tax per annum, £170,000 New Homes Bonus and £160,000 expenditure per annum of new residents;
 - v. The redevelopment of a vacant, redundant and underutilised brownfield site in a key regeneration area which is highly sustainable and accessible;
 - vi. The removal of a derelict, vacant structure for which there is no demand for employment use and which has a range of issues that would prevent it from feasibly being converted including issues with drainage, ventilation, thermal efficiency and services;
 - vii. The provision of high-quality landscaped communal open spaces to promote health and wellbeing amongst residents;

- viii. The delivery of new, high quality landscaping to achieve biodiversity enhancements including a 10% net gain;
- ix. The creation of improved pedestrian linkages throughout the site and a new accessible access to the Garden of Remembrance;
- x. Sustainable construction materials and techniques and provision of Electric Vehicle charging points is included within the parking design to minimise the impact upon climate change.

5.41 In combination with this, the Applicant appointed BC Real Estate to market the site between May 2019 and Q3 2022. There was no viable interest from commercial occupiers to purchase and refurbish Parkfield House in its present form. Parkfield House benefits from a prior approval (ref. 20/00699/PRA56) for conversion to 33 apartments which was granted on 10 August 2020. The Applicant's design team have reviewed the feasibility of refurbishing and converting to Parkfield House but this is simply not been found to be viable to achieve the necessary building regulations; deliver a sufficient level of accommodation to offset the development costs; and making effective use of previously developed land in a highly sustainable location.

5.42 In summary, whilst there is conflict with Policy P2 of the Local Plan, evidence has been provided which can inform a balanced judgement regarding the loss of a non-designated heritage asset and the relevant tests of NPPF paragraph 216. The analysis demonstrates the benefits outweigh the harm and the loss of Parkfield House should not preclude granting of the proposals.

Matter 3: Housing

Housing Standards

5.43 With regards to housing standards, the proposed residential elements of the development comply with PfE Policy JP-H3 'Type, Size and Design of New Housing:

- All dwellings meet NDSS for 4b5p standards.
- All dwellings are Part M4(2) compliant.

Housing Mix and Density

5.44 Policy C3 'Delivering the Right Type of Housing' states the Council will deliver the right types of homes, well designed and built to appropriate densities, to meet the overall needs

and aspirations of the borough. There is need to increase the supply of larger and higher value housing combined with promoting effective use of land, such as previously developed land.

5.45 Paragraph 8.22 of the Core Strategy states:

“The Rochdale Strategic Housing Market Assessment (SHMA) shows that people who plan to move over the next few years would prefer a detached or semi-detached property with relatively few expressing a preference for a terraced property. Since what people expect to move to is different from their aspirations, it is clear that there is currently a mis-match between the supply and demand of certain property types within the Borough. Therefore to create and maintain a more attractive housing market it is important to deliver these types of properties as well as meeting local housing needs.”

5.46 The proposed development delivers a mixture of principally semi-detached and detached dwellings with 3 terraced properties. All dwellings are 4-bed properties and will, therefore, meet the Council’s aim to deliver larger and higher value housing, complimenting the existing smaller scale properties in the Borough’s current housing stock.

5.47 According to the UDP proposals map, the site is located c. 350m southwest of the Middleton Town Centre boundary. Policy JP-H4 ‘Density of New Housing’ in PfE which sets out a minimum density of 70dph for schemes within 400m of a designated town centre. Whereas the Middleton Town Centre Masterplan provides a high level strategy for the Town Centre and wider area. The Masterplan suggests a lower density of development at the proposed site. The density of the residential part of the site comprises c. 30dph and is considered suitable based on the site’s proximity to Middleton Town Centre.

5.48 Overall, it is considered the proposed development comprises with Policy C3 of the Core Strategy.

Affordable Housing

5.49 Policy C4 ‘Providing Affordable Homes’ states that the Council will seek affordable housing on all developments of 15 dwellings or more. It will seek a contribution to affordable housing of 7.5% of the development sale value of the overall scheme.

5.50 A separate Financial Viability Assessment has been undertaken by Alder King and is provided as part of the application documents. The assessment concludes there is no financial headroom available for planning obligations.

Matter 4: Design, Character and Appearance

5.51 A wholesale review of the design has been undertaken by the Applicant in light of feedback from the Council Officers and external consultees. With regards to the Core Strategy and PfE, the key policies of relevance are:

- Policy P1: Improving Image.
- Policy P2: Protecting and Enhancing Character, Landscape and Heritage.
- Policy P3: Improving Design of New Development.
- Policy JP-P1 Sustainable Places.

5.52 Combined with this, paragraph 139 of the NPPF is clear that significant weight should be given to development which reflects local design policies and government guidance on design. In support of this, the Government have produced a suite of guidance documents including Building for a Healthy Life ("BHL"), the National Model Design Code ("NMDC") and the National Design Guide ("NDG") which form a material consideration in the assessment of the design of development proposals, and aid Local Authorities and developers alike in understanding if development proposals are well-designed.

5.53 The Site layout is substantially improved when compared with the previous proposals. Key elements which have been delivered as a result of the revised scheme include:

- Care home – the footprint of the building has been moved north and east and reduced in scale. This softens the form of development when viewed from the south.
- Parking – the bank of parking at the southern extent of the site has been removed, with parking provided in front of / adjacent to properties.
- Trees – Key trees have been retained in the revised scheme including the Cat A trees located centrally within the site.
- Pedestrian access (western) – a safe and bespoke pedestrian only access is provided adjacent to the western vehicular access point.
- Pedestrian access (parallel to Manchester Old Road) – The existing pedestrian route which runs parallel to Manchester Old Road has been reinstated and forms part of the proposals.

- Pedestrian and vehicular access (eastern) – The eastern vehicular access has been removed with the boundary wall remaining in-situ. In its place, a pedestrian only access is provided into this part of the site, providing access to the pedestrian only footpath which runs parallel to Manchester Old Road and Limefield Park to the north.
- Residential plots – the gated nature of the residential area has been removed and the development faces an inner courtyard which intends to be activated with on and off-site residents using this space to access both Manchester Old Road and Limefield Park.

5.54 An analysis against the requirements of key elements in Policies P1 and P3 is presented below.

Table 5.1: Design Policy Review

Policy Extract	Commentary
Requiring design which is of a high standard, demonstrating innovation and originality.	The revised designs draw inspiration from the existing Parkfield House through the new care home's fenestration, glazing and materiality. The residential uses utilise gable features to draw inspiration from the surrounding townscape combined with brick detailing to animate the facades and ground the building.
Helping to 'green' the urban environment, for example by securing tree planting on sites and along streets and roads.	The majority of trees are retained on site and a significant number of new trees are proposed to enhance the site's green infrastructure.
Promoting 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.	The site has laid vacant for a number of years and is not viable in its current form. The proposed scheme responds to comments from Council Officers and key consultees to minimise harm to heritage assets and create a high quality place for existing and future residents.
Creating people-friendly, safe, vibrant, uncluttered public areas.	The new site layout improves permeability and as a result the pedestrian environment is markedly improved along Manchester Old Road and with a direct access point into Limefield Park.
Enhance the borough's identity and sense of place, by respecting context where it is positive and having regard to the scale, density, massing, height, layout, landscape, materials and access of surrounding buildings and areas in general.	The context of the site and surrounding area has been explored in detail by Bower Mattin and Young as part of the revised proposals. The context work has established the townscape and architectural form from key local architects such as Edgar Wood and how the proposals can draw inspiration from

Policy Extract	Commentary
	his designs. All elements of the scheme have been revised and respond to the borough's identity and sense of place.
Ensure that buildings contribute positively to the townscape, and are well proportioned.	The site is in a very poor state of disrepair and consistently subject to vandalism. The proposed designs are seen as extremely positive additions which contribute to the built and natural environment by creating new homes and care facilities for elderly residents in the area.
Incorporating design measures that design out crime and ensure developments and spaces are safe to use and access (including lighting as appropriate)	Secure by design principles are embedded into the design with public spaces overlooked and a layout which minimises the risk of crime.
Provide an appropriate mix of uses and consider the needs of all sections of society	The proposals caters to key needs identified in the borough including elderly accommodation and family housing.
Ensure a development is easy to move through and get around, especially for pedestrians, cyclists, public transport, disabled people and emergency service vehicles	The access network places pedestrians and cyclists at the top of the street hierarchy, ensuring free movement of future residents and off-site pedestrians accessing Limefield Park.
Provide a hierarchy of routes, streets and spaces, relating positively to visual connections between the development and its surroundings	The street hierarchy has been discussed with Officers throughout the pre- and post-submission consultation process. There is clear demarcation through the hard landscaping so site users understand the connections and movement network within the site.
Ensure buildings can be easily adapted to meet future/alternative needs of occupants	All residential dwellings meet Part M4(2) accessible and adaptable dwellings.
Minimise impact upon the environment, and help adapt to the impacts of climate change, including by re-using existing buildings and materials (maximising the benefits of existing embodied energy) and utilising sustainable drainage (Policies G1 and G2)	Highly efficient fabric first buildings are proposed which include a range of sustainability and energy efficiency measures through glazing, ventilation, plot layout to maximise solar gain, smart technology and low water use systems.
Design buildings and spaces so that quality and appearance can be maintained over time	The management of the spaces has been at the forefront of the designs to ensure the spaces work efficiently and it is clear where the public and private spaces are. A management company will be secured as part of the S106 to manage public spaces within the site.
Reduce the monotony and visual impact of car parking areas by using substantial and well integrated landscaping.	A comprehensive landscaping strategy has been designed which integrates cars within the landscape and utilises boundary features in the form of

Policy Extract	Commentary
	hedgerows, trees and low brick walls to reduce the visual impact of cars on the streetscene.

- 5.55 Overall, it is considered the proposed development comprehensively addresses the requirements of Policies P1 and P3 of the Core Strategy.

Matter 4: Highways

- 5.56 A series of amendments to the proposed designs have been implemented to address highways officers comments. In summary, these comprise:

- Provision of a safe pedestrian access in the western extent of the site.
- The internal access road width has been increased to 5.5m and footpaths provided which are predominantly 2m in width.
- The residential parking bay dimensions meet the Council's parking standards.
- The care home has provided parking spaces for minibuses / ambulances.
- Vehicle tracking and visibility splays meet recommended standards.

- 5.57 Overall, the revisions to the scheme design have addressed highways officers comments and demonstrate compliance with Core Strategy Policies T2 'Improving Accessibility' and DM1 'General Development Requirements', Policy JP-C8 'Transport Requirements of New Development of PfE and the NPPF.

Matter 5: Trees

- 5.58 All of the Category A trees previously identified for removal have been retained. However, 1no. Category A tree (T3) now requires removal compared with 2no. trees under the previous scheme. 2no. Category B trees require removal under the current proposals compared with 4no. trees under the previous scheme.
- 5.59 To offset this loss, a comprehensive landscaping strategy has been prepared which seeks to plant 41no. trees combined with a range of shrub, hedgerow and grassland planting.
- 5.60 In summary, alongside the protection measures and landscaping additions proposed, the development is considered to be acceptable in arboricultural terms in accordance with Core Strategy Policy G6 'Enhancing Green Infrastructure'.

Matter 6: Amenity

- 5.61 The development will create a place that is safe, inclusive and accessible and which promote health and well-being with a high standard of amenity for existing and future users.
- 5.62 The site doesn't have any immediate properties on its boundaries and will not adversely affect the amenity of residents or users through visual intrusion, overbearing impact, overshadowing or loss of privacy.
- 5.63 Each dwelling across the development complies with the relevant NDSS requirement, and large rear gardens are provided for each property. The care home has extensive amenity spaces including a terrace at first floor and sensory garden space.
- 5.64 A noise assessment has been undertaken as part of the revised proposals. Internal noise levels are achievable through suitable glazing, plot layout and ventilation measures. The majority of gardens meet external noise level criteria. There are slight exceedances for the gardens associated with plots 8-18 with gardens adjacent to Manchester Old Road. The exceedance is within the 55-60db range so only slightly above the 55dB guideline threshold. The layout of the scheme has been driven by the site's heritage attributes and the need to maximise tree retention. Therefore, whilst there are slight exceedances for external noise criteria, this can be weighed against the wider benefits of the scheme and its overall compliance with the majority of planning policy and guidance within the Development Plan.

6 SUMMARY AND CONCLUSIONS

- 6.1 This SPS comprises an Addendum prepared in March 2023 in relation to the proposed development at Parkfield House, Middleton.
- 6.2 A comprehensive scheme redesign has been prepared in light of consultee comments during the determination process. This process has been guided by a proactive PPA which has been agreed with Officers at RMBC.
- 6.3 The care home has been subject to a full redesign in terms of form, mass and materiality to better reflect and draw inspiration from the existing Parkfield House which is vacant and no longer fit for purpose. The residential layout is substantially improved and addresses a number of technical comments from design, arboricultural and highways officers to deliver a high quality sense of place and improve permeability throughout the site.
- 6.4 An Addendum to the Heritage Statement has been prepared and submitted as part of the revised documents. This confirms there is no harm to the Garden of Remembrance nor the Conservation Area as a result of the proposals. The development intends to demolish Parkfield House; however this is a NDHA which is deemed to be of very low value and the earlier assessments demonstrates there are sufficient benefits to outweigh the harm in the balanced judgement exercise.
- 6.5 Overall, the revised proposals and suite of technical assessments demonstrate a high quality scheme and there are no reasons why planning permission cannot be granted without delay.

