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BY EMAIL ONLY

Reference: PREAPP/00113/24
Date: 12/12/2024

Dear Mr Ashworth,

Reference No:	PREAPP/00113/24
Proposal:	Change of use from public house and restaurant to office including alterations to existing building and plant storage area.
Location:	Church Inn, Castle Hill Road, Heywood, BL9 6UH

I write in reference to your request for pre-application planning advice, relating to the site of the former Church Inn in Heywood. Primarily, you are seeking to understand the acceptability of your proposals to change the use of the Church Inn from a public house and restaurant to an office for a local civil engineering company. The proposals also include a number of alterations to the existing building, namely the increase in the overall height of the original building and the replacement of the existing flat roof front extension. Additionally, a 2m high timber fence would be erected to provide a secure boundary for the usable curtilage and the existing dry stonewall at the site entrance would be extended with new gates setback from the site entrance.

The proposals also include the demolition of the existing flat roof first floor extension currently housing the stairs and the existing fridge and store rooms which extend to the side of the existing front extension. The submitted site plan indicates that the existing areas of hardstanding around the building would be reduced to accommodate biodiversity enhancements, including a staff garden. The plans also note the potential to extend the developed site further by creating a plant storage area for large machinery and equipment.

Principle of Development - Green BeltAlterations to Existing Buildings

Policy JP-G9 of the Places for Everyone Joint Development Plan (PfE) seeks to restrict development within the Green Belt to the limited types of development which are deemed appropriate by national planning policies unless very special circumstances can be demonstrated.

The revised National Planning Policy Framework (NPPF) states that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.

Paragraph 154 of the NPPF states that a local planning authority should regard the construction of new buildings as inappropriate in the Green Belt, with a number of specific exceptions as detailed below.

- a) *buildings for agriculture and forestry.*
- b) *the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it.*
- c) *the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building.*
- d) *the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces.*
- e) *limited infilling in villages.*
- f) *limited affordable housing for local community needs under policies set out in the development plan (including policies for rural exception sites).*
- g) *limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would: – not have a greater impact on the openness of the Green Belt than the existing development; or – not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority.*

When considering the proposed alterations to the existing building, exception c) is relevant. Based on the submitted volume calculations, the proposals would result in an overall reduction in built form. Therefore, the alterations to the existing building would likely meet exception c) as they would not result in disproportionate additions over and above the size of the original building.

Storage of Vehicles, Plant Storage Area and Timber Fencing

Paragraph 142 of the NPPF states that 'the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.'

For the purpose of Green Belt policy, 'openness' is not formally defined within planning policy or legislation but is taken to mean the absence of built development. The term 'openness' comprises a spatial and visual component which should be assessed in considering whether a proposal preserves the openness of the Green Belt.



The site plan indicates that large vehicles would be stored on site and that there is the potential for the developed curtilage of the site to be extended into an area to the southwest of the main building, close to the frontage with Castle Hill Road, for the storage of machinery. The storage of large vehicles and machinery on site would likely have a harmful impact on the openness of the Green Belt and the generally open Manchester Pennine Fringe and Southern Pennines National Character Areas.

This approach to openness should also be taken when considering the proposed 2m timber boarded fence, which would likely result in harm to the openness of the Green Belt and the surrounding landscape character.

Principle of Development – Change of Use

Policy C8 of the Council's Core Strategy (CS) places an importance on improving community, sport, leisure and cultural facilities. This policy mentions that these facilities are vital to local communities and provide the services needed for a good quality of life, for example, helping to promote community cohesion.

The development would result in the change from a community use to a non-community use. The local planning authority can, via the Localism Act 2011, give some weight to the above matters in the consideration of an application of this type if a premises is listed as an Asset of Community Value (ACV).

While the Church Inn is not listed as an ACV, the NPPF (Criterion (b) Paragraph 203) requires local planning authorities to take account of 'the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality'. It is noted that the proposed development would bring a heritage asset back into occupancy and use, and therefore could be considered to be economically beneficial. However, from a visitor and leisure economy perspective, the change of use would clearly be harmful as it would result in the permanent loss of an institution that has clearly been popular to many over multiple generations and until recently had contributed positively to the cultural life of the borough over a long period. Therefore, it should be demonstrated that the loss of a historic community facility would be justified.

CS Policy E1 states that the Council will focus retail, leisure, cultural, office, residential and other development to promote the viability and vitality of all the borough's town centres to maintain them as thriving and sustainable centres. Additionally, CS Policy E2 expects office development to be directed to town centres or Employment Zones (EZs) where appropriate. Given the nature of the proposed office use, it is not considered that a town centre location would be appropriate. However, it should be demonstrated within the submission of any planning application that the location proposed is the most appropriate in lieu of being outside an EZ or economic growth corridor.



Design, Visual Appearance and Heritage Impacts

Due to its age and architectural qualities, the Church Inn would be considered to be a non-designated heritage asset; indeed the building can be identified on the First Edition O.S. Map. It is, however, noted that the building has undergone a significant amount of change over the years. 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.' A detailed Heritage Assessment will be required as part of any application and this must robustly deal with the significance of the building, including that the building is one of the oldest established public houses in the region.

Adjacent to the application site to the northwest is the Grade II listed St John the Baptist's Church. There is an access track between the site and the Church which also forms part of a Public Right of Way. Paragraph 212 of the NPPF explains that 'when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.'

Paragraph 213 states that 'any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or **from development within its setting**), should require clear and convincing justification. Substantial harm to or loss of grade II listed buildings, or grade II registered parks or gardens, should be exceptional.'

Birtle Conservation Area was formally designated in 2010. The site lies in an area identified as a potential extension to the Birtle Conservation Area, although this extension was never formally adopted. Nevertheless, the site and building clearly play a key part in the story of the development of the settlement of Birtle over time and this must also be considered.

It is considered that raising the roof height has the potential to result in significant loss of historic fabric. Should it be determined that the increase in ridge height is acceptable following on from the detailed Heritage Assessment, then careful attention to construction detailing would be required to ensure the minimum amount of harm to the existing building.

Similarly, there are significant concerns that the increase in window heights to meet modern interior standards could be significantly harmful to the heritage value of the existing building and this would need to be robustly justified.

It is considered that the existing extensions are modern and of low quality. On this basis, the provision of a replacement building on the front elevation could be considered to represent an overall enhancement. However, there are some concerns



regarding the form, height and position of this replacement extension, and sufficient information is not readily available to ascertain whether an alternative structure to that proposed could assist in revealing more of the special architectural characteristics of the host building.

The proposed 2m high timber boarded fence should be reconsidered on the basis of potential design and heritage harm.

Any subsequent application should seek to preserve and enhance the character of the building; including retaining and revealing any original features that contribute to that character where they remain.

A Heritage Statement must be included with any application, identifying the significance of the building and assessing the impact of the proposal on the same. Where harm is identified, a robust justification setting out the public benefits of the proposal should be provided. PfE Policy JP-P2, CS Policies P2, P3 and DM1, and Chapter 16 of the NPPF will be relevant.

Amenity Standards and Noise Impacts

CS Policy DM1 requires all development proposals to demonstrate that they will not have a negative impact upon the amenities of existing and future residents and occupiers. As with CS Policy DM1, PfE Policy JP-P1, the SPD and the NPPF are concerned with high standards of residential amenity and they are relevant to the current proposals.

There is a suitable degree of separation between the application site and the nearest residential properties across Castle Hill Road to the southwest. Given the level of separation, it is not considered that the proposals would have a physically overbearing impact on nearby residential properties, nor would they result in a loss of privacy.

Further, given the existing lawful use of the site it is not considered that the activity associated with an office use would result in harmful levels of noise. It is likely that the proposed use would result in fewer comings and goings, particularly during the evening hours. Therefore, it is not considered that the change of use would generate an unacceptable level of noise.

On this basis, it is considered that the proposal is unlikely to have an unacceptable impact on the amenities of existing and future residents and occupiers, in accordance with CS Policy DM1, PfE Policy JP-P1, the SPD and the NPPF.

Highways and Parking

The Council's Highways Officer has raised no objections to the proposals in principle. There would be sufficient parking provision for the proposed use and it is not considered that the proposals would result in an adverse impact on highway safety. A transport assessment is not a requirement for a development of this scale.



Drainage

Preliminary details of drainage of surface and foul water drainage should be submitted with any formal application for planning permission should there be material changes to the existing drainage of the building and the site in light of the change of use.

Contamination of Land or Buildings

It is recommended a Phase I Site Investigation in respect of the potential for land or building contamination, whether originating on or off site, is included with any formal application for planning permission. If not submitted with the application, it may be required by condition in the event of the granting of planning permission.

Ecology

The application site predominantly comprises grassland and scrub, with developed land and the Church Inn located centrally. Numerous waterbodies are located within close proximity to the site, while areas of Open Mosaic Habitat are located adjacent to the south and west.

Ecological Survey Requirements

As part of any planning application, we would recommend:

- A Preliminary Ecological Assessment is carried out with particular reference to species including but not limited to great crested newts, badger and invasive plant species;
- A bat roosting assessment of the building and any mature trees to be impacted by the works and;
- A UK Habitat Assessment to inform Biodiversity Net Gain

All survey work must be undertaken by a suitably experienced ecologist and follow best practice methodology. Any additional survey work that is subsequently recommended after the initial survey (such as bat activity/emergence surveys) must also be undertaken and submitted with the application.

Contributing to and Enhancing the Natural Environment & Biodiversity Net Gain

Mitigation and enhancement should be provided for any negative effects on wildlife, which could include bat and bird boxes installed onto the existing building.

The design of the scheme should also avoid impact on the individual tree habitats on-site and ensure they are sufficiently protected from any adverse impacts of the proposals.

Assuming it does not qualify for exemption, the scheme will be required to achieve a 10% net gain in Biodiversity Units. If the development is exempt from the 10%



mandatory BNG, measurable net gains for biodiversity should still be demonstrated in line with the policies of the NPPF. BNG guidance is available through the following links [Biodiversity net gain \(BNG\) | Rochdale Borough Council](#), [Biodiversity net gain - GOV.UK \(www.gov.uk\)](#) and [Biodiversity Net Gain - Greater Manchester Combined Authority \(greatermanchester-ca.gov.uk\)](#)

Summary

The main concerns regarding the proposals are the loss of heritage value and the impact on the openness of the Green Belt.

It is recommended that the applicant undertakes a detailed Heritage Assessment before further discussions take place regarding design. It is important that every opportunity is taken to reveal the special architectural characteristics of the host building. The loss of historic fabric should be avoided and any harm to the heritage value of the existing building must be robustly justified. Furthermore, the proposed change of use would result in the loss of one of the oldest established public houses in the region and the Heritage Assessment must deal with this issue.

While the proposed alterations to the existing building are unlikely to result in Green Belt harm, it is considered that the storage of large vehicles and machinery on site and the erection of a 2m high fence would have a harmful impact on the openness of the Green Belt and the generally open Manchester Pennine Fringe and Southern Pennines National Character Areas. This should be reconsidered.

Following the completion of a Heritage Assessment, it would be useful to hold a meeting to discuss the findings ahead of any potential re-design.

Validation Requirements

Should you wish to progress to submission of a full application for planning permission, the following supporting information should be provided, at a minimum, with any application:

- Location plan to scale 1:1250 showing the direction of north, with the application site clearly edged in red, including the access to the public highway;
- Existing and proposed site plans to scale 1:500;
- Existing and proposed elevations in full to scale 1:100;
- Internal floor levels and section drawings where relevant (e.g. to show ceiling heights);
- Full details of any proposed boundary treatments;
- Full details of existing and proposed hard and soft landscaping,
- Details of proposed surface and foul water drainage strategy;
- Phase 1 site investigation for contamination (recommended); ;
- Planning/design and access statement;
- Heritage statement;
- Biodiversity metric (including habitat plan); and
- Biodiversity statement or biodiversity gain plan.



Please note that any advice provided above is an informal opinion only and is made without prejudice to any formal determination which may be given in the event of an application being submitted. In particular, it does not constitute a formal decision of the Council with regard to any future planning applications, which will be subject to wider consultation and publicity, and provides no guarantee of a future decision.

I hope this is of assistance. However, if you have any questions or wish to discuss more detailed proposals prior to formal submission of an application then please do not hesitate to contact me using the above details.

Yours Sincerely,



Bob Melling
Planning Officer

