



ECONOMY

DIRECTORATE

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Our Ref: PREAPP/00090/23

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BY EMAIL ONLY

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Dear Mr Suleman

Reference No:	PREAPP/00090/23
Proposal:	Double storey side extension to existing Midd Cons' Club, additional car park on existing bowling green, carpark ramp to access new carpark level and alterations to facade on side elevation
Location:	Middleton Conservative Club, 77 Long Street, Middleton, M24 6UN

I write in reference to your request for pre-application planning advice for the above.

The applicant has submitted a Pre-Application Statement, Location Plan, Existing Site Plan, Proposed Site Plan, Existing Floor Plan, Proposed Floor Plan, Existing Elevations, Proposed Elevations, Proposed Street Scene and photos.

Proposed Development

The proposed development comprises a double storey side extension to Middleton Conservative Club, and an additional car park and carpark ramp to access the new carpark is proposed. Alterations to the façade are proposed on the side elevations and installation of a new staircase. It is stated in the Pre-Application Statement that some trees will be removed.

The proposed development will be for multi-use functions such as weddings and community events.

Site and Surroundings

The application relates to Middleton Conservation Club which is a large two storey building of red brick construction. The site is accessed off Long Street. The building is identified as a non-designated heritage asset (NDHA) and is currently vacant with windows boarded up. An unused bowling green is at the rear of the building and is included in the site. There are existing trees along the rear boundary of the site and beyond this is residential housing and an industrial building. To the front of the site is a carpark, under this existing carpark is a row of shops fronting Long Street. The site differs in levels, to the rear it increases where the unused bowling green is, retaining walls are in place to differentiate heights. Access to the bowling green is to the south side of the property via a steel staircase.

The site is within the Defined Urban Area and Middletown Town Centre Conservation Area. It is also designated as a town centre (Middleton Town Centre). The trees on site are protected as they are within the Conservation Area.

This site is identified as enhanced green space within the Middleton Centre Masterplan.

Planning History

95/D31620 – Alterations to Existing Conservation Club to form single and two storey extension. – Grant

80/D11013 – Alterations and Extension to provide kitchen staircase and concert and games room extensions

Relevant Planning Policy

Sub-Regional Policy

Places for Everyone Joint Development Plan (PfE)

The Places for Everyone Joint Development Plan was adopted and became part of the statutory development plan for each of the 9 authorities covered by the plan on 21st March 2024.

JP – P1 Sustainable Places

JP – P2 Heritage

National Guidance

National Planning Policy Framework (NPPF)
National Planning Practice Guidance (NPPG)

Adopted Rochdale Core Strategy (CS)

DM1 General Development requirements
SD1 Delivering sustainable development

P2 – Protection and enhancing character, landscape and heritage

P3 – Improving design of new development

SO2 Creating successful and healthy communities

C6 Improving health and wellbeing

SO3 Improving design, image and quality of place

P2 Protecting and enhancing character, landscape and heritage
P3 Improving design of new development

SO4 Promoting a greener environment

SO5 Improving accessibility and delivering sustainable transport

T2 Improving accessibility

Unitary Development Plan (UDP):

G/W/1 Waste Management

G/3 Protection of Existing Recreational Open Space

EM/3 Noise and New Development

EM/7 Development and Flood Risk

EM/8 Protection of Surface and Ground Water

Supplementary Planning Documents

- Middleton Town Centre Masterplan

Summary of Consultation Responses

Highways

The Council's Highway Engineer has been consulted on the proposed development and raises the following observations:

'The developer should include an appropriate transport study with any application submitted to be determined by traffic generation.

The applicant should ensure parking standards for the site should meet the maximum standards set out in the core strategy.

Access to the site is suitable.

No changes are proposed to the existing highways and no new highways are planned.

We have no road safety concerns.

Refuse collection will be privately arranged.

No PROW will be obstructed by this proposal.

We have no objection to the proposals in principle however would reserve recommendations until the application in full detail is received.'

Conservation Officer

The Council's Conservation Officer has made the following comments:

"In principle I am supportive of a proposal which would bring this important back into a viable use. That being said, I have the following comments/concerns regarding the current proposal:

- *Given the proximity and importance of nearby heritage assets, as well as the importance of the site itself within the Middleton Town Centre Conservation Area, any planning application would need to be accompanied by a heritage statement. This would need to be carried out by a suitably qualified and experienced heritage professional.*
- *No elevations have been provided of the proposed extension, as such I am not able to provide any detailed comments on design and the potential extent of any harm to significance. If an extension is proposed in this location, it is essential that it is set back and reads as subservient to the host property. One option may be to use a lightweight link to separate the historic property from the addition. A high quality palette of natural materials would be expected. Manmade materials, such as concrete tiles and UPVC windows would not be acceptable.*
- *Any scheme should include proposals to repair and restore the existing building as well as to improve its grounds.*

- *It is not clear whether a topographical survey has been carried out. I note that there is a significant rise in levels, and this will impact on the design of any extension in this location.*
- *No details have been provided of the proposed car ramp. Further details are required for me to be able to properly comment. However, I am concerned that this could read as an overly engineered and intrusive feature, in this highly sensitive location.*
- *The bowling green was historically associated with the Conservative Club. Its loss to create a car park would result in less than substantial harm to the significance of the NDHA as well as the Conservation Area. I would not be able to support this loss, without robust justification and mitigation of the harm. It is noted, that the building is in a central location, that there is an existing carpark and that the site has operated as a banqueting hall previously with this parking provision. The recently adopted Masterplan ([Append. 1 for Middleton Town Centre Masterplan.pdf \(rochdale.gov.uk\)](#)) also identifies this area for enhanced green space, as well as providing an opportunity to improve connectivity. The use of the space as a car park would appear to conflict with this aim*

The trees on site are protected due to their location within the Conservation Area.”

Drainage Officer (summary)

The Council's Drainage Officer has made the following comments:

'Full details of sustainable permeable paving or a soakaway system will be required by the Planning Authority:- at either full planning application stage, or at the discharge of Planning Application stage.'

The full consultation is included with this letter.

Analysis

Principle of Development

The proposed development consists of

- Loss of bowling green
- New extension
- New carpark
- A new car ramp

The site is located within the Defined Urban Area as designated under the Proposals Map of the UDP. New development, wherever possible and appropriate, should be concentrated within the urban area in order to support urban regeneration and to protect the countryside.

The site also lies within Middleton Town Centre Conservation Area as designated under the Proposals Map of the UDP. The relevant Policy BE/17, 'New Development Affecting Conservations Areas' will only permit development that preserves or enhances the character or appearance of a conservation area. Careful consideration should be given to the relationship to the existing building and the design of the proposal.

The site lies within a Middletown Centre, the relevant Policy is S/5 of the Unitary Development Plan aims to promote uses and activities that will generate economic activity and not adversely affect amenity in sensitive locations.

Loss of bowling green

The proposal includes the loss of the bowling green and the associated building. This is existing open space. The NPPF sets out the following in paragraph 103:

“Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:

- a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements;*
- b) or the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or*
- c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.”*

Unless an exception can be met, the proposed loss of the bowling green will be contrary to planning policy. This would need to be demonstrated within any future application.

Similarly, Rochdale's Unitary Development Plan sets out the following in Policy LT/9 Protection of existing built sports and recreational facilities:

“The redevelopment or change of use to built sports and recreational facilities will not be permitted unless:

a) An assessment has been undertaken which clearly shows the building to be:

- i. Surplus to requirements; or*
- ii. No longer needed; or*
- iii. Uneconomical to maintain or repair; or*
- iv. No longer viable; or*

b) Adequate replacement provision is made, of equivalent or better quality and in a suitable and accessible location; or

c) The Council considers that the development would deliver a benefit to the local community that would outweigh the harm resulting from the loss of premises used for sport and recreation.”

In the absence of a robust and up-to-date assessment by the Council, an application for planning permission may seek to demonstrate through an independent assessment that the land and buildings meet a) above. Any assessment will be expected to take into account local sporting and recreational needs and demand, fitness for purpose including consideration of all the alternative recreational uses, and should demonstrate that the community is supportive of the proposals.

Policy G/3, Protection Of Existing Recreational Open Space also sets out the following,

“The development of public or private recreational open space for any other purpose will not be permitted unless one or more of the following exceptions applies:

- a) The development is for a non commercial community use within a park or other outdoor recreation area, is ancillary to the recreational use of the area, would not lead to a deficiency in recreational open space in relation to present or future needs, and does not harm the recreational, townscape or nature conservation value of the remaining open space;*

b) Alternative provision is made of at least the equivalent quantity and quality of recreational open space, in a satisfactory location and taking account of local environmental and traffic considerations; c) The development funds improvements to existing outdoor sports facilities within the site or on another site, commensurate with the open space being lost; and

d) The development comprises a built recreational facility of greater benefit to the wider community than the open space being lost and does not result in a serious deficiency in open space in the area.”

The pre application has made no case to identify which or if any of the exceptions in the NPPF or UDP is relevant in this case to support the loss of the bowling green. However the proposal relates to the loss of the outdoor recreational area the applicant would need to provide an assessment to show an exception is met. Based on the information submitted, this part of the proposed development is unacceptable in principle.

Proposed extension, car park and ramp

The principle of the proposed extension is acceptable, however as the site is within Middleton Conservation area justification will need to be provided for the large carpark as this results in the loss of green space. The site is also identified as enhanced green space within the Middleton Town Centre Masterplan and the proposed new car park appears to be in conflict with this. Officers also have concern over the proposed ramp, no details have been provided and it could appear as overly visually intrusive.

Summary of principle

Whilst the principle of bringing a vacant building back into use as an events facility is acceptable in principle, no justification has been made to support the loss of the bowling green, and as such, this part of the proposal is currently unacceptable in principle.

Character and appearance

Paragraphs 131 and 135 of the National Planning Policy Framework (NPPF) state that good design is a key aspect of sustainable development and that planning policies and decisions should ensure that developments function well and add to the overall quality of the area and are visually attractive as a result of good architecture, layout and appropriate and effective landscaping. This is largely reflected within Policies DM1, P1, P2 and P3 of the Council's adopted Core Strategy, which require development proposals to demonstrate high quality design.

PfE Policy JP-P1 sets out the ambition for Greater Manchester to become one of the most liveable cities in the world, consisting of a series of beautiful, healthy and varied places and sets out a number of requirements for new development to adhere to which generally conform to the guidance set out in the documents linked above. This includes creating places which respect and acknowledge the character and identity of the locality and are visually stimulating, creating interesting and imaginative environments.

Proposed elevations have been provided, however they do not show any detail as only an outline of the building had been provided. Proposed materials have not been given, however CGI images have been submitted. These show red brick detailing which would complement the existing building. Details of proposed materials should be submitted in a future application, and these should be of a high quality design and reflect the character of the area i.e. natural materials would be expected.

The planning statement states the proposal will be set back from the existing building, this would be considered acceptable as the extension should be subservient and set back from the highway to minimise visual intrusion.

No details have been provided of the proposed ramp and the Conservation Officer has raised concerns that this could be seen as an overly intrusive feature. As such it is not possible to provide any further observations at this stage. Any planning application shall be accompanied by full details of its appearance.

Rochdale's Core Strategy policy P2 states that the borough's heritage will be protected through conserving, enhancing and promoting key heritage assets; this includes conservation areas, listed buildings, and non-designated heritage assets. The application will help to conserve this building as aspects of the building will be repaired and in this respect complies with the policy.

Overall the Conservation Officer would support a proposal that brings the building into a viable use and also includes proposals to repair the existing building and improve the grounds. An application should take the Conservations Officers comment into consideration when submitting a future application. A Heritage Statement should also be included in any future application and justify how the policy is met.

Impact on Occupiers and Surrounding Land Users

Policy DM1 of Rochdale's Core Strategy sets out new development should be compatible with surrounding land uses, both in terms of impact on those uses and development should not adversely affect the amenity of residents. Paragraph 135 of the National Planning Policy Framework advises that planning decisions should always seek to secure a high standard of amenity for existing and future users.

The proposed development will likely be visible from the highway and surrounding neighbours. Space standards are set out in Rochdale's, 'Guidelines & Standards for Residential Development' SPD and should be adhered to. This will minimise the negative effects the proposal may have on surrounding occupiers. The following space standards are set out in paragraph 4.1, '21m between directly facing principal windows of habitable rooms, at an upper floor level AND 10.5m between a principal window at an upper floor level and a directly facing boundary of the curtilage (ii) 14m between a principal window and any directly facing two storey elevation which does not contain a principal window to a habitable room. (iii) 10m between a principal window and any directly facing single storey elevation which does not contain a principal window to a habitable room.' From submitted plans the proposed development complies with the SPD.

There are a number of shops to the front of the site and houses at the rear that may be affected by the proposal. The main impact on these residents and shops may be during the construction phase of the development as there will be large vehicles entering the site. A construction management plan should be provided with a future application to demonstrate how the impact on surrounding occupiers will be minimised during construction.

The development may have an impact in term of noise on surrounding occupiers. Hours of opening would need to be provided and a noise impact assessment would need to demonstrate that appropriate noise levels can be achieved.

Highways

Paragraph 115 of the National Planning Policy Framework states 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 would be severe.

The submitted plans do not provide information on total number of parking spaces, the Council's Highways Officer has stated the proposal should meet the maximum standards set out in the core strategy. Appendix C of Rochdale's Unitary Development Plan sets out the schedule of parking standards and this should be adhered to.

A transport study should be included in any future application.

Biodiversity Trees and Ecology

Policies G6 Enhancing Green Infrastructure and G7 Increasing the value of biodiversity and geodiversity apply. A future application should demonstrate how they comply with these policies.

The trees on site are protected as the site is within Middleton Conservation Area Planning policy at the national and local level (NPPF and Policies G6 and G7 of the Core Strategy) requires new development to avoid loss or harm to biodiversity in the first instance. No development should result in the net loss of biodiversity or geodiversity and should result in net gain – this will need to be demonstrated. Compensation for loss of biodiversity should be treated as a last resort option; with BNG delivered on-site in the first instance. It is now a requirement 10% biodiversity net gain is required for small sites since April 2024.

This site will be subject to mandatory BNG requirements, the applicant must provide a statement showing how the BNG requirements apply to the proposed development.

Where the development is subject to BNG, the application must be accompanied by minimum information (set out in the Town and Country Planning (Development Management Procedure) (England) Order 2015). If this information has not been provided, the local planning authority must refuse to validate the application. Additional information is required upfront as it is unlikely the LPA will be able to determine the application if this information is not included. This information includes, a completed biodiversity metric indicating the level of biodiversity net gain or loss is likely to be achieved by the scheme, a written BNG statement or draft BGP, raw baseline habitat data and pre- and post – development habitat maps showing areas of habitat retention and loss.

If the applicant is proposing to deliver ‘significant on-site enhancements’ or any off-site gain, the developer is required to:

- submit a habitat management and monitoring plan (HMMP)
- enter into a legal agreement (planning condition, planning obligation or conservation covenant);
- commit to maintaining the BNG for at least 30 years after completion of the development (including the habitat works)

The policies above necessitate the protection and enhancement of existing features such as trees, hedges, wooded areas, meadows, flora and fauna and require developments to take opportunities to promote biodiversity and create new habitats using landscaping and building and construction features wherever possible (e.g. ponds, species of vegetation, green roofs and walls, bat boxes, roof space, appropriate nest boxes and landscaping). Any tree loss that cannot be avoided must be compensated for at a ratio of 2:1.

The proposed site plans demonstrated trees on the site and these trees are protected. A planning application shall be informed by an Ecological Appraisal and any subsequent surveys that are required, an Arboriculture Impact Assessment (should tree loss be needed), a proposed landscaping plan and a Biodiversity Net Gain Statement.

Conclusion

The principle of bringing a vacant building back into use is acceptable. However, the unjustified loss of the bowling green is contrary to local and national planning policy. As the site is within a conservation area, careful consideration should be given to the Conservation Officer’s comments and design choices should be justified through a heritage statement. More

details will be needed in terms of the proposed ramp, carpark and alterations to the side façade. The proposed development is subject to mandatory BNG requirements – 10% net gain will need to be provided and this should be provided on site in the first instance.

Validation Requirements

If you did pursue a planning application, the Council has adopted a Local Validation List which sets out the expectations of what supporting information should be submitted with a planning application. In respect of the proposed development, the following supporting information should be provided, at a minimum:

- Location Plan to scale 1:1250 showing
- Existing and Proposed site plans to scale 1:200/1:500;
- Existing and Proposed Elevations in full to scale 1:100/1:50;
- Existing and Proposed Floor Plans in full to scale 1:100/1:50;
- Existing and Proposed Street Scene Drawings to scale 1:100/1:50;
- Noise Impact Assessment
- Heritage assessment
- Tree survey and Arboricultural Impact Assessment
- Planning Statement
- Topographical Survey
- Biodiversity Net Gain Metric calculation and proposals for achieving a 10% gain in biodiversity;
- Ecology survey
- Landscaping proposals
- Transport study
- Construction Management 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 details contained at the top of this letter

Yours Sincerely,

Aimee Bovaird