

## DELEGATED DECISION CHECKLIST AND REPORT

APPLICATION NO.	CASE OFFICER	DATE
25/00983/FUL	Bob Melling	3 <sup>rd</sup> December 2025

**Address:** 69A Church Street, Littleborough, OL15 8AB

**Proposal:** Change of use and conversion of existing office building (Use Class E) into 7-bedroom House of Multiple Occupation (HMO) (Sui Generis) and associated works including removal of security shutters and grilles and installation of cycle rack

<b>PUBLICITY</b>	Weekly list expired?	Y	Site notice expired?	Y
	Neighbour letters expired?	Y	Press Notice expired?	Y

<b>DELEGATION</b>	Significant departure from local plan?	N	Contrary to national policy?	N
	Applicant a Council Member or officer?	N	Contrary to previous decision?	N
	Major with 10 or more objections and recommending approval?	N	Called in or Planning Panel objection?	N

<b>COMMENTS</b>	Planning Panel comments received?	N
	Neighbour comments received?	Y

<b>EIA</b>	Screening opinion completed and saved to Onbase?	N/A
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<b>CONDITIONS</b>	Pre-commencement conditions proposed?	N/A
	Pre-commencement conditions agreed (or notification period expired)?	N/A

<b>RECOMMENDATION</b>	<b>REFUSE</b>
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**CHECKED AND SIGNED OFF BY:** RK

**DATE:** 05/12/2025

## **SITE**

The application relates to no. 69A Church Street, a two storey, attached property located within the Littleborough Town Centre Conservation Area. The property is a vacant office building set back from the main building line by approximately 11m. The front entrance is accessible from Church Street, although the building is not widely visible from Church Street. It is adjoined by nos. 69 and 71 Church Street to the north, no. 73 Church Street to the west and no. 65 Church Street to the east. The property also has a rear entrance on Queens Road with two off-street parking spaces located across Queens Road to the south. The rear elevation of the application property faces a large industrial unit occupied by 'AD Laser Cutting.' This unit is elevated above Queens Road and measures approximately 12m from the rear elevation of the application property. The surrounding area is characterised by a mixture of residential and commercial uses.

## **PROPOSAL**

Permission is sought for the change of use from an office building (Class E) to a 7-bedroom, 7-person House in Multiple Occupation (HMO). Minimal external alterations are proposed such as the removal of the security shutters and grilles from the existing windows and doors. The internal layout of the building would be reconfigured to provide a WC, a bathroom, two storage areas, a kitchen/dining room and three bedrooms at ground floor level and a WC, a bathroom, a shower room, a living room and four bedrooms at first floor level. Two off-street parking spaces would be provided across Queens Road to the south along with a cycle rack and bin storage.

### Accommodation Schedule

Bedroom 1 = 6.7sqm  
Bedroom 2 = 6.9sqm  
Bedroom 3 = 6.8sqm  
Bedroom 4 = 9.3sqm  
Bedroom 5 = 7.1sqm  
Bedroom 6 = 6.6sqm  
Bedroom 7 = 7.1sqm  
Kitchen/Dining = 17.3sqm  
Living Room = 16.7sqm

## **PLANS AND INFORMATION SUBMITTED**

Drawing No: Ex03. Revision A – Existing Plans and elevations  
Drawing No: P05. Revision B – Proposed Plans and elevations  
Drawing No: P06. Revision A – Proposed First Floor Plan  
Drawing No: P07. Revision B – Proposed Location and Site Plan  
Design & Access statement and Heritage Impact statement  
Project No: 22488 – Noise Impact Assessment prepared by Enevo dated 15/09/2025

## **RELEVANT PLANNING POLICY**

### National Guidance

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

### Sub-Regional

### 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 21<sup>st</sup> March 2024. The following policies are relevant:

JP-S1	Sustainable Development
JP-P1	Sustainable Places
JP-P2	Heritage
JP-C8	Transport Requirements of New Development

### Local

#### Rochdale Core Strategy (CS):

DM1	General Development requirements
SD1	Delivering sustainable development
<b>SO2</b>	<b>Creating successful and healthy communities</b>
C1	Delivering the right amount of housing in the right places
C3	Delivering the right type of housing
<b>SO3</b>	<b>Improving design, image and quality of place</b>
P2	Protecting and enhancing character, landscape and heritage
P3	Improving design of new development
<b>SO4</b>	<b>Promoting a greener environment</b>
G9	Reducing the impact of pollution, contamination and land instability
<b>SO5</b>	<b>Improving accessibility and delivering sustainable transport</b>
T2	Improving accessibility

#### Unitary Development Plan (UDP):

<b>G/D/1</b>	<b>Defined Urban Area</b>
<b>G/S/1</b>	<b>Hierarchy and Role of Centres</b>

#### Supplementary Planning Documents (SPD):

Guidelines and Standards for Residential Development SPD (June 2016)

### **RELEVANT SITE HISTORY**

07/D50150: Variation Of Condition 05 Of Planning Permission D48803 To Allow Opening Hours From 0800 To 2300 HRS Monday To Sunday Inclusive. Granted subject to conditions (February 2008).

07/D48803: Change Of Use From Workshop To Café. Granted subject to conditions (June 2007).

05/D46511: Change Of First Floor From Office To Dwelling. Granted subject to conditions (February 2006).

### **SUMMARY OF CONSULTATION RESPONSES**

#### Highways

No comments received at time of writing.

### Conservation

Summary: No objections.

### Environmental Health (Noise)

Summary: No objections to submitted Noise Impact Assessment (NIA) subject to implementation of mitigation measures prior to occupation.

### Strategic Housing

I can confirm that all space standards, facilities and amenities have been met based on the plans provided.

## **REPRESENTATIONS**

Letters of notification were sent to all surrounding properties, a site notice displayed on Church Street, and a notice published in the local newspaper. 26 letters of objection and 1 letter of support have been received raising the following concerns:

- No need for this property type in the local area.
- Too many cars.
- Too many waste bins.
- Lots of bins will attract vermin.
- The number of bins would affect the Queens Road access.
- Police have been attending HMOs in the area.
- Noise disturbance from comings and goings.
- Overconcentration of HMOs which has affected the character of the area.
- HMOs harm community cohesion.
- Concerns around safety.
- The HMO might house people with an unknown criminal history.
- The future occupants might cause antisocial behaviour.
- It will add extra pressure to local services.
- HMOs are not in keeping with a town centre in need of regeneration.
- Queens Road is unsuitable for increased traffic.
- The building is an unsuitable size.

## **ANALYSIS**

### Principle of Development

The application site is located within the Defined Urban Area (saved UDP policy G/D/1) which expects new development, where possible and appropriate, to be concentrated in the urban area. Additionally, CS policy C1 seeks to provide the right amount of homes in the right places, with a specific focus on regenerating inner areas and town centres.

Chapter 5 of the NPPF seeks to deliver a sufficient supply of homes, with paragraph 61 setting out that *'the overall aim should be to meet as much of an area's identified housing need as possible, including with an appropriate mix of housing types for the local community'*. Paragraph 63 states *'within this context of establishing need, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies.'*

The principle of an HMO at this highly sustainable location is considered to be acceptable given the existing mixture of both commercial and residential uses. HMOs provide an additional housing accommodation option that contributes towards housing requirements in the borough and in this instance would provide accommodation for 7 residents. As such the development is considered acceptable in principle, subject to compliance with other development management requirements, assessed below.

### Accommodation Standards, Impact on Residential Amenity and Noise

#### *Occupier Amenity*

CS policy DM1 states that proposals need to demonstrate that they do not adversely affect the amenity of residents or users through visual intrusion, overbearing impact, overshadowing or loss of privacy. Additionally, the NPPF advises that planning should always seek to secure a good standard of amenity for all existing and future occupants of land and buildings.

PfE policy JP-P1 requires all new development to be comfortable and inviting with indoor and outdoor environments that offer a high level of amenity that minimises exposure to pollution and addresses microclimate issues such as sunlight and shade (inter alia).

Any proposed change of use to an HMO must comply with the standards set out by the Council, including minimum standards for bedrooms, communal rooms and bathrooms/WCs. The Council's Housing Standards Officer has been consulted on the application and confirmed that all space standards, facilities and amenities have been met based on the plans provided. Therefore, it is considered that the proposed HMO would comply with the Council's HMO standards.

Although the Nationally Described Space Standard (NDSS) is not typically applied to HMOs, it should be noted that the minimum floor area requirement for a single bedroom is 7.5sqm. In this instance, it is noted that 6 of the 7 bedrooms would fall below the 7.5sqm NDSS standard. While this is not necessarily a substantive reason to refuse the application in itself, it is reasonable to assume that the future occupants are likely to spend a greater amount of time in the communal living areas given the sizes of the bedrooms. In this context, it should be noted that the first floor living room would be served by only two rooflights while the ground floor kitchen/dining room would be served by a set of double doors, opening onto the small circulation space in between the front elevation of the application property and the rear elevation of no. 69 Church Street.

Firstly, it is not considered that the rooflights would provide an adequate source of natural light or outlook for the living room. Furthermore, the rooflights would be located on the north-facing roof slope in close proximity to the adjoining buildings. Moreover, the natural light to the kitchen/dining room would be severely restricted given the proximity of adjoining buildings. The doors would face a dark, enclosed space, and would measure approximately 2.3m to the rear elevation of no. 69 Church Street. Therefore, it is considered that any future occupants of the proposed HMO would experience an oppressive, dark and uncomfortable indoor living environment that would not provide a satisfactory standard of amenity. This harm is exacerbated by the bedroom sizes, with future occupants likely to spend more time in the communal areas.

In addition, it is noted that the ground floor bedrooms would suffer from an unacceptable lack of privacy due to the position of the windows at street level, directly adjacent to the highway. Given the site's town centre location, with several accesses to commercial and residential premises along the road, it is likely that there would be a moderate amount

foot and vehicle traffic at various points during the day. This would significantly compromise the privacy of those occupying the ground floor bedrooms and would likely require them to draw curtains or blinds during the day, further exacerbating the aforementioned amenity issues.

It is acknowledged that the rear elevation windows would be sited in excess of 12m from the directly facing industrial unit on James Hill Street, which falls short of the minimum space standards of section 4.1 (ii) of the SPD. Notwithstanding, it is acknowledged that the windows would still benefit from natural sunlight and some degree of outlook to the south.

Paragraph 198 of the NPPF seeks to ensure that new development is appropriate for its location taking into account the likely effects of pollution on health, living conditions and the natural environment. In this context, planning decisions should avoid noise giving rise to significant adverse impacts on health and quality of life. CS policy G9 also requires that new development does not have impacts that lead to an unacceptable increase in noise pollution.

The application property is sited in close proximity to a number of retail and industrial uses and thus may be subject to potential noise impacts. A Noise Impact Assessment, which includes mitigation measures, has been submitted in support of the application. The Council's Environmental Health Officer was consulted and raised no objections to the proposed development subject to the implementation of the recommended mitigation measures prior to occupation.

The proposed development would be provided with an outdoor amenity space; however, this is only adequate for car parking, cycle storage and bin storage. Due to the site's town centre location, it is acknowledged that there are other opportunities to access outdoor public amenity spaces.

#### *Privacy and Overlooking/Overbearing Impacts*

No extensions to the building are proposed and no new window opening would be formed. Given the position and location of the windows, it is not considered that the proposal would result in any overlooking or overbearing effects that would be detrimental to the living conditions of the neighbouring residents.

#### *Noise Disturbance*

The level of noise and disturbance from up to 7 additional residents is considered negligible within the existing context and would not give rise to any harm to local amenity. Management of the property would be controlled through separate legislation in respect of management and licensing of HMOs which sits outside of the planning system.

#### *Summary*

While the proposal is not considered to unduly impact on the amenity of the occupants of existing residential properties, it would fail to provide an acceptable standard of amenity for any future occupants of the proposed HMO by virtue of its non-compliance with PfE policy JP-P1, CS policy DM1, the SPD and the relevant provisions of the NPPF.

#### Impact on Character and Appearance

The application site is located to the rear of Church Street within the Littleborough Town Centre Conservation Area. It is a red brick building, which appears to be late 20<sup>th</sup> century in appearance, however it may have replaced an earlier 19<sup>th</sup> century building.

Section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires local planning authorities to pay special attention to the desirability of preserving or enhancing the character or appearance of Conservation Areas. NPPF chapter 16, PfE policy JP-P2 and CS policy P2 also apply. Conservation Areas are key heritage assets for the purposes of CS policy P2. This policy seeks to conserve, enhance and promote these assets.

The proposal is for the conversion of the existing building into a 7-bedroom HMO. External changes include the removal of the existing security shutters and grilles, and the installation of a new cycle rack.

There are no heritage objections to the principle of the proposed use. The removal of the security shutters and grilles would have a positive impact on the building. No concerns are had regarding the design of the proposed cycle rack, which would not be considered a visually intrusive addition, and details of the proposed bin store can be secured by condition.

Overall, the design of the proposal is considered to be acceptable and would have a neutral impact on the significance of the Conservation Area. Therefore, the proposal accords with CS policies DM1, P2 and P3, PfE policies JP-P1 and JP-P2, and the NPPF.

#### Highways and Parking

CS policy DM1 requires development proposals to provide satisfactory vehicular access with adequate parking, manoeuvring, and servicing arrangements taking into account the proposed use and location.

The application site is in a highly sustainable location in Littleborough Town Centre with local amenities and public transport provisions within walking distance. Notwithstanding, the submitted plans indicate the provision of two off-street parking spaces which would be adequate for the proposed use. The development would also provide space for cycles to be stored, enabling future occupants to utilise alternative modes of active travel.

Bin storage would be provided across Queens Road to the south of the application property in a convenient location for future occupants. No concerns are had regarding the servicing arrangements for the proposed use, which are expected to take place much the same as they do for neighbouring residential properties.

Taking the above matters into consideration, the proposed development is in accordance with CS policies DM1 and T2, PfE policy JP-C8 and the relevant requirements of the SPD and the NPPF.

#### **OTHER MATTERS**

The application has generated a number of concerns from local residents which have either been addressed in the 'Representations' section above or within the analysis of the application itself. There are some other matters, however, which do not fit into the report sections above, but which are addressed below.

#### Future Residents and Safety Concerns

Concerns have been raised relating to the type of residents who might occupy the proposed HMO and the impact on the safety and security of neighbouring residents. The behaviour associated with future tenants is not a material planning consideration. Any issues of anti-social behaviour would be controlled by standard approaches which would not differ from any other dwellinghouses other than there being a greater level of control over management issues of such a property due to additional regulation and licensing requirements associated with such properties.

### Conclusion

It is acknowledged that the proposal would make a contribution, albeit minor, to the borough's housing requirements in a sustainable, town centre location. However, it is not considered that this minor contribution to housing supply would outweigh the identified harm regarding occupier amenity. The proposed communal areas would suffer from an unacceptably poor provision of natural light and outlook, and the indoor living environment would feel oppressive and uncomfortable as a result. In addition, the ground floor bedroom windows would directly overlook the road, with passersby able to see into the property at a close range. This would further reduce the sense of privacy for future occupants. On this basis, the proposal would fail to comply with the Development Plan including other relevant material considerations, and it is recommended that permission is refused.

### **RECOMMENDATION**

#### **Refuse for the following reason:**

1. By reason of its design and relationship with neighbouring properties, the proposed HMO would fail to provide a satisfactory standard of amenity for future occupants. The standard of accommodation would be undermined through an unsatisfactory outlook, a lack of sufficient natural light and a loss of privacy by way of the ground floor bedroom windows being at street level, with passersby able to see directly into these rooms. As a result, the proposal would fail to comply with the requirements of the Guidelines and Standards for Residential Development Supplementary Planning Document, Policy DM1 of the adopted Rochdale Core Strategy, Policy JP-P1 of the adopted Places for Everyone Joint Development Plan and the National Planning Policy Framework.

### **Procedure Statement**

The proposal would not improve the economic, social and environmental conditions of the area nor does it comply with the development plan and therefore does not comprise sustainable development. There were no amendments to the scheme, or conditions which could reasonably have been imposed, which could have made the development acceptable and it was therefore not possible to approve the application.

### **Notes for Applicant**

1. For the avoidance of doubt, this decision relates to the following plans and supporting documents:
  - Drawing No: Ex03. Revision A – Existing Plans and elevations
  - Drawing No: P05. Revision B – Proposed Plans and elevations
  - Drawing No: P06. Revision A – Proposed First Floor Plan
  - Drawing No: P07. Revision B – Proposed Location and Site Plan
  - Design & Access statement and Heritage Impact statement

- Project No: 22488 – Noise Impact Assessment prepared by Enevo dated 15/09/2025