

DELEGATED DECISION CHECKLIST AND REPORT

APPLICATION NO.

24/01216/FUL

CASE OFFICER

Anna Hayes

DETERMINATION DATE 31.03.2025 **EXT OF TIME** 20.06.2025

Address: G N G Foam Converters (Lancs) Ltd Todmorden Road Littleborough Rochdale OL15 9EG

Proposal: Erection of front extension to create new two storey office building, rear infill extension to existing warehouse to provide additional storage and operational space including the creation of three new loading bays. Other works include the associated raising of the eaves and ridge height of the existing warehouse building

PUBLICITY	Weekly list expired?	y	Site notice expired?	y
	Neighbour letters expired?	y	Press Notice expired?	y

DELEGATION	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

COMMENTS	Planning Panel comments received?	n/a
	Neighbour comments received?	n

EIA	Screening opinion completed and saved to Onbase?	n/a
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CONDITIONS	Pre-commencement conditions proposed?	n
	Pre-commencement conditions agreed (or notification period expired)?	n

RECOMMENDATION	Grant subject to conditions
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CHECKED AND SIGNED OFF BY: TH **DATE:** 19.06.2025

SITE

The application site relates to an industrial site located just off Todmorden Road in Littleborough which is currently occupied by GNG Foam Converters (Lancs) Ltd. The site is occupied by a number of large industrial units and a separate office building located just north of the entrance point. The site is located just outside of Littleborough Town Centre Conservation Area and adjoins the Caldervally railway line to the east, which provides rail services to Manchester Victoria, also providing links through to Todmorden, Leeds and Blackburn.

The site is located within the defined urban area (Core Strategy Policy G/D/1), a designated mixed employment zone (EC/3) and Development Flood Risk area (EM/7)

For the purposes of this application, the site boundary indicated by the red line boundary on the submitted site location plan has been reduced to the immediate area around the proposed development. Other land owned by the applicant is edged in blue.

PROPOSAL

Planning permission is sought for the part conversion of an existing warehouse unit to create a new two storey office space with a two storey front extension. The proposals also include an infill extension to the rear of the same warehouse building to increase floor space and create a new loading bay, as well as the raising of the eaves and ridge height to create a new shallow pitched roof.

The front office extension would extend 16.5m in width to align with the existing warehouse building and project forward 1.48m. The rear infill extension would measure approximately 31.4m x 4.8m. The eaves and ridge height are to be increased by some 3.7m and 3.3m respectively.

Proposed materials comprise external horizontal cladding materials and facing brickwork.

RELEVANT PLANNING POLICY

National Guidance

National Planning Policy Framework (NPPF)

Section 2 Achieving sustainable development

Section 6 Building a strong, competitive economy

Section 9 Promoting sustainable transport

Section 11 Making efficient use of land

Section 12 Achieving well-designed places

Development Plan

Planning decisions should be made in accordance with the development plan unless material considerations indicate otherwise and the NPPF does not change the statutory status of the development plan as the starting point for decision making.

The development plan for the proposal consists of the Places for Everyone (PfE) Joint Development Plan, Rochdale Core Strategy (CS), adopted 2016, and saved Unitary Development Plan (UDP) policies. The Council also has an adopted series of Supplementary Planning Documents and Supplementary Guidance Notes, which are other material considerations.

Places for Everyone Joint Development Plan (PfE) (2024)

Sustainable and Resilient Places

JP-S1 Sustainable Development
JP-S2 Carbon and Energy
JP-S3 Heat and Energy Networks
JP-S4 Flood Risk and the Water Environment
JP-S5 Clean Air
JP-S6 Resource Efficiency

Places for Jobs

JP-J1 Supporting Long-Term Economic Growth
JP-J2 Employment Sites and Premises
JP-J4 Industry and Warehousing Development

Greener Places

JP-G1 Landscape Character
JP-G8 A Net Enhancement of Biodiversity and Geodiversity

Places for People

JP-P1 Sustainable Places

Connected Places

JP-C6 Walking and Cycling
JP-C8 Transport Requirements of New Development

Adopted Rochdale Core Strategy (CS):

SO1 To deliver a more prosperous economy

E2 Increasing jobs and prosperity (partially replaced by PfE policies JP-J3 and JP-J4)
E3 Focussing on economic growth corridors and areas

SO3 Improving design, image and quality of place

P1 Improving image
P2 Protecting and enhancing character, landscape and heritage
P3 Improving design of new development

SO4 Promoting a Greener Environment

G7 Increasing the value of biodiversity and geodiversity
G8 Managing water resources and flood risk
G9 Reducing the impact of pollution, contamination and land instability

SO5 Improving accessibility and delivering sustainable transport

T2 Improving accessibility

Managing delivery and monitoring progress

DM1 General Development requirements
SD1 Delivering sustainable development

Unitary Development Plan (UDP):

G/D/1 Defined urban area
EC/3 Mixed Employment Zone
EM/7 Development and Flood Risk

Other

The following Supplementary Planning Documents (SPD) are also relevant:
- Guidelines & Standards for Residential Development SPD, June 2016.

Also of relevance are:

- National Design Guide (2019) (Ministry of Housing, Communities and Local Government);
- National Planning Practice Guidance.

RELEVANT SITE HISTORY

No recent planning history.

CONSULTATION RESPONSES

Highways and Engineering

Confirms no objection to the proposal.

Env Health - Noise/Odours

Confirms no objection to the proposal.

Env Health - Air Quality

Confirms no objection to the proposal.

Lead Local Flood Authority/Drainage

Confirms no objection to the proposal.

Environmental Control (Landfill Gas)

Confirms no objection to the proposal subject to condition requiring the submission of a Phase 1 Report (Preliminary Risk Assessment) prior to the commencement of any development on site.

Network Rail

Advises that a RAMS will need be undertaken for any development which falls within 10m of the operational railway and the developer will need to sign a BAPA with Network Rail.

Greater Manchester Ecology Unit

No objections to the proposal. Recommends an informative note reminding the applicant of their duties under the 2019 Regulations that it is an offence to disturb, harm or kill bats.

REPRESENTATIONS

In accordance with the requirements of the Town and Country Planning (Development Management Procedure) (England) Order 2015, the application has been advertised by neighbour notification letters and site notice.

No comments have been received.

ANALYSIS

Principle

As set out in PfE policy JP-J1, a thriving, inclusive and productive economy will be sought in all of the nine boroughs of Greater Manchester (forming part of the Places for Everyone Joint Development Plan). PfE policy JP-J2 seeks to ensure that there is an excellent supply of employment sites and premises across the Plan area, with sufficient variety in terms of quality, cost and location to maximise the ability to attract and retain jobs and investment. As expressed within policy JP-J4, the development of new and existing industry and warehousing sites is important on a wider scale in helping Greater Manchester maximise its ability to attract and retain business and hence support its long-term economic growth prospects and the availability of local jobs.

The site falls within a mixed employment zone which is protected by saved UDP Policy EC/3. This policy seeks to protect and enhance secondary employment areas

for employment and commercial mixed uses, including B2 and B8 uses, as well as other Sui Generis uses such as motor trade and tyres and exhaust centres. It is acknowledged under this policy that Mixed Employment Zones identified on the proposal map are within the older urban area, often adjoining residential areas, with old industrial premises and infrastructure; however, it is made clear that developments will not be permitted if they are likely to cause nuisance or disruption to existing uses within the area.

Core Strategy Policies E2 and E3 which align with saved UDP Policy EC/3, also aims to support existing business, in particular under policy E2 which seeks to protect existing employment zones and employment sites and premises (over 0.2ha) and support their retention and redevelopment for employment uses.

In this instance, the proposal seeks to extend an existing warehouse unit by raising the roof height and constructing a rear infill extension to introduce a new loading bay and expanded warehouse floor space to align with the existing use of the site. Expanded ancillary office provision is also proposed to the front of the building with the creation of a new two storey front extension. The expanded warehouse space will support the continued use of the site by GNG Foam Converters, who are a foam rubber supplier within the borough, and improve internal functionality and the ability for the business to accommodate modern machinery and processes, as well as provide additional storage and operational space.

Overall, the proposals would support the retention and development of an existing industrial/commercial business within an allocated Mixed Employment Zone. Subject to all other material planning considerations being satisfied, including design, amenity and highway safety, the development is found to be in accordance with the aims and aspirations of PfE policies JP-J1, JP-J2 and JP-J4, and policies E2 and E3 of the adopted Rochdale Core Strategy.

Character and Appearance

Amongst other things, at paragraph 135, the NPPF seeks new development to be: a high standard of design which functions well and adds to the overall quality of the area; be visually attractive as a result of good architecture and landscaping; and establish or maintain a strong sense of place.

Locally, CS policy P3 requires all new developments, including associated landscaping, regardless of location in the borough, to adhere to high standards of design and goes on to list relevant design principles. Further to this, CS policy DM1 sets out general development requirements and details a list of criteria which all development proposals will be expected to demonstrate compliance, including the need for high quality design.

Existing units on site primarily comprise of large warehouse buildings, industrial in character, which stand around 2 storeys in height with red brick external elevations and metal cladding detailing. Existing roof styles vary, including a mixture of arched, flat and dual-pitched styles. The existing office building at the site entrance comprises of stacked porta cabins.

The proposal seeks to raise the roof of the existing warehouse, which sits centrally within the site, to a maximum height of around 8m with an eaves height of 7m. The resultant building would sit just 0.4m above the existing adjacent two storey porta cabin. The increased height of the building would not be detrimental to the character of the industrial/employment site and would not appear overly dominant. The proposed new office extension to the front of the partly-converted warehouse building would also create design interest within the site, with large window openings to the façade which help to break up the mass of the two-storey elevation. Proposed

materials are facing brick at ground floor with horizontal metal cladding at first floor. The rear infill extension would largely be concealed from view and would integrate sympathetically with the existing buildings in form and massing.

Subject to the use of appropriate materials and an appropriate colour palette, which is recommended to be secured by condition, no objections are raised in regards to visual amenity and the proposal is found to be acceptable in regard to section 12 of the NPPF and CS Policies P3 and DM1.

Amenity

Paragraph 135 of the NPPF requires that new development achieves a high standard of amenity for existing and future users. This is reflected locally through CS policy DM1 which requires development proposals to ensure that they “do not adversely affect the amenity of residents or users through visual intrusion, overbearing impact, overshadowing or loss of privacy”.

Although it is expected that most new development will have some impact on neighbours, it is important to ensure that the impact is not so significant that it results in unacceptable harm. New development on employment sites are particularly sensitive, given that they tend to be of a larger scale, generate more noise and potentially operate at unsociable hours.

The proposed extensions and alterations are to an existing warehouse unit within an existing designated mixed employment area. The nearest residential use is the Olive Stranding Sheltered Housing located approximately 60m+ to the west/south-west, as well as the terraces on Todmorden Road. To the east, separated by the rail line and dense vegetation, are a ribbon of new-build residential properties on Dockside. Given the separation distance of the development site from these properties, Officers are satisfied that the proposals would not result in a loss of amenity to the occupiers of these properties, with privacy, outlook and light being suitably preserved and unaffected.

There are no objections from the Council’s Environmental Health department and Officers have no reason to disagree noting the above factors. The proposal is therefore found to be acceptable, having no unacceptable harm on the amenity of surrounding residents and commercial premises, in accordance with paragraph 135 of the NPPF and CS Policy DM1.

Access and Highway Safety

Policy T2 of the Core Strategy sets out that development and infrastructure proposals are required to satisfy the Council’s accessibility hierarchy and, in all circumstances, the safety, accessibility and amenity of those who live or have business in the area will have priority, while providing reliable journey times for those travelling through. Developments are required to provide parking in compliance with the Council’s Maximum Car Parking Standards as set out in Appendix 5 of the Core Strategy.

The Council’s Highways Engineer has reviewed the proposals and notes that scale of the extension is such that the Local Highway Authority (LHA) would not require any further transport study undertaken, as they would not expect any significant volume of traffic to be generated in excess of the existing volumes. Additional loading bays should see a more efficient use of the site with less chance of vehicles waiting and congestion as a result. No changes to the existing highways are proposed nor are any new highways proposed as a result of this development. On this basis, the LHA have confirmed that there are no safety concerns as a result of the development and are accepting of the submitted Construction Method Statement dated November 2024.

Overall, there are no objections to the proposal from a highway and safety perspective and no amendments are required. For this reason, the proposal is found to be in accordance with the NPPF and would not conflict with paragraph 116 and Core Strategy policy T2.

Ground Conditions (Contaminated Land)

To ensure a site is suitable for its new use and to prevent unacceptable risk from pollution, the implications of contamination for development should be considered through the planning process to the extent that it is not addressed by other regimes. Paragraph 196 of the NPPF states that, amongst other matters, planning policies and decisions should ensure that a site is suitable for its proposed use taking account of ground conditions and any risks arising from land instability and contamination. This includes risks arising from natural hazards or former activities such as mining, and any proposals for mitigation including land remediation (as well as potential impacts on the natural environment arising from that remediation). As per paragraph 197, where a site is affected by contamination or land stability issues, responsibility for securing a safe development rests with the developer and/or landowner.

The site and surrounding area have a long history of industrial use. As such, there is likely to have been pre-development works which may have consisted of levelling the site with material. Any changes to the ground made by the proposed development as the potential to expose site users to contaminations.

The Council's Public Protection team have been consulted on the proposal and on the basis of the above, offered no objections subject to a condition requiring the applicant to submit a Phase I Report (Preliminary Risk Assessment) prior to the commencement of any development, in order to assess the actual and/or potential contamination risks at the site. Where the Phase 1 Report has identified potential unacceptable risks, a suitable investigation, risk assessment and remedial action shall be carried out in accordance with details and within a timescale to have first been submitted to and approved in writing by the Local Planning Authority.

Officers have no reason to disagree with the above recommendations, and the recommended pre-commencement condition is considered necessary to make the development acceptable in planning terms, in accordance with the NPPF. The applicant's agent has agreed to the requirements of the condition.

The proposal is therefore found to be acceptable in regard to paragraph 196 of the NPPF, which seeks to ensure that any unacceptable risks posed by contamination are appropriately addressed and the site is suitable for its proposed use.

Ecology

Paragraph 187 of the NPPF states that the planning policies and decisions should contribute to and enhance the natural and local environment.

In England, biodiversity net gain is required under a statutory framework introduced by Schedule 7A of the Town and Country Planning Act 1990. Under the statutory framework for biodiversity net gain, subject to some exceptions, every grant of planning permission is deemed to have been granted subject to the condition that the biodiversity gain objective is met. This objective is for development to deliver at least a 10% increase in biodiversity value relative to the pre-development biodiversity value of the onsite habitat. This increase can be achieved through onsite biodiversity gains, registered offsite biodiversity gains or statutory biodiversity credits.

PfE Policy JP-G8 also states that through local planning and associated activities a net enhancement of biodiversity resources will be sought where relevant. In particular, development will be expected to achieve a measurable net gain in biodiversity of no less than 10%.

Greater Manchester Ecology Unit (GMEU) have been consulted on the proposal commenting as follows (summarised):

Bats

Current guidance states it is essential that the presence or otherwise of protected species and the extent that they may be affected by the proposed development is established before the planning permission is granted otherwise all relevant material considerations may not have been addressed in making the decision (UK Government Guidance within the ODPM Government Circular 06/2005).

The buildings are located in a relatively high-risk location for bats, with a number of green corridors associated with the canal, railway line and River Roch. Based on the existing elevation drawings and aerial imagery, the buildings look to be of a type unlikely to be utilised by bats; however at the request of GMEU, external and internal photographs have been provided of the building (where the roof is being raised) and additional information such as level of use/noise levels in the buildings in order to assess the buildings as negligible risk.

Based off this information (Supporting Risk Analysis for the Presence of Bats and Nesting Birds, ref GNG/16042025ABA), received 01.05.2025, GMEU have confirmed that they are satisfied that the buildings are very low risk given the nature of the roof and level of internal usage. There may however be limited potential for individual bats on occasion to roost under external features such as soffits and so the following informative is recommended:

'Whilst the building to be converted and extended are very low risk for bats, the applicant is reminded that under the 2019 Regulations it is an offence to disturb, harm or kill bats. If a bat is found all work should cease immediately and a suitably licensed bat worker employed to assess how best to safeguard the bat(s).'

Nesting Birds

Certain species of bird can nest on buildings. The building however appears low risk and unlike bats the risk can be dealt with via condition or informative. Following the findings of the above report received 01.05.2025, GMEU have confirmed the above informative to be appropriate.

Contributing to and Enhancing the Natural Environment & Biodiversity Net Gain (BNG)

Section 180 of the NPPF 2023 states that the planning policies and decisions should contribute to and enhance the natural and local environment. 10% BNG is mandatory under Schedule 7A of the Town & Country Planning Act 1990 (as inserted by schedule 14 of the Environment Act 2021). There appear to be no vegetated habitats lost as a result of this development and the works are located over 10m from the River Roch. Adverse effects on wildlife are also likely negligible.

GMEU therefore accept that the development is exempt from 10% net gain under the de minimis rule.

Overall, the development is found to be acceptable in regard to ecology and biodiversity matters and as an enhancement, GMEU recommend the addition of bird and bat boxes on appropriate elevations of the new building. These are shown on drawing the elevation drawings, reference 24.3344.2.5B.

Subject to these conditions, the proposal is found to be acceptable in regard to biodiversity and compliant with paragraph 197 of the NPPF and PfE Policy JP-G8.

Flood Risk

The site is located within a designated Development and Flood Risk area as defined by CS policy EM/7, falling within the Environment Agency's 'High Risk' category for yearly chance of flooding from rivers and the sea, with a defined 'very low' chance of flooding from surface water.

The application is supported with the submission of a Flood Risk Statement and Drainage Assessment (24.3344) and Proposed Site Plan (24.3344.2.6). The Lead Local Flood Authority have been consulted on the application and based off the proposed development, that being a relatively minor extension of an existing commercial premises, are satisfied that there is no significant increase of impermeable area and therefore have no further comments for this application.

On the basis of the above, Officers are satisfied that no further information is required, and that the development is compliant with section 14 of the NPPF.

Other

The site adjoins the railway boundary and so Network Rail have been consulted on the proposal as an adjoining landowner. Whilst the proposed development would not infringe on the railway line or be within 3m of the boundary, Network Rail have advised that, outside of the planning application, if approved, the developer is to submit directly to Network Rail asset protection, a Risk Assessment and Method Statement (RAMS) for all works to be undertaken within 10m of the operation railway under Construction (Design and Management) Regulations, and this in addition to any planning consent. This is because Network Rail would need to be re-assured the works on site follow safe methods of working and have also taken into consideration any potential impact on Network Rail land and the existing operational railway infrastructure.

As the proposal includes works which could impact the existing operational railway and in order to facilitate the above, a BAPA (Basic Asset Protection Agreement) will need to be agreed between the developer and Network Rail. The developer will be liable for all costs incurred by Network Rail in facilitating this proposal, including any railway site safety costs, possession costs, asset protection costs / presence, site visits, review and agreement of proposal documents and any buried services searches. The BAPA will be in addition to any planning consent.

The applicant has been provided with the above information and confirmed that no lighting is proposed which would affect the operational railway.

RECOMMENDATION

This recommendation is made following careful consideration of all the issues raised through the application process. In this case the recommendation is to GRANT PLANNING PERMISSION subject to conditions.

Conditions and reasons:

1. The development must be begun not later than the expiration of three years beginning with the date of this permission.

Reason: Required to be imposed by Section 91 of the Town and Country Planning Act 1990 as amended by Section 51 of the Planning and Compulsory Purchase Act 2004.

2. The development hereby permitted shall be carried out in accordance with the following approved plans and documents unless otherwise required by the conditions below:

Site Location Plan received 22.05.2025

Drawing reference 24.3344.2.6 – Proposed Site Plan

Drawing reference 24.3344.2.5B – Proposed Elevations

Drawing reference 24.3344.2.4 – Proposed Floor Plans

Construction Method Statement dated November 2024

Reason: For the avoidance of doubt and to ensure a satisfactory standard of development in accordance with the policies contained within the adopted Rochdale Core Strategy, the saved Rochdale Unitary Development Plan and the National Planning Policy Framework.

3. Notwithstanding any description of materials in the application no above ground construction works shall take place until samples and / or full specification of materials to be used externally on the building(s) have been submitted to and approved in writing by the Local Planning Authority. Such details shall include the type, colour and texture of the materials. Development shall be carried out in accordance with the approved details.

Reason: In order to ensure a satisfactory appearance in the interests of visual amenity in accordance with policies DM1 and P3 of the adopted Rochdale Core Strategy, policies JP-G9 and JP-P1 of the Places for Everyone Joint Development Plan and the National Planning Policy Framework.

4. The development shall be carried out in accordance with the submitted Construction Method Statement (CMS), prepared by James Campbell Architecture dated November 2024. The approved CMS shall be adhered to throughout the construction period.

Reason: To minimise detrimental effects to the neighbouring amenities, the amenities of the area in general, detriment to the natural environment through the risks of pollution and dangers to highway and railway safety, during the construction phase in accordance with Policies DM1, T2, G8 and G9 of the adopted Rochdale Core Strategy and the National Planning Policy Framework.

5. Prior to commencement of the development a Phase I Report (Preliminary Risk Assessment) must be completed to assess the actual and/or potential contamination risks at the site. The Phase 1 Report must be submitted to, and approved in writing by, the Local Planning Authority and shall include a desk top study, site walk over, conceptual model, basic hazard assessment and recommendation regarding the need or otherwise for further investigation and risk assessment.

Where the Phase 1 Report has identified potential unacceptable risks, a suitable investigation, risk assessment and remedial action shall be carried out in accordance with details and within a timescale to have first been submitted to and approved in writing by the Local Planning Authority.

In the event that contamination is suspected or found at any time when carrying out the approved development that was not previously identified, or contamination is caused, the Local Planning Authority shall be notified immediately and development affected and potentially affected by the contamination must stop. An investigation and/or risk assessment and/or remediation shall be carried out in accordance with an agreed process and within agreed timescales to have first been submitted to and approved in writing by the Local Planning Authority. If contamination is not suspected, found or caused during development, this must be confirmed in a completion letter which is subject to the approval in writing of the Local Planning Authority.

Reason: To ensure the safe development of the site in accordance with Policy G9 of the adopted Rochdale Core Strategy, Policy JP-S1 of the adopted Places for Everyone Joint Development Plan and to ensure any unacceptable risks posed by contamination are appropriately addressed and the site is suitable for its proposed use in accordance with paragraph 196 of the National Planning Policy Framework.

6. Prior to the first occupation of the development hereby approved, the biodiversity enhancement measures (bird/bat boxes) as indicated on the approved elevation drawing, reference 24.3344.2.5B, shall be installed and retained as approved at all times thereafter.

Reason: In the interests of enhancing biodiversity and habitat provision within the site in accordance with policy G7 of the adopted Rochdale Core Strategy, policy JP-G8 of the Places for Everyone Joint Development Plan and the National Planning Policy Framework.

Procedure Statement:

The proposal complies with the development plan and would improve the economic, social and environmental conditions of the area. It therefore comprises sustainable development and the Local Planning Authority worked proactively to issue the decision without delay.

Notes for Applicant:

Biodiversity/ Ecology

The developer must seek ecological advice should they find or suspect that the proposals will impact on protected species during construction.

Network Rail

To the applicant / developer - an interface with Network Rail is REQUIRED for this proposal – the outside party is advised that Network Rail will need to agree and supervise this proposal & that no works are to take place until agreed with Network Rail. The full consultation response is available online.

Report Author Anna Hayes