

DELEGATED DECISION CHECKLIST AND REPORT

APPLICATION NO.	CASE OFFICER	DATE
25/00330/FUL	Hamish Rigg	30/07/2025

Address: 121 Drake Street, Rochdale, OL16 1P2

Proposal: Change of use from commercial premises (Use Class E) to a self-contained flat (Use Class C3) at first floor and an office space (Use Class E) at ground floor ground floor. The installation of 2no. bin stores and a bike store in the rear yard.

PUBLICITY	Weekly list expired?	Y	Site notice expired?	n/a
	Neighbour letters expired?	Y	Press Notice expired?	n/a

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
	Neighbour comments received?	N

EIA	Screening opinion completed and saved to Onbase?	n/a
-----	--	-----

CONDITIONS	Pre-commencement conditions proposed?	N
	Pre-commencement conditions agreed (or notification period expired)?	n/a

RECOMMENDATION	Refuse
----------------	--------

CHECKED AND SIGNED OFF BY: RK

DATE: 18/08/2025

SITE

The application relates to 121 Drake Street: a two-storey terraced property on the edge of Rochdale town centre. No. 121 forms part of an attractive terrace dating back to the turn of the Twentieth Century, comprising mixed commercial and residential use. The site does not fall within a conservation area but lies within Drake Street local centre, as per UDP Policy G/S/6.

121 Drake Street appears to have been vacant for the last year and was formerly used as a dental practice. The building faces north, fronting the pavement and overlooking the adopted public highway. It adjoins no. 119 to the east and no. 123 to the west. The rear boundary of the curtilage faces south, bordering the pavement on Henry Street.

PROPOSAL

The application is to convert the first floor into 1no. self-contained flat, whilst retaining a commercial use at ground floor. Permission is also sought for alterations to the shopfront, including the replacement of the ground floor window with UPVC double doors. The plans include 2no. bin stores and a cycle store in the rear yard.

RELEVANT PLANNING POLICY

National Guidance

National Planning Policy Framework (NPPF) – July 2021

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 21st March 2024. The following policies are relevant:

JP-P1 Sustainable places

Adopted Rochdale Core Strategy (CS):

DM1	General Development Requirements
C1	Delivering the right amount of housing in the right places
P3	Improving design of new development
C3	Delivering the Right Type of Housing
P2	Protecting and enhancing character
SO5	Improving accessibility and delivering sustainable transport
T2	Improving accessibility
DM1	General Development requirements
SD1	Delivering sustainable development

Unitary Development Plan (UDP):

G/D/1 - Defined Urban Area

Supplementary Planning Documents (SPD):

Supplementary Planning Guidance note 'Guidelines and Standards for Residential Development' (June 2016).

RELEVANT SITE HISTORY

17/00291/FUL – Grant subject to conditions:

Single storey rear extension

CONSULTATION RESPONSES

Highways – 30/05/2025

No objections:

The proposed development is within Rochdale Town Centre close to many local amenities and public transport options.

No changes to the transport network are proposed as a result of this development. Servicing and emergency access to this site will operate much the same as it does for neighbouring properties.

Given the location within the town centre and the proximity of public transport infrastructure we have no objections to this proposal.

Public protection (noise) 31/07/2025

The Environmental Health Officer has raised no objection, subject to the following condition:

The development hereby approved shall not be occupied until such time as the upgraded glazing, as set out within 'Chapter 5- Scheme of Noise Mitigation' of the submitted Noise Impact Assessment (RP Acoustics Ltd. Ref. NIA/1376/25/441/v1.0/12, Dated 12/05/2025), and a scheme of mechanical ventilation has been installed. No part of the development shall be occupied until such time as a verification report has been submitted to and approved in writing by the Local Planning Authority to confirm that the approved acoustic and ventilation measures have been implemented to achieve the required maximum noise levels. The noise attenuation measures shall be retained as installed thereafter.

Reason: To safeguard the amenities of residents in order to comply with the requirements of Policies G9 and 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.

REPRESENTATIONS

Letters of notification were sent to neighbouring properties 22/05/2025; no objections were raised.

ANALYSIS

Principle for development:

Permission is sought for the change of use of the first floor into a self-contained flat. Places for Everyone establishes the need for at least 616 net additional dwellings per year in Rochdale to meet the housing needs of the borough. Policy C1 of the Core Strategy aims to maximise the potential of previously developed sites within the urban area to achieve a target of 80% of new housing of previously developed land. The site falls within the 'defined urban area' as set out in Policy G/D/1 of the saved Unitary Development Plan (UDP). Furthermore, policy JP-H4 of PfE states that new housing should be delivered a density appropriate to the location, reflecting the relative accessibility of the site by walking, cycling and public transport and the need to achieve efficient use of land and high-quality design. Therefore, where possible concentrating a higher density of housing in town centres.

The principle for development, relating to this application, is therefore established by contributing towards additional housing supply, and in supporting development on previously developed land, within the defined urban area and town centres.

Design: DM1 and P3

Policies P3 and DM1 of the Council's adopted Core Strategy requires development proposals to adhere to high quality design and enhance the borough's identity and sense of place, by respecting context where it is positive and having regard to the scale, density, massing, height, layout, landscape, materials and access of surrounding buildings and areas in general. Paragraph 135 of the NPPF goes on to state that planning policies and decisions should ensure that developments function well and add to the overall quality of the area, are visually attractive as a result of good architecture, layout and appropriate and effective landscaping and are sympathetic to local character and history. Paragraph 139 states that development that is not well designed should be refused.

The National Design Guide sets out the characteristics of well-designed places and demonstrates what good design means in practice. It states that new development is influenced by the existing characteristics of the street scene, including the relationships between buildings, such as façade design, degrees of symmetry and the pattern and proportions of windows and doors.

The application property forms part of an attractive terrace featuring a curved façade, traditional decorative elements, and a repeat pattern of fenestration.

The main concern is the proposal to replace the existing ground floor window on Drake Street with UPVC double doors. The current window, with its grid design, timber frame, stone cill, and recessed placement, contributes to the terrace's traditional character and aligns with the fenestration pattern across nos. 109–125 Drake Street.

Creating a wider opening for UPVC double doors would displace the property's existing primary access, disrupt the fenestration pattern across the terrace and undermine the visual harmony of the street scene. According to the National Design Guide, new development should respect existing symmetry and patterns to preserve local

character. While the property is visually distinct from adjacent red brick buildings due to its rendered finish, its fenestration plays a key role in maintaining cohesion with the wider terrace. Altering this would break the continuity of the façade, fragmenting the appearance of the terrace and eroding its collective identity.

In addition, the replacement of a grid-design timber window with a UPVC door, along with the loss of traditional features such as the stall riser and stone lintels, would not be in keeping with the building's historic character or the wider street scene. These changes represent a clear downgrade in design quality, undermining the architectural integrity and visual coherence of the area.

It is acknowledged that modern shopfronts have been installed at nos. 127-129 Drake Street. Due to their rendered façade, there is a visual relationship with the application building, which could be interpreted as a precedent for the proposed shopfront. However, nos. 127-129 represent examples of where the visual cohesion of the street scene has become fragmented and poor quality materials have been used. The Core Strategy states that *'it is not acceptable to use existing poor quality development in the vicinity as a reason for lowering design standards in new development.'* Nos. 127-129 Drake Street should not be used as justification for the proposed alterations to the shopfront.

It should be noted that the application form and plan drawings do not clearly specify the proposed shopfront materials. The form incorrectly states that the existing window material is UPVC, overlooking the timber frame at ground floor level. Under 'proposed materials and finishes', it simply notes 'replace existing ground floor windows with shopfront', without mentioning timber. It is therefore reasonable to assume that the replacement material may be UPVC.

Summary:

The proposed replacement of the traditional timber-framed window with UPVC double doors represents poor design by disrupting the established fenestration pattern and visual harmony of the terrace. This change erodes the building's historic character and undermines the architectural integrity of the wider street scene. The proposed development therefore fails to comply with the requirements of the National Planning Policy Framework in respect of the need for development to be well-designed, Policy JP-P1 of the Places for Everyone Joint Development Plan Document, and Policy P3 of the Rochdale Core Strategy.

Amenity: DM1 and SPD

Space standards:

Paragraph 135 of the NPPF seeks to ensure that new developments create a high standard of amenity for future users. Furthermore, in conjunction with the SPD, Policy DM1 of the Rochdale Core strategy aims to secure a good standard of amenity for future occupants, including in relation to changes of use. As such, both the NPPF and the Core Strategy promote National Planning Practice Guidance (NPPG) on internal amenity, with NPPG being a 'material consideration' when taking decisions on planning applications.

The Nationally Described Space Standards is a technical document which establishes minimum internal floor areas for new dwellings, in order to ensure an acceptable standard of amenity for future occupants.

The table below outlines the NDSS minimum gross internal floor areas for a 1no. bedroom flat. Discounting the stairwell, the gross internal floor area of the proposed flat measures approximately 65m². As such, the flat would support up to a maximum of 2no. persons in a single bedroom.

Table 1. Minimum gross internal floor areas and storage (m²)

Number of bedrooms (b)	Number of bed spaces (persons)	1 storey dwellings	2 storey dwellings	3 storey dwellings	Built-in storage
1b	1p	39 (37) *			1.0
1b	2p	50	58		1.5
2b	3p	61	70		2.0
2b	4p	70	79		2.0

The NDSS also requires that in order to provide two bedspaces, a double bedroom has a floor area of at least 11m² and is at least 2.75m wide. The proposed double bedroom measures approximately 16m², but at its narrowest measure 2.7m. Whilst the width technically falls short of the maximum standard, the difference of 0.05m is considered immaterial when considered against securing the wider benefits of securing the building's optimum viable use and contributing towards the Borough's housing targets. The bedroom otherwise offers a generous amount of floor space.

Given the above, the proposed first floor flat is big enough to support 2 persons in a double room.

Outlook, natural light and privacy:

Policy DM1 requires all new development to demonstrate that occupants will experience acceptable levels of privacy, whilst the SPD aims to ensure that all habitable rooms (in which occupants spend prolonged periods of time) will be served by sufficient outlook and natural light.

The proposed plans feature a central lounge area with a rear-facing window. This window is positioned between two angled, two-storey elevations that sit perpendicular to it. While this configuration does limit both the outlook and the amount of natural light entering the lounge, it is noted that the window faces south, which helps to mitigate some of these limitations.

The reduced access to natural light and restricted views are considered acceptable when weighed against the need to optimise the use of the first floor. The overarching development principle highlights the borough's need for additional housing, with a preference for delivering this on previously developed land in sustainable locations.

Furthermore, Policy E1 of the Core Strategy supports enhancing town centre vitality, including through the conversion of upper floors to a variety of uses. On balance, the limited outlook and natural light are not deemed to cause significant harm that would justify refusing a residential use—particularly one that contributes to housing targets and supports the vibrancy of the town centre.

The proposed bedroom window directly faces habitable room windows at 156 Drake Street. According to paragraph 4.1 of the SPD, a minimum separation distance of 21 metres is required between directly facing upper-floor habitable room windows to safeguard the privacy of both existing and future occupants. The submitted plans show a separation distance of 20 metres between the proposed bedroom window and the upper-floor windows at 156 Drake Street.

Although this falls short of the standard by 1 metre, the shortfall is not considered materially significant. Paragraph 4.3 of the SPD acknowledges that exceptions to the standard may be appropriate, particularly where a reduced distance would not result in a noticeable loss of privacy. Given the urban context and the densely built environment, there are several examples in the surrounding area of directly facing habitable room windows that do not meet the 21-metre standard.

Therefore, the proposed development would not result in a harmful impact on the existing levels of privacy and is considered acceptable. Additionally, the proposed bedroom window would provide adequate outlook and access to natural light.

Noise impact:

Policy DM1 requires all new development to mitigate against any adverse impacts from noise. The site is located on a busy main road on the edge of Rochdale town centre and in close proximity to the Metrolink tram system and bus network.

The application is supported by a 'Noise Impact Assessment (RP Acoustics Ltd. Ref. NIA/1376/25/441/v1.0/12, Dated 12/05/2025)' which includes details of a baseline noise survey and recommended mitigation measures. The NIA concludes that in order to achieve the British Standard 8233:2014 for internal noise levels, all habitable room windows would require improved glazing. The NIA also recommends the use of standard trickle ventilation.

The Council's Environmental Health Officer has been consulted. Whilst accepting the recommended improvements in glazing, the Officer rejected the use of trickle ventilation, and instead recommended the use of mechanical ventilation, to be required via condition.

Subject to the recommendations of the Noise Impact Assessment, alongside the inclusion of a condition requiring the installation of mechanical ventilation, the proposed development would offer an acceptable standard of amenity for future occupants in terms of a noise disturbance.

Summary:

Overall, and subject to the recommended conditions, the proposed development would offer future occupants and neighbouring residents an acceptable level of amenity, in accordance with National Planning Policy Framework, Policy JP-P1 of the Places for Everyone Joint Development Plan, Policy DM1 of Rochdale Council's Core Strategy, and the Council's Guideline and Standards for residential Development SPD.

Refuse collection:

The plans and supporting 'Planning Statement' indicate the storage of a bin within the existing rear yard, and collection to the rear as per the existing strategy. This is considered to be acceptable.

Highways: DM1 and T2, Appendix 5

Whilst the applicant has indicated no on-site parking spaces, the Council's Highways Officer raised no objections to the proposed development. The officer concluded that the changes of use is unlikely to generate a significant volume of traffic and that it is close enough to town centre amenities and transport links that off street parking is not essential. Moreover, they raised no concerns regarding refuse collection.

RECOMMENDATION

Refuse:

1. By virtue of its poor design, the revision of the existing window opening to a double door would not sit sympathetically with, and would disrupt the visual cohesion of the street scene and the patterns of fenestration. In failing to take account of positive characteristics of the surrounding built environment, namely through failing to have regard to the pattern and proportions of fenestration present across the terrace, the development would comprise a harmful and unjustified alteration that would not be well-designed and therefore fails to comply with the requirements of the National Planning Policy Framework, Policy JP-P1 of the Places for Everyone Joint Development Plan Document, and Policy P3 of the Rochdale Core Strategy.

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:

For the avoidance of doubt, this decision relates to the following plans:

- Location plan
- Proposed site plan
- Proposed elevations and floor plan: A102
- Noise Impact Assessment (RP Acoustics Ltd. Ref. NIA/1376/25/441/v1.0/12, Dated 12/05/2025)

