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Planning, Development & Heritage Consultants

Chaise Property Ltd

68 Church Street West, Radcliffe, Bury,
M26 2SY

Planning Statement

18 February 2026

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1. Introduction

- 1.1 This Planning Statement has been prepared by Paul Butler Associates on behalf of our client, Chaise Property Ltd, in support of a full planning application relating to 68 Church Street West, Radcliffe, Bury, M26 2SY. The application proposal is for 'Change of use of existing dwellinghouse (Use Class C3) to 5 person HMO (Use Class C4) with minor alterations'.
- 1.2 To provide a clear understanding of the application proposal this statement includes:
- A description of the application site and surrounding area;
 - A review of the site's relevant planning history;
 - A description of the proposed scheme;
 - A review of national and local planning policies of relevance to the scheme;
 - An appraisal of the scheme against relevant planning policies and an assessment of the scheme in relation to its immediate and surrounding context; and,
 - A conclusion.

2. The Site and Surrounding Area

- 2.1 The application site is located at 68 Church Street West, Radcliffe, Bury, M26 2SY (see figure 2.1 below). The site comprises a mid-terrace property fronting 68 Church Street West and it is bounded by a service road to the south and residential properties to the east and west. The site is rectangular in shape and approximately 160 sqm in size.



Figure 2.1: Aerial view of application site (outlined in red).

- 2.2 The application property is a traditional mid-terrace property, constructed with brick and a slate roof. Accommodation is provided across ground, first and second floor levels, there is also a basement which provides storage. To the rear, there is a two storey outrigger. The roofspace has been converted and there is a front dormer, with a rooflight to the rear pitch.
- 2.3 The property occupies an elongated plot which is bisected by a service road running to the rear of properties on this part of Church Street West. To the front, the house is set back from the pavement by small front garden and enclosed with a low rise brick wall with railings. The primary access to the site is via Church Street West. There is an enclosed yard area to the

rear of the property with a gated access from the rear service road. Beyond this to the south is a parking area for two cars, and a further garden area.



Figure 2.2: Front elevation.



Figure 2.3: Rear elevation.



Figure 2.4: Parking area with space for two cars (Note: the tree is outside the site and is unaffected).

- 2.4 The site is located within Radcliffe Town Centre, The Spring Lane / Church Street West / Radcliffe Metrolink Station Town Centre Policy Area (Area RD6), and the Radcliffe Renewal Area (H5/1/2 Inner Radcliffe). The site is not located within a conservation area and does not contain any statutorily or locally listed buildings. The application site is situated within flood zone 2 (medium risk). There are no TPO trees on the site. The site is not within an Air Quality Management Area.

The Surrounding Area

- 2.5 The immediate vicinity of the site has a mixed character which reflects its location within Radcliffe Town Centre. Residential properties include traditional terrace dwellings, as well as more recent house and flat development such as toward the south of the site on Glenvale Close. There are a wide range of commercial premises nearby including shops, offices, hairdressers, cafes, and takeaways etc. Asda and Lidl supermarkets are also present. There are a range of local community and religious institutions, whilst Radcliffe Hub is due to open in 2026 and will include a library, swimming pool and fitness centre.

2.6 The site is close to various green open spaces which include Festival Gardens, Close Park, Coronation Park, Outwood Country Park and Red Bank Wood Local Nature Reserve. In terms of public transport, Radcliffe Metrolink stop is less than 200 metres from the site and provides services to destinations including Bury and Manchester City Centre. Additionally, bus stops are located on Church Street West and in Radcliffe Town Centre with destinations including Bury, Bolton and Manchester City Centre.

3. The Proposed Scheme

- 3.1 The lawful use of the application building is a dwellinghouse (use class C3). This application seeks consent for the conversion of the property to a 5 person HMO (use class C4) with minor external alterations.
- 3.2 Internally the conversion will comprise a kitchen / dining / living space (measuring 22.7sqm) and a bedroom on the ground floor (with ensuite). Two ensuite bedrooms and a utility room will be provided on the first floor, with a further two ensuite bedrooms provided on the second floor. The basement is to remain as storage space.
- 3.3 The property will be finished and furnished to a high standard to cater for the young-professional market. Photographs of previous developments completed by the applicant are provided at Appendix 1 and show the high standard of accommodation provided. It is also noted that as a 5 person HMO the property will require a HMO License from Bury Council and will not be able to be occupied until this is obtained.
- 3.4 Only minor external alterations are necessary to facilitate the conversion of the building. These include the enlargement of a window to the rear elevation which will serve the kitchen / dining space. Two new rooflights will also be installed to the roof to provide increased natural light and outlook to the second floor bedrooms. The chimney stack will also be removed as this is not structurally sound (confirmed by a structural report), whilst this will allow more space within the accommodation.
- 3.5 The rear yard area will provide an external amenity space for the HMO for residents to sit out and dry washing etc. It will also accommodate a secured / covered cycle store with space for 5 bikes (100%). There is also space for the storage of 4 wheelie bins.
- 3.6 Beyond the rear yard area space for two cars to park in a tandem format will be provided, with the existing crude timber structure being removed. The parking area will have a permeable surface to allow for natural drainage.

4. National and Local Planning Context

4.1 Planning policy guidance of relevance to the proposed scheme, and which provides the context for its assessment, is set out within the following:

- The National Planning Policy Framework (NPPF); and,
- The Development Plan for Bury

4.2 Relevant emerging planning policy is also considered.

National Planning Policy Framework

4.3 The National Planning Policy Framework (NPPF) was revised in December 2024, and sets out the government's planning policies and how these are expected to be applied. It replaces the Framework published in July 2018, however a presumption in favour of sustainable development continues to be at the heart of the NPPF which ensures that development is pursued in a positive way.

4.4 Development proposals that accord with an up-to-date Development Plan should be approved without delay. Where there are no relevant development plan policies, or the policies which are most important for determining the application are out of date, permission should be granted unless:

- The application of policies in the Framework that protect areas or assets of particular importance provides a clear reason for refusing the proposed development; or
- Any adverse impact of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

- 4.5 Paragraph 8 confirms that there are three dimensions to sustainable development; economic, social and environmental. To achieve sustainable development, economic, social and environmental gains should be pursued in mutually supportive ways through the planning system.

Delivering Sustainable Development

- 4.6 The NPPF explains that the purpose of the planning system is to contribute to the achievement of sustainable development. Planning policies and decisions should play an active role in guiding development towards sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area. These sustainable objectives should be delivered through the preparation and implementation of plans and the application of the policies in the framework. The NPPF is split into 17 chapters, the chapters of relevance to this development are discussed below.
- 4.7 Delivering a sufficient supply of homes (Chapter 5) – paragraph 61 explains that in order to support the government’s commitment to significantly boosting the supply of homes, it is important that a sufficient amount and variety of land comes forward for development where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay. The overall aim should be to meet an area’s identified housing need, including with an appropriate mix of housing types for the local community
- 4.8 Paragraph 73 highlights that small to medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly. Paragraph d) emphasises the importance of windfall sites and states local authorities should support their development through giving great weight to the benefits of using suitable sites within existing settlements for homes.

- 4.9 Building a strong and competitive economy (Chapter 6) - emphasises that the government is committed to ensuring that the planning system should help to support economic growth. It recognises that a poor environment and a lack of housing can act as a potential barrier to investment.
- 4.10 Promoting healthy communities (Chapter 8) - the planning system should aim to achieve healthy, inclusive and safe communities. Planning decisions should aim to achieve places which promote, amongst other things, safe and accessible developments, where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion.
- 4.11 Promoting sustainable transport (Chapter 9) - to protect and exploit opportunities for the use of sustainable transport modes, development should be located and designed to give priority to pedestrian and cycle movements and have access to high quality public transport facilities.
- 4.12 Paragraph 116 advises 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, following mitigation, would be severe, taking into account all reasonable future scenarios.
- 4.13 Making effective use of land (Chapter 11) – the NPPF recognises the need for the planning system to promote an effective use of land in meeting the need for homes and other uses. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or ‘brownfield’ land. Paragraph 125 (c) explains that the planning system should specifically give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, proposals for which should be approved unless substantial harm would be caused. Further, sub-section (d) of this paragraph explains that planning should also promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively

4.14 The chapter goes on to discuss how appropriate densities can be achieved. Paragraph 129 sets out that the planning system should support development that makes efficient use of land, taking into account the following:

a) the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;

b) local market conditions and viability;

c) the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;

d) the desirability of maintaining an area's prevailing character and setting (including residential gardens), or of promoting regeneration and change; and

e) the importance of securing well-designed, attractive and healthy places.

4.15 Achieving well-designed places (Chapter 12) - this chapter sets out at paragraph 135 that planning policies and decisions should aim to ensure that developments:

a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;

b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;

c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);

- d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;
- e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and
- f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

4.16 Meeting the challenge of climate change, flooding and coastal change (Chapter 14) - this chapter emphasises the importance of securing reductions in greenhouse gas emissions, minimising vulnerability and providing resilience to the impacts of climate change; and, in terms of flooding, development should be made safe without increasing flood risk elsewhere.

4.17 Conserving and enhancing the natural environment (Chapter 15) - the planning system should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes, recognising the wider benefits of ecosystem services and minimising impacts of biodiversity and providing net gains in biodiversity where possible. It should also prevent new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability.

4.18 Decision making – guidance in paragraph 39 states that local planning authorities should approach decisions in a positive and creative way, making use of the full range of planning tools available, including brownfield registers and permission in principle, and work proactively with applicants. Decision - makers at all levels should seek to approve applications for sustainable development where possible.

National Planning Practice Guidance

- 4.19 National Planning Practice Guidance is a government resource that provides online guidance on how to implement the National Planning Policy Framework (NPPF). It's a key part of the planning system, offering practical advice and support for local authorities, developers, and the public.

National Design Guide

- 4.20 The National Design Guide sets out the characteristics of well-designed places and demonstrates what good design means in practice. It advises that well-designed places have individual characteristics which work together to create its physical character. The ten characteristics help to nurture and sustain a sense of community. They work to positively address environmental issues affecting climate. They all contribute towards the cross-cutting themes for good design set out in the National Planning Policy Framework. The ten characteristics of good design identified are: context; identity; built form; movement; nature; public spaces; uses; homes and building; resources and lifespan.

The Development Plan for Bury

- 4.21 The Development Plan for Bury comprises the following documents:
- Places for Everyone;
 - Saved policies of the Bury Unitary Development Plan;
 - Bury Local Plan; and,
 - Supplementary Planning Documents.

Places for Everyone (PfE)

- 4.22 PfE is a joint Development Plan Document being prepared by nine Greater Manchester districts (Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and

Wigan). It identifies the quantum of new housing and employment development, supports the delivery of key infrastructure, and protects environmental assets. The joint plan determines the kind of development that takes place in their Boroughs, maximising the use of brownfield land and urban spaces while protecting Green Belt land from the risk of unplanned development. The Places for Everyone Plan took effect and became part of the statutory development plan for each of the nine PfE authorities on March 21, 2024.

4.23 The policies which are relevant to the application proposals are listed below:

- Policy JP-S1: Sustainable Development: To help tackle climate change, development should aim to maximise its economic, social and environmental benefits simultaneously.
- Policy JP-P1: Sustainable Places: This policy sets out various criteria including that development should be socially inclusive, safe, functional and convenient and well connected.
- Policy JP-S2: Carbon and Energy: This policy sets out objectives for meeting Manchester's carbon neutrality commitments.
- Policy JP-C2: Digital Connectivity: This policy supports the provision of affordable, high quality, digital infrastructure including access to high-speed internet.
- Policy JP-C8: Transport Requirements of New Development: This policy states that new development will be required to be located and designed to enable and encourage walking, cycling and public transport use.
- Policy JP-H1: Scale, Distribution and Phasing of New Housing Development: Bury Council needs to deliver 7,678 homes during the plan period, with an annual average of 452 homes per year.
- Policy JP-H3: Type, Size and Design of New Housing: Development across the plan area should seek to incorporate a range of dwelling types and sizes to meet local needs and deliver more inclusive neighbourhoods. Residential developments should

provide an appropriate mix of dwelling types and sizes reflecting local plan policies, and having regard to masterplans, guidance and relevant local evidence.

- Policy JP-H4: Density of New Housing: New housing development should be delivered at 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.

Saved Policies of the Bury Unitary Development Plan (Adopted August 1997)

4.24 The Unitary Development Plan (UDP) for Bury was adopted on 29 August 1997 and forms part of the Development Plan against which proposals should be judged. UDP objectives and policies of particular relevance to the proposed scheme are summarised below:

- Policy H2/1 'The Form of New Residential Development' states that all new residential development will be expected to make a positive contribution to the form and quality of the surrounding area. Factors to be considered when assessing proposals will include: the height and roof type of adjacent buildings; the impact of developments on residential amenity; the density and character of the surrounding area; the position and proximity of neighbouring properties; and, the materials to be used in proposed developments, especially their colour and texture.
- Policy H1/2 'Further Housing Development' states that the Council will have regard to the following factors when assessing proposals for housing development on sites not identified on the Proposals Map:
 - the need to direct development towards the urban area;
 - the availability of infrastructure;
 - the need to avoid the release of peripheral open land, unless this can be shown to be consistent with urban regeneration;

- the suitability of the site in land use terms with regard to amenity, the nature of the local environment and surrounding land uses;
 - other policies and proposals of the Plan.
- Policy H2/2 'The Layout of New Residential Development' states that new residential development will be required to demonstrate acceptable standards of layout. Factors to be considered when assessing proposals will include: car parking provision; access for both vehicles and pedestrians, and provision for public transport; the possible need for traffic calming measures; density; space about and between dwellings; landscaping and screening; protection/provision of trees and hedgerows; open space/children's play areas; design for safety and security; access/facilities for the disabled; and, the existence of any public rights of way.
- Policy H2/4 'Conversions' states that conversion of a building into a house of multiple occupation will be considered with regard to the following factors: the effect on the amenity of neighbouring property through noise, visual intrusion, the position of entrances, impact of parking areas, extensions and fire escapes; the general character of the area and the existing concentration of flats; the amenity of occupants; the effect on the street scene of any changes to the external appearance of the building; and, car parking and servicing requirements.
- Policy EN1/2 - 'Townscape and Built Design' advises that the Council will give favourable consideration to proposals which do not have an unacceptable adverse effect on the particular character and townscape of the Borough's towns, villages and other settlements.
- Policy EN7/2 'Noise Pollution' states in seeking to limit noise pollution the Council will not permit:
 - development which could lead to an unacceptable noise nuisance to nearby occupiers and/or amenity users;

- development close to a permanent source of noise.
- Policy HT2/4 'Car Parking and New Development' states that in considering the location of new or intensified development, the Council will encourage proposals which supports the principles of sustainable development.
- Policy Area RD6 'Spring Lane/Church Street West/Radcliffe Metrolink Station' states that the Council will encourage the consolidation of existing employment generating uses within the Spring Lane/Church Street West/Radcliffe Station area of the town centre, and will, where appropriate, support the introduction of further employment generating uses, such as business (B1) and offices, industrial (B2 and B8), and complementary town centre retailing uses. Housing development will also be welcomed, where appropriate, together with measures to improve the area's environmental and physical appearance.
- RD6 Policy H5/1 'Area Improvement' states that the Council will be especially concerned with improving house conditions and the housing environment. H5/1/2 'Inner Radcliffe' states that owing to a high level of poor housing conditions and a poor housing environment, inner Radcliffe has been identified as a Renewal Area.

4.25 The detailed assessment of the scheme within the following planning appraisal section confirms that the proposal accords with the above UDP policies.

Bury Local Plan

4.26 Bury Council is currently in the process of preparing a new Local Plan, and once adopted it will replace the existing UDP document. A Call for Sites exercise was undertaken between 25 March to 6 May 2024. The Plan is not yet adopted, therefore limited weight can be given to policies within it.

Supplementary Planning Documents (SPDS) and Guidance

- 4.27 There are also various Supplementary Planning Documents of relevance to the proposed scheme, which include:
- SPD 11: Parking Standards in Bury (May 2007);
 - SPD 13: Conversion of Buildings to Houses in Multiple Occupation (January 2020); and,
 - SPD 6: Alterations and Extensions to Residential Properties (May 2007).
- 4.28 The proposed development scheme has been designed in accordance with the policies of the UDP, PFE and the above SPDs.

Emerging Planning Policy

- 4.29 Bury Council have currently consulted on the 'Houses in Multiple Occupation' Supplementary Planning Document (SPD). The consultation ran from 15 December 2025 to January 2026. Once adopted it should be treated as a material planning consideration as a SPD. As the SPD is not yet adopted its policies can only be afforded limited weight, however the application proposal has been prepared with due regard to its provisions. The following key provisions are noted within the SPD:

Avoiding a concentration of HMOs

HMO Concentration Threshold

- 4.30 Planning permission will not normally be granted for new HMOs, or for proposals to increase the number of bedrooms within existing HMOs, where:

a) Proposals would result in more than 10% of properties (residential and commercial) or more than four properties (whichever is the fewer) being classed as HMOs within a 100m buffer of the application property; or

b) The number of HMOs already exceeds 10% of properties or four HMOs within a 100m buffer of the application property.

Restricting the sandwiching of properties

Proposals which would result in any house that is in use as a single dwelling being adjacent to more than one house in multiple occupation will not normally be considered acceptable. This includes properties behind or in front, as well as to either side. Sandwiching of or by properties to the front or rear will be considered on a case by case basis. Factors to be considered will include the nature of any separation between properties.

Restricting three adjacent HMOs

Planning permission will not normally be granted for proposals that would result in three or more adjacent HMOs.

- 4.31 The draft SPD states 'Rented properties (including HMO's and shared housing) tend to house individual occupiers with lower-than average levels of car ownership compared to the overall population average. As a consequence it is of particular importance that HMO's should be in sustainable locations, with access to public transport, shops and services.
- 4.32 Other detailed guidance is also provided including in relation to achieving a good standard of accommodation, and safeguarding the amenity of neighbouring residents. This is considered and assessed within the appraisal section of this Statement.

5. Planning Appraisal

5.1 Having regard to the relevant planning policy guidance in the previous section, the key material considerations against which the proposed scheme should be considered, and which are discussed in this section, include:

- Principle of Development
- Residential Amenity
- Sustainable Development: Economic, Social and Environmental Benefits
- Highways, Accessibility, and Parking
- Waste Management
- Flood Risk

Principle of Development

5.2 The application site comprises a mid-terrace residential property located at Church Street West which is within a residential part of Radcliffe Town Centre. The principle of converting the existing property from dwellinghouse (use class C3) to a 5 person HMO (use class C4) is currently permitted development under Schedule 2, Part 3, Class L of the General Permitted Development Order thereby establishing this as acceptable in principle. Nevertheless, it is recognised that the Council may introduce an Article 4 Direction to remove this permitted development right with a proposal to introduce this appearing on the agenda of the December 2025 Planning Control Committee but the item was withdrawn prior to debate. On the basis that an Article 4 Direction is not in place (and assuming this is not the case at the point of decision) the permitted development fall-back that exists represents a significant material consideration as a fall-back.

5.3 If an Article 4 Direction to remove the permitted development right is introduced, then an assessment against the adopted planning policy and guidance will be required having

regard to relevant material considerations. An assessment on this basis is provided within the remainder of this Planning Statement.

- 5.4 The proposed HMO will retain the residential use of the property. Given that the application building is located in a residential area, adjacent to residential properties and located in a sustainable/accessible location in proximity to amenities and public transport, this further reinforces that the proposals are acceptable in principle.
- 5.5 Housing Objectives 1 and 2 of the UDP relate to meeting housing demand within the Borough, and developing housing stock which is related to the urban area. The proposed change of use to a HMO will provide a valuable source of accommodation which is attractive to a range of occupiers including young professionals and key-workers.
- 5.6 Housing Objective 3 of the UDP states that a wide range of housing stock should be provided to reflect the demands and needs of the Borough. This includes the provision of smaller housing units and provision for those unable to compete financially in the housing market sector. The Council recognise that properly managed and regulated HMOs can offer good quality affordable accommodation to people who cannot afford to buy their own homes and are not eligible for social housing. The proposals therefore directly respond to Housing Objective 3.
- 5.7 Policy JP-H4 of the Places for Everyone Joint Plan states that new housing development should be delivered at 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. The policy sets out minimum densities for new housing developments. In town centre locations, a minimum of 120 dwellings per hectare should be achieved. This application is for the conversion of a dwellinghouse (use class C3) to a HMO (use class C4), therefore the density standard is not applicable to this development, nonetheless, the proposals comply with the general principles of the policy. Paragraph 7.8 of PfE states that there is a strong focus on directing new housing towards previously-developed sites within the existing urban area. This will help to address existing

dereliction and poorly used sites, as well as reducing the need to release greenfield and Green Belt land for development. Paragraph 7.11 stresses that it will be important to make the most of existing housing stock. The proposals will result in a more efficient use of an existing house which is located in a highly sustainable and accessible town centre location.

- 5.8 Saved UDP Policy H2/4 'Conversions' is the key policy relating to HMO accommodation. The policy states that applications for the conversion of a building into a HMO will be considered against various factors. These factors are set out below, and addressed in greater detail in the following sections of this appraisal:

a) the effect on the amenity of neighbouring property through noise, visual intrusion, the position of entrances, impact of parking areas, extensions and fire escapes;

- 5.9 The proposed residential use will not result in conflict with neighbouring properties in relation to noise or visual intrusion. The conversion of the property to a 5 person HMO may increase the occupancy of property compared to use as dwellinghouse, however it is not considered that to result in a materially greater level of noise generation than the existing use. As part of the conversion the party wall along the entrance corridor will have acoustic insulation installed to minimise potential for sound transfer to the adjacent property.
- 5.10 The internal layout has the communal kitchen / dining / living space located at the rear of the property. This reflects existing arrangements and ensures that this space does not adjoin a bedroom a neighbouring property potentially resulting in noise transfer. The upper floors of the property will comprise bedrooms which again ensures compatibility with neighbouring properties. A utility space for residents will be provided on the first floor of the building. This is located within the outrigger element meaning there is not a party wall and potential noise is easier to control.
- 5.11 The proposal does not include any extension or alterations that are associated with visual intrusion. There are no external fire escapes structures / additions required.

- 5.12 Parking will be provided at the rear of the site which reflects the existing situation and the arrangements present at neighbouring properties within the terrace row. The parking area is separated from the properties by the access route and rear yards, and its continued use is not associated with any adverse amenity impacts.

b) the general character of the area and the existing concentration of flats;

- 5.13 The immediate vicinity of the site is residential in nature, comprising primarily terraced houses. The site is located within Radcliffe Town Centre and is located in an area where land uses transition from housing to more commercial, retail, community and civic uses associated with the Town Centre. Some commercial premises within the Town Centre have flats on the upper floors whilst there are also some flats within the housing development at Glenvale Close. The wider area is therefore mixed in character.

- 5.14 It is recognised that the draft HMO SPD applies a policy in relation to assessing the concentration of HMOs. This policy only carries limited weight at this time until such time as the SPD is formally adopted. The policy requires an assessment of properties (residential and commercial) with a 100m radius of the site, and that HMOs within this radius do not exceed 10% of the total properties, or more than 4 properties (whichever is lower).

- 5.15 A 100m search area is indicated by Figure 5.1 below. The Council's HMO Register has been reviewed, together with a review of the planning database, local property listing websites (Rightmove / Spareroom), and a site visit to the area during which any tell-tail signs of a HMO property were observed (eg. downstairs bedrooms, multiple letter boxes, letting boards etc). This research identified HMOs at the following addresses within the 100m search:

- 56 Church Street West
- 84 Church street west
- 86 Church street west

- 5.16 The search area included c. 110 properties (the exact number of properties is difficult to establish with certainty due to number of flats in the area). The proposal will create a fourth

HMO within the 100m radius. Given the number of properties in the area the 10% threshold is not breached (this would only be the case if there were 11 or more HMOs), nor is the 4 HMO limit given by the draft SDP.

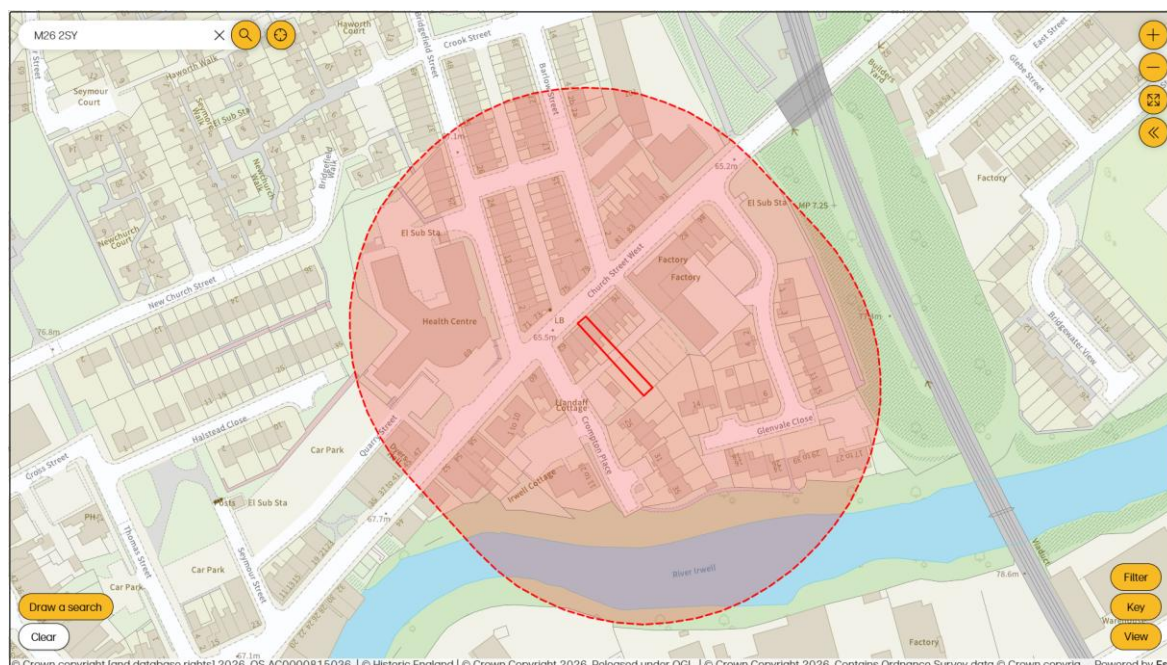


Figure 5.1: Plan showing 100m search radius from the subject site (outlined red).

- 5.17 The draft SPD also applies requirements to restrict the sandwiching of properties and restrict three adjacent HMOs. Based on the HMOs identified in the area it is confirmed that the proposed change of use to a HMO will not create an overconcentration of HMOs, and complies with the draft SPD provisions.

c) the amenity of occupants;

- 5.18 All occupants will have a high standard of amenity. The proposed HMO will be delivered to a high quality standard of design in terms of living accommodation, sound proofing, natural lighting and ventilation. This matter is discussed in greater detail later in this chapter of the statement.

d) the effect on the street scene of any changes to the external appearance of the building; car parking and servicing requirements

- 5.19 Only very minimal external alteration including the enlargement of a window to the rear of the house, the insertion of a roof light to the front and rear roof pitches, and the removal of the chimney stack which is in poor structural condition (confirmed by a structural report). These changes will not have a material effect on the streetscene or the harm the appearance of the building. It is also recognised that these changes could be undertaken via permitted development rights and this is a material consideration of significant weight.
- 5.20 Car parking and servicing arrangements will take place via the rear access road which reflects the existing arrangements for the property and neighbouring properties. Bins will be stored within the rear yard area except for on collections days.
- 5.21 Paragraph 3.12 of SPD 13 states that HMOs are often best located in vibrant areas that are near a relatively busy highway, well served by public transport, cycle routes and a range of services including shopping and leisure. The application site is located in Radcliffe Town Centre which benefits from a range of services and amenities, and the site is well connected to public transport facilities, including numerous bus services and the Metrolink (which is less than 200m away).
- 5.22 The proposal is also consistent with Saved UDP Policies Area RD6 and H5/1. These policies state that housing development will also be welcomed, where appropriate, together with measures to improve the area's environmental and physical appearance, and improve housing conditions. The scheme will be finished to a high standard and will be well-maintained as confirmed throughout this Statement.
- 5.23 Overall, the principle of the development is considered to be entirely acceptable, and the proposals are in accordance with considerations for Saved UDP Policy H2/4, the guidance within SPD 13, relevant provisions of the NPPF, and draft HMO SPD.

Potential Impact on Amenity

- 5.24 With regards to the scheme's potential impact on residential amenity, two issues require consideration: whether the proposed scheme will maintain a satisfactory level of amenity for neighbouring uses; and, whether the design will ensure that future occupants are able to enjoy a satisfactory level of amenity.

Neighbouring Uses

- 5.25 The application site is bounded on both sides by residential dwellings. The proposed HMO will be compatible with the neighbouring uses given the property will also remain in residential use. It is accepted that there may be some additional activity associated with occupants, however this is likely to be negligible and there is no evidence to substantiate that any additional noise and disturbance would be so great as to materially impact the residential character of the area or have an unacceptable impact on the amenity of neighbouring occupiers.
- 5.26 Whilst it is acknowledged that HMO uses are sometimes associated with increased noise and comings and goings, the property is a be a high end, high specification HMO which is targeted at young professionals and key workers. In addition, the applicant is experienced in converting and managing HMOs, and has put in place a robust lettings and management strategy which ensures the operation of the HMO is compatible with neighbouring uses. A HMO Management Plan has been submitted as part of the application and sets out robust measures to ensure that the scheme will be well-managed and amenity impacts are avoided.

Proposed Accommodation

- 5.27 All of the proposed bedrooms exceed the space standards for double occupancy rooms set out in the Bury Council HMO Licensing Conditions document, although they will be for single occupancy only. The minimum licensing requirement is 6.5sqm, whilst the standard

set out in the Nationally Described Space Standards is 7.5sqm. The proposed bedrooms will all have ensembles and will measure: 13.1sqm, 11.1sqm, 13sqm, 11sqm and 11.7sqm and therefore comfortably exceed the standards. The bedrooms have regular shapes to allow for an appropriate internal furniture layout. All bedrooms are accessed from corridors and do not require access from via a communal room. All bedrooms will have good levels of natural light and outlook. With regards to the two bedrooms in on the second floor these will have natural light provided by the existing rooflight and dormer, with two new rooflights (one to each bedroom) also being provided. The new rooflights will be positioned at a height which allows for an outlook to be achieved.

- 5.28 The scheme also includes a generous provision of communal space, including a large kitchen / dining / living area on the ground floor measuring 22.7sqm. This comfortably exceeds the licensing requirement for a kitchen / dining / living room within a 5 person HMO which is 18.2sqm. In addition, a utility space will be provided on the first floor measuring 3.5sqm.
- 5.29 Future residents will have access to the rear yard area which provides a space for sitting outdoors and drying washing etc. It is also highlighted that the site benefits from good access to open spaces including Festival Gardens, Close Park, Coronation Park, Outwood Country Park and Red Bank Wood Local Nature Reserve
- 5.30 Policy JP-H3 of the Places for Everyone Joint Plan relates to the type, size and design of new housing. It states that all dwellings must comply with nationally described space standards (NDSS) and be built to the accessible and adaptable standard in Part M4(2) of Building Regulations unless specific site conditions make this impracticable. The NDSS apply to new dwellings. The NDSS are not directly applicable to HMO developments nonetheless the space standard table has been completed and is included at Appendix 2 of this Statement.
- 5.31 With regard to accessibility, it is noted that the main and rear entrances have level access. Bedroom 1 situated on the ground floor is potentially suitable for occupation by a disabled resident and is the largest, at 13.1sqm, with an ensuite also provided. The communal spaces

are also situated at ground floor and have open-plan layout to minimise obstructions and avoid pinch-points. Slip-resistant floor coverings will be incorporated throughout to support safe movement for residents and visitors, and external lighting will be installed to ensure safe entry during hours of darkness.

- 5.32 The proposed scheme will not result in any undue loss of amenity to neighbouring or existing occupiers, and future residents will be afforded a good level of amenity. The proposal complies with Saved UDP Policy H2/4, and the guidance within SPD 6 and SPD 13.

Sustainable Development: Economic, Social and Environmental Benefits

- 5.33 The proposal will comprise sustainable development as a result of the associated economic, social, and environmental benefits that it will bring.
- 5.34 Economic Benefits: The shortage of housing can act as a barrier to people accessing job opportunities, thus preventing the Borough from achieving its economic potential. The proposed HMO accommodation will help meet the needs of local people and those moving to the Borough, thereby contributing to Bury District's economy. Ministerial statements refer to the pressing need of ensuring that the planning system does everything it can to help sustain economic growth, urging planning authorities to make every effort to identify and meet the housing needs of their areas. It is accepted that house building is a driver of the local economy and there will be employment associated with the conversion of the property to a HMO. There may also be increased footfall and spending in local businesses in Radcliffe Town Centre.
- 5.35 Social Benefits: The proposals will provide a HMO which is an important form of housing for a number of people, particularly young professionals, key workers and lower income groups. The site is located within an established residential area within Radcliffe Town Centre and benefits from the wide range of amenities and services this will provide, as well as being nearby to open space and recreation facilities which will provide for the needs of future

occupants of the scheme. The proposed development will deliver good quality accommodation and contribute to the creation of a mixed and sustainable community.

- 5.36 In relation to PfE policy JP-C2 'Digital Connectivity' it is noted that the site is in a location where there is ready access to high-speed internet connections (up to 1000Mbps), and this will be provided to the proposed accommodation.
- 5.37 Environmental Benefits: The proposed scheme has environmental benefits since it involves the redevelopment of a brownfield site, thereby reducing development pressure on greenfield sites. Future residents will benefit from the highly sustainable and accessible nature of the development, thereby reducing the need to travel by car and helping to reduce carbon emissions and air quality impact.
- 5.38 The scheme will incorporate sustainable energy benefits associated with the installation of energy efficient lighting and heating controls. The building currently has a 'G' EPC certificate. This will be improved with the target of achieving a 'C' rating. This will be achieved through the following measures:
- Low-energy LED lighting throughout the building to reduce electrical consumption.
 - Emergency lighting in communal areas using high-efficiency luminaires.
 - Upgraded heating controls including programmable thermostats and thermostatic radiator valves.
 - Improved insulation in internal partitions, particularly along the party walls, which will also improve acoustic performance.
 - Secure cycle storage for bicycles to encourage sustainable travel and reduce car dependency.
- 5.39 The proposed measures are estimated to achieve a 10–15% reduction in regulated CO₂ emissions compared to the existing baseline performance, primarily through enhanced lighting efficiency, better heating controls, and improved insulation. The measures will align with PfE policy JP-S2 and JP-S6 which support low carbon development.

Highways, Accessibility and Parking

- 5.40 The draft SPD states 'Rented properties (including HMO's and shared housing) tend to house individual occupiers with lower-than average levels of car ownership compared to the overall population average. As a consequence it is of particular importance that HMO's should be in sustainable locations, with access to public transport, shops and services.
- 5.41 The site is located in a sustainable and accessible location in Radcliffe Town Centre with access to a range of services, amenities, employment opportunities. The site also benefits from good public transport links, including frequent bus services and close proximity to Radcliffe Metrolink Station which is under 200m away. Due to these factors car ownership by future residents is not necessary, whilst nature of HMO accommodation also means that car ownership levels are typically low. Notwithstanding this it is noted that two car parking spaces can be provided at the rear of the site to cater for any demand. This provision is considered appropriate for the proposed development and is in accordance with the car parking guidance with the draft HMO SPD. This identifies that the site is within Zone B where 0.25 unallocated spaces per bedroom are typically sought. This equates to 1.25 spaces for the 5 person HMO.
- 5.42 Additionally the scheme will provide a secure cycle store within the rear yard area which will provide space for 5 bikes (100% provision). This will promote cycling as a viable and attractive means of travel. The level of provision proposed within the scheme will also help to support a reduction in reliance upon the private car and help to encourage use of more environmentally friendly and sustainable modes of transport amongst future residents.
- 5.43 In terms of assessing highways matters paragraph 116 of the NPPF is relevant which advises '*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, following mitigation, would be severe, taking into account all reasonable future scenarios.*' This is a high policy test and it is not considered that the development would be associated with severe adverse highway impacts which would warrant a refusal.

- 5.44 It has been demonstrated that the scheme accords with the transport requirements of the NPPF; Saved UDP Policy HT2/4, and would be acceptable when assessed against part e of Saved UDP Policy H2/4 and the relevant guidance within SPD 11, and the draft HMO SPD.

Waste Management

- 5.45 The proposals include the provision of four wheelie bins within the rear yards area which will allow for the segregation of refuse and recyclable / food waste and ensures the storage of bins does not adversely impact on the street scene. Servicing is understood to take place via the rear access road which reflects the existing arrangements. Residents will be responsible for transferring bins from the yard area to the access road on collection day and returning them to the yard after collection.
- 5.46 As such it is confirmed that there would be a no detrimental effect on the safety and operation of the local highway network, as it would operate in the same manner as the existing site and nearby properties.

Flood Risk

- 5.47 It is noted that the site is located in Flood Zone 2. It is not within the 1 in 30 year surface water flood event, although is just within the 1 in 100 year event, and the 1 in 1,000 year event. No extension or other impermeable hardsurfacing is proposed which would increase the flood risk on other land. The conversion to HMO use does not lead to a more vulnerable use in planning terms compared to the existing C3 residential use, whilst the basement space will be retained as storage (with no living / sleeping accommodation being provided within the basement). A Sequential Test or Exception Test are not required taking account of the above factors. The HMO will have escape routes via the front and rear of the property in event of flooding. Flood resilient measures including flood resilient doors at ground level, and installing electrical sockets etc. above flood levels can be incorporated as appropriate mitigation. Future residents will also be advised to register for the Environment Agency Flood Risk warnings and will be advised on flood evacuation as part of their residents welcome

information, whilst this will also be displayed in communal areas (the escape route is likely to be via Church Street West as this is situated at a higher level and further from the River Irwell). On the basis of the above mitigation measures relevant flood risk provisions within Section 14 of the NPPF are complied with.

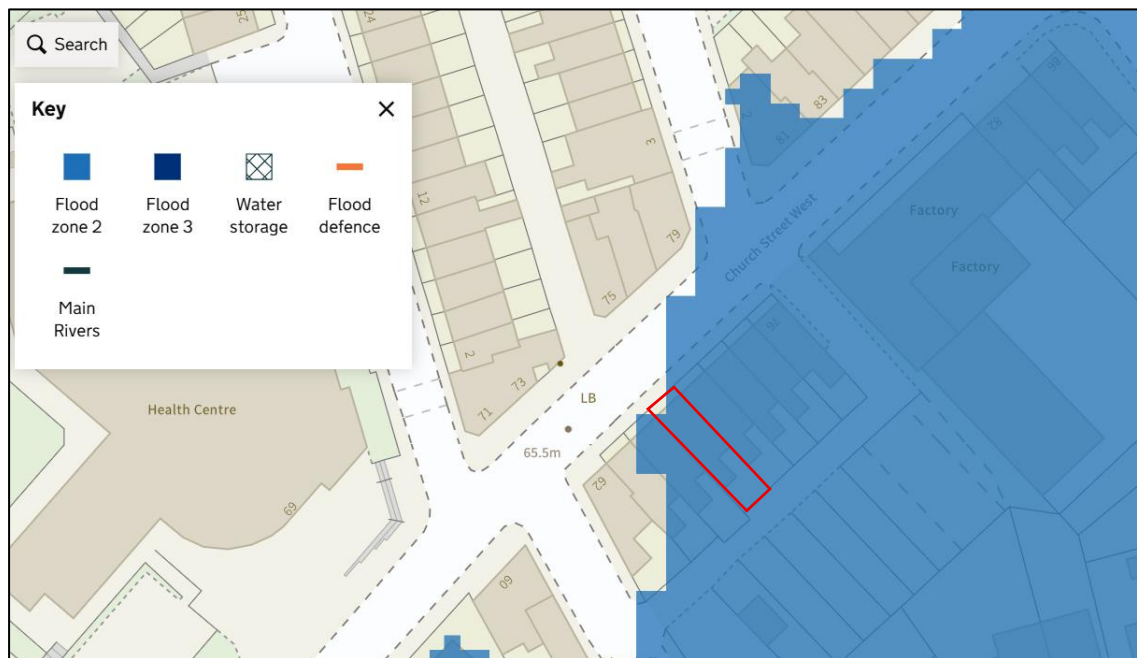


Figure 5.2: Flood Risk Map with the subject property outlined red.

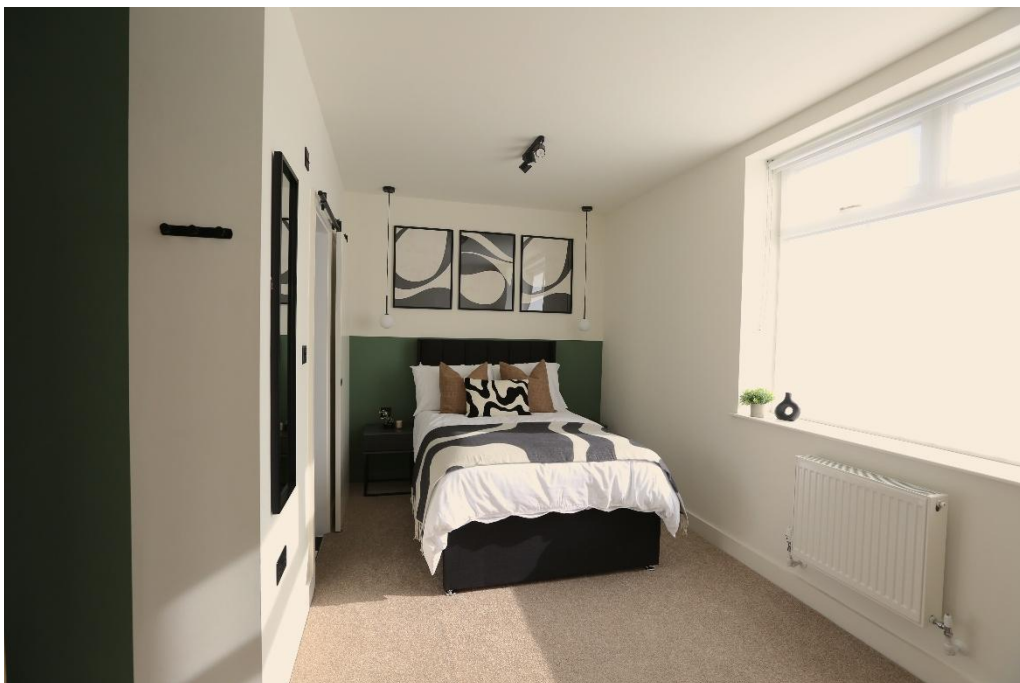
6. Conclusion

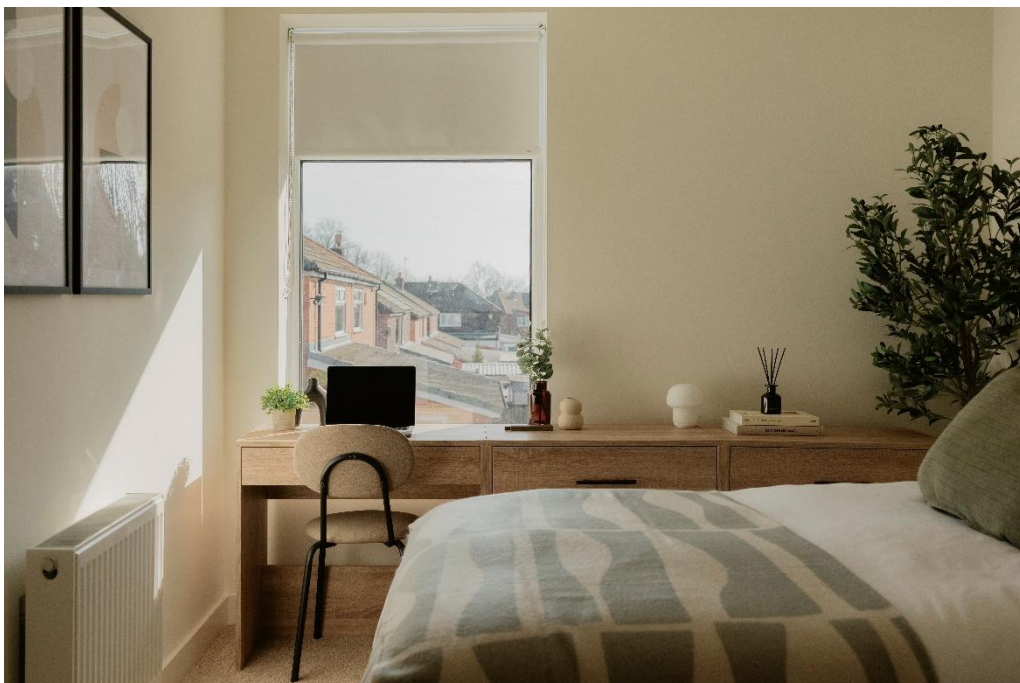
- 6.1 This Planning Statement has been prepared by Paul Butler Associates on behalf of Chaise Property in support of a full planning application at 68 Church Street West, Radcliffe, Bury, M26 2SY for 'Change of use of existing dwellinghouse (Use Class C3) to 5 person HMO (Use Class C4) with associated alterations'.
- 6.2 It is highlighted that this development would be permitted development, however planning permission is sought noting that a HMO Article 4 Direction may be introduced. As confirmed within this Statement the proposed scheme would accords with national and local planning policy guidance, including saved policies of the UDP, PfE, and relevant supplementary planning documents/guidance, as well as relevant provisions of the NPPF.
- 6.3 The proposed scheme will deliver a range of positive planning benefits as discussed within this report, including:
- The proposed conversion will contribute to meeting housing demand in Bury, and will make a meaningful contribution to objectives to provide increased affordable accommodation.
 - The proposed HMO property will provide a valuable source of accommodation which is attractive to a range of occupiers including young professionals and key-workers.
 - The proposed accommodation will be furnished to a high standard and will provide housing in an accessible and sustainable location within walking distance of everyday services, amenities, employment opportunities and public transport connections within Radcliffe Town Centre.
 - The provision of a development with high quality sustainability credentials that will deliver economic, social, and environmental benefits.
- 6.4 As evidenced in this statement, the site has been shown to be suitable and a sustainable location for a proposed 5 person HMO with no known adverse impact arising from the

development that would significantly and demonstrably outweigh its benefits. Indeed, it is our view that no material planning considerations exist that would justify refusal of planning permission.

Appendix 1: Photographs of Previous HMO Development by Chaise Property







Appendix 2: Nationally Described Space Standards Table

Proposed Bedroom within HMO - 1, 2, 3...etc)	Applicable overall floor space standard (m2) –	Number of occupants per bedroom	Principle double bedroom floor space (m2)	Minimum Principle double bedroom width	Single occupancy bedroom floor space (m2)	Minimum Bedroom width	Applicable overall built-in storage standard space (m2)	Overall built-in storage space (m2)
1	7.5sqm	1	n/a	n/a	13.1sqm	3.24m	n/a	n/a
2	7.5sqm	1	n/a	n/a	11.1sqm	2.71m	n/a	n/a
3	7.5sqm	1	n/a	n/a	13sqm	2.875m	n/a	n/a
4	7.5sqm	1	n/a	n/a	11sqm	2.46m	n/a	n/a
5	7.5sqm	1	n/a	n/a	11.7sqm	2.52m	n/a	n/a

NOTES

Minimum gross internal floor area, bedroom floor space (double and single) and built-in storage should be presented in square metres (m2).

Please highlight in a red background those cells where the applicable standard is not met.

National Space Standards: [Technical housing standards – nationally described space standard - GOV.UK \(www.gov.uk\)](https://www.gov.uk/technical-housing-standards)