

**APPLICATION REPORT – OUT/355327/25**  
**Planning Committee – 11<sup>th</sup> February 2026**

Registration Date: 13<sup>th</sup> November 2025  
Ward: Chadderton South

Application Reference: FUL/355327/25

Type of Application: Outline

Proposal: Outline planning application (landscaping reserved) for the change of use of floors 2, 3 and 4 of former Ram Mill building to create hotel accommodation (C1) comprising 75 double bedrooms and 105 hotel aparthotel units with dedicated flexible work areas together with common space and service areas

Location: Ram Mill, Gordon Street, Chadderton, Oldham, OL9 9RH

Case Officer: Stephen Gill  
Applicant: Mr Javid Akbar  
Agent: Mr Simon James

## **1. INTRODUCTION & BACKGROUND**

- 1.1 The application is referred to Planning Committee for determination as it a major development.
- 1.2 The site comprises the former Ram Mill, a substantial multi-storey historic mill building with associated service areas and car parking, located off Gordon Street, Chadderton, Oldham. The site lies just over 2 miles south-west of Oldham Town Centre and is situated to the north-west of Jardine Way.
- 1.3 The site is set within an established urban area characterised by a mix of commercial, business and retail uses. The immediate surroundings are predominantly commercial in nature, including large format retail and food outlets, while the wider Whitegate residential area lies to the south of the site. The site benefits from good accessibility to the strategic and local highway network and is also well served by public transport.
- 1.4 Ram Mill itself extends to approximately 21,000 square metres of floorspace arranged over five storeys, including a distinctive tower element and roof terrace. The building was originally constructed in 1904 during the Edwardian period for textile manufacturing purposes and remained in industrial use for much of the twentieth century. It is a prominent example of Oldham's historic mill stock and, although not statutorily listed, is recognised as a non-designated heritage asset of local significance.

- 1.5 In recent years, significant investment has been made in the building by the current owners. Planning permissions granted since 2021 have enabled refurbishment and reuse of the basement, ground and first floors, including repairs to the building fabric, replacement of fenestration on a like-for-like basis, and the creation of modern commercial, leisure and business space. These works have been implemented, and the lower floors of the building are now occupied by a range of uses, contributing to the building's regeneration and ongoing viability.
- 1.6 The current application relates to the upper floors of the building (floors 2 to 4), which remain underused, and forms the next phase in the wider refurbishment and regeneration of Ram Mill.

## **2. THE PROPOSAL & BACKGROUND**

- 2.1 The application seeks outline planning permission (with landscaping reserved) for the change of use of floors 2, 3 and 4 of Ram Mill to provide hotel accommodation (Use Class C1). The development would comprise a total of 180 hotel units, consisting of 75 double bedrooms and 105 aparthotel units, the latter incorporating dedicated flexible workspace areas. The proposal also includes associated common areas and service spaces to support the operation of the hotel use.
- 2.2 The hotel and aparthotel accommodation is intended to operate as a single, centrally managed Use Class C1 development. The standard hotel bedrooms are designed to accommodate short-stay visitors, while the aparthotel units are intended for short- to medium-term stays, particularly for business users, project-based workers and visitors requiring more flexible accommodation. The aparthotel units incorporate dedicated workspace areas to support working while in residence but are not intended to function as permanent or self-contained residential dwellings. All accommodation would be managed and serviced as part of the wider hotel operation, with shared reception, facilities and services.
- 2.3 Internally, the proposed layout makes use of the existing floor plates and structural grid of the building. The aparthotel units are generally arranged around the perimeter of the floors to take advantage of natural light and fenestration, while the more compact hotel bedrooms are located within the internal zones of the building. No external alterations of significance are proposed as part of this application, beyond those already approved and implemented under earlier permissions.

## **3. PLANNING HISTORY**

- 3.1 The following is a summary of the planning history attached to the site:

- FUL/352804/24 - Erection of temporary car parking deck to increase parking provision on site, including adjustments to/formalisation of existing haphazard/unclear site parking arrangements. Granted

- FUL/350044/22 - Retrospective glazed lobby entrance with external steps and disabled access lift to the main entrance. Granted
- MMA/349821/22 - Minor Material Amendment relating to condition 2 (approved plans) related to approved planning permission PA/344791/20 – Granted
- FUL/349665/22 - Change of use of the ground and first floor to offices (Class E), provision of catering facilities at the reception building and a gym with ancillary changing rooms (retrospective) – Granted
- PA/344791/20 - Change of use of the ground and first floor to office use (Class B1a) – Granted

#### **4. RELEVANT PLANNING POLICIES**

4.1 The Places for Everyone (PfE) Plan and related documentation took effect and became part of the statutory development plan on 21 March 2024.

4.2 The PfE Plan must now be considered in the determination of planning applications, alongside Oldham's Joint Core Strategy and Development Management Development Plan Document (Local Plan), adopted November 2011, in accordance with the National Planning Policy Framework (NPPF).

4.3 The following policies are relevant to the determination of this application:

##### **Places for Everyone**

- Policy JP-S1: Sustainable Development
- Policy JP-G8: A Net Enhancement of Biodiversity and Geodiversity
- Policy JP-P1 Sustainable Places
- Policy JP-C8: Transport Requirements of New Development
- Policy JP-J1 - Supporting Long-Term Economic Growth
- Policy JP-P2 – Heritage
- Policy JP-S2 – Energy & Carbon

##### **Oldham Core Strategy**

- Policy 01 - Climate Change and Sustainable Development
- Policy 09 - Local Environment
- Policy 13 - Employment Area Policy
- Policy 14 - Supporting Oldham's Economy
- Policy 24 – Historic Environment

##### **Other Material Considerations**

*National Planning Policy Framework (NPPF)*

- Chapter 06 – Building a Strong, competitive Economy
- Chapter 09 – Promoting Sustainable Transport
- Chapter 12 – Achieving well designed places
- Chapter 15 – Conserving and enhancing the natural environment
- Chapter 16 – Conserving and Enhancing the Historic environment

*Oldham Mills Strategy 2021*

**5. CONSULTATIONS**

Environmental Health	No objection in principle subject to a condition relating to the submission of ventilation requirements.
Highway Engineer	No objection subject to conditions.
Greater Manchester Ecology Unit	No objection subject to conditions relating to bat box provision, external lighting and precautionary methods of working. Comments are discussed further in the report.
Lead Local Flood Authority	No objection
Health & Safety Executive	The HSE has reviewed the proposal and advises that it does not wish to advise against the granting of planning permission for the development.
Growth Lancashire	No objection to the principle of development.
Transport for Greater Manchester	TfGM has reviewed the submitted Transport Assessment and advises that the traffic impact of the development would be negligible, with junctions operating within capacity. No objection is raised, subject to the implementation of appropriate access, parking, active travel measures and a Travel Plan
Greater Manchester Fire Service	The Fire Service raises no objection to the proposal, subject to compliance with Approved Document B (Requirement B5) of

	the Building Regulations in relation to fire service access and facilities. The installation of sprinklers is strongly encouraged.
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## 6. PUBLICITY AND THIRD-PARTY REPRESENTATIONS

6.1 In accordance with the requirements of the Town and Country Planning (Development Management Procedure) (England) Order 2015, and the Council's adopted Statement of Community Involvement, the application has been advertised by way of neighbour notification letters, site notices and a press notice. No representations have been received.

## ASSESSMENT OF THE PROPOSAL

### 7. PRINCIPLE OF DEVELOPMENT

7.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that, to the extent that development plan policies are material, planning decisions must be taken in accordance with the development plan unless material considerations indicate otherwise. This requirement is reiterated in Paragraph 2 of the NPPF.

7.2 The site forms part of the Greengate / Broadgate Business Employment Area (BEA), and Local Plan Policies 13 and 14 are relevant.

7.3 Paragraph 6.38 of the supporting text to Policy 13 explains that BEAs are designated to support a broad and diverse range of employment-generating uses. These areas are intended to meet the needs of a changing local economy and provide investment opportunities for both new and existing businesses.

7.4 Policy 14 sets out the acceptable uses within BEAs, which include:

- i. Business
- ii. General Industry
- iii. Storage or Distribution
- iv. Restaurants and Cafés
- v. Drinking Establishments
- vi. Hot Food Takeaways (excluding SEAs 1 to 10)
- vii. Hotels
- viii. Leisure facilities up to 1,000m<sup>2</sup> gross floorspace
- ix. Retail facilities up to 500m<sup>2</sup> gross floorspace
- x. Building and construction-related uses
- xi. Transport and transport-related uses
- xii. Waste management facilities
- xiii. Garden centres

7.5 As set out above, the development comprises a hotel use (Use Class C1), including both standard hotel bedrooms and aparthotel units. In planning terms, both elements fall within the scope of a hotel use and are expressly identified as an acceptable use within Local Plan Policy 14. The aparthotel units are intended to accommodate short to medium stay visitors and business users and would not function as permanent residential accommodation.

7.6 The location of the site within the Greengate / Broadgate BEA is well suited to the use, particularly given the buildings accessibility, and established mix of commercial, business and leisure use within the wider area.

7.7 The development also aligns with the objectives of Policy 13, which seeks to promote a flexible and diverse range of employment-generating uses within BEAs. The proposal would bring currently underutilised floors back into active use, contribute to the ongoing regeneration of the site, and support continued investment in the building without displacing existing employment uses at lower levels.

7.8 On this basis, it is concluded that the development is acceptable in principle and accords with Local Plan Policies 13 and 14.

## **8. LAYOUT, APPEARANCE, SCALE & HERITAGE**

8.1 In design terms, NPPF paragraph 135, Local Plan Policy 9 and PfE Policy JP-P1 require visually attractive development, achieved through good architecture, layout and landscaping, which is sympathetic to local character.

8.2 Development proposals affecting designated or non-designated heritage assets and their settings will be assessed in line with national policy, as outlined in PfE Policy JP-P2 and Core Strategy Policy 24. These policies collectively seek to protect, conserve, and enhance the borough's heritage assets, recognising their contribution to local character and identity.

8.3 Paragraph 215 of the NPPF states that where a proposal leads to less than substantial harm to the significance of a designated heritage asset, this harm must be weighed against the public benefits of the development, including securing its optimum viable use. Paragraph 216 confirms that, in the case of non-designated heritage assets, a balanced judgement must be made, taking into account the scale of harm or loss and the significance of the asset

### *Layout*

8.4 The existing layout of the second, third and fourth floors of the building are characterised by large, open-plan floorplates reflecting the building's original industrial function. As shown on the submitted existing plans, these floors are largely unsubdivided, with a regular structural grid of columns and beams and extensive perimeter fenestration on all elevations.

8.5 Floor 2 is predominantly laid out as a single open space, with limited ancillary accommodation. These ancillary areas include existing circulation cores, lift access, offices, kitchen area and WC facilities, with the remainder of the floorplate remaining open and largely vacant. Floors 3 and 4 follow a similar arrangement and are almost entirely open in character. Both floors comprise expansive, unobstructed floorplates with a consistent column grid and minimal internal subdivision. Across all three floors, the existing layout provides a high degree of flexibility, but the lack of internal definition means that the floors are currently underutilised.

8.6 In relation to the proposed layout, this follows a consistent and structured approach, across floors 2-4, which is informed by the historic form of the building, its regular structural grid and the established pattern of fenestration.

8.7 Each floor is organised around a central circulation corridor, providing clear and legible access to all accommodation and service areas. This arrangement allows the units to be accommodated efficiently within the existing floorplates, without the need for intrusive structural alteration.

8.8 Across Floors 2, 3 and 4, the aparthotel units are predominantly located along the external elevations of the building. These positions benefit from the regular window rhythm, enabling the larger unit formats to incorporate dedicated flexible workspace areas and to benefit from access to natural light and outlook. This approach to the layout is what would be expected for a scheme such as this, as the aparthotel units are designed to accommodate longer stays than the hotel units, which are more transient in nature.

8.9 As set out above, the hotel bedrooms are primarily arranged within the internal zones of each floor and accessed directly from the central corridor. These rooms are more compact in nature and are efficiently accommodated within the deeper parts of the floorplates, and they do not have any access to windows or a natural outlook. However, the applicant concludes that the approach taken regarding the hotel rooms follows the compact “Z-hotel” style model, which in some instances may include rooms without external windows. A hotel use is a transient use, designed for very short stays, they are not designed for long-term living. The Z-Hotel approach is becoming more prevalent in city centre environments, where space is at a premium.

8.10 The applicant asserts that the hotel rooms would be designed to a high internal specification, incorporating enhanced artificial lighting, ventilation and acoustic treatment to provide an acceptable internal environment. In addition, to ensure that there would be appropriate levels of ventilation for these rooms, Environmental Health have requested a condition to ensure that this information is submitted prior to the commencement of development.

8.11 Vertical circulation cores, including existing lift and stair access, are retained and integrated within the layout, together with associated service and support spaces. These elements are located within the internal areas of the floors, ensuring that the perimeter zones remain focused on primary accommodation and that the historic

structural framework of the building is respected.

8.12 Overall, the proposed layout represents a logical and efficient reuse of the existing upper floorplates, responding positively to the historic structure, fenestration pattern and internal grid of the former mill building.

#### *Scale & Appearance*

8.13 In relation to scale and appearance, the development does not involve any changes to the external scale, height or overall form of the existing building. As set out above, the works are confined to the internal reconfiguration of Floors 2, 3 and 4, with the building's established footprint, massing and roof profile remaining unaltered.

8.14 In terms of appearance, the proposal would retain the existing external elevations, materials and architectural detailing. The characteristic brickwork, fenestration rhythm and prominent tower element would remain unchanged. As such, the development would preserve the building's established industrial character and its contribution to the surrounding townscape. Overall, there are no concerns relating to the scale and appearance.

#### *Heritage Impacts*

8.15 As set out above, the building is a Non-Designated Heritage Asset (NDHA) and is also identified within the Oldham Mills Strategy (the "Mills Strategy"). The Mills Strategy identifies Ram Mill as a high-priority NDHA that makes a positive contribution to local character and distinctiveness. The Strategy recognises the building's historic and architectural significance and notes that it had previously been at risk due to underuse. Importantly, Ram Mill is assessed as having high potential for employment or mixed-use redevelopment, having regard to its scale, structural form, accessibility and location within a strategic business and employment area. The Strategy promotes a clear presumption in favour of the retention, repair and adaptive reuse of such mills, supporting proposals that secure their long-term viable use while conserving key heritage features.

8.16 Growth Lancashire (GL), the Council's heritage consultants, have reviewed the application and raise no objection to the principle of the proposal. GL considers the reuse of the upper floors of Ram Mill to be a positive intervention that would bring currently underutilised parts of the building back into active use, thereby supporting its long-term conservation. The retention of existing internal structural elements, including beams and columns, and their integration within the proposed layout is identified as a positive approach that responds appropriately to the building's historic character.

8.17 GL advised that, in order to fully understand the heritage implications of the scheme, clarity was required in relation to any external works, including whether further window replacement or repairs to the external fabric were proposed. The applicant has since confirmed that the only external alterations would comprise window replacement, with no changes to the position, size or form of the existing openings, and that such works would be undertaken solely to facilitate the proposed use.

- 8.18 Following this clarification, GL has advised that it would raise no objection to the replacement windows, provided that they match those installed on the lower floors as part of implementing planning permission FUL/349665/22 in terms of colour, appearance and design, including frame width. On this basis, it is considered appropriate to secure details of the replacement windows by way of a planning condition.
- 8.19 Overall, GL concludes that the proposed development would not result in a discernible level of harm or loss of significance to the heritage asset. The LPA concur with this assessment, and it is therefore considered that the proposal accords with PfE Policy JP-P2, Local Plan Policy 24 and the requirements of Chapter 16 of the National Planning Policy Framework.

## **9. FIRE SAFETY**

- 9.1 A Fire Statement has been submitted in support of the application. The document has been prepared to provide a high-level fire safety framework in relation to the development.
- 9.2 Given that the building exceeds 18-metres in height, the applicant submitted the Fire Statement. The Fire Statement confirms that detailed fire safety matters, including means of escape, compartmentation, fire suppression systems and fire-fighting facilities, will be fully addressed at the detailed design stage and through compliance with the Building Regulations. At outline stage, the document provides reassurance that there are no fundamental fire safety constraints that would prevent the reuse of the upper floors for hotel accommodation and that a detailed fire strategy can be developed to meet all relevant regulatory requirements.
- 9.3 Greater Manchester Fire and Rescue Service has reviewed the proposal and raises no objection, subject to compliance with Approved Document B (Requirement B5) of the Building Regulations and strongly encourages the installation of a sprinkler system. Given the outline nature of the application and the absence of any external alterations affecting fire access, it is considered that fire safety matters can be appropriately secured through the Building Regulations process and, where necessary, by planning condition.
- 9.4 The Health and Safety Executive (HSE) has reviewed the proposal in respect of land-use planning and public safety considerations. The HSE advises that it does not wish to advise against the granting of planning permission for the proposed development. No specific fire safety or major hazard-related concerns have been raised.

## **10. ACCESS & HIGHWAYS**

- 10.1 PfE Policy JP-C8 requires new development to be designed and located in a way that promotes walking, cycling, and public transport use, reducing reliance on private cars

and supporting the creation of sustainable, accessible, and attractive communities. Developments must provide safe, direct, and inclusive access for all users, prioritising pedestrians, cyclists, and public transport in line with the user hierarchy. Proposals should also ensure strong connectivity to local facilities and transport links. Adequate and well-integrated parking should be provided, including for disabled users, alongside secure and convenient cycle parking.

10.2 NPPF paragraph 116 states 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.

#### *Highway Impact*

10.3 A Transport Assessment (TA) has been submitted, which has been reviewed by the Highway Engineer and Transport for Greater Manchester (TfGM). In relation to potential trip generation this has been calculated using TRICS database information, which is a common approach.

10.4 The TA identifies that the development would generate approximately 46 two-way vehicle movements during the weekday morning peak hour (08:00–09:00) and 38 two-way vehicle movements during the weekday evening peak hour (17:00–18:00). The TA compares this to the previous historic textile storage use of the upper floors, which according to the TA could have generated up to 42 two-way trips in the morning peak and 44 in the evening peak. Based on this, proposal has the potential result in a marginal net increase in the morning peak and a slight net reduction in the evening peak. Overall, the TA concludes that the change in trip generation is broadly neutral.

10.5 The TA includes an assessment of the impact of the development on the surrounding highway network, with particular focus on the Jardine Way / McDonald's / Lidl roundabout and the A663 Broadway / Whitegate Lane / Jardine Way junction. The TA concludes that both junctions would continue to operate within capacity during peak periods even after the development has been implemented. The TA concludes that the scale of additional traffic is well below the threshold typically associated with material or severe highway impact.

10.6 TfGM has reviewed the TA and advises that the trip generation methodology and assumptions are robust. TfGM has also reviewed the traffic distribution and junction modelling and have raised no concerns.

#### *Access Arrangements*

10.7 The site is served via an established single vehicular access arrangement that connects the site to the local highway network. Access to the site is taken via Gordon Street, which provides a connection through to Jardine Way.

10.8 In operational terms, the TA confirms that the access and internal circulation

arrangements can accommodate service vehicles associated with the proposed uses. Swept path tracking has been undertaken and demonstrates that a refuse vehicle can enter and exit the site in a forward gear, carrying out turning manoeuvres within the site and operating adjacent to the existing bin collection point. The assessment also indicates that a 7.5-tonne box van can access and manoeuvre around the eastern and northern parts of the building, with turning achievable within the site.

10.9 TfGM and the Highway Engineer raise no objection in principle to the proposed access arrangements.

#### *Parking Arrangements*

10.10 The development would be supported by 272 on-site car parking spaces, which would be provided within the existing building footprint and associated parking deck. This includes 204 spaces at ground floor level and a further 68 spaces within the upper deck, all accessed via the established site access arrangements. The proposal does not require the loss of any existing off-site parking or alterations to the public highway.

10.11 The TA includes a detailed parking demand assessment. This assessment identifies a maximum anticipated parking demand of approximately 201 spaces during peak periods. The scale of provision is considered appropriate as confirmed by the Councils Highway Engineer

#### *Active Travel*

10.12 TfGM advises that improvements to the pedestrian environment can assist in encouraging the uptake of active travel modes, including measures such as footway resurfacing, reinstatement of redundant access points and the provision of tactile paving and dropped kerbs at access junctions. However, following a site visit and discussions with the Highway Engineer, the LPA is satisfied that the site already benefits from strong pedestrian connections. These link the site effectively to Broadway, where there is good access to public transport services and the wider pedestrian network. In this context, it is considered that the existing pedestrian infrastructure is of a suitable standard to serve the proposed development, and that it would not be reasonable or necessary to require additional off-site pedestrian improvement works to make the development acceptable in planning terms.

10.13 In relation to cycle parking provision, TfGM notes that the TA proposes the provision of 10 unsheltered cycle parking spaces monitored by CCTV and advises that the development would benefit from the provision of secure and easily accessible internal cycle storage. The Council's Highway Engineer considers that this matter warrants further consideration, having regard to the characteristics of the site and TfGM's comments. On this basis, it is considered appropriate to secure details of cycle parking provision by way of a pre-occupation planning condition, to ensure that suitable and secure facilities are provided prior to the commencement of the use.

#### *Conclusions on Highways*

10.14 Taking the above matters into account, it is considered that the development would not result in an unacceptable impact on highway safety or the operation of the local highway network. The submitted TA demonstrates that the change in trip generation would be broadly neutral, that key junctions would continue to operate within capacity, and that the scale of additional traffic would fall well below the threshold associated with severe impact. Appropriate access, servicing and parking arrangements can be accommodated within the site, and the development benefits from good pedestrian connectivity and access to public transport. Subject to the imposition of a condition to secure suitable cycle parking provision, the proposal is considered to accord with PfE Policy JP-C8 the requirements set out in Chapter 9 of the NPPF and is acceptable in highways terms.

## **11. AMENITY**

- 11.1 Local Plan Policy 9 requires development to safeguard the amenity of existing and future occupants, including in respect of privacy, safety, noise, security, visual appearance and access to daylight. Paragraph 135 of the NPPF also requires development to secure a high standard of amenity for existing and future users.
- 11.2 The site is located deep within a BEA and is separated by a significant distance from existing residential properties. Given the nature of the proposed land use, the development would not give rise to conflicts with surrounding commercial land uses. Given the nature of the proposed use, which is transient, there would not unacceptable implications in terms of privacy, overlooking, noise, or general disturbance to potential customers.
- 11.3 Environmental Health raise no objections in relation to either the construction or operational phases of the development. No concerns have been identified in respect of noise, air quality or general amenity. Therefore, it is considered that the proposal would safeguard the amenity of existing and future users, in accordance with Local Plan Policy 9 and Chapter 12 of the NPPF.

## **12. ECOLOGY & BIODIVERSITY NET GAIN**

- 12.1 Local Plan Policy 21 requires new development to protect, conserve and enhance the natural environment, including biodiversity, geodiversity, landscapes and Green Infrastructure. The policy seeks to ensure growth is balanced with environmental protection and the provision of new or enhanced Green Infrastructure.
- 12.2 A Bat Roost Suitability Assessment (BRSA) has been submitted with the application. The BRSA concludes that the overall bat roost potential of the building is low, with any potential roosting activity likely to be limited to common and widespread species, such as the common pipistrelle bat. The site's urban context and distance from higher-value foraging habitats further limits its suitability for supporting significant bat populations.
- 12.3 The BRSA further concludes that because the development will result in internal

alterations only, the risk of impacting roosting bats or potential roost features is negligible. On this basis, the BRSA states that no further bat surveys are required.

- 12.4 Greater Manchester Ecology Unit (GMEU) have been consulted and conclude that the building has been correctly assessed as having low suitability for bat roosting. GMEU agrees with the conclusion that, given the proposals are limited to internal works, the development would have a negligible impact on bats, and that no further bat surveys are required to inform the determination of the application.
- 12.5 GMEU notes that a Precautionary Method of Working (PMoW) has been set out within the assessment and advises that this should be followed should any external works be required. It is recommended that the PMoW be secured by condition to ensure that bats are appropriately safeguarded. In addition, GMEU advises that any new external lighting should be designed in accordance with best practice guidance to avoid adverse impacts on foraging, commuting or potentially roosting bats, and that this should also be secured by condition.
- 12.6 In terms of biodiversity enhancement, GMEU supports the recommendation within the BRSA for the installation of at least two bat boxes on the building, which can be secured by way of condition.
- 12.7 With regard to nesting birds, GMEU advises that although birds were not specifically addressed within the BRSA, there is a recorded peregrine falcon nest associated with the tower element of the building. While the application relates to the internal alterations only, GMEU conclude that building works could result in disturbance to nesting birds. GMEU therefore recommends that works which may affect nesting habitats should not be undertaken during the main bird nesting season (March to August) unless appropriate checks have confirmed the absence of active nests, which can be secured by way of condition.
- 12.8 Based on the above, the development would not result in harm to protected species and is acceptable in ecological terms. Appropriate safeguards and enhancements, including a precautionary method of working, sensitive external lighting, provision of bat boxes and protection for nesting birds, can be secured by condition. On this basis, the proposal accords with Local Plan Policy 21 and the requirements set out in Chapter 15 of the NPPF.

#### *Biodiversity Net Gain*

- 12.9 Biodiversity Net Gain (BNG) is a statutory requirement for new development and seeks to ensure that the natural environment is left in a measurably better state than before. Under Schedule 7A of the Town and Country Planning Act 1990, as inserted by Schedule 14 of the Environment Act 2021, qualifying developments must deliver a minimum 10% net gain in biodiversity value.
- 12.10 Schedule 7A also provides a number of exemptions from the statutory BNG requirement. These include a *de minimis* exemption where development would not result in the loss of onsite habitat exceeding 25 square metres, or any loss of linear

habitats such as hedgerows or watercourses.

- 12.11 The development for the vast majority involves an internal change of use of the existing building, and does not include any extensions, external alterations affecting habitats, or ground disturbance. As such, the proposal would not result in the loss of any onsite habitat and would not exceed the *de minimis* threshold set out in the legislation.
- 12.12 The GMEU has reviewed the application and advises that the development is likely to be exempt from BNG requirements under the *de minimis* provisions, subject to the LPA being satisfied that no qualifying habitat loss would occur. Based on the submitted plans and supporting information, the LPA are satisfied that this exemption applies in this instance.
- 12.13 Considering the above, the submission of a Biodiversity Metric or the delivery of a minimum 10% BNG is not required for this development.

### **13. FLOOD RISK AND DRAINAGE**

- 13.1 PfE Policy JP-S4 expects developments to manage surface water runoff using sustainable drainage systems (SuDS) as close to the source as possible, aiming to achieve greenfield runoff rates unless demonstrated to be impracticable.
- 13.2 There are no extensions or alterations to the building's footprint, and no requirement for new hardstanding. As a result, the proposal would not increase the extent of impermeable surfaces on site and would not give rise to additional surface water runoff. Given the absence of external works or changes to ground levels, the development would have no material impact on surface water drainage or flood risk, and there is no requirement for additional sustainable drainage measures.
- 13.3 The Lead Local Flood Authority (LLFA) have confirmed that they do not object to the development. The LLFA would like the applicant to look at opportunities to enhance green infrastructure within the external areas of the site. However, landscaping, is not a matter that is being considered as part of this application, as it is reserved. There will be opportunities to look at this matter further as part of a reserved matters application.
- 13.4 Based on the above, the proposal is considered acceptable in relation to flood risk and drainage, in accordance with PfE Policy JP-S4.

### **14. ENERGY**

- 14.1 PfE Policy JP-S2 promotes the retrofitting of existing buildings to improve energy efficiency, the use of life-cycle carbon assessment, and a positive approach to renewable and low-carbon energy generation. It expects development to follow the energy hierarchy, prioritising minimising energy demand, maximising energy efficiency, and incorporating renewable and low-carbon energy sources wherever practicable.

- 14.2 No Energy Statement has been submitted with the application. The submission of an Energy Statement can be secured by planning condition, requiring details of energy efficiency measures, carbon reduction performance and low-carbon technologies to be provided prior to the commencement of development.
- 14.3 Subject to such a condition, it is considered that the proposal would be capable of complying with the relevant energy and sustainability objectives of the development plan and national policy, and the absence of an Energy Statement at outline stage does not give rise to a reason for refusal.

## **15. BENEFITS**

- 15.1 In coming to a recommendation on this application, it is important to weigh up all the material considerations set out above and any benefits of the scheme.
- 15.2 The applicant has submitted an Economic Benefits Statement in support of the application. The assessment estimates that the development would involve an investment of approximately £20 million from the applicant and would generate significant economic benefits during the construction phase, including direct and indirect jobs through the use of local trades and local and regional supply chains.
- 15.3 In operational terms, the assessment indicates that the development would support approximately 56 additional jobs, including both direct employment within the hotel and indirect and induced employment within the wider economy. The operational phase of the development is estimated to generate £millions in Gross Value over a ten-year period, contributing to the ongoing economic performance of the site and the surrounding area.
- 15.4 The assessment also considers visitor expenditure, estimating that guests staying at the hotel and apartment could generate £millions per year in local spending. This spending is likely to support local services, facilities and businesses within Oldham.
- 15.5 Overall, the submitted assessment concludes that the proposal would deliver significant economic benefits, complementing the existing business uses at Ram Mill, supporting employment, generating visitor expenditure and helping to secure the long-term viable reuse of a large brownfield building. The LPA has no reasonable basis to disagree with the conclusions set out in the Assessment, and the economic benefits of the scheme weigh significantly in favour of the development in the planning balance.

## **16. CONCLUSION**

- 16.1 The development is acceptable in principle within the Greengate / Broadgate BEA and accords with Local Plan Policies 13 and 14.
- 16.2 The proposal would bring underutilised floors of a prominent Non-Designated Heritage Asset back into active use, supporting its long-term conservation in line with the

Oldham Mills Strategy, PfE Policy JP-P2 and Local Plan Policy 24.

- 16.3 The layout represents an efficient and appropriate reuse of the existing building fabric, and no technical objections have been raised in respect of highways and transport matters, heritage, fire safety, ecology, amenity, flood risk or energy.
- 16.4 The development would deliver significant economic benefits, including private investment, job creation and increased visitor expenditure, which weigh positively in the planning balance.
- 16.5 Taking all material considerations into account, it is concluded that the proposal accords with the relevant PfE and Local Plan Policies set out and discussed in the report. Subject to appropriate conditions, the application is therefore recommended for approval.

## **17. RECOMMENDATION**

- 17.1 The application is therefore recommended for approval subject to the following conditions set out below:
  1. All applications for reserved matters must be made within three years of the date of this decision notice and development must be commenced before the expiration of two years from the final approval of the reserved matters or, in the case of approval on different dates, the final approval of the last such matter to be approved. REASON: In accordance with Section 92 (as amended) of the Town and Country Planning Act 1990.
  2. Before any phase of the development hereby granted outline permission is commenced, approval shall be obtained from the Local Planning Authority with respect to the reserved matters for (a) landscaping. REASON: In order to ensure the development is satisfactory and that details of all outstanding matters are submitted, in accordance with Section 92 (as amended) of the Town and Country Act 1990. The details are required prior to the commencement of development, because otherwise the development would not be lawful.
  3. No development shall commence until an Energy Statement has been submitted to and approved in writing by the Local Planning Authority. The development shall thereafter be carried out in accordance with the approved Energy Statement. REASON: To ensure the development contributes to the reduction of carbon emissions and promotes sustainable development, in accordance with Places for Everyone Policy JP-S2.
  4. Prior to the commencement of development details of how the approved uses shall be sufficiently ventilated will be submitted to and approved in writing by the Local Planning Authority. The approved method(s) of ventilation shall be implemented in full prior to first occupation of the development and must be retained for the lifetime of the development. REASON: To prevent discomfort or nuisance caused by

odours from external sources, in accordance with Policy 9 of the Oldham Local Plan.

5. Prior to the first occupation of the development hereby approved a travel plan for the development shall be submitted to and approved in writing by the Local Planning Authority. Following acceptance of the plan, the occupier shall submit their travel plan to the Local Planning Authority for approval and the approved plans shall thereafter be implemented within 3 months of first occupation of the development. Reason - To ensure the development accords with sustainable transport policies having regard to Places for Everyone Policy JP-C8
6. If any external lighting is proposed, details of the lighting scheme shall be submitted to and approved in writing by the Local Planning Authority prior to its installation. The details shall include the location, height, type, luminance levels, direction of light spillage, and measures to minimise glare and light pollution. The lighting shall be installed and thereafter operated in accordance with the approved details. REASON: To safeguard ecological habitats in accordance with Oldham Local Plan Policy 21.
7. The development hereby permitted shall not be occupied until details of the provision of two bat boxes have been submitted to and approved in writing by the Local Planning Authority. The details shall include the type and specification of the bat boxes, their precise location shown on an appropriately scaled plan, and the timing of installation. The approved bat boxes shall be installed in accordance with the approved details and retained thereafter. REASON: To safeguard ecological habitats, including protected species in accordance with Oldham Local Plan Policy 21.
8. No works to the building shall occur between the 1st March and 31st August in any year unless a detailed bird nest survey by a suitably experienced ecologist has been carried out and written confirmation provided that no active bird nests are present which has been agreed in writing by the LPA. Reason - To ensure the protection of bird habitats, which are protected species under the Wildlife and Countryside Act 1981, having regard to Policy 21 of the Oldham Local Plan.
9. The development shall be carried out in accordance with the Precautionary Methods of Working set out in section 6.0 of the Bat Roost Suitability Assessment (Beamsley Ecology Version 1 November 2025) unless otherwise agreed in writing by the Local Planning Authority. REASON: To safeguard ecological habitats, including protected species in accordance with Oldham Local Plan Policy 21.
10. On submission of any reserved matters application, a scheme for the provision of secure cycle parking shall be submitted to and approved in writing by the local planning authority. The approved scheme shall remain available for users of the development thereafter: Reason – In order to promote sustainable means of travel having regard to Places for Everyone Policy JP-C8.

11. Prior to the installation of any replacement windows, full details of the windows shall be submitted to and approved in writing by the Local Planning Authority. The details shall include window specifications, dimensions, materials, colour, and frame profile. The development shall thereafter be carried out in accordance with the approved details. Reason - To ensure that the replacement windows preserve the character and appearance of the building as a Non-Designated Heritage Asset in accordance with Places for Everyone Policy JP-P2, Oldham Core Strategy Policy 24 and the requirements of Chapter 16 of the National Planning Policy Framework.

## **SITE LOCATION PLAN (NOT TO SCALE):**

