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Sequential Approach to Development

At

Spotland Bridge Mill, Rochdale

On behalf of

Defiance Spirits Ltd

Prepared by
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1 Introduction

- 1.1 This statement has been prepared on behalf of Defiance Spirits Ltd, in respect of a proposal to convert part of the ground floor of the existing Mill to a Gin Distillery with ancillary area for demonstration and consumption (formerly Class A3 now Class E(b) – the sale of food and drink for consumption (mostly) on the premises).
- 1.2 The Local Planning Authority – Rochdale Council have requested that the applicants provide commentary upon the Sequential approach to “Town Centre” uses in relation to this proposed change of use.
- 1.3 The following sections of the statement provide a description of the site and its surroundings; details of the proposal, alongside a sequential assessment drawing an overall conclusion of the site’s suitability and availability.
- 1.4 This statement demonstrates that the location of the proposal is justified having regard for the general principles of the sequential approach set out in paragraph 91 of the National Planning Policy Framework (2023) and advice contained with National Planning Practice Guidance whilst considering the requirements of the Rochdale Core Strategy. There are no sequentially preferable sites which are both available and suitable to deliver the development proposed whilst also demonstrating reasonable flexibility
- 1.5 As contextual background it is worthy of note that Defiance Gin, was voted the best in the world at the San Francisco World Spirits Competition (SFWSC), 2020. Considered alongside more than 3000 entries, Defiance Navy Strength won the 'Best in Show, Unaged White Spirit' category. The SFWSC was established in 2000 and is considered the most prestigious competitions of its type in the world. Defiance is the first British product to win the award since 2006.

2. Site Description & Location

- 2.1 The Site of the Mill building and its general location will be known to the Council and we do not therefore propose to provide a detailed site description. The site is a Grade II listed building. We do not propose providing a description of its heritage significance as this is provided in other reports which accompany the applications relating to Spotland Bridge Mill. The Site contains several buildings and a large area of hardstandings. The location of the site the subject of this Statement is shown in the Plan attached as Appendix A.
- 2.2 The proposal the subject of this Statement involves the conversion of a small component of the Mill into a Gin Distillery with ancillary demonstration & tasting and consumption area to be operated by Defiance Spirits Ltd.
- 2.3 The Mill lies approximately 1km to the north west of Rochdale town centre within the existing urban area. The Mill and the site upon which it sits is previously developed land. The Mill lies in an accessible location being less than 150m from a bus stop which provides access to a high frequency bus route.
- 2.4 The Mill historical use has been for uses falling within Classes B1, (now E(g)) B2 and B8 of the Town & Country Planning Uses Classes Order.
- 2.5 Historically the Mill has been granted both planning and listed building consent in the past to allow its conversion to residential apartments. The current proposals for Spotland Bridge Mill Ltd envisage that the Mill will remain in active employment use. An active employment use is consistent with its historical development and therefore has heritage benefits to the understanding of the building context and purpose and delivers long term employment opportunities for the town.

3. The Proposal

- 3.1 Before coming to the Sequential approach, itself it is helpful to understand the background of Defiance Spirits and the nature of the proposed use. To gain a proper appreciation of the nature of the use it is helpful to understand that Defiance Spirits is currently located at Unit 9 Woodend Mill, Lees, Oldham OL4 5DR, from which it undertakes all the activities envisaged by the current proposal. It will be seen that this is a manufacturing and storage unit which is part of an existing commercial area situated approximately 500m to the southeast of Lees High Street and 3km to the east of Oldham town centre within but on the edge of the existing urban area. In retail planning terms the current site is what would be described as “out-of-centre”. A location plan for the current site is attached as Appendix B.
- 3.2 Due to the commercial success the operations and activities which are undertaken at the current site at Woodend Mill will be transferred to Spotland Bridge Mill and expanded upon. The proposal will amount to inward investment into the economy of Rochdale Borough.
- 3.3 The primary function of the unit will be for the manufacturing and production of Gin, the proposal will involve an ancillary area given over to the demonstration of Gin manufacture, together with an educational and associated tasting experience. This secondary use is important in terms of the financial viability of the enterprise as a whole by supporting the businesses overall cash flow but is a secondary use. Defiance Spirits is a “global” brand, and a significant proposition of the company’s business involves the export of spirits, in particular Gin to Australia and Canada. The proposed tasting & demonstration and consumption component of the overall activity is not a separate “planning unit”
- 3.4 It is worth when considering the sequential approach to town centre development to start with the basic principles. In England and Wales, the development of land requires planning permission (Town and Country Planning Act 1990 (the Act), s. 57). The statutory definition of ‘Development’ includes a material change of use (Act. s. 55). However, this is subject to two important exceptions:
- 3.5 Subsection 55(2)(d) of the Act expressly excludes from the definition of ‘Development’: “ the use of any buildings or other land within the curtilage of a dwelling house for any purpose incidental to the enjoyment of the dwelling house as such”. It also excludes a use which is ancillary to the main use of land. Thus where a use is ancillary to the main use a proposal to provide the ancillary use does not constitute a material change of use (*Williams v Minister of Housing and Local Government* (1967) 18 P & CR 396).
- 3.6 Considering these two exceptions, in deciding whether or not an alleged material change of use requires planning permission, the decision maker needs to answer two questions: First has a material change of use taken place, and second if so, is that change of use incidental or ancillary to the primary use of the land (*Wallington v Secretary of State for Wales* (1991) 62 P.& C.R. (1990))?
- 3.7 Determining whether there has been a material change of use is a question of fact and degree, and the focus of the investigation must be on the character of the use (*East Barnet UDC v British Transport Commission* [1962] 2 QB 484).

- 3.8 In many cases, the change in character is obvious: e.g. operating a corner shop from the front room of a house (a retail use) is clearly very different in character from a normal residential use of the same room (e.g. watching television, relaxing or entertaining friends).
- 3.9 However, some changes of use are less obvious. For example, the difference in character between use of a house by an individual or family as their long-term home and letting out the same property to holiday guests. In these borderline cases, the planning decision maker assesses whether there is a material change in the planning impacts of the use, in particular on neighbouring properties (*Devonshire CC v Allens Caravans (Estates) Ltd (1962) 14 P & CR*).
- 3.10 By way of example, the case of *Sheila Moore v Secretary of State for Communities and Local Government [2012] EWCA Civ 1202*, (a case which concerned the use of a dwelling house for commercial holiday lets) is often quoted, particularly because of the Judge's comment that "*Neither of the two extreme propositions – that using a dwellinghouse for commercial holiday lettings will always amount to a material change of use, or that use of a dwellinghouse for commercial holiday lettings can never amount to a change of use – is correct*".
- 3.11 Having established that there has been a material change of use, the next question is whether that change of use is 'incidental' or 'ancillary' to the primary use of the land.
- 3.12 The important point to note here is that irrespective of whether the question is raised in respect of a dwelling under s. 55(2)(d) or in respect of an ancillary use of some other property, this is an 'objective' test, that is to say to fall within s. 55(2)(d), the activity needs to be reasonably incidental to a normal use of the dwelling house as a dwelling house.
- 3.13 In respect of non-domestic properties, an ancillary use needs to be incidental not just to the particular property in question, but reasonably incidental to the normal use of the general type of property.
- 3.14 In non-domestic properties, the point was made by Schiemann LJ in the case of *Harrods Ltd v Secretary of State for the Environment, Transport and the Regions* (a case about whether landing a helicopter on the roof of Harrods as the preferred mode of transport of its owner was ancillary to the running of the shop): "*It is not appropriate to concentrate on what is incidental to this particular shop, given the way it is run, and given its needs. The right approach is to see what shops in general have as reasonably incidental activities*".
- 3.15 In *Sage v Secretary of State for Housing, Local Government and Communities [2021] EWHC 2885 (Admin)* the above principles were discussed as was the fact that what is normal at any point in time is liable to change.
- 3.16 The case was a challenge to an Inspector's decision that operating a commercial gym from a shed in a homeowner's garden constituted a material change of use requiring permission, notwithstanding that there was no evidence of adverse impacts.
- 3.17 In upholding the Inspector's decision, Ouseley J stressed that: "... *a material change of use can be made without any adverse environmental impact at all. Treating environmental impact as the seemingly crucial issue for the judgment as to whether a material change of use has occurred, or a purpose is reasonably incidental is not consistent with clearly established law. The crucial test is whether there has been change in the character of the use*".
- 3.18 Aside from the obvious point that Ouseley J made namely, some changes in the character of a use are so obvious that there is no need to consider further any related planning impacts from

the change), it is also worth noting that Ouseley J considered that environmental impacts were relevant in deciding whether a material change of use is reasonably incidental to the primary use

- 3.19 Ouseley J also touches briefly on a variety of ‘services’ which are commonly offered from a person’s home, such as private tuition (including in music), childminding and a range of medical services. Particularly where offered on a commercial basis, these are material changes of use, but equally uses which since time immemorial have been offered from people’s homes. Doubtless in deciding whether such uses are reasonably ancillary on a case-by-case basis, a decision maker will need to consider the extent of any related environmental impacts and the extent to which those fall outside the norm.
- 3.20 Finally, Ouseley J noted that “*what is normal or reasonably incidental now may have shifted with changes in work habits as a result of Covid*”. This is a welcome reminder that what was unusual yesterday may become the norm today or tomorrow.
- 3.21 Deciding whether or not a change of use is either material or reasonably incidental to the normal main use of a property is difficult. However, it is a helpful reminder that not all material changes of use will have obvious amenity impacts, that environmental impacts can be relevant in deciding whether a material change of use is ancillary to the main use of the property, and that what is ‘normal’ will inevitably change over time.
- 3.22 In our view the provision of an ancillary area to allow for consumption tasting, demonstration and educational activities is not likely to have any differing environmental impacts to those of the actual manufacturing process, lending weight to the argument that it is an ancillary use
- 3.23 We note that the Council have concluded that the for the purposes of the sequential approach to town centre uses the two “elements” of the proposal namely the principal manufacturing element and the ancillary consumption, tasting, demonstration, educational element should not be disaggregated.
- 3.24 We agree that it would be inappropriate to disaggregate the two elements as the tasting, demonstration, educational element would not function without the principal manufacturing component, indeed the two elements are interlinked at the current site in Oldham.
- 3.25 Given that the two functions are interlinked it is necessary to understand the operational requirements of the main manufacturing use and the ancillary tasting, demonstration element

The main manufacturing use

- 3.26 Gin manufacture involves several key ingredients:
- 3.27 A fermentable base: Most alcohol-making begins with an agricultural product that will undergo a fermentation process. The most common base for liquor is a mixture of grains—for instance, corn, wheat, rye, or malt barley—though producers can use many other ingredients in this stage, like molasses, honey, apples, grapes, carrots, or potatoes. After undergoing the fermentation process, these base produces ethanol, which gin makers sieve out of the solid mixture, leaving them with pure, liquid alcohol.
- 3.28 Water: After the distillation process, gin makers will add water to the product to achieve the desired alcohol by volume.

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- 3.29 Juniper berries: Juniper berries have a woody, pine-like flavor. They are the only required botanical ingredient for liquor to be considered gin and are usually added during the distillation process.
- 3.30 Additional botanicals: Most gin makers add different botanical ingredients during the gin-making process, including citrus peel (especially lemon and bitter orange peel), licorice root, angelica root, orris root, cardamom, anise, coriander, and cinnamon.
- 3.31 Once manufactured the product needs to be bottled. The above means that the site requires the ability to accept significant deliveries of both raw materials and bottles, likewise it is necessary to have appropriate loading areas to allow for the distribution of the finished product. The site must be able to offer the ability to operate a forklift truck.
- 3.32 There are three distillation techniques that gin distillers use to purify their ethanol and infuse botanicals into the product:
- 3.33 Steeping: For this technique, the distiller mixes the ethanol and botanicals in a pot still—a metal container situated over a heat source. The botanicals steep in the base spirit. Depending on the flavor profile that the distiller wishes to achieve, they may remove the botanicals promptly or let them steep for up to 48 hours.
- 3.34 Vapor infusion: This method involves a modified still known as a Carter-head still, which is equipped with a suspended basket. The basket contains the botanicals and hangs over the surface of the base spirit. When the spirit is heated in the still, ethanol vapors rise into the botanical basket. This step allows the botanicals to release their essential oils into the vapors, which then re-liquify, carrying the botanical flavors with them.
- 3.35 Vacuum distillation: Also known as cold distillation, this distillation technique requires a low-pressure vacuum environment, which significantly reduces ethanol's boiling point. Proponents of this method claim that without extreme heat, the flavors from the botanicals remain intact.
- 3.36 The above means that the premises must be of sufficient size and of the correct height and configuration to house stills and tanks. The proposal will involve 4 large commercial stills
- 3.37 Gin makers follow a few basic steps to produce gin:
- 3.38 Combine the base ingredients. To make a fermentable base, gin makers will mix dried, prepared grains—like flaked maize and wheat malt—with water and yeast. They then heat and stir the mixture (sometimes called “gin mash”) to make sure it's well combined and ready to ferment.
- 3.39 Ferment the base. Gin makers then store their base mixture for a specified amount of time—often between one and two weeks—to fully ferment the mixture. During this step, the compounds begin to break down and produce a simple, natural alcohol called ethanol.
- 3.40 Strain the mixture. Once fermentation is complete, gin makers strain off the liquid from the fermented solids. They'll discard the solids and use the liquid (ethanol) to make gin.
- 3.41 Distill. Distillation is a process that purifies a liquid by heating and vaporizing it, then collecting the vapor as it recondenses into a liquid. The resulting liquid is considered purer (since it leaves behind many impurities when it evaporates) and more alcoholic. Gin makers all take different approaches to distillation—some may distill only once or twice, while others may require distillation and redistillation many times for a purer result. They may also add botanicals at various

stages of the process—some steep their botanicals in ethanol before or between distillings. Others add botanicals during distilling with a special still.

- 3.42 Collect and sort the product. The liquid that gin makers have after distillation isn't all the same because as ethanol distills, the resulting liquid changes. The first 35 percent of a distillation results in an ethanol product that contains methanol or acetone and can be highly volatile or toxic containers of this liquid are called the "foreshots" and the "heads," and distillers usually throw them out. The following 30 percent contains the "hearts," which are the best, most usable product. The final 35 percent are the "tails," which are impure but can be kept and redistilled for a little more product.
- 3.43 Dilute. Once the distillers have their distilled product, they'll dilute the gin to the desired alcohol content by testing the alcohol by volume (ABV) and gradually adding water. At this step, distillers making gin liqueur may add additional flavorings or sugar to create products like sloe gin, pink gin, or rhubarb gin.
- 3.44 Bottle. The final step is the bottling process, in which gin makers add the final product to labeled bottles.

The ancillary educational tasting and demonstration use

- 3.45 In relation to the educational, tasting and demonstration activities this allows visitors to make their own unique bottle of gin whilst enjoying a fine selection of in-house gins. The experience involves a tour of the distillery to find out how the award-winning gins and rums are made. Learn about the art and science behind blending botanicals to create your own unique bottle of gin.
- 3.46 The experience is booked in advance and involves: -
- A welcome gin on arrival
 - A talk and tour of the Defiance Distillery
 - An opportunity for visitors to make their own bottle with a choice of over 40 botanicals
 - Light bites (cold cuts, cheese, meats, olives etc to share)
 - A final drink whilst Defiance discuss and document the botanicals on the bottle (500ml approx. 40% abv)
- 3.47 The entire experience takes approximately 2.5 hours. It is of course self-evident that without the principal use namely the manufacturing the ancillary academy experience would not be possible.
- 3.48 It will be possible for people to visit the site and consume Gin and spirits (subject of course to licensing requirements) , but this is emphatically a secondary element of the operation
- 3.49 It is our view that given the essential characteristics of the proposed operation and given that it is accepted by the council that it would be inappropriate to seek to disaggregate the two components it would be *prima facie* inappropriate, given the manufacturing nature of Gin production to seek to locate the proposed use within the core of Rochdale Town centre.
- 3.50 The production of Gin and other spirits involves the commercial delivery of raw materials and empty bottles and the commercial distribution of finished product. The level of activity and the nature of the distribution process would mean that it would be unsuited to a town center location.

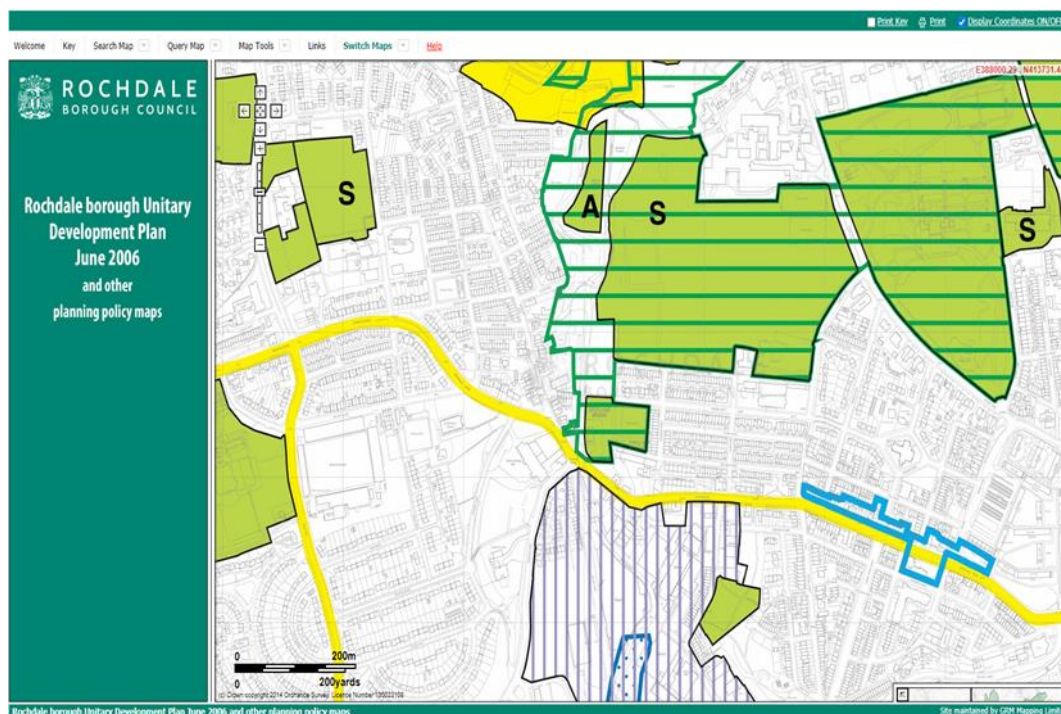
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- 3.51 The catchment from within which visitors are drawn is UK wide. As we have discussed above the exportation of Gin and spirits is a global operation
- 3.52 Despite the above in the light of the Council's request we have gone on to consider the policy background to the sequential test and undertaken an appraisal below.

4. Planning Policy

- 4.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires applications for planning permission to be determined in accordance with the Development Plan unless material considerations indicate otherwise. In addition, government policy, principally the National Planning Policy Framework 'NPPF' published in February (2023), is material to the determination of planning applications. This is supplemented by National Planning Practice Guidance 'NPPG'.
- 4.2 In the case of Rochdale, the Statutory Development Plan is made up of several key Local Plan documents. In full the Development Plan for the area comprises: -
- The Rochdale Core Strategy adopted by the Council in October 2016;
 - The saved policies/ allocations of the Rochdale Borough Unitary Development Plan Adopted June 2006.
 - The Greater Manchester Joint Waste Development Plan published in April 2012; and
 - The Greater Manchester Joint Minerals Development Plan published in April 2013.
- 4.3 The local planning authority is involved in the preparation of several plans which will in due course replace those historic plans whose policies are currently "saved" these include: -
- The emerging Allocations Plan Development Plan Documents.; and
 - Emerging and adopted Neighbourhood Plans.
- 4.4 In addition, Rochdale Council is working with 8 other local authorities in Greater Manchester to create a joint spatial plan known as Places for Everyone [PfE]. PfE was submitted to the Secretary of State for Levelling Up, Housing and Communities in February 2022, and its Examination in Public commenced on 02 November 2022. Hearing sessions concluded on 5 July 2023 and the Inspectors issued IN39 on 11 September 2023 advising that they are satisfied at this stage of the examination that all of the proposed main modifications are necessary to make the Plan sound and/or legally compliant and would be effective in that regard. Consultation on the Main Modifications started on 11 October 2023 and closed on 6 December 2023. 174 representations were received in response to the Main Modifications consultation, and none raise any fundamental issues with the adoption of the Plan in its current form, as amended by the Main Modifications. Adoption of the Plan by all nine Councils is anticipated in February and March 2024. Consequently PfE is now at a very advanced stage in the plan making process and substantial weight can be attached to its policies
- 4.5 As discussed above also, of direct relevance are the policies and guidance set out on a national basis in the National Planning Policy Framework [NPPF] and Planning Practise Guidance [PPG]
- 4.6 In our view the in the context of the sequential test this does not raise issues relevant to Minerals and Waste Planning we accordingly make no further mention of these plans.
- 4.7 The Rochdale Core Strategy advises that: -

Sequential Approach (Retail and Leisure) - sets out a procedural approach in selecting sites for new retail and commercial leisure developments and other key town centre uses. It requires parties to demonstrate that first preference be given to town centre sites, followed by edge-of-centre sites, and only then by out-of-centre sites in locations that are, or can be made, easily accessible by a choice of means of transport. Only when these possibilities have been exhausted should retail development be allocated out of town.

- 4.8 The Rochdale Unity Development plan adopted by the Council in June 2006 shows the site unallocated on its policy maps. An extract from the proposals map is included below



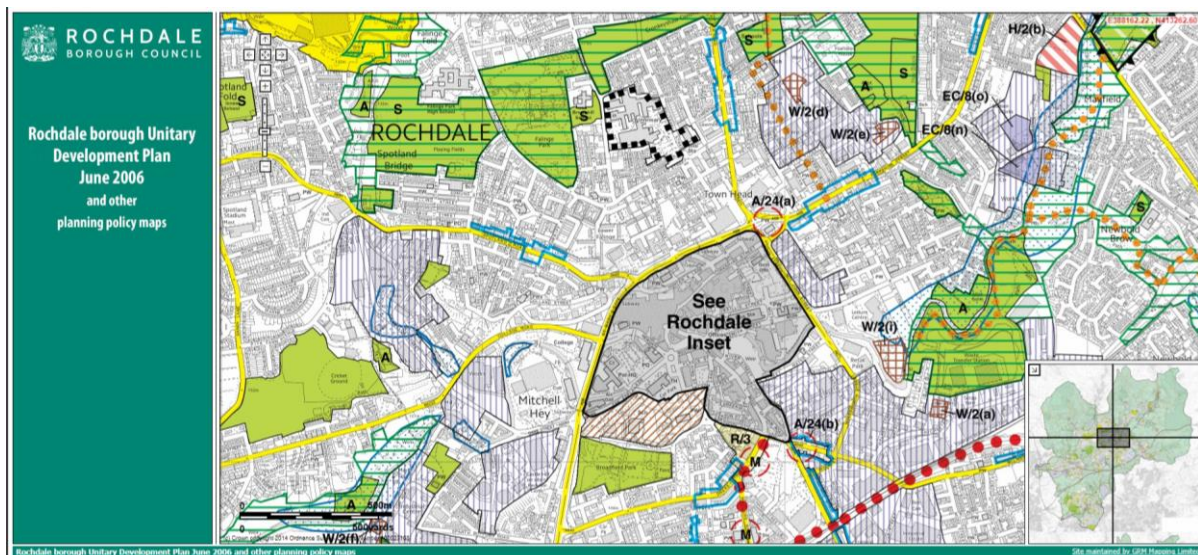
- 4.9 The nearest centre to the site is the Spotland Bridge Road centre.
- 4.10 It is also relevant to consider the extent of the Town Centre of Rochdale, this is shown on the extract below. In doing so, it is help to consider the definitions of various terms relating to the application of the Sequential Test. The definitions below are taken from the NPPF as follows

Town centre: *Area defined on the local authority's policies map, including the primary shopping area and areas predominantly occupied by main town centre uses within or adjacent to the primary shopping area. References to town centres or centres apply to city centres, town centres, district centres and local centres but exclude small parades of shops of purely neighbourhood significance. Unless they are identified as centres in the development plan, existing out-of-centre*

developments, comprising or including main town centre uses, do not constitute town centres

Edge of centre: For retail purposes, a location that is well connected to, and up to 300 metres from, the primary shopping area. For all other main town centre uses, a location within 300 metres of a town centre boundary. For office development, this includes locations outside the town centre but within 500 metres of a public transport interchange. In determining whether a site falls within the definition of edge of centre, account should be taken of local circumstances.

Out of centre: A location which is not in or on the edge of a centre but not necessarily outside the urban area.



- 4.11 Thus, it is not appropriate to consider the entire area covered by the Rochdale Inset to be a "Town Centre" location. Rather based upon the NPPF definition given above the core town centre might reasonably be considered to be The Rochdale Riverside development and Yorkshire Street.
- 4.12 As discussed above the edge of centre locations would be those locations lying 300m from the primary core.
- 4.13 Turning to PpE this mirrors national planning policy stating: -

In accordance with national planning policy, it is appropriate for retail and leisure facilities to be directed towards designated centres wherever possible. This will help to maintain the vitality and viability of those centres, and their continued ability to meet the needs of residents

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- 4.14 Finally in relation to national planning policy as set out in the NPPF deals with town centres and ensuring their viability in section 7 paragraph 91 sates

Local planning authorities should apply a sequential test to planning applications for main town centre uses which are neither in an existing centre nor in accordance with an up-to-date plan. Main town centre uses should be located in town centres, then in edge of centre locations; and only if suitable sites are not available (or expected to become available within a reasonable period) should out of centre sites be considered.

- 4.15 Finally National Planning Practice Guidance confirms that in applying the sequential approach to retail and leisure development “*The application of the test will need to be proportionate and appropriate for the given proposal*”. As we have explained above Defiance Spirits currently operates from a commercial manufacturing property in Lees Oldham, the primary use proposed is manufacturing in nature and character. The educational, demonstrational and tasting elements are ancillary to the manufacturing and could not take place without the manufacturing. The council agrees that the two components should not be disaggregated

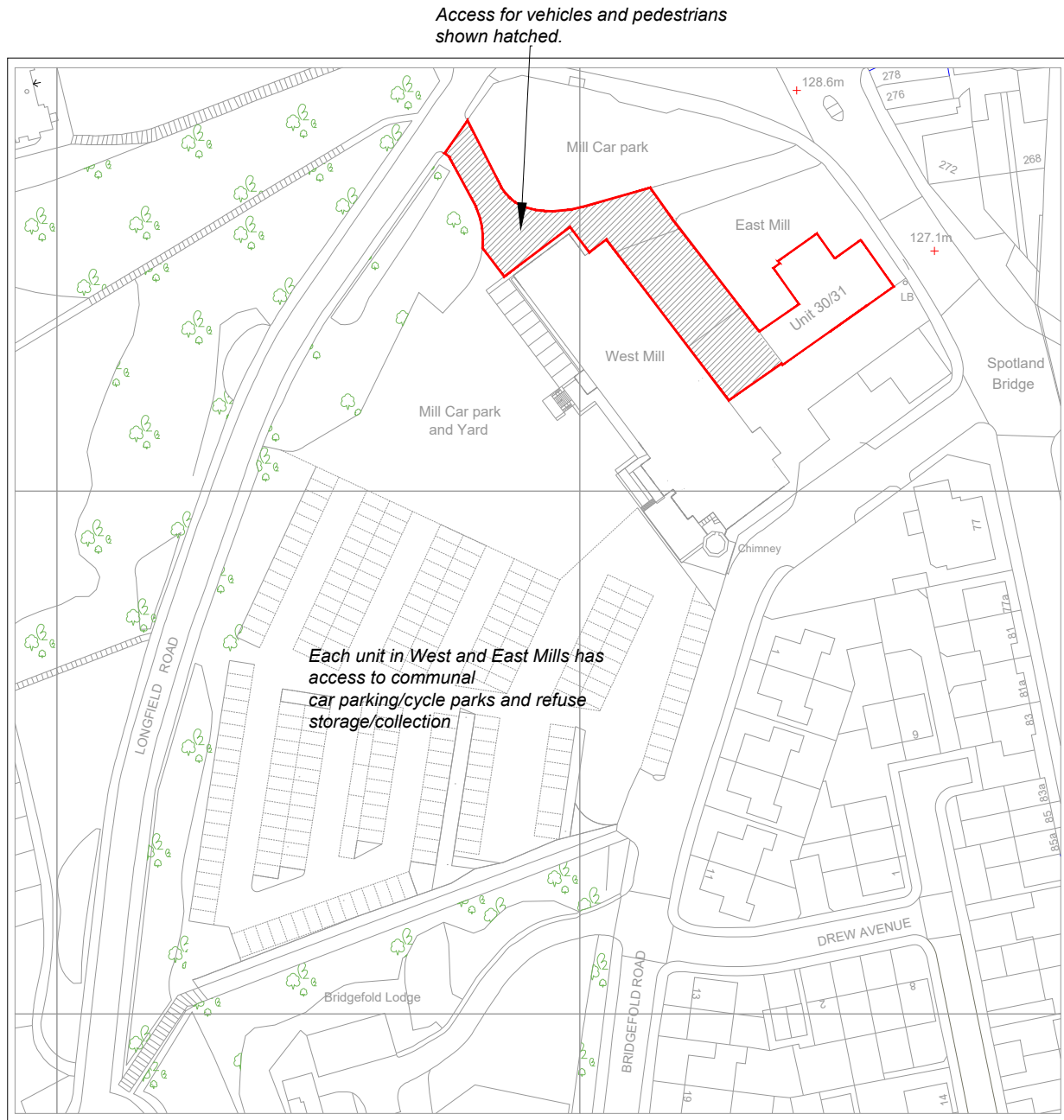
5. Sequential Approach

- 5.1 In considering the proposal it is important to have regard to the circumstances of its impacts upon the vitality and viability of existing centres. The proposed educational and tasting use is intended to serve a wide UK based catchment, it is however ancillary to the main manufacturing use. The proposal will involve inward investment into the economy of Rochdale.
- 5.2 We have assessed Rochdale Town Centre and those areas which lie within 300m of the core. We have attached as Appendix C an ariel view of Rochdale centre identifying the location, we consider to comprise the “Town Centre” as defined by the NPPF. We have considered this location and concluded that the only available properties are “traditional” vacant retail units, or retail units within the Riverside Development
- 49 Yorkshire Street
 - 38 Yorkshire Street
 - 52-56 Yorkshire Street
 - Unit 2 Market Way – The Exchange Shopping Centre
 - Unit 29-30 Market Place - The Exchange Shopping Centre
 - Unit 17 Market Way – The Exchange Shopping Centre
 - Units within Rochdale Riverside
- 5.3 We consider that traditional retail units are entirely inappropriate given the nature of the proposed use. The importation of raw materials and the export of bottled spirits could not be efficiently achieved within the sites identified above. Further we are aware that, the Riverside regeneration involves the development of 242 residential apartments. We consider the proposed manufacturing by use would be inappropriate having regard to residential amenity.
- 5.4 None of the identified units offer the space and configuration needed to be able to offer the appropriate environment within which to undertake the proposed use.
- 5.5 Turning to edge of centre locations we have been unable to identify any accommodation which could be remotely considered appropriate

Conclusion

- 5.6 In the light of the forgoing having considered the proposed use its nature, the fact that the ancillary educational and tasting areas cannot be disaggregated from the primary manufacturing use, we believe that the Spotland Bridge Mill is entirely suitable in the context of the sequential approach to retail development.

Appendix A – Site Location Plan



Location Plan



A.J. Cocker Associates

Architectural Design Building Surveyors Project Management Planning Supervisors
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project **Proposed distillery and bar
unit 30/31 Spotland Mills,
Spotland, Rochdale**

client

Defiance Distillery

scale - **1:1250**

size - **A4**

date - **Sept. 2022**

drawn - **NL**

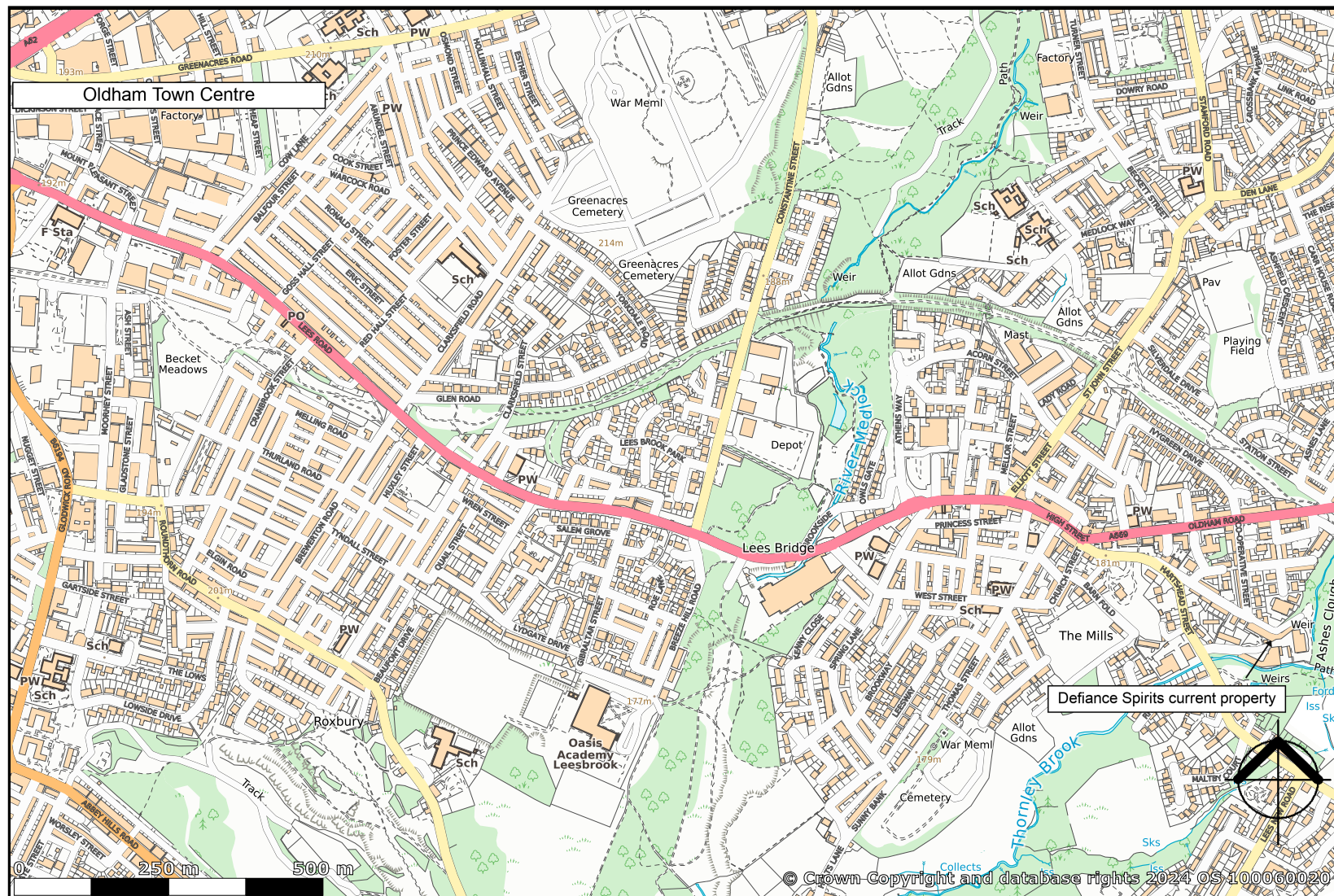
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D251-02

Appendix B – Location plan existing Defiance Spirits production and tasting facility

Unit 9, Woodend Mills, South Hill, Springhead, Oldham, OL4 5DR



created on **edozo**

Plotted Scale - 1:10,000

Appendix C – Rochdale “Town Centre” based upon NPPF Glossary

Rochdale Town Centre



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Plotted Scale - 1:2,500