

Retail Sequential Test

2 Salkeld Street

Rochdale

OL11 1PS

Change of use of Residential Dwelling (Use Class C3) to a Jewellery Shop (Use Class E) and a Self-Contained Apartment.

March 2023

Building Design Services (BDS)

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1.0 INTRODUCTION

- 1.1 This sequential Impact Assessment has been prepared on behalf of 'Mr Numaan Nawaz' in support of a planning application for the Change of use of part of the Ground Floor at 2 Salkeld Street, Rochdale, from a residential dwelling (Use Class C3) to a Jewellery Shop (Use Class E).
- 1.2 In terms of retail, a key objective of national planning guidance is to deliver economic growth and prosperity through sustainable development. In order to achieve this in the borough it is important that we ensure sufficient land is available of the right type, quality and in the right places.
- 1.3 The sequential assessment guides main town centre uses towards town centre locations first, then, if no town centre locations are available, to edge of centre locations, and, if neither town centre locations nor edge of centre locations are available, to out of town centre locations, with preference for accessible sites which are well connected to the town centre. It supports the viability and vitality of town centres by placing existing town centres foremost in both plan-making and decision-taking.
- 1.4 In plan-making, the sequential approach requires a thorough assessment of the suitability, viability and availability of locations for main town centre uses. It requires clearly explained reasoning if more central opportunities to locate main town centre uses are rejected.
- 1.5 Matters that should be considered when taking a sequential approach to plan-making:
- The assessment should consider the current situation, recent up-take of land for main town centre uses, the supply of and demand for land for main town centre uses, forecast of future need and the type of land needed for main town centre uses.
 - When identifying sites, the suitability, availability and viability of the site should be considered, with particular regard to the nature of the need that is to be addressed.
 - If the additional main town centre uses required cannot be accommodated in town centre sites, what are the next sequentially preferable sites that it can be accommodated on.
- 1.6 The National Planning Policy Guidance states that 'It may not be possible to accommodate all forecast needs in a town centre: there may be physical or other constraints which make it inappropriate to do so. In those circumstances, planning authorities should plan positively to identify the most appropriate alternative strategy for meeting the need for these main town centre uses, having regard to the sequential and impact tests. This should ensure that any proposed main town centre uses which are not in an existing town centre are in the

best locations to support the vitality and vibrancy of town centres, and that no likely significant adverse impacts on existing town centres arise.

2.0 TRADING CHARACTERISTICS OF THE PROPOSED JEWELLERY SHOP

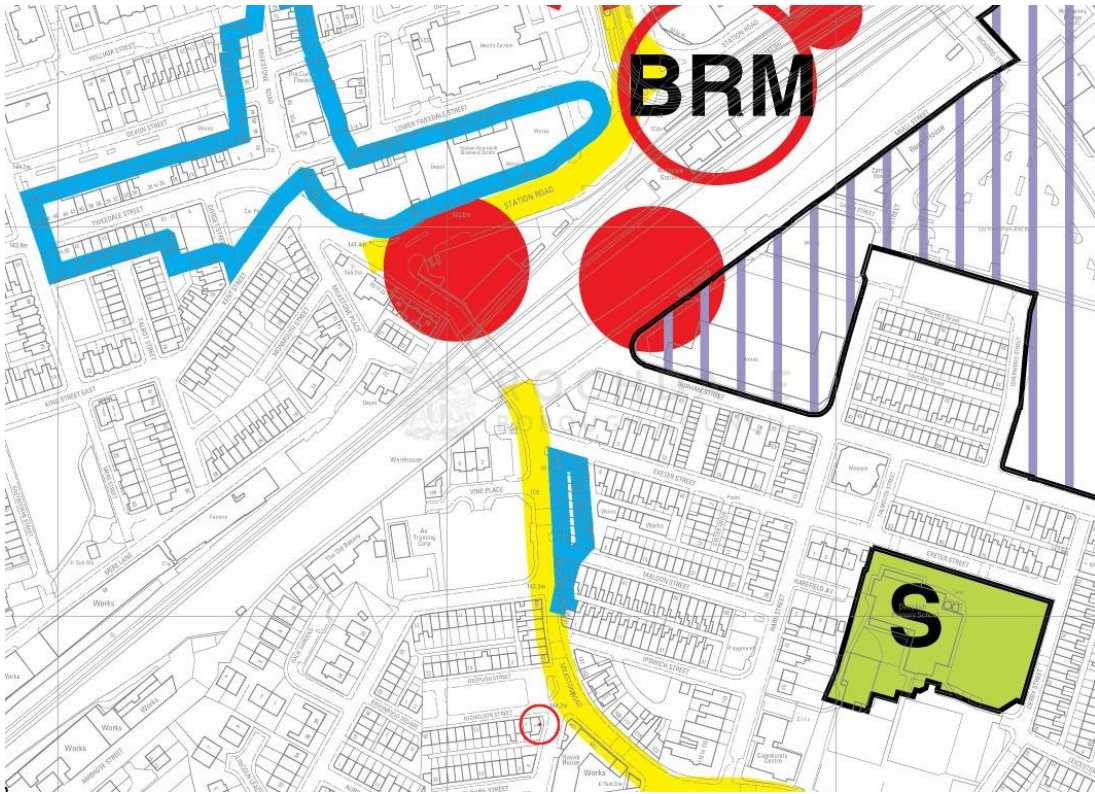
- 2.1 The proposed jewellery store would be a very small shop that would take up the existing lounge area of the dwelling. The small size of the shop would only provide for the immediate surrounding area. This would be a bespoke shop selling Asian Gold where customers would mainly be from an Asian background. The catchment area for the shop is therefore focused on areas which have a high concentration and are largely populated by Asians and who would be interested in purchasing this type of jewellery. Therefore, the shop is situated close to the local centres along Milkstone Road.
- 2.2 The shop would provide custom made jewellery in a sustainable location in this close tight knit community. Most of the customers would be living in the area would walk to the shop.
- 2.3 Given this would be a small bespoke jeweller it is not considered to attract large numbers of customers during a typical day, its operation would not be considered detrimental to the town centre. Most of the customers to the jeweller would not wish to be drawn into the town centre, and indeed this would offer very little potential for linkage with retail operators.
- 2.4 It is considered that it would be extremely difficult for the jeweller which would be selling and trading in Asian gold to be located in the Town centre of Rochdale where it would have less chance of being noticed and for impulse buying.
- 2.5 In addition to the above, the family home would be retained at the site, the proposal is only for one of the downstairs rooms to be converted into the shop, through this the applicant wants to ensure maximum security for the high value items in the shop. Leaving such high value items in town centre locations overnight, unattended, would not be responsible and would be a target for crime even with high tech security measures in place.
- 2.6 The location and presence of the proposed jeweller would complement its position where the existing local centre of Milkstone road/ Maldon Street (South of the train station) has already extended to a significant degree.

3.0 SITE AND SURROUNDINGS

- 3.1 The site lies within the settlement boundary of Rochdale, but outside the town centre of Rochdale, and nearest local centre of Milkstone road/ Maldon Street Local Centre to the north of the site. The site is otherwise unallocated.
- 3.2 The application site relates to an end terrace two storey building located on the corner of where Salkeld Street meets Nicholson Street. The property is currently used as a family dwelling. Its gable is the main front elevation and is finished in red brick with hipped roof and natural slates. The entrance door is arched with stone heads and cills provided for the windows.
- 3.3 The building is situated in a mixed use area of Rochdale with retail shops along Milkstone Road and mainly traditional terrace residential dwellings and some semi-detached properties surrounding the site. Directly opposite the site is an Asian clothes store. Milkstone Road/ Maldon Street Local Centre (South of the train station) is at a distance of 80m, Milkstone Road local centre (this is north of the train station) is approximately 290m from the site, and Rochdale Town Centre is at a distance of approximately 750m (as the crow flies).



The site is located on the corner of Salkeld Street and Nicholson Street as highlighted above, it is in a mixed-use area with retail stores provided adjacent and along Milkstone Road at this location.



The Image above taken from the UDP Proposals map shows the location of the site from the local centres (outlined in blue) of Milkstone Road/ Maldon Street, and Milkstone Road local centre (this is north of the train station).

4.0 PROPOSED DEVELOPMENT

- 4.1 The applicant is applying for planning permission to change of use of part ground Floor from a residential dwelling (Use Class C3) to a Jewellery Shop (Use Class E). This Statement focuses on the retail impact of the development and what impact it would create, if any on the vitality and viability of the two closest local centres and Rochdale Town Centre.
- 4.2 There would be no significant changes internally where a simple shop floor would be provided for such a unit. There would be no changes externally and the appearance of a dwelling would be retained. This assessment will solely discuss the retail impact of the proposal.



Above: Image shows the gable front elevation of the application property .

5.0. INVOLVEMENT

- 5.1 Although no formal pre-application advice in this instance has been sought from the Council there have been informal discussions with the Councils planning officers regarding the type of development provided and what would be acceptable. The scheme now put forward with this retail assessment is an acceptable proposal proving quality development in the area.
- 5.2 Paragraph 39 of the NPPF states;
- “Early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties. Good quality preapplication discussion enables better coordination between public and private resources and improved outcomes for the community.”.
- 5.3 This assessment has been submitted as part of this planning proposal to provide a reasoned justification of the proposal using local and national planning policy and guidance.

6.0 HISTORY

- 6.1 A history check has been undertaken which has revealed the below planning history for the site, the relevant planning history includes;

Single storey side extension

2 Salkeld Street Rochdale OL11 1PS

Ref. No: 19/00599/HOUS | Received: Thu 23 May 2019 | Validated: Thu 23 May 2019 | Status: Decided

Erection Of 1 X 2M High Freestanding Pedestrian Access Alleygate

Alleyway to Side Of 2 Salkeld Street, Rochdale

Ref. No: 10/D52883 | Received: Tue 02 Feb 2010 | Validated: Tue 02 Feb 2010 | Status: Decided

Change Of Use Of Part Of Ground Floor From Dwelling To Shop/Goldsmiths

2 Salkeld Street Rochdale

Ref. No: 93/D30072 | Received: Fri 01 Oct 1993 | Validated: Tue 26 Oct 1993 | Status: Decided

Retrospective Change Of Use Of Part Of Ground Floor Of Dwellinghouse To Jewellery Manufacture And Retail.

2 Salkeld Street Rochdale

Ref. No: 93/D29142 | Received: Tue 02 Mar 1993 | Validated: Tue 02 Mar 1993 | Status: Decided

Change Of Use From Dwellinghouse To Shop At Ground Floor And Store At First Floor Level

2 Salkeld Street Deepdish Rochdale

Ref. No: 90/D25411 | Received: Fri 22 Jun 1990 | Validated: Fri 22 Jun 1990 | Status: Decided

7.0 RELEVANT PLANNING POLICY

- 7.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that decisions should be made in accordance with the development plan unless material considerations indicate otherwise.

NPPF (2023)

- 7.2 The NPPF clearly states ‘that the purpose of the planning system is to contribute to the achievement of sustainable development’ (paragraph 7). Paragraph 10 confirms that ‘in assessing and determining development proposals, local planning authorities should apply the presumption in favour of sustainable development’. Paragraph 11 states that a presumption in favour of sustainable development is at the heart of the NPPF.
- 7.3 Para 90. Planning policies and decisions should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation. Planning policies should:
- e) where suitable and viable town centre sites are not available for main town centre uses, allocate appropriate edge of centre sites that are well connected to the town centre. If sufficient edge of centre sites cannot be identified, policies should explain how identified needs can be met in other accessible locations that are well connected to the town centre;
- 7.4 Para 91. 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.
- 7.5 Para 92. When considering edge of centre and out of centre proposals, preference should be given to accessible sites which are well connected to the town centre. Applicants and local planning authorities should demonstrate flexibility on issues such as format and scale, so that opportunities to utilise suitable town centre or edge of centre sites are fully explored.
- 7.6 **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.

7.7 National Planning Practice Guidance (NPPG)

The government published its NPPG on 6 March 2014. This is intended to complement the NPPF and to provide a single resource for planning guidance, whilst rationalising and streamlining the material. Almost all previous planning Circulars and advice notes have been cancelled. Specific reference will be made to the NPPG or other national advice in the Analysis section of the report, where appropriate.

Rochdale Core Strategy

- 7.8 Policy E1 - Establishing thriving town, district and local centres of the Core Strategy states 'We will focus retail, leisure, cultural, office, residential and other development to promote the viability and vitality of all the borough's town centres to maintain them as thriving and sustainable centres and the preferred shopping and leisure destinations for people living, working and visiting the borough. We will also ensure the provision of a hierarchy of accessible district and local centres and shops that meets people's daily shopping needs'.
- 7.9 Policy E1 goes on to state that 'In considering proposals for main town centre uses we will:
- f. Support the provision of small scale shops and services to meet local needs outside centres, including in Employment Zones, where:
 - i. They are in a location that is not, or will not be, reasonably served by an existing or proposed centre or local shop;
 - ii. There are no suitable vacant shops nearby; and
 - iii. They will be accessible to local residents / workers on foot.

8.0 PROPOSAL IMPACT

8.1 Paragraph 91 of the NPPF requires local planning authorities to apply a sequential test to planning applications for main town centre uses that are not in an existing centre and not in accordance with an up-to-date development plan. They should require applications for main town centre uses to be located in town centres, then in edge of centre locations and only if suitable sites are not available should out of centre sites be considered.

8.2 The NPPF goes on to note that when considering edge of centre and out of centre proposals, preference should be given to accessible sites, well connected to the town centre. Both applicants and local authorities are required to demonstrate flexibility on issues such as format and scale.

In addition to the above Policy E1 of Rochdale's Core Strategy states goes onto state that 'In considering proposals for main town centre uses we will:

f. Support the provision of small scale shops and services to meet local needs outside centres, including in Employment Zones, where:

i. They are in a location that is not, or will not be, reasonably served by an existing or proposed centre or local shop;

ii. There are no suitable vacant shops nearby; and

iii. They will be accessible to local residents / workers on foot.

8.3 As set out above, the proposed jewellery shop would be a retail use. This would be an extremely small shop which would be reliant heavily upon the surrounding Asian community for its and overall trade and survival. It is unlikely due to the business operation, and the trade orientation of the business that there will be linked trips with other Rochdale town centre uses. Whereas the application site is well placed in terms of its proximity to future potential customers with no properties available in both the local centres along Milkstone Road.

8.4 The proposed jeweller is not considered to attract large numbers of customers and the operation is aimed at serving a small catchment area who do not wish to be drawn into centres. The proposal in this location and type of business would offer very little potential for linkages with retail operators. This would have little to no impact on the vitality and viability of Rochdale Town Centre.

- 8.5 It is considered important that the approach of the retail impact is applied in a realistic and practical manner having regard to both the nature of the product and the operation of the business provided by the jewellery Store. Whilst we have sought to adopt a flexible approach, it is not considered appropriate to seek to dismember a bespoke mainly Asian product away from its target market and into the town centre. This would clearly have no benefit for future customers.
- 8.6 In this instance this would be a small scale shop which would meet the local need and is very short distance from the local centre outside centres. In addition, there are no suitable vacant shops nearby, and the shop would be accessible to local residents on foot.
- 8.7 Furthermore, the Councils Draft Allocation Plan below indicates the expansion of the Milkstone Road/Maldon Street local centre, the expanded local centre would move adjacent to the proposed site although does not include it, however it is considered this site should be included and would result in no significant impact on Rochdale Town Centre.



Rochdale Borough Council Draft Allocations Plan
Local Centre – Milkstone Road / Maldon Street



Above: The Allocations Plan proposes areas and sites around the borough to build or develop up to 2028. The blue line shows the draft expansion, the proposed site is indicated (red circle).

9.0 SEQUENTIAL APPROACH

- 9.1 The NPPF defines edge of centre sites (for retail purposes) as being locations that are well connected to, and within easy walking distance (i.e., up to 300m) of the main town centre. The site is located more than 700m walking distance from the town centre as defined on the UDP proposals map. It is therefore out of centre. However, it should be noted that pedestrian accessibility from the town centre to the site is good, with pedestrian crossings provided along its route.
- 9.2 As the site is out of centre, it is therefore necessary to assess whether there are any sequentially preferable sites within Rochdale Town Centre.
- 9.3 The application proposes the use of part of the application site as a jewellery shop. An assessment has been undertaken of available, suitable and viable sites within Rochdale Town Centre to ascertain whether any of these sites are capable of accommodating the proposed use.
- 9.4 Below is a list of available units that have been advertised for sale/let in Rochdale Town Centre:
- Street food vendor for sale – Yorkshire street – **Unsuitable and not viable;**
 - Drake Street – 4 storey Retail and Office space for sale – **Too large, unsuitable and not viable;**
 - Yorkshire Street, 3 storey retail premises for sale - 3,886 sq. ft - **Too large, unsuitable and not viable;**
 - Drake Street, 3 storey retail premises for sale (1) - **Too large, unsuitable and not viable;**
 - Drake Street, 3 storey retail premises for sale (2) - **Too large, unsuitable and not viable;**
 - Restaurant and Takeaway for sale – Seats 20 with kitchen near Train Station - **Too large, unsuitable and not viable;**
 - York House – 129-131 Yorkshire Street - 4,464 sq.ft - **Too large, unsuitable and not viable;**
 - 109 Yorkshire Street – Adamsons Estate Agents – 2 storey office space - **Too large, unsuitable and not viable;**
 - Sanctuary Trust – 48b Drake Street - 868 sq.ft (80.6 sq.mtrs) approximately, plus large basement - **Too large, unsuitable and not viable;**
- 9.5 It should be noted that the above sites are available in the town centre. However, the sites would not be sequentially preferable against the application site given their large sizes and suitability to function, and capability of working as a small independent bespoke jewellery shop.
- 9.6 Furthermore, whilst there is no requirement for an impact assessment, it should be noted that there would be no impact on the town centre. The proposed jewellery shop would not compete with town centre occupiers, and the proposed shop would not change the existing dynamics. This would be a new business to

attract existing customers who use the two Milkstone Road local centres. As such the proposal would not affect the town centre footfall and would not adversely impact on the vitality and viability of the shopping area.

Milkstone Road/ Maldon Road Local Centre

- 9.7 An assessment was undertaken on Friday 8th March 2024 of the Milkstone Road/ Maldon Road Local Centre to identify whether there are any available and viable sites within this local centre, please see photographs below;



Above: The photos clearly show almost all of the sites are occupied. There is one unit adjacent to Haji Tours which appears to be empty, however, there is no To Let/Sale sign, or advertisement online, as such the site is considered unavailable at the time of this report.



Above: There are a number of units as shown above which have spilled out of the local centre and which are adjacent to the application property, these units are included in the Council's draft allocations plan.

Milkstone Road/ Maldon Road Local Centre

9.8 An assessment was undertaken on Friday 8th March 2023 of the Milkstone Road Local Centre to identify whether there are any available and viable sites within this local centre, please see photographs below;







Above: The photos clearly show almost all of the sites are occupied. No units appeared to be empty within this local centre or available for sale/rent.

10. CONCLUSIONS OF SEQUENTIAL ASSESSMENT

- 10.1 The sequential assessment concludes that there are no available, suitable or viable units to accommodate the proposed development within the town centre of Rochdale and all the units within the local centres of Maldon Street/Milkstone Road, and Milkstone road are all occupied or unavailable. Given the size, specific use and clientele, the proposal would have no significant impact on the town centre. The proposed jewellery shop would not compete with town centre occupiers. The jewellery business would serve mainly the Asian community around the Milkstone Road local centres.
- 10.2 The application is also supported by the NPPF. In the first instance, the NPPF states that the Government is committed to ensuring that the planning system does everything it can to support sustainable economic growth. Planning should operate to encourage and not to act as an impediment to sustainable growth. Therefore, significant weight should be placed on the need for economic growth through the planning system, and the retention and development of accessible local services and community facilities, such as local shops.

11. CONCLUSIONS

- 11.1 In plan-making, the sequential approach requires a thorough assessment of the suitability, viability and availability of locations for main town centre uses. It requires clearly explained reasoning if more central opportunities to locate main town centre uses are rejected. As such the nature of the need that is to be addressed.
- 11.2 The National Planning Policy Guidance states that It may not be possible to accommodate all forecast needs in a town centre: there may be physical or other constraints which make it inappropriate to do so. In those circumstances, planning authorities should plan positively to identify the most appropriate alternative strategy for meeting the need for these main town centre uses, having regard to the sequential and impact tests. This should ensure that any proposed main town centre uses which are not in an existing town centre are in the best locations to support the vitality and vibrancy of town centres, and that no likely significant adverse impacts on existing town centres arise.
- 11.3 The NPPF goes on to note that when considering edge of centre and out of centre proposals, preference should be given to accessible sites, well connected to the town centre. Both applicants and local authorities are required to demonstrate flexibility on issues such as format and scale.
- 11.4 The site is located out of centre but is well connected to Rochdale Town Centre and Milkstone Road Local centres and therefore pedestrian accessibility is good. A sequential assessment has been undertaken, which has revealed that there are no suitable, available or viable sites either within Rochdale Town Centre or the surrounding Local Centres.
- 11.5 Therefore, it has been demonstrated that the proposal would have little to no impact on the vitality and viability of the town centre of Rochdale and accords with policy E1 of the Core Strategy and the NPPF.
- 11.6 In addition, given the presumption in favour of development and the Government's commitment to promoting sustainable development in accordance with the development plan, it is respectfully requested that planning permission is granted without delay.