



Sandbrook Retail & Leisure Park Rochdale

Sequential Assessment

On behalf of **AIG Holdings Limited**

Document Control Sheet

Project Name: Sandbrook Retail & Leisure Park Rochdale Way, Bedford
Project Ref: 34476/A5/DM/SS
Report Title: Sequential Assessment

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For and on behalf of Stantec UK Limited				

Revision	Date	Description	Prepared	Reviewed	Approved
1	16/08/2023	Final	Dan Melling	Susie Stephen	Susie Stephen

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1 INTRODUCTION

- 1.1.1 This Sequential Assessment has been prepared by Stantec on behalf of AIG Holdings Limited ("AIG") in support of a planning application for the following development at Sandbrook Retail & Leisure Park, Rochdale ("the Site") (Ref: 23/00119/FUL):

"Erection of a drive-thru coffee shop (Use Class E) unit with car park, landscaping and associated works".

- 1.1.2 The proposed drive-thru coffee shop unit is intended to be occupied by Starbucks, who would operate as an ancillary facility to the existing retail and leisure facilities located with Sandbrook Retail and Leisure Park.
- 1.1.3 The extent of the Application Site is illustrated on the Existing Site Plan included in **Appendix A**. The Site forms part of the wider Sandbrook Retail and Leisure Park, which extends to approximately 4.59ha. The Site lies approximately 1.6 kilometres to the south of the Rochdale Primary Shopping Area (PSA) and is accessed via Sandbrook Way onto the A664 Edinburgh Way and the A267 which connects to junction 20 of the M62 Motorway.
- 1.1.4 The Site's immediate surroundings are characterised by out-of-centre retail warehousing in the form of Sandbrook Retail and Leisure Park. Existing retailers in the area include Odeon, Boots, Tenpin and Pure Gym, as well as a range of restaurants including McDonald's, KFC, Pizza Hut, Subway, Pink Drips and Copper Pot. The proposed drive thru unit would add to this and enhance the choice of available food and beverage facilities on offer.
- 1.1.5 The Site is located out-of-centre for the purposes of retail planning policy. As such, there is a requirement to demonstrate compliance with the Sequential Assessment as set out under paragraph 87 of the NPPF and Development Plan Policy E1.
- 1.1.6 Against this background, the assessment covers the following:
- **Section 2** – a description of the Application Site and Proposed Development;
 - **Section 3** – analysis of the retail planning policy context;
 - **Section 4** – considers the proposals against the policy objectives of the sequential approach;
 - **Section 5** – outlines the summary and conclusions arising from the above including the scheme's compliance with the retail policies set out within the NPPF and relevant adopted Development Plan policy.
- 1.1.7 Full details of the scheme and justification against other policy considerations is provided within the Planning Statement (January 2023) and the suite of technical documents submitted as part of the planning application.

2 APPLICATION SITE AND PROPOSED DEVELOPMENT

2.1 The Application Site and Surroundings

- 2.1.1 The boundary of the Application Site is identified in red on the Existing Site Plan, included at **Appendix A**. The Site extends to c.0.19ha.
- 2.1.2 The boundary of the wider Sandbrook Retail and Leisure Park and the Application Site is identified by the Site Location Plan (Drawing Ref: 9973-L050-D) provided in **Appendix B**.
- 2.1.3 The Retail Park is located approximately 1.6 kilometres to the south of the Rochdale Primary Shopping Area (PSA) and the Site is therefore defined as 'out-of-centre' in retail policy terms.
- 2.1.4 The Park is strategically positioned in the Rochdale area due to its proximity to the surrounding road network with linkages to the Town Centre. Access is taken from Sandbrook Way onto the A664 Edinburgh Way and the A267 which connects to junction 20 of the M62 Motorway.
- 2.1.5 The wider Park to the north-east consists of a range of commercial and leisure units in an L-shaped terrace which face onto a surface level car park (799 spaces).
- 2.1.6 The Application Site itself comprises an area of existing car parking (48 spaces) to the south of the existing Pizza Hut and Pink Drips Units, and to the north of the existing McDonald's Unit.

2.2 Proposed Development

- 2.2.1 The application seeks full planning permission for the erection of a coffee drive thru unit (Class E), with associated parking, landscaping and associated works. As noted above, the proposed drive thru is to be positioned within an existing area of car parking. The proposed drive thru unit will comprise a single storey building of modern design extending to 171 sqm (GEA) in addition to an adjacent utility yard comprising 23 sqm. The Proposed Development will provide 17 parking spaces, as well as make use of the existing car park serving the wider Retail and Leisure Park.
- 2.2.2 The Proposed Site Plan is included in **Appendix C**. The proposed drive thru unit is intended to be occupied by Starbucks and has been designed having regard to their specific operational requirements.

2.3 Starbucks Format

- 2.3.1 Starbucks are a globally recognised operator of coffee shops, both within Town Centre locations and outside including within retail and leisure park settings and along key arterial routes. As such, the application proposals have been designed not only to meet a requirement for additional representation by Starbucks in order to improve their offer within the Rochdale area, but also to provide a high-quality development that is operationally and commercially viable.
- 2.3.2 By implication, compromises to the type of location or the form and layout of the Proposed Development will impact on the retailer's business model and will result in unacceptable operational impacts which would prevent the operator from proceeding with the Site.
- 2.3.3 Starbucks are not a trip generating attraction in their own right and therefore when considering sites, it is important for there to be existing facilities which attract trips which will be the main source of their custom, via linked trips.

- 2.3.4 In considering Sites, Starbucks require a minimum site area of 0.16ha.
- 2.3.5 Starbucks do not typically look to progress standalone applications on large development plots without the certainty of a wider masterplan or application being progressed as this does not work for their business model, which relies on proximity (or certainty of proximity) to complementary major trip generating uses. There is therefore a ceiling of 0.25ha above which, standalone development sites will not be considered.
- 2.3.6 Having regard to Starbucks' operational requirements, prospective sites would need to comprise a minimum developable area of 0.16ha. Sites falling below this threshold cannot suitably accommodate the required drive thru lane, car parking and suitable servicing arrangements, even in a compromised arrangement and will not therefore be considered. Sites towards this lower end of the floorspace requirement will also need to be in locations which benefit from existing facilities in terms of facilitating shared parking provision and offering complementary uses which will act as a key visitor attractor.
- 2.3.7 Starbucks require 24hr access to their units to allow for deliveries and servicing to avoid deliveries taking place during opening hours and within peak hours on the highway network. Starbucks typically seek to service their units between 05:30 and 06:00 or between 23:00 and 01:00.

3 PLANNING POLICY CONTEXT

3.1 Overview

- 3.1.1 This section outlines the relevant retail planning policy context which is of relevance to this Assessment. A comprehensive review of the policy context for the development as a whole is provided in the Planning Statement (January 2023).

3.2 National Planning Policy Framework (NPPF)

- 3.2.1 The revised National Planning Policy Framework (NPPF) was published in July 2021 and sets out the Government's objectives for achieving sustainable development.
- 3.2.2 Of relevance to this Assessment, Section 7 (Ensuring the Vitality of Town Centres) sets out the retail planning framework. Paragraph 87 requires a 'sequential test' to be applied to planning applications for main Town Centre uses not in a Centre and not in accordance with an up-to-date Development Plan. This requires an assessment of Town Centre, edge-of-centre, then out-of-centre locations. For edge and out-of-centre schemes, preference should be given to accessible sites well connected to the Town Centre and requires applicants to demonstrate flexibility in terms of format and scale. It should be noted that the term 'Town Centre' also applies to District and Local Centres in the NPPF.

3.3 Planning Practice Guidance (PPG)

- 3.3.1 The Planning Practice Guidance (PPG) provides more detailed guidance to support the interpretation of the NPPF.
- 3.3.2 Of relevance to this assessment, the PPG sets out guidance supporting paragraphs 87-91 of the NPPF and provides further detail in respect of how locational requirements should be considered. The guidance acknowledges that use of the sequential test should recognise that certain main town centre uses have particular market and locational requirements which mean that they may only be accommodated in specific locations. (ID: 2b-012-20190722).
- 3.3.3 The PPG also provides guidance with regard to viability. The sequential test supports the Government's 'town centre first' policy. However as promoting new development on town centre locations can be more expensive and complicated than building elsewhere, local planning authorities need to be realistic and flexible in applying the test (ID: 2b-013-20190722).

3.4 The Development Plan

- 3.4.1 Section 38(6) of the Planning and Compulsory Purchase Act requires that planning applications are determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 3.4.2 The Development Plan for the Site consists of the Core Strategy for Rochdale (2016), Greater Manchester Joint Waste Development Plan (2012), Greater Manchester Joint Minerals Development Plan, saved policies of the Rochdale Borough Unitary Development Plan 2006 ("UDP") (saved policies May 2009) and Planning Policies Map (June 2006). Bedford Borough Local Plan 2030.
- 3.4.3 Policy E1 of the Rochdale Core Strategy is consistent with the NPPF and requires proposals for town centre uses within out of centre locations to demonstrate that there are no suitable sites in, or on the edge, or well connected to, the town centre, district centres or local centres and the proposal would cause no significant overall impact on the existing centres vitality and viability.

- 3.4.4 Policy E1 applies a local threshold for impact assessments, the details of which are set out under paragraph 7.15 of the Core Strategy. The local threshold for Rochdale is 2,000 sqm. On the basis that the proposal involves a total of 195 sqm, this falls below the threshold and an impact assessment is not therefore required.

3.5 Policy Conclusions

- 3.5.1 The key retail policy issues relate to demonstrating compliance with the sequential test, which is detailed in Section 5 of this Assessment.

4 SEQUENTIAL ASSESSMENT

4.1 Overview

- 4.1.1 Core Strategy Policy E1 requires proposals for main town centres uses that are not in the defined centres to satisfy the requirements of the sequential test.
- 4.1.2 The sequential test, as set out in paragraph 87 of the NPPF, requires proposals 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 (or expected to become available within a reasonable period) should out of centre sites be considered (paragraph 86).
- 4.1.3 The Application Site is located 'out-of-centre' in retail policy terms, and we have therefore undertaken an assessment of sequentially preferable sites.
- 4.1.4 The NPPF (paragraph 88) includes the requirement to 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. There is no requirement to consider disaggregation. The Planning Practice Guidance (PPG) adds that *'it is not necessary to demonstrate that a potential town centre or edge of centre site can accommodate precisely the scale and form of development being proposed, but rather to consider what contribution more central sites are able to make individually to accommodate the proposal'* (ID: 2b-011-20190722).
- 4.1.5 Case law has also established firm principles on the application of the sequential approach. The Supreme Court decision in *Tesco Stores Limited v Dundee City Council* (March 2012) provides clarity on demonstrating flexibility in the consideration of alternative sites and that it is whether such sites are *"suitable for the proposed development, not whether the proposed development can be altered or reduced so that it can be made to fit an alternative site"* (paragraph 29).
- 4.1.6 This premise was reiterated in the *Rushden Lakes Secretary of State Appeal Decision* (APP/G2815/V/12/2190175) dated June 2014, which, at paragraph 8.45 of the Inspector's Report, set out the following:

"In summary it establishes [a] that if a site is not suitable for the commercial requirements of the developer in question then it is not a suitable site for the purposes of the sequential approach; and [b] that in terms of the size of the alternative site, provided that the Applicant has demonstrated flexibility with regards to format and scale, the question is whether the alternative site is suitable for the proposed development, not whether the proposed development could be altered or reduced so that it can be made to fit the alternative site."

- 4.1.7 The Secretary of State (who ultimately determined the appeal) agreed with the Inspector in respect of the above point.
- 4.1.8 In relation to the *Scotch Corner Secretary of State Appeal Decision*, December 2016 (APP/V2723/V/15/3132873 & APP/V2723/V/16/3143678) the Inspector found:

"In carrying out the sequential test it is acknowledged that whilst the Framework paragraph 24 indicates that applicants should demonstrate flexibility on issues such as format and scale, it does not require the applicant to disaggregate the scheme. The sequential test to see if the application, i.e. what is proposed, can be accommodated on a town centre site or on sequentially preferable sites..." (IR paragraph 11.7).

- 4.1.9 At paragraph 11 of the Decision Letter, the Secretary of State agreed with the Inspector's findings.
- 4.1.10 Finally, the Warners judgement (June 2016) confirms that *"what bounds can reasonably be set on an applicants' preference and intentions as to "format and scale" in any individual case will always, and necessarily, depend on the facts and circumstances of that particular case. The policy in paragraph 24 of the NPPF should not be seen as prescriptive in this respect. It is plainly not."* (paragraph 30).
- 4.1.11 On this basis, the NPPF sequential test seeks to see if the application, i.e. what is proposed, can be accommodated on a sequentially preferable site. This includes the requirement to demonstrate flexibility on issues such as format and scale but does not require the applicant to disaggregate the scheme. "Suitable" and "available" means suitable and available for the broad type of development that is proposed in respect of the approximate (rather than precisely the) size, type and range of goods that are proposed. We have not identified any other Secretary of State decisions or judgements made by the courts that would lead to a different interpretation of the sequential approach.

4.2 Methodology and Approach

- 4.2.1 As noted in Section 2, the Starbucks business model is predicated on proximity to major trip generating uses where Starbucks would be viewed as providing a complementary offer as they do not themselves act as a significant trip generating use in their own right.
- 4.2.2 The Application Site area comprises 0.19ha which is just above the minimum stated requirement at 0.16ha. However, in order to demonstrate flexibility, we have assessed potential sites on the basis of whether they are considered suitable and available for the "broad type of development" that is proposed.

Catchment Area

- 4.2.3 In considering the potential catchment area of the Proposed Development we have considered 1.3km radius from Rochdale Town Centre. This covers a relatively extensive area which takes in Rochdale Town Centre and several Local Centres and Linear Commercial Areas. Our 'Area of Search' looks to identify sites in and on the edge of the following centres:
- Rochdale Town Centre
 - Oldham Road at Royds Street West, Rochdale
 - Oldham Road south of Kingsway, Rochdale
 - Milkstone Road with Tweedale Street and Station Road, Rochdale
 - Milkstone Road at Maldon Street, Rochdale
 - Queensway Neighbourhood Shopping Centre, Well I' Th' Lane, Rochdale;
 - Spotland Road, Rochdale;
 - Halifax Road, Hamer, Rochdale;
 - Milnrow Road, Newbold, Rochdale;
 - Yorkshire Street (east of Town Head), Rochdale;
 - Oldham Road, Rochdale, east side from Milnrow Road to the Rochdale Canal;

- Drake Street, Rochdale from School Lane / Milnrow Road to Church Stile / Milkstone Road;
- Milnrow Road, Rochdale from Oldham Road to Molesworth Street and Railway Street.

4.3 Sequential Site Assessment

- 4.3.1 In identifying potential sites, we have had regard to the adopted (and emerging) Development Plan and our own site visits (undertaken in July 2023), from which we have identified the following sites in or on the edge of existing defined centres within our Area of Search.

Site Of Former Wellfield Surgery

Land north and south of Durham Street

Drake Street Car Park

Land bound by Drake Street and St Albans Street

Land bound by Red Cross Steet, Hope Street and Oldmill Street

Former GSF Car Parts, Rugby Road

- 4.3.2 Detailed Site Proformas are included in **Appendix D**, and a summary of our assessment is set out below.

1) Site Of Former Wellfield Surgery Off Oldham Road

- 4.3.3 The site is being promoted for residential use and there is therefore a question mark over the site's availability to accommodate the Proposed Development.
- 4.3.4 The site extends to 0.17ha and whilst it could theoretically accommodate a drive-thru development there are a number of constraints which, in combination, reduce the developable area and raise the potential for conflict with adjacent residential users. Added to this, there are no major trip generating uses within the vicinity which is key to Starbucks locational requirements. For these reasons, the site is not suitable to accommodate the Proposed Development.
- 4.3.5 On the basis that the site is not suitable to accommodate the Proposed Development, and there is a question mark over its availability, it may be discounted as sequentially preferable.

2) Land north and south of Durham Street

- 4.3.6 Whilst the site is considered available to accommodate the Proposed Development there are policy aspirations to bring forward development on the site for employment use. The Proposed Development is not considered compatible with these objectives and the piecemeal development of the site would undermine the wider development potential for a policy compliant scheme.
- 4.3.7 Furthermore, given the scale of the site, Starbucks would not consider the site for an isolated development in the absence of a wider masterplan or developer-led scheme being promoted. On the basis that there is no evidence of such a scheme being promoted, the site is not considered suitable to accommodate the Proposed Development. Added to this, there are no major trip generating uses within the vicinity which is key to Starbucks locational requirements. For these reasons, the site is not suitable to accommodate the Proposed Development.

- 4.3.8 On the basis that the site is not suitable to accommodate the Proposed Development, it may be discounted as sequentially preferable.

3) Drake Street Car Park

- 4.3.9 The site, at 2.4ha is of a sufficient scale to accommodate the Proposed Development. However, Starbucks will not progress a standalone application on a large development plots (above a ceiling of 0.25ha) without the certainty of a wider masterplan or application being progressed as this does not work for their business model, which relies on and requires certainty of proximity to complementary major trip generating uses. The presence of Central Retail Park to the south of the site would meet this requirement but would necessitate Starbucks being able to carve out a portion of the wider site around the southern boundary in order to integrate with and effectively operate as part of the adjacent Retail Park.
- 4.3.10 However, the site already benefits from planning permission for a residential-led scheme and there is clear evidence that the site is being prepared for this development to come forward. There is no drive-thru component within the approved scheme and the site is not therefore considered available to accommodate the Proposed Development..
- 4.3.11 On the basis that the Site is not available, it may be discounted as sequentially preferable.

4) Land bound by Drake Street and St Albans Street

- 4.3.12 Whilst the site is physically capable of accommodating the drive thru unit (at an area of 0.33ha), the site is constrained by the proximity of surrounding residential uses and the propensity for the nature of the use proposed to give rise to potential disturbances, particularly having regard to the required 24 hour operation. The proximity to residential properties located close to the site boundaries therefore presents a significant constraint in design terms.
- 4.3.13 Further, whilst vehicular access to the site could theoretically be achieved off St Albans Street or Broadfield Stile, these roads are primarily residential and it is questionable whether they would be considered suitable, in highway terms, to accommodate the level of traffic typically associated with a drive-thru facility including an allowance for queuing. Similarly, it is also questionable whether access off Drake Street would be acceptable on the basis that queuing may occur along what is a busy arterial route to the Town Centre.
- 4.3.14 Added to this, there are no major trip generating uses within the vicinity which is key to Starbucks locational requirements. For these reasons, the site is not suitable to accommodate the Proposed Development.
- 4.3.15 On the basis that the site is not suitable to accommodate the Proposed Development, it may be discounted as sequentially preferable.

5) Land bound by Red Cross Steet, Hope Street and Oldmill Street

- 4.3.16 The northern part of the site appears to have been cleared for development although we are not aware of any extant planning permission on this part of the site. We also note that there is an established site compound and an advertisement purporting that the land has been acquired by RBH for new homes and whilst this signals an intent for the redevelopment of the site for residential use, in the absence of a planning permission, the site is regarded as available to accommodate the Proposed Development.
- 4.3.17 The southern part of the site has also been cleared following grant of Prior Approval for the demolition of the Social Club and garages to the rear (Ref: 22/01024/DEM). We are not aware of any further applications having been submitted for the redevelopment of this part of the site and therefore also consider this part of the site to be available to accommodate the Proposed Development.

- 4.3.18 The developable area of the site within which the drive-thru unit could be accommodated is significantly reduced, given that Redcross Street, Hope Street and Oldmill Street are all lined by existing residential properties, whilst nos. 15-21 Oldmill Street sit within the centre of the site itself. The proximity to residential properties, presents a significant challenge in terms of preventing amenity harm, whilst enabling the efficient operation of the drive thru unit on a 24-hour basis. Whilst the site is considered available, it is not suitable to accommodate the Proposed Development and can be dismissed on this basis.
- 4.3.19 On the basis that the site is not suitable to accommodate the Proposed Development, it may be discounted as sequentially preferable.

6) Former GSF Car Parts, Rugby Road

- 4.3.20 The site is presently vacant, and we are not aware of any planning permissions in place for the site's redevelopment. The site is therefore considered available to accommodate the Proposed Development.
- 4.3.21 The operational requirements of a drive thru require a separate access and egress point for vehicles using the drive thru lane. The physical constraints of this site, being long and narrow, alongside a constrained access off Rugby Road does not present a workable proposition to accommodate a drive thru facility. The site is not suitable on this basis.
- 4.3.22 On the basis that the site is not suitable to accommodate the Proposed Development, it may be discounted as sequentially preferable.

4.4 Conclusions

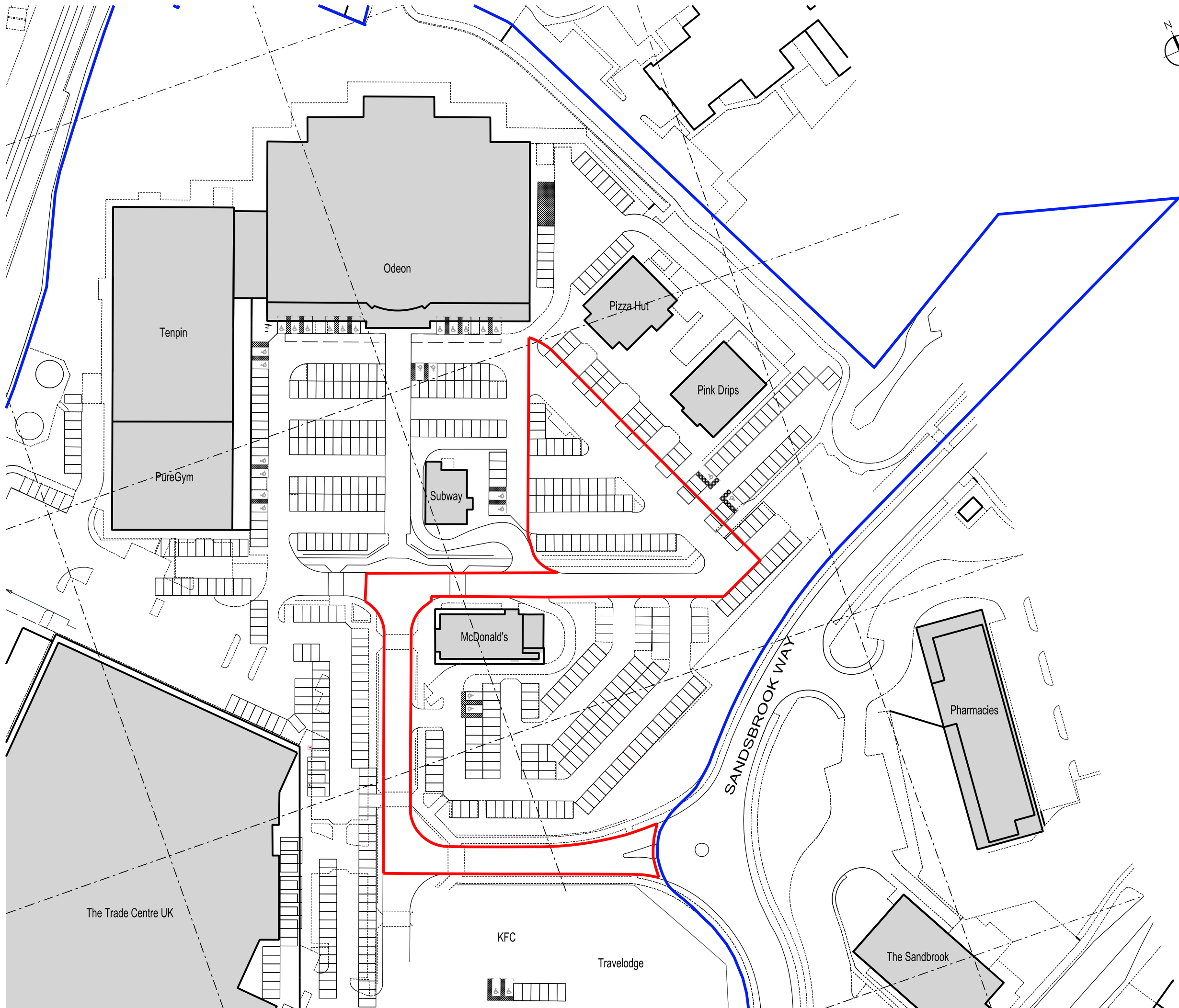
- 4.4.1 From our assessment, we have not been able to identify any sequentially preferable opportunities within or on the edge of existing centres that can be considered both suitable and available to accommodate the Proposed Development, even allowing for flexibility.
- 4.4.2 Against this background, there is no conflict with the NPPF or Local Plan Policy E1 in retail policy terms.

5 SUMMARY AND CONCLUSIONS

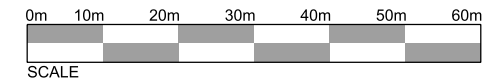
- 5.1.1 This Assessment has been prepared to consider the appropriateness of the proposed Class E drive thru use forming part of the Proposed Development at the Application Site in retail policy terms.
- 5.1.2 The proposed drive thru is intended to be occupied by Starbucks who have identified a requirement for a new drive thru facility within the Rochdale area. The proposed drive thru will add to the existing offer at Sandbrook Retail and Leisure Park and enhance the choice of available leisure uses on offer.
- 5.1.3 Having considered alternative, more central sites, it has been demonstrated that there are no sequentially preferable locations which are suitable and available to accommodate the proposed drive thru facility, even allowing for flexibility in approach.
- 5.1.4 On the basis that the proposed floorspace falls below the local threshold imposed by Policy E1, there is no requirement to undertake an impact assessment.
- 5.1.5 Against this background, this assessment demonstrates that the scheme complies with paragraph 91 of the NPPF. It is therefore entirely appropriate to grant planning permission for the Proposed Development in retail policy terms.

Appendix A EXISTING SITE PLAN

09/02/2023 123432 P:\DDGN\11000\11200-11299\11254\11254-P-01 BLOCK PLAN-Scheme 2.dgn
Unit H, Sandbrook Park
carman.linott



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- Site Ownership Boundary
- Application Boundary

A	09.03.23 APPLICATION BOUNDARY AMENDED	CF
REV.	DATE	NOTES
		INIT.

CLIENT / PROJECT
AIG HOLDINGS LTD
SANDBROOK PARK, ROCHDALE
OL11 1RY
DRAWING TITLE
EXISTING BLOCK PLAN
SCHEME 2

STATUS
PLANNING

DATE	DRAWN	SCALE @ A3
06.07.2022	CF	1:1000

PROJECT NUMBER	UNIT / BLOCK	CI / SFB CODE	TYPE & NUMBER	REVISION LETTER

DRAWING NO.			
11254	P	011	A

Site Location Plans	L	GA Plans	P	Elevations	E
Sections	S	Details	D	Prefix Colour	C

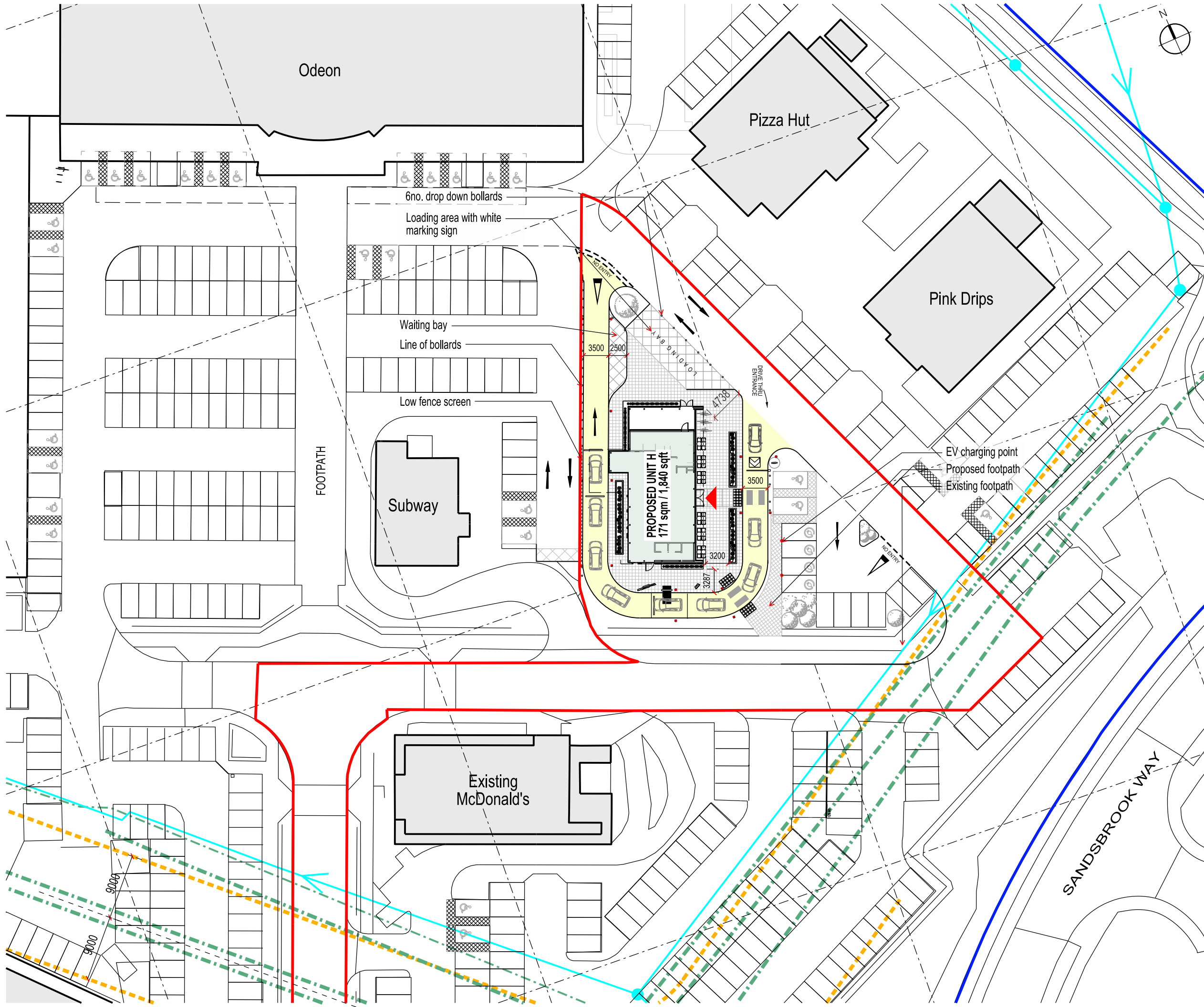
THE RATCLIFFE GROVES PARTNERSHIP
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Appendix B SITE LOCATION PLAN

05/07/2023 16:28:46 P:\0000\11200-11299\11254\1-Site\11254-P-201 PR SITE PLAN-Scheme 2.dgn Unit H, Sandbrook Park carmen.flood



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0m 5m 10m 15m 20m 25m 30m
SCALE

All service locations subject to site investigation

- Existing building
- Site Ownership Boundary
- Application boundary
- Existing culvert
- Existing culvert 8m easement zone
- Drainage line

15 car parking spaces incl. 2 Blue badge holder parking spaces & 4 EV charging point within the application boundary

Ref to Starbucks drawing 93861-001 TF2

LAYOUT SUBJECT TO SITE SURVEY AND UNDERGROUND SERVICES SURVEY

F	05.07.23	ANNOTATIONS AMENDED	CF
E	05.07.23	DROP DOWN BOLLARDS AND WHITE MARKING ADDED TO LOADING BAY	CF
D	09.03.23	APPLICATION BOUNDARY AMENDED	CF
C	17.08.22	KERB LINE TO DELIVERY BAY REVISED	CF
B	02.08.22	GIA, KERB LINES, APPLICATION BOUNDARY & F.E DOOR REVISED	JT
A	13.07.22	PLANNING ISSUE	CF
REV.	DATE	NOTES	INIT.

CLIENT / PROJECT
AIG HOLDINGS LTD
SANDBROOK PARK, ROCHDALE
OL11 1RY

DRAWING TITLE
UNIT H
PROPOSED SITE PLAN
SCHEME 2

STATUS
PLANNING

DATE	DRAWN	SCALE @ A3
06.07.2022	CF	1:500

PROJECT NUMBER	UNIT / BLOCK	CI / SFB CODE	TYPE & NUMBER	REVISION LETTER
11254	P	201	F	

Site Location Plans	L	GA Plans	P	Elevations	E
Sections	S	Details	D	Prefix Colour	C

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RGF
architects

Appendix C PROPOSED SITE PLAN

Appendix D SEQUENTIAL SITE PROFORMAS

1. Site Of Former Wellfield Surgery Off Oldham Road

Details:	
Name:	Site Of Former Wellfield Surgery Off Oldham Road
Location:	Site Of Former Wellfield Surgery Off Oldham Road Rochdale OL16 5HX
Description:	The site is located within the Oldham Road (south of Kingsway) Local Centre and is bordered by Oldham Road to the west, Woodbine Road to the south and Rochdale Canal to the north. The Site formerly accommodated Wellfield Surgery, before the Site was cleared, following grant of prior approval (12/56156/DEM) in 2012. The site now comprises an open expanse of grass. It is notes that there is an easement along the site's northern boundary to account for United Utilities operations.
	
Source: Google Earth	
Constraints:	
Adjacent Uses:	The site's surrounding area is mixed in character. The site is bordered to the north by the Rochdale Canal, with managed workspace located on the opposite side of this. The area further to the north and west primarily comprises commercial and business uses, reflective of the Mixed Employment Zone designation (see below). The area to the immediate west is within residential use. Shops and services within Oldham Road (south of Kingsway) Local Centre are located to the south of the site.
Planning Policy:	The site is designated as an Area of Opportunity (Saved UDP Policy R/4f) and within a Local Centre (Policy S/6) as shown on the Rochdale UDP Proposals Map (2006). A small part of the site is also situated in a Mixed Employment

	Zone (Policy EC/3 and Core Strategy Policies E2 and E3). The site is located 'in-centre' in retail policy terms.
Access:	There is no existing vehicular access into the site, although it is considered capable of being accessed via both Oldham Road and Woodbine Street.
Availability	
It is our understanding that the site has stood vacant following the demolition of the Wellfield Surgery in 2012. At the time of writing, we are aware of a live application (Ref: 22/01027/FUL) for erection of 18no. apartments with associated landscaping and car parking. Whilst the application is still pending determination, this provides a reasonable signal of intent which suggests that the site is likely to come forward for residential development in the near future. It is therefore questionable as to whether the site may be considered available to accommodate the Proposed Development.	
Suitability	
The site extends to 0.17ha which is at the lower end of what Starbucks would consider in terms of site area. Whilst the site is of a scale which is considered physically capable of accommodating a drive-thru development there are other constraints in terms of its configuration, site access and surrounding land uses and the easement along the site's northern boundary which limits the developable area. Notwithstanding the local centre location, there are no major trip generating uses within the vicinity which would meet Starbucks locational requirements. Access could be facilitated onto the site via Oldham Road and Woodbine Street, although at present there is no existing access point. Woodbine Street is a no-through road intended for residential access only and is not therefore considered suitable to accommodate traffic associated with a drive thru facility. For the purposes of the application proposals, it is not considered that the vehicular movements associated with the proposed drive thru could be accommodated without incurring unacceptable amenity to surrounding residents. Starbucks will generally avoid development of drive-thru units in locations which are closely bordered by residential properties, on account of their health and safety policy, which seeks to avoid vehicular and pedestrian conflict in such locations. Accordingly, both the access and egress points would need to be accommodated on Oldham Road, which is an arterial route into Rochdale Town Centre. This arrangement is likely to raise concerns with regard to potential traffic congestion and safety caused by vehicles manoeuvring into the drive-thru lane. This would potentially be exacerbated by the spatially constrained nature of the site, which would offer limited capacity to accommodate queuing vehicles within the drive thru lane or through designated parking bays and as such, may extend out along the main road. There are existing residential properties located directly adjacent to the eastern boundary, which would present a further constraint in design terms having regard to the potential for adverse impacts on residential amenity associated with the proposed drive-thru use and in particular its 24-hour operation. A physical buffer would be required between the uses which would further reduce the already constrained developable area of the site. Alternatively, a restriction on hours of operation or servicing may be considered necessary which would undermine the commercial viability of the scheme. On the basis of the above, the site is not considered suitable to accommodate the Proposed Development.	
Conclusions	
The site is being promoted for residential use and it is therefore questionable as to whether it could be considered available to accommodate the Proposed Development. Notwithstanding this, the site is not in any event considered suitable to accommodate the Proposed Development.	

2. Land north and south of Durham Street

Details:	
Name:	Land north and south of Durham Street
Location:	Durham Street, Rochdale OL11 1JL
Description:	The site comprises two parcels of land located to the north and south of Durham Street. The northern part of the site comprises a large expanse of grassland bordered by Lincoln Street to the west and Oldham Road to the east. The southern part of the site sits between Norwich Street and the canal which runs adjacent to Oldham Road and comprises the remnants of derelict built form.
	
Source: Google Earth	
Constraints:	
Adjacent Uses:	The site is bordered by residential uses to the west (the closest comprising the recently completed homes on Larkfield Close and those bordering Durham Street), by Lincoln Close Industrial Estate to the north; by commercial development to the east; and by an industrial building to the south. The wider surrounding area comprises a mix of residential, industrial and commercial uses.
Planning Policy:	The site lies within the Defined Urban Area (saved policy G/D/1), and the Canal Basin Area of Opportunity (saved policy R/4(f)), of the UDP (2006)). The site is also referenced in the Milkstone and Deeplish adopted SPD 2010 as an area that should be developed specifically for employment purposes. The area to the north is a designated Mixed Employment Zone under UDP Policy EC/3.
Access:	The northern part of the site can be accessed via the surrounding highways network of Lincoln Street, Durham Street and Oldham Street. The southern parcel is accessible via Durham Street, or via the narrow access road which stems from Norwich Street.

Availability

On the north site, permission (Ref: 18/01099/FUL) was granted in April 2019 for the erection of industrial/warehouse units (Class B1/B2/B8) with ancillary office accommodation together with associated access, parking service road and landscaping.

This permission has since lapsed and is not therefore capable of being built out. The northern section of the site is therefore considered available.

On the southern site, permission was granted in May 2020 (Ref: 19/00041/FUL) for partial demolition of fire damaged building and full demolition of adjacent industrial unit, repair and rebuild of eastern warehouse building range and erection of industrial building incorporating production space, warehousing, showroom and offices, and formation of car park (plus LBC). Whilst an application was made in January 2023 to discharge the pre-commencement conditions, this is yet to be determined and it is therefore our understanding that the master permission has also now lapsed. For the purposes of our assessment, we have assumed that the southern part of the site is also available.

Accordingly, the site is considered available to accommodate the Proposed Development.

Suitability

Whilst the site lies outside of the Mixed Employment Zone there is a guiding principle set out in the aforementioned policies that the site should be developed for employment purposes. This is also reflected in the proposal to allocate the site as an extension to the Employment Zone in the draft Rochdale Borough Allocations Plan (AL/EMP/30 – proposed extension to Oldham Road/Canal Basin employment zone).

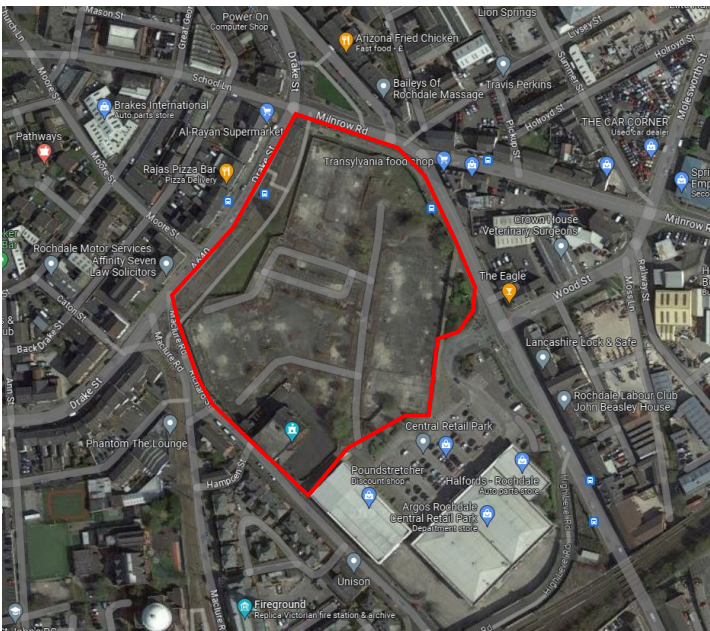
The northern section of the site comprises approximately 0.7ha which is physically capable of accommodating the Proposed Development. However, the proposals alone are not of sufficient scale to make effective use of the site and to do so would require a broader, mixed-use development which is not being proposed. Piecemeal development of the site within a defined opportunity area could potentially undermine policy objectives or prejudice the delivery of an employment scheme as envisaged by the emerging Allocations Plan and accordingly, it is not considered appropriate to bring forward the drive thru proposals in isolation. Starbucks would not consider the site in isolation being greater than 0.25ha in the absence of a wider developer led scheme.

The southern part of the site comprises 0.57ha. As with the site northern section of the site, the proposals alone are not of sufficient scale to make effective use of the site and would require a broader development which is not being proposed. Furthermore, the site is an awkward shape, with access restricted from the eastern side by the Rochdale Canal. Access would only be achievable via Durham Street, or via the constrained and narrow access from Norwich Street, which is not considered desirable to accommodate a drive thru development in its current configuration.

Conclusions

Whilst the site is considered available to accommodate the Proposed Development there are policy aspirations to bring forward development on the site for employment use. The Proposed Development is not considered compatible with these objectives and the piecemeal development of the site would likely undermine the wider development potential for an employment scheme. Starbucks would not consider the site in isolation being greater than 0.25ha in the absence of a wider developer led scheme. As such the site is not considered suitable to accommodate the Proposed Development.

3. Drake Street Car Park

Details:	
Name:	Drake Street Car Park
Location:	The site is located to the north of Rochdale train station and is enclosed on three sides by the strategic road network, with Oldham Road to the west and Richard Street to the east.
Description:	The site extends to 3ha and is currently vacant following demolition of the Central Retail Park in the mid 2000s. To the immediate south of the site lies a retained part of the retail park. The site is currently enclosed by hoardings and is subject to an enabling works permission (Ref: 22/00336/FUL). The site has also been cleared as part of site remediation and preparation works during Autumn 2022. The Site benefits from planning permission (Ref: 22/01119/FUL) for erection of 81 dwellings and a 5/6 storey building containing 142 apartments (Use Class C3) with ground floor commercial use (Use Class E), new park, internal estate roads, revised means of vehicular access off Oldham Road, associated parking, infrastructure, landscaping, ancillary works and amended car parking layout to retained Central Retail Park. On the basis that the site is being prepared for development, it is anticipated that this permission will be implemented in due course (if not already).
 Source: Google Earth	
Constraints:	
Adjacent Uses:	The surrounding area comprises a number of buildings and urban features. To northeast/east across Oldham Road are 2-storey commercial buildings. To the north Milnrow Road separates the site from Rochdale Town Centre, with Oldham Road continuing beyond linking to Drake Street. To northwest the immediate boundary is defined by the separate Metrolink. To the northwest of the site is Milnrow Road Local Centre, which is characterised by a small cluster of commercial uses. The primarily commercial properties continue along Oldham Road, reflective of the Oldham Road Linear Centre.

	To the immediate south of the site is the Central Retail Park, which accommodates a number of retail units around a central car park. To the west is Rochdale Train Station and the Local Centres of Milkstone Road and Drake Street Linear Commercial Areas.
Planning Policy:	The Site falls outside of, but in close proximity to the designated Local Centres of Milkstone Road and Drake Street Linear Commercial Areas, the Linear Commercial Areas and Rochdale Town Centre. It is therefore defined as 'Edge of Centre' in retail policy terms. The Site is not subject to any specific policy designations.
Access:	The site is accessible via the surrounding highway network which encloses the site and via the Central Retail Park car park to the south. There are existing points of access on Oldham Road and from the Central Retail Park to the south.
Availability	
The Site benefits from planning permission (Ref: 22/01119/FUL) for erection of 81 dwellings and a 5/6 storey building containing 142 apartments (Use Class C3) with ground floor commercial use (Use Class E), new park, internal estate roads, revised means of vehicular access off Oldham Road, associated parking, infrastructure, landscaping, ancillary works and amended car parking layout to retained Central Retail Park. An application (Ref: 22/00336/FUL) for enabling works comprising site clearance, site remediation, required archaeological investigations, temporary means of access(es) and temporary means of enclosure, installation of substation, installation of utility and drainage infrastructure, estate roads and associated works along with piling works, in order to prepare the site for comprehensive redevelopment was also granted in March 2022. A hoarding has been erected around the site, reflective of this permission and it would appear that the site has been cleared under this permission. At the time of writing, there is a live application seeking to discharge conditions attached to Planning Permission Ref: 22/01119/FUL, and a number of Discharge of Conditions applications relating to the enabling works permission. It is therefore reasonably evident that the site is being brought forward for development for a residential-led scheme within which there is no proposal for a drive thru facility. Accordingly, the site is not considered available to accommodate the Proposed Development.	
Suitability	
The site, at 2.4ha is of a sufficient scale to accommodate the Proposed Development. Starbucks would not progress a standalone application on a large development plot without the certainty of a wider masterplan or application being progressed as this does not work for their business model, which relies on and requires certainty of proximity to complementary major trip generating uses. The presence of Central Retail Park to the south of the site would meet this requirement but would necessitate Starbucks being able to carve out a portion of the wider site around the southern boundary in order to integrate with and effectively operate as part of the adjacent Retail Park.	
Conclusions	
The site is not available to accommodate the Proposed Development and can be discounted on this basis.	

4. Land bound by Drake Street and St Albans Street

Details:	
Name:	Land bound by Drake Street and St Albans Street
Location:	206 Drake St, Rochdale OL16 1PJ
Description:	The Site is located immediately south of Broadfield Park, between St Albans Street to the north and Drake Street to the south, with Broadfield Stile running to the east. Permission was granted in June 2007 for '<i>Demolition Of 206/208 Drake Street and Erection Of 17 Townhouses</i>' (Ref: 07/D48939). This permission was allowed to lapse and a subsequent permission (with the same description) was secured in 2010. Whilst the demolition of 206/208 Drake Street was undertaken, the scheme was not completed. The site now comprises an area of cleared land, with evidence of hardstanding from the former buildings at 206/208 Drake Street.



Source: Google Earth

Constraints:	
Adjacent Uses:	The site's surrounding area is mixed in character, but primarily comprises residential uses on St Alban's Street, Broadfield Stile and on the opposite side of Drake Street. Speedwell Garage is located to the immediate west of the site, with Broadfield Park extending to the north. Beech House School is also located close to the Broadfield Stile elevation of the site.
Planning Policy:	The site is located approx. 230m from Milkstone Road centre and is therefore defined as 'edge-of-centre' in retail policy terms. The site is not subject to any specific policy designations.
Access:	Access to the Site can be taken via St Albans Street to the north or via Drake Street to the south. Access could be facilitated via Broadfield Stile to the east, although no existing access point is available.

Availability

Permission was granted in 2010 (Ref: 10/D53261) to for the demolition of 206/208 Drake Street and erection of 17 townhouses. Whilst the site has been cleared, the development has not been built out. The site is therefore considered available to accommodate the Proposed Development.

Suitability

Whilst the site is physically capable of accommodating the drive thru unit (at an area of 0.33ha), the site is constrained by the proximity of surrounding residential uses and the propensity for the nature of the use proposed to give rise to potential disturbances. The proximity to residential properties located close to the Site boundaries presents a significant constraint in design terms, in having regard to the potential for adverse impacts on residential amenity associated with the proposed drive-thru use.

It would be considered challenging to accommodate the operational requirements, such as parking and the drive thru lane, without compromise to the operation of the unit or the amenity of surrounding residents. Starbucks require 24hr access to their units to allow for deliveries and servicing to take place outside of opening hours and during peak hours on the highway network. Accordingly, this practice is considered incompatible with neighbouring residential uses in such close proximity and would present a significant challenge in terms of preventing amenity harm, whilst enabling the efficient operation of the proposed unit.

Starbucks will generally avoid development of drive-thru units in locations which are closely bordered by residential properties, on account of their health and safety policy, which seeks to avoid vehicular and pedestrian conflict in such locations.

Further, whilst vehicular access to the site could theoretically be achieved off St Albans Street or Broadfield Stile, these roads are primarily residential and may not be considered suitable for the level of traffic typically associated with a drive-thru facility or for the allowances for queuing. Similarly, it is also questionable whether access off Drake Street would be acceptable on the basis that queuing may occur along what is a busy arterial route to the Town Centre.

Notwithstanding the proximity to a designated local centre, there are no major trip generating uses within the vicinity which would meet Starbucks locational requirements. Starbucks are not a trip generating attraction in their own right and therefore when considering sites, it is important for there to be existing facilities which attract trips which will be the main source of their custom, via linked trips.

Having regard to the above constraints, the site is not considered suitable to accommodate the Proposed Development.

Conclusions

Whilst the site is considered available it is not suitable to accommodate the Proposed Development and may be discounted on this basis.

5. Land bound by Red Cross Steet, Hope Street and Oldmill Street

Details:	
Name:	Land bound by Red Cross Steet, Hope Street and Oldmill Street
Location:	Oldmill St, Rochdale OL12 0PN
Description:	The Site comprises two distinct parts. The northern part of the site is presently vacant, other than a site office located on the northern edge. Fencing has been erected around the site's perimeter advertising that the land has been acquired by RBH for new homes. The southern element previously accommodated the Brickcroft Social Club. This has since been demolished, following grant of Prior Approval for <i>'the demolition of the Brickcroft Social Club and 9 no. garages to the rear'</i> in 2022 (Ref: 22/01024/DEM). This part of the site is now vacant and has been fenced off. Within the central portion of the site, the boundary wraps around a row of terraced housing on its eastern side.



Source: Google Earth

Constraints:	
Adjacent Uses:	The surrounding area is primarily residential, which has been further intensified by recent residential development, particularly to the north-west. The dwellings on Redcross Street are orientated to directly address the site.
Planning Policy:	The site is located approximately 130m from the Rochdale Town Centre and is therefore defined as 'edge-of-centre' in retail policy terms. The site is not subject to any specific policy designations.
Access:	The primary access to the site is provided via Redcross Street and High Street and Rope Street to the south, although access could be achievable via the majority of the surrounding road network.

Availability

The northern part of the site appears to have been cleared for development although we are not aware of any extant planning permission on this part of the site. We also note that there is an established site compound and an advertisement purporting that the land has been acquired by RBH for new homes and whilst this signals an intent for the redevelopment of the site for residential use, in the absence of a planning permission, the site is regarded as available to accommodate the Proposed Development.

The southern part of the site has also been cleared following grant of Prior Approval for the demolition of the Social Club and garages to the rear (Ref: 22/01024/DEM). We are not aware of any further applications having been submitted for the redevelopment of this part of the site and therefore also consider this part of the site to be available to accommodate the Proposed Development.

Suitability

The site's surrounding area is residential in character. Whilst the site is of a suitable size to accommodate a drive thru unit (extending to 0.86ha in total), the site is constrained by the proximity of surrounding residential uses and the propensity for the nature of the use proposed to give rise to potential disturbances.

The developable area of the site within which the drive-thru unit could be accommodated is therefore significantly reduced, given that Redcross Street, Hope Street and Oldmill Street are all lined by existing residential properties, whilst nos. 15-21 Oldmill Street sit within the centre of the site itself. The proximity to residential properties, would present a significant challenge in terms of preventing amenity harm, whilst enabling the efficient operation of the drive thru unit.

Starbucks require 24hr access to their units to allow for deliveries and servicing to take place outside opening hours and peak hours on the highway network. Accordingly, this practice is considered incompatible with neighbouring residential uses in such close proximity and would present a significant challenge in terms of preventing amenity harm, whilst enabling the efficient operation of the Starbucks unit. Furthermore, Starbucks will generally avoid development of drive-thru units in locations which are closely bordered by residential properties, on account of their health and safety policy, which seeks to avoid vehicular and pedestrian conflict in such locations.

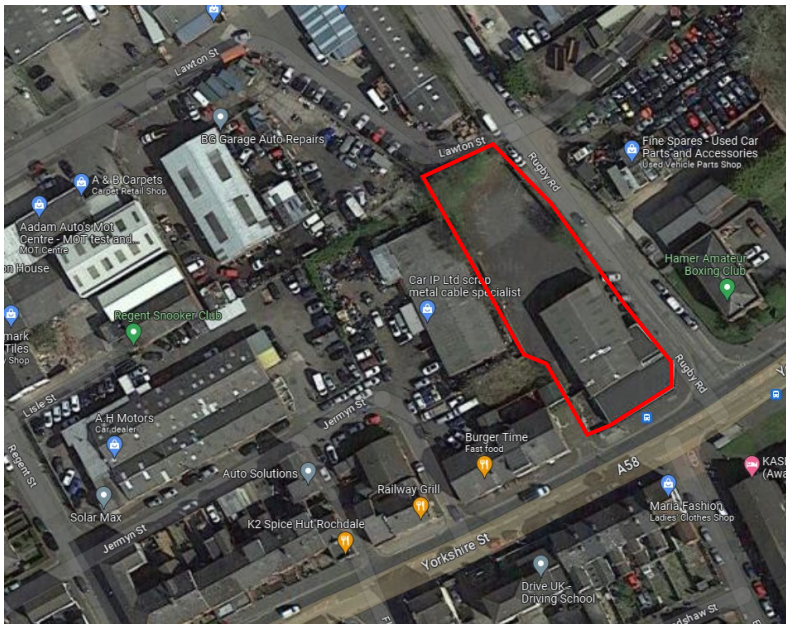
Further, whilst vehicular access is theoretically possible from Redcross Street, Hope Street and Oldmill Street, these roads are primarily residential and may not be considered suitable for the level of traffic typically associated with a drive-thru facility which requires some allowance for queuing. Similarly, it is also questionable whether access off High Street would be acceptable on the basis that queuing may occur along what is a busy arterial route to the Town Centre.

Having regard to the above constraints, the site is not considered suitable to accommodate the Proposed Development.

Conclusions

Whilst the site is considered likely to be available, it is not suitable to accommodate the Proposed Development and can be dismissed on this basis.

6. Former GSF Car Parts, Rugby Road

Details:	
Name:	Former GSF Car Parts, Rugby Road
Location:	1 Rugby Rd, Rochdale OL12 0DY
Description:	The site comprises a vacant site, formerly occupied by GSF Car Parts. There is an existing, vacant building on the site fronting Yorkshire Street with a large service yard to the rear, accessed off Rugby Road.
	
Source: Google Earth	
Constraints:	
Adjacent Uses:	The area to the north of the site is characterised by commercial and industrial uses and accommodates a number of used car and scrap metal facilities. To the west is Yorkshire Street Local Centre, with the areas to the south and east comprising primarily residential uses.
Planning Policy:	The site is located within 50m of Yorkshire Street Local Centre and is therefore defined as 'edge-of-centre' in policy terms. The site also falls partly within a mixed employment zone designation under Saved UPD Policy W/2(e).
Access:	The site is accessible from Rugby Road, which stems from Yorkshire Street, and runs along the eastern side of the site.
Availability	
The site is presently vacant and we are not aware of any planning permissions in place for the site's redevelopment. The site is therefore considered available to accommodate the Proposed Development.	
Suitability	

The site, at 0.19ha is comparable in scale terms with the Application Site. However, the site's configuration, being long and thin, presents a significant challenge in design terms to accommodate a drive thru layout.

The operational requirements of a drive thru require a separate access and egress point for vehicles using the drive thru lane. The physical constraints of the narrow site and the constrained access provided by Rugby Road are not appropriate to accommodate these requirements and the operation of the proposed drive thru facility would be significantly compromised on this site.

Notwithstanding the proximity to a designated local centre, there are no major trip generating uses within the vicinity which would meet Starbucks locational requirements. Starbucks are not a trip generating attraction in their own right and therefore when considering sites, it is important for there to be existing facilities which attract trips which will be the main source of their custom, via linked trips.

Having regard to the above constraints, the site is not considered suitable to accommodate the Proposed Development.

Conclusions

Whilst the site is considered available, it is not considered suitable to accommodate the Proposed Development and may therefore be discounted on this basis.