



JMS PLANNING & DEVELOPMENT

PLANNING AND DESIGN AND ACCESS STATEMENT

IN SUPPORT OF A PLANNING APPLICATION
BY MOTOR FUEL GROUP LIMITED

DEMOLITION OF EXISTING JET WASH AND
REDEVELOPMENT TO PROVIDE A 'FOOD TO
GO' POD, NEW BIN STORE, CAR PARKING
AND ALL OTHER ASSOCIATED WORKS

AT

LITTLEBOROUGH SERVICE STATION
CHURCH STREET
LITTLEBOROUGH
OL15 8JA



Client: Motor Fuel Group Limited
Project: Littleborough Service Station
Date: August 2025

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SECTION 1: INTRODUCTION

- 1.1. This Planning Statement has been prepared by JMS Planning & Development Ltd on behalf of Motor Fuel Group (MFG) ('the Applicant') in support of an application for the "demolition of existing jet wash and redevelopment to provide a 'food to go' pod, new bin store, car parking and all other associated works" at Littleborough Service Station, Church Street, Littleborough, OL15 8JA.
- 1.2. The application seeks approval for the demolition of the site's existing jet wash facility and its replacement with a 'Food to Go' pod, to be operated by Greggs.
- 1.3. This proposed 'Food to Go' Pod will provide jobs suitable for local residents, particularly residents who wish to be flexible in the hours they work. The proposal will therefore bring a wide range of economic benefits and accord with the role and the focus of relevant planning policy as contained within the NPPF and the adopted Development Plan.
- 1.4. In addition, the proposed car parking facility will greatly enhance the site's legibility. At present, the absence of designated parking results in irregular and informal parking by customers; the new facility will address this issue effectively.
- 1.5. This Statement continues in Section 2 by providing a summary of the Motor Fuel Group, Section 3 provides the site's location and its context, with a brief summary of the planning history for the site in Section 4. Details of the application proposal and the proposed occupier are set out in Section 5. A detailed summary of the planning policy position at National and local level contained within Section 6. Section 7 sets out the justification for the proposal in the context of national requirements, local need and the policy position. Section 8 provides a brief Design and Access Statement and conclusions on all matter are drawn in Section 9.



SECTION 2: MOTOR FUEL GROUP

- 2.1 Motor Fuel Group (MFG) is the largest independent forecourt operator in the UK. The Company has around 1,200 sites offering customers a growing dual fuel strategy, a versatile valeting offer and a convenient retail and 'food-to-go' offer, operating under the BP, Shell, Esso, Texaco, JET and Murco fuel brands.
- 2.2 MFG is backed by committed investors and is focused on growing and developing the business into one of the most dynamic and profitable independent forecourt operators in the UK.
- 2.3 MFG intends to continue to offer its customers premium fuel brands and electric vehicle charging coupled with an attractive, competitive and expanding forecourt shop offer for today's cost-conscious consumers. The Company's key objective is to make all visits to a MFG forecourt as pleasurable as possible. They aim to provide customers with high levels of service; good quality, competitively priced fuels and charging and, of course, a convenient and competitive shopping experience.
- 2.4 The Company's intention is to ensure that its shops provide customers with an exceptional product range and 'food-to-go' offer from top name brands, ongoing value promotions and a shopping environment to match any of the multiples, whilst the forecourts met the every need of motorists.



SECTION 3: SITE AND SURROUNDING AREA

- 3.1 The application site is located on the A58 (Church Street), to the west of Littleborough town centre, along the route connecting Littleborough and Rochdale. The surrounding area is a mix of commercial and residential uses, with predominantly commercial properties to the north and mainly residential areas to the south, east, and west. Immediately east of the site are two commercial units, currently occupied by a tattoo parlour (Border Rose) and a charity organisation (Reuse Littleborough).
- 3.2 The petrol station occupies a relatively small forecourt and includes petrol pumps, car washing and vehicle maintenance facilities, as well as a sales kiosk that also functions as a small convenience store. The site has operated on a 24-hour basis, seven days a week, since planning permission was granted in September 2018 for the *"Variation/removal of condition 3 of planning permission D22481 to allow for 24-hour opening."*
- 3.3 The application site is located in Flood Zone 3. The site is not located within a Conservation Area (although it is noted that Littleborough Town Centre Conservation Area lies approximately 50 metres to the east), nor are there any listed buildings within the vicinity of the application site nor are there any TPOs.



SECTION 4: PLANNING HISTORY

4.1 A review of the application site's planning history has been undertaken.

Application Number	Description of Proposal	Date of Decision
86/D19176	Use Of Premises As Doctors Surgery And Provision Of Car Park	Granted 24 July 1986
87/D21243	Redevelopment To Form Petrol Filling Station With Car Wash Facility	Refused 30 March 1988
88/D22481	Redevelopment Of Petrol Filling Station Incorporating A Car Wash Facility	Granted 8 December 1988
90/D24754	Continuance Of Use Of Petrol Filling Station And Car Wash Without Compliance With The Conditions Restricting Opening Hours	Refused 22 March 1990
01/D39225	Single Storey Extension And Alterations To Existing Car Wash Facility	Granted 14 February 2002
02/D39930	Single Storey Extension And Installation Of Atm	Granted 26 April 2002
02/D40951	Siting Of 1M Satellite Dish On Roof Of Premises	Granted 16 December 2002
05/A5403	Internally Illuminated Double Sided Free Standing Advertising Display Unit	Refused 17 March 2005
07/D49636	Alterations To Petrol Filling Station To Include Demolition Of Plant Room And Roof Over Jet Wash Bay, Erection Of New Bin Store, Formation Of 4 New Parking Bays And Reduction Of Existing Boundary Wall To 2M	Granted 20 September 2007
17/O0709/VRCON	Variation/removal of condition 3 of planning permission D22481 to allow for 24 hr opening 7 days a week	Granted 28 September 2018



- 4.2 The site has operated as a Petrol Filling Station since its initial approval in 1988. Since then, it has been periodically redeveloped to reflect evolving customer expectations regarding on-site facilities.
- 4.3 This application directly responds to the increasing demand for enhanced services and amenities at Petrol Filling Stations.



SECTION 5: PLANNING PROPOSAL

- 5.1 This planning application seeks full planning permission for the demolition of existing jetwash facility and its replacement with a Greggs' pod (Use Class E). The building will have a total floor area of 70 sqm (GIA) and includes a small sales area with display units and servery, back of house space for storing, preparing and baking goods to be sold, staff facilities and a toilet.
- 5.2 Greggs has a requirement for a new bakery in this location to meet the needs of motorists whilst also serving workers and visitors to the surrounding area meeting an identified need within this location.
- 5.3 The proposal includes the provision of a new bin store which will be entirely enclosed, and located directly adjacent to the proposed building.
- 5.4 The proposal also includes the provision of 5 no. car parking bays – comprising 2 no. staff bays, 2 no. customer bays and 1 no. customer DDA space.

The Occupier

- 5.5 With over 2,600 shops, nine centres of excellence and some 33,000 employees who serve millions of customers each week, Greggs is the UK's leading bakery food-on-the-go retailer. The company started over 85 years ago when John Gregg started out with the goal to deliver, by bicycle, fresh eggs and yeast to families in Newcastle. 10 years later he opened Greggs of Gosforth on Gosforth High Street, which remains a Greggs to this day.
- 5.6 As confirmed by the Chief Executive *'it is a duty as a modern business to stand for more than just profit'* and in April of this year published *'The Greggs Pledge'*.
- 5.7 Greggs has a proud reputation of giving back and since John Gregg founded the business in 1939, Greggs have always tried to do the right thing by their people, suppliers and communities. *'The Greggs Pledge'* was first launched in 2021 and has been updated annually since, setting out their sustainability targets and progress, and includes ten things they are doing to make the world a better place by 2025 and beyond.

The Breakfast Club Programme

- 5.8 *'The Greggs Pledge'* commits to supporting 1,000 schools' Breakfast Clubs by 2025 providing some 70,000 meals each school day. Greggs started the Breakfast Club programme in 1999 because it knew there were children over the country attending school every day without having eaten breakfast. As of the end of 2024 there are around 1,015 Breakfast Clubs operating across the UK, serving 75,000 children every school day.



5.9 Evaluations of Breakfast Club schemes have uncovered the following key benefits:

- Children have improved health and nutrition;
- Children have improved attendance and punctuality;
- Children are able to socialise and make friends;
- Children have better relationships with school staff;
- Parents are less wary of schools and are more likely to attend parents' evenings; and
- Children are able to concentrate better, and results are improved.

5.10 The Breakfast Club model, which delivers flexibility to meet the needs of the children, has been highly successful with many schools working with the Foundation for in excess of 25 years.

Putting an End to Food Waste

5.11 Greggs are obsessed with freshness and that is key to the business model, but it is a challenge too, making sure there is enough for everyone but avoiding waste at the end of the day. Greggs have focussed on reducing waste in production and in the shops and also putting waste to good use.

5.12 In Greggs' manufacturing sites, food waste has been reduced by 32% since 2018, exceeding the set target of a 25% reduction by 2025. In 2024, food waste from these sites was cut by over 45% — representing a 4% improvement on 2023 and an 8% improvement on 2022.

5.13 Greggs aim to donate as much unsold food to charity as possible, including soup kitchens, food banks and shelters for the homeless and the vulnerable. The amount of unsold food the company has donated to good causes has increased ten-fold over the last five years and the company has ambitious plans to grow this more in the years ahead.

5.14 In 2023, Greggs maintained a network of 956 local charities which pass surplus food on to people in need. Greggs gave away over 1,000 tonnes of food this way in 2023.

5.15 In 2024, Greggs donated 50 tonnes of food to FareShare, which passed it on to more than 1,500 charities across the UK. Since beginning work with FareShare in 2014, over 420 tonnes of food has been donated which, according to WRAP's meals calculator, is equivalent to 1 million meals.

5.16 Furthermore, over 1,000 shops now feature on the 'Too Good To Go' app which gives Greggs another channel to redistribute unsold food. Through the app, Greggs sell 'Surprise Bags' worth between £8 - £12 for just £2.59. In 2024, 45% of unsold food was sold through this channel, and in 2023, Greggs



sold 1.3 million discounted Surprise Bags to customers, an increase of almost 20% compared with 2022.

Supporting our Communities

- 5.17 Greggs now have 38 'Outlet shops' around the UK where day old food products are sold at a reduction helping people to spend less on food. The Outlet shops are located in areas where social deprivation is high. During 2024, Greggs customers bought more than 7 million products through their Outlet shops, which equates to around 17% more tonnes of food sold through the Outlet shops across the year than in 2023, indicating the huge popularity of these discounted shops.
- 5.18 The outlet shops were originally introduced to help avoid sending edible food to land fill. We now see that these shops can do even more; Greggs donate a share of all their profits from these shops to the Greggs' Foundation which passes it on to local community groups that are working to address food poverty and associated problems. The Greggs Foundation awarded grants to 75 community organisations throughout the UK during 2024.
- 5.19 It is envisaged that by the end of 2025, Greggs will have 50 Outlet shops which will continue to provide affordable food in areas of social deprivation.

Helping our Customers to make Healthier Choices

- 5.20 Since 2021, Greggs have maintained their target for 30% of the items on their shelves to be healthier choices. Greggs define a 'healthier option' as one that contains fewer than 400 calories and with no red traffic lights, based on the UK Government's voluntary nutrition labelling scheme.

Net Zero Carbon

- 5.21 Greggs are committed that by 2025 they will be well on their way to achieving carbon neutrality by using 100% renewable energy across all of their operations. Today 97.1% of the electricity Greggs use is from renewable sources and therefore carbon neutral. The goal is simple; Greggs want that to be 100% by 2025.
- 5.22 Greggs started this journey by putting photovoltaic solar panels on the roof of nine of their manufacturing sites which have the capacity to generate 2,111 kW every day which is the equivalent to the amount of energy used in 235 typical UK households. Whilst they do not have sufficient roof space to generate enough renewable energy to meet all of their energy needs Greggs have chosen to purchase Green Electricity from the grid which has had the result of reducing the carbon intensity of the business by over two thirds.



- 5.23 The majority of Greggs' direct emissions come from three sources: diesel and petrol for their vehicles, gas for cooking and heating water, and refrigerant gas. They are taking steps to reduce the carbon impact of all three.
- 5.24 Greggs continue to migrate their company car fleet to electric or hybrid vehicles and are building a charging network into our manufacturing and logistics sites, as well as at Greggs House. By 2035, Greggs want to have a net-zero fleet.
- 5.25 Greggs no longer install gas boilers when they open a new shop or refit an existing one, with the intention of going entirely electric over time. In the meantime, they have increased the amount of renewable gas they purchase by 30% and are on track to get to 100% by 2025.
- 5.26 Greggs also have a number of other carbon reduction projects which include energy saving technologies, helping customers to eat less meat, reduce packaging, sustainable forest management and decreasing the use of palm oil and soya.

Building the Shops of the Future

- 5.27 In 2022, Greggs opened their first Eco-Shop in Northampton, testing 20 different green initiatives which, between them, cut energy use by a fifth compared with a standard shop. Greggs are committed that by 2025 25% of their shops will feature elements from their eco shop 'store of the future' design.
- 5.28 In 2023, Greggs set themselves the target to introduce ideas from their Eco-Shop into over 500 shops. They achieved it, meaning that 21% of their estate now features some form of resource saving technology. In 2024, 27% of their shops featured elements of resource saving technology, meaning that they have met their 2025 target of 25% at least a year ahead of schedule.

Using Less Packaging

- 5.29 In 2021 Greggs joined the "On Pack Recycling Label" (OPRL) scheme to make recycling communications for customers easier to understand. Now, 100% of Greggs branded printed packaging carries a simple, recognisable recycling icon, helping customers get packaging into the correct bins.
- 5.30 By 2025 Greggs will use 25% less packaging, by weight, than in 2019 and the only remaining packaging will be made from material that is widely recyclable.
- 5.31 Greggs have tackled single-use plastics, eradicated unnecessary packaging, and reduced their use of things like stretch-wrap film and plastic trays. Optimising the amount of packaging used is complex — using too much is a waste of resources, but remove too much and the product is more likely to get damaged and wasted; but Greggs are always looking for that perfect balance.



- 5.32 In 2024, Greggs have changed the stickers to label their products and have saved over 32 tonnes of paper. They have also swapped the rigid plastic lids that were used for pasta salad pots for a peelable film lid, reducing the use of plastic on this one packaging type by almost eight tonnes.
- 5.33 In addition, Greggs' recyclable baking paper was named the Sustainability Initiative of the Year at the 2024 Baking Industry Awards. They now plan to move to recyclable baking paper in all of their shops by the end of 2025.

Embracing Diversity

- 5.34 Greggs are committed to ensuring that by 2025 the workforce will represent the communities which they serve.
- 5.35 Greggs want everyone to feel welcome and their employees to be able to be themselves at work, whatever their background, preferences or views. They also want to make sure there are no barriers that might stop anyone from growing a successful career with them. Greggs accept that being a diverse business is critical to their future growth.

Sourcing Sustainably

- 5.36 By 2025 Greggs will have a robust and responsible sourcing strategy in place and will report annually on the progress towards their targets. Six key principles in meeting this commitment include *'we treat our suppliers with respect; we care about how animals are treated; we respect human rights; we support fair trade; we support local businesses and we respect the environment'*.
- 5.37 Greggs have clear environmental and social standards and requirements that their suppliers must meet if they want to do business with them. Examples include the Modern Slavery Policy which ensures that sound social and ethical practices are upheld, the Greggs Farm Animal Welfare Strategy which sets out how they expect animals in their supply chain to be treated, and ingredient-specific standards for commodities such as soy, palm oil, beef, and cocoa contained within their Responsible Sourcing — Deforestation Policy.

Protecting Animal Welfare

- 5.38 Greggs are committed to securing and maintaining Tier 1 in the Business Benchmark on Farm Animal Welfare (BBFAW) Standard. The Company has achieved Tier 2 rating (March 2025) one of only four companies in the UK to have achieved this. Notably, the other three are all retailers (M&S, Waitrose and Premier Foods). Greggs' aim therefore is to top this global list on animal welfare performance.



- 5.39 Animal welfare is a priority for Greggs and they want to do the right thing by ethically sourcing which is consistent with their values and nothing less than you would expect from them. Greggs' Farm Animal Welfare Standards, set clear rules that were developed with consideration to the Farm Animal Welfare Committees five freedoms and over the last five years this has been implemented by Greggs with their suppliers.

Greggs' Foundation

- 5.40 Greggs donates one percent of its pre-tax profits to the Greggs Foundation and distributes around £3.0 million to community and charity organisations throughout England, Scotland and Wales. A significant proportion of the Greggs Foundations' impact is also achieved with the generosity of Greggs' employees and customers. The Foundation brings together all of Greggs charitable groups which has a long and rich history. It is managed by an executive team of currently nine members of staff and overseen by a Board of Trustees, with the charitable mission of 'making a difference to people in need in the heart of Greggs' local communities'.
- 5.41 The Foundation prioritises organisations that support voluntary careers, people with disabilities, homeless people and older people. The Foundation aims to make a difference through the following programmes; North East Core Fund, Local Communities Urban Rivers Regeneration Fund, Hardship Fund, Breakfast Clubs Programme, Community Holiday Club Programme and Health Programme Grant which share the common goal of improving the quality of life of people in local communities.
- 5.42 The Community Urban Rivers Regeneration Fund provides funds to river trusts to run educational and community based environmental projects based on urban rivers.
- 5.43 The Tackling Health Programme is an interactive project for children which takes a holistic approach to teach children about their own health and well-being and about leading a healthy lifestyle.
- 5.44 The North East Core Fund makes grants to charitable organisations based on the North East of England, who make a difference to people in need. Grants can be up to £45,000 and aims to increase the capacity of organisations to provide quality services. Around £600,000 per year is donated through this programme.
- 5.45 The Hardship Fund provides grants to people in extreme financial need in the North East of England via recognised social organisations such as charities registered with the Charity Commission, housing associations and social services acting on behalf of a family or individuals in need. Grants are made for up to £180 to families and individuals and can be used towards household



equipment such as cookers, fridges and washing machines that can make a significant difference to peoples' lives.

- 5.46 In 2024, the Foundation provided more than £1.85 million in community grants to 75 organisations. These grants were specifically for essentials such as household appliances, beds and bedding, clothing, food, or utility vouchers. Almost half of the grants were for families in the Foundation's school network.

The Application

- 5.47 The proposed Greggs bakery will offer the following baked and convenience goods including:-

- Bread;
- Savoury pastries;
- Cakes;
- Sandwiches;
- Soups;
- Salads;
- Pasta;
- Snacks;
- Hot wraps;
- Confectionery;
- Hot and cold drinks; and
- Other ancillary items.

- 5.48 The proposed Greggs bakery will extend to approximately 70 sqm and will provide a convenient food and beverage offer for motorists traveling on Church Street. This addition is expected to generate four full-time and four part-time job opportunities, which will be recruited locally, contributing to local employment.

- 5.49 Given its location within an established petrol filling station, the introduction of Greggs is considered to be a beneficial enhancement, complementing the existing facility and further improving the overall service offering for road users

SECTION 6: PLANNING POLICY FRAMEWORK

- 6.1 This Section of the supporting Statement sets out national and local planning policy framework relevant to the proposed planning application.

National Planning Policy Framework

- 6.2 The National Planning Policy Framework (NPPF) was updated in December 2024 and amended in February 2025 and constitutes guidance for local planning authorities and decision-makers and is a material consideration in the determination of planning applications (paragraph 2).
- 6.3 The purpose of the planning system is to contribute to the achievement of sustainable development (paragraph 7).
- 6.4 Paragraph 8 confirms that there are three overarching objectives to sustainable development: economic, social, and environmental, which are interdependent and need to be pursued in mutually supportive ways.
- An economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
 - A social objective – to support strong, vibrant and healthy communities by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural wellbeing; and
 - An environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making efficient use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.
- 6.5 These objectives should be delivered through the preparation and implementation of plans and application of policies in the framework; they are not criteria against which every decision can or should be judged. It is confirmed that the planning system should play an active role in guiding development to sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area (paragraph 9).



- 6.6 At the heart of the NPPF is a presumption in favour of sustainable development (paragraph 10). For decision-takers this means, inter alia, approving development proposals that accord with the development plan without delay.
- 6.7 Local Planning Authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available and work proactively with Applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-takers at every level should seek to approve applications for sustainable development where possible (paragraph 39).
- 6.8 Planning law requires that applications for planning permission be determined in accordance with the Development Plan unless material considerations indicate otherwise. Decisions on applications should be made as quickly as possible, and within statutory timescales unless a longer period has been agreed by the applicant in writing (paragraph 48). Local Authorities may give weight to relevant policies and emerging plans according to the stage at which they are at and the extent of unresolved objections (paragraph 49).
- 6.9 Chapter 6 of the NPPF sets out the government's intentions to build a strong, competitive economy. Paragraph 85 advises that planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.
- 6.10 Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, considering both local business needs and where there are opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future (paragraph 85).
- 6.11 Planning policies set out a clear economic vision and strategy which positively and practically encourages sustainable economic growth having regard to; the local industrial strategies and other local policies for economic development and regeneration; set criteria to identify strategic sites for local inward investment to match the strategy and meet anticipated needs over the plan period; met the needs of the modern economy; seek to address potential barriers to investment; and be flexible enough to accommodate the needs not anticipated in the plan, allow for new and flexible working practices and enable a rapid response to changes in economic circumstances (paragraph 86).
- 6.12 Planning policies and decisions should recognise and address specific locational requirements of different sectors (paragraph 87).

- 6.13 Planning policies and decisions should enable the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed new buildings, as well as the retention and development of accessible local services and community facilities, such as local shops (paragraph 88).
- 6.14 The addition of paragraph 97 to the latest version of the NPPF is noted that suggests Local Planning Authorities should refuse planning applications for hot food takeaways if they are within walking distance of schools or other places children and young people congregate, unless within a designated town centre, or where there is evidence of such uses having an adverse impact on local health, pollution or anti-social behaviour.
- 6.15 Transport issues should be considered from the early stage of plan-making in development proposals so that well designed, sustainable and popular places can be delivered. This should include understanding impacts of development on transport networks, realising opportunities from existing or proposed transport infrastructure and changing transport technology; identify and pursuing opportunities to promote walking, cycling and public transport use; and considering the environmental impacts of transport, including taking appropriate opportunities for avoiding and mitigating any adverse effects and for net environmental gains (paragraph 109).
- 6.16 Paragraph 111 confirms that planning policy should provide for any large-scale transport facilities that need to be located in the area, and the infrastructure and wider development required to support their operation, expansion and contribution to the wider economy. A footnote to this paragraph notes that such facilities would include roadside services but that the primary purpose of these services should be to support the safety and welfare of the road user (and most such proposals are unlikely to be nationally significant infrastructure projects).
- 6.17 Maximum parking standards for residential and non-residential development should only be set where there is a clear and compelling justification that they are necessary for managing the local road network, or for optimising the density of development in city and town centres and other locations that are well served by public transport (paragraph 112). Paragraph 117 advises that applications for development should be designed to enable charging plug in and other ultra-low emission vehicles in safe, accessible and convenient locations.
- 6.18 Planning policies and decisions should promote an effective use of land in meeting the needs for homes and other uses, whilst safeguarding and improving the environment and ensuring safe and healthy living conditions (paragraph 124).

- 6.19 The creation of high-quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps to make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this. So too is the effective engagement between applicants, communities, Local Planning Authorities and other interests throughout the process (paragraph 131).
- 6.20 Planning policies and decisions should ensure that developments will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development; are visually attractive as a result of good architecture, layout and appropriate and effective landscaping; are sympathetic to local character and history; establish or maintain a strong sense of place; and create places that are safe, inclusive and accessible and which promote health and well-being with a high standard of amenity for existing and future users (paragraph 135).
- 6.21 Chapter 14 of the NPPF sets out advice on meeting the challenges of climate change, flooding and coastal change. The opening paragraph to this Section confirms that the planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve reliance, encourage the reuse of existing resources, including the conversion of existing buildings and support renewable and low carbon energy and associated infrastructure (paragraph 161).

Development Plan Policy

- 6.22 To the extent the Development Plan policies are material to an application for planning permission, the decision must be taken in accordance with the Development Plan unless there are material considerations that indicate otherwise (Section 70(2) of the Town and Country Planning Act 1990 and Section 38(6) of the Planning Compulsory Act 2004).
- 6.23 The statutory development plan comprises:
- Places For Everyone Joint Development Plan 2022 to 2039 (Adopted 21 March 2024)
 - Adopted Rochdale Core Strategy (Adopted October 2016)
 - Unitary Development Plan 2001 – 2016 (Adopted June 2006)
- 6.24 The following policies are of relevance to the application:

Places For Everyone Joint Development Plan 2022 to 2039 (2024)

- 6.25 Policy JP-S4: Flood Risk and the Water Environment seeks to manage flood risk by locating and designing development so as to minimise the impacts of current and future flood risk, including retrofitting or relocating existing developments, infrastructure and places to increase resilience to flooding.
- 6.26 Policy JP-J1: Supporting Long-Term Economic Growth strives to help deliver a thriving, inclusive and productive economy by placing an emphasis on maintaining a very high level of economic diversity and supporting local job growth.

Adopted Rochdale Core Strategy (2016)

- 6.27 Policy SD1: Delivering sustainable development indicates that when considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework.
- 6.28 Policy DMI General development requirements suggests all development proposals, including changes of use of land and buildings, extensions and alterations, will be expected to demonstrate that they:
 - a. Are of high quality design and take the opportunity to enhance the quality of the area;
 - b. Are compatible with surrounding land uses, both in terms of its impact upon those uses and the impact of the surrounding land uses upon the amenities of future residents / users;
 - c. Do not adversely affect the amenity of residents or users through visual intrusion, overbearing impact, overshadowing or loss of privacy;
 - d. Mitigate against any impacts due to noise, air, dust, light and odour pollution, traffic generation or inadequate access, where such mitigation is identified as being necessary; Rochdale Core Strategy Adopted October 2016 rochdale.gov.uk 120
 - e. Provide satisfactory vehicular access with adequate parking, manoeuvring, and servicing arrangements taking into account of the proposed use and location;
 - f. Do not have an adverse impact on health, through its impact or the effect of existing problems e.g. land contamination, or poor air quality;
 - g. Provide, or demonstrate the availability of, the service and community infrastructure necessary to meet local needs e.g. local shops, community, leisure and sport facilities and provision of open space;
 - h. Minimise opportunities for crime against people or property;
 - i. Take account of ground conditions including unstable or contaminated land - where a potential risk exists, a survey should be carried out and any necessary remedial measures identified and carried out;

- j. Incorporate, where appropriate, high quality landscape schemes;
- k. Have assessed whether the development may be affected by ground instability;
- l. Have considered the availability of water and wastewater infrastructure, and any need for additional capacity; and
- m. Do not lead to impacts detrimental to the conservation interests of European Protected

6.29 Policy E2 Increasing jobs and prosperity seeks to ensure a sufficient supply of suitable land, buildings and infrastructure in the right places to support the creation and retention of successful businesses and increase the number and quality of jobs to create a more prosperous lower carbon economy.

6.30 Policy G8 Managing water resources and flood risk ensures that new development (including flood risk mitigation measures) does not lead to any form of increased flooding locally or further downstream, does not impede natural water and flood risk management, is not detrimental to existing or potential flood storage areas, contributes where possible to alleviating existing flood risk, is itself well protected from flood risk and ensures prudent use of water resources.

Unitary Development Plan 2001 – 2016 (2006)

6.31 Policy G/SP/1 Urban Concentration and Regeneration states the promotion of urban regeneration will be achieved through the concentration of development in the urban area, through a sequential approach to allocations for new development. appropriate locations for each type of development should be identified within the urban area firstly.

6.32 Policy G/SP/3 Meeting the Needs of Local Communities suggests the identification of suitable locations and opportunities for new development and activities, through the allocation of land in the plan for particular uses and through general policies where appropriate, will take into account (in addition to spatial policies G/SP/1 and G/SP/2):

- A) the needs of, and issues affecting, the local and wider community around the site, considered against the plans key objectives and other part one policies;
- B) the extent to which the proposed development meets the above needs and addresses the above issues;
- C) whether there are more appropriate uses for the site in question;
- D) whether the proposal is contributing to urban or rural regeneration;
- E) the accessibility of the location especially by sustainable means of transport and the need to minimise trip generation.

6.33 Policy S/8 Retail Development outside Town, District and Local Centres indicates in areas outside town, district and local centres, new shops, other than

shops to meet local needs and specialist shops (defined below), will only be permitted when:

- a) The applicant has demonstrated the need for the development;
- b) The applicant has demonstrated that the sequential approach to site selection has been adopted and that no suitable sites or buildings that are sequentially preferable are available or likely to become available within a reasonable period of time;
- c) The proposal, either by itself or together with recently completed developments or outstanding planning permissions, will not harm the vitality or viability of any town, district or local centre;
- d) The site is, or could be, widely accessible by existing or planned public transport provision and has good access to the Strategic Highway Network;
- e) It will not unduly affect the amenity of nearby residents or other uses by reason of noise, traffic generation and hours of opening; and
- f) The site is within the urban area and is well related to existing patterns of movement between residential areas and town, district and local centres and other major retail locations.

6.34 Policy S/10 Food and Drink Outlets states the development of, or change of use to, a café, restaurant, pub, wine bar, snack bar or hot food or fast food takeaway will be permitted provided that:

- a) It is in accordance with Policies S/3 - S/8;
- b) It will not unduly affect the amenity of nearby residents or businesses by reason of noise, smell, litter and hours of opening;
- c) It will not result in an over concentration of such uses which could adversely change the nature and character of the area;
- d) Vehicle access, manoeuvring and parking related to the use will not cause undue obstruction to traffic, be detrimental to road safety, or affect local residential amenity; and
- e) Any ventilation flues and/or ducting can be accommodated without detriment to the visual amenity of the building or the surrounding area.

6.35 Policy EM/3 Noise and New Development suggests development will not be permitted where:

- a) It would lead to unacceptable levels of noise nuisance to nearby existing or future occupants of buildings, or users of open space; or
- b) It involves a noise sensitive use (such as housing, a school or hospital) which would be sited in or close to an area that is, or is likely to become, subject to unacceptably high levels of noise generation.

6.36 Where the effects of existing noise on proposed new development, or noise likely to be generated by new development, can be adequately controlled by design, landscaping and other measures, as enforced by planning conditions,

the Council will grant planning permission, provided the development is acceptable in all other respects.

- 6.37 Policy EM/7 Development and Flood Risk indicates development will not be permitted in areas identified as flood plains, or other areas where development could contribute to increased flood risk, unless an appropriate flood risk assessment has been carried out and all of the following criteria are met:
- a) It will not increase the risk of flooding within the flood plain or in adjoining areas by reducing flood storage capacity, increasing flows within a flood plain or through the additional discharge of surface water;
 - b) It will not itself be at risk from flooding;
 - c) Appropriate sustainable drainage systems are used;
 - d) Adequate access adjacent to the water course for maintenance is provided;
 - e) Existing or proposed flood defences are protected; f) It would not result in extensive culverting; and
 - f) Flood defence works required as a consequence of development are provided at the developer's expense.



SECTION 7: PLANNING ISSUES

7.1 This Section of the Planning Statement sets out the general planning matters which require consideration in the determination of this application. Accordingly, the following general planning matters are considered below:

- The principle of development on the site;
- Sequential Approach;
- Accessibility;
- Amenity;
- Landscaping;
- Flooding;
- Health and safety.

Principle of Development

- 7.2 The town of Littleborough is the fourth largest centre in the district. General Local and National Policy requirements to make the best use of brownfield, previously developed sites supports the proposed development on this site.
- 7.3 Littleborough Service Station is an established petrol filling station located in an urban area, which operates 24 hours a day, seven days a week. The principle of development for petrol filling station uses is established in this location and this has been confirmed by the planning history of the site. Since the 1980s there have been numerous applications to allow the site to adapt and expand to meet motorists' needs. The site provides an important facility for motorists, which is in need of upgrade in order to meet customers' needs and to bring the facility up to modern day standards.
- 7.4 The provision of a food-to-go offer on-site supports the Applicant's ambition to ensure that its sales buildings provide customers with an exceptional product range as motorists have come to expect at petrol filling stations. 'Food to Go' offers are commonly found as part of petrol filling stations meeting the needs of users of the site providing refreshment and a break from driving.
- 7.5 The proposed development will support the wider use of the site, meeting the needs of motorists. It is considered that the food-to-go offer will support the existing use of the petrol filling station and will provide an enhanced food offer for customers and motorists. The proposed facility will operate in a secondary/ancillary manner to the petrol filling station.
- 7.6 The proposed scheme is therefore in accordance with Policy JP-J1, Policy E2 , Policy G/SP/1 and Policy G/SP/3 as it is an accessible and sustainable urban location.

- 7.7 As detailed elsewhere in the report, it is anticipated that the Greggs bakery will provide job opportunities for the local residents. The benefits of the Greggs in respect of job creation and support for the wider area, both in terms of existing occupiers, particularly those working in the immediate vicinity of the site and wider area, plus the improvement to the attractiveness of the area for future occupiers, should also be noted. Many of these jobs will be suitable for local residents, particularly residents who wish to be flexible in the hours they work. The proposal will therefore bring a wide range of economic benefits and accord with the role and the focus of relevant planning policy as contained within the NPPF and the adopted Development Plan.
- 7.8 Greggs has a strong commitment to social and environmental responsibilities as detailed in Section 5 above which includes carbon neutrality, recycling and decreasing food waste and a number of programmes to support local people including breakfast clubs and work through the Greggs Foundation, supporting the community. Accordingly, Greggs make a valuable contribution beyond just the physical presence of a retail unit. It is envisaged that the proposed Greggs unit will improve the attractiveness of the area to both existing and future occupiers by providing an easily accessible and healthy lunching option whilst also providing employment opportunities.
- 7.9 The proposal has the potential to improve the vitality and viability of the area and support the local community both through the provision of jobs and the Greggs Pledge social and environment commitments. Furthermore, the proposal will provide improvement in the visual appearance of the site compared to the existing position. Greggs has high standards both in terms of physical appearance of the site and as an operator, so will ensure the unit is well maintained throughout its occupation.

Sequential Approach

- 7.10 Chapter 7 of the NPPF (2024) and the associated Planning Practice Guidance (paragraph 009 – Ensuring the Vitality of Town Centres) confirms that, in reviewing alternative sites, careful regard should be given to their suitability, viability and availability. These are defined as follows:-
- Availability – whether sites are available now or are likely to become available for a development within a reasonable period of time (determined on the merits of a particular case, having regard to, amongst other matters, the applicant’s suitable criteria and timescales).
 - Suitability – with due regard to the requirements to demonstrate flexibility, whether sites are suitable to accommodate the proposal.
 - Viability – whether there is a reasonable prospect that development will occur on the site at a particular point in time. Again, the importance of

demonstrating the viability of alternative sites depends in part on the nature of the proposal and the timescale over which the applicant requires it to be delivered.

- 7.11 Whilst '*Viability*' is not expressly referenced by the NPPF in relation to planning applications, it is cited as a relevant consideration in the allocation of sites. It is argued that viability remains relevant to the consideration of whether sites are 'suitable' (and therefore for completeness we would include viability within our consideration of sequentially preferable sites).
- 7.12 The above parameters provide a robust and policy compliant basis for assessment. Considering the relevant sites, we have also applied the 'Dundee' principle to our assessment and would emphasise the importance of the meaning of 'suitable' from the perspective of the applicant, as clearly underlined by this judgment.
- 7.13 This case is material to the operation of the sequential approach. This is a decision from the Supreme Court (21 March 2012) and as such has currency in England and Wales, although it relates to an appeal by Tesco Stores Limited in Scotland. This appeal was lodged in relation to a planning permission granted to ASDA and MacDonald Estates in Dundee.
- 7.14 The Supreme Court held in *Tesco Stores Ltd v Dundee City Council* [2012] UKSC13, that the specific construction of a planning policy is a matter in law. This important case clarifies that the sequential test should apply to the specific proposal for which the applicant seeks permission. Therefore, the relevant question is not whether there is a site suitable for meeting identified deficiencies in retail provision in the area but whether there is a site suitable for the development proposed by the applicant. Further, the question is 'not whether the proposed development can be altered or reduced so that it can be made to fit an alternative site'.
- 7.15 This principle has subsequently been upheld at appeals in England such as the proposed Sainsbury's in Crawley where the Inspector commented that the Dundee case was a material consideration in the application of sequential test (PINS ref: APP/Q3820/A/11/2158410). Consequently, the legally correct approach to the sequential test, as set out in the NPPF and summarised by Lord Hope in the Dundee case, would be as follows: -
- "It is the proposals for which the developer seeks permission that has to be considered when the questions are asked whether no suitable site is available within or on the edge of the town centre".
- 7.16 The Dundee position has been reiterated in various key Secretary of State decisions most notably, in respect to land adjacent to Skew Bridge Ski Slope, Northampton Road, Rushden (Rushden Lakes) (PINS ref:

AAP/G2815/V/12/2190175). This confirms the Sequential Test seeks to see whether the application i.e. what is proposed, can be accommodated on the town centre site. Within the decision, the Inspector states: "There is no suggestion here that the Sequential Test means to refer to anything other than the application proposal". The decision also states that the Dundee decision "Expressly rejected the notion that 'suitable' means that one should alter or reduce the proposal so as to fit onto an alternative site." (Inspector's Report, paragraph 8.44). The decision also confirms 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 that *"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."* (Inspector's Report, paragraph 8.45). This appeal decision is dated 11 June 2014. The above position was also reiterated in a decision dated 25 June 2015 regarding a proposed Sainsbury's supermarket, Pods Brook Road, Braintree, (PINS Ref: APP/Z1510/A/14/2219101).

Disaggregation

- 7.17 Disaggregation is not part of local or national policy in relation to the sequential test. Rather the relevant test to apply is whether or not reasonable flexibility has been applied on issues of format and scale.
- 7.18 A more recent appeal decision dated 28 March 2023 concerning Land to the East of Kingsway Road, Scunthorpe, DN16 2AE (PINS Ref: APP/Y2003/W/22/3299625) also confirms at paragraph 24 that "The appellant is not though required to disaggregate the proposal in order to try and find town centre and edge of centre sites, although the framework does require some flexibility to be shown."
- 7.19 There is therefore confirmation that disaggregation is not required as part of national planning policy. As stated above, neither is there any requirement in the local planning policy for disaggregation.
- 7.20 However, notwithstanding the above, the issue of disaggregation is not relevant in this instance given that the proposal is for a single unit. Accordingly, it is not necessary for the Applicant to give any consideration for disaggregation as the scheme cannot actually be disaggregated. In this respect, the Applicant will be examining the catchment area for a site which can accommodate a Greggs bakery in the immediate vicinity.

The Catchment Area

- 7.21 In respect to the establishment of the correct catchment area for the application proposal. National Planning Policy Guidance on *"Ensuring the Vitality of Town*

Centres” was published on 3 March 2014. In respect to the sequential test, it is confirmed that in respect to how the sequential test should be used in decision/taking it is confirmed 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. Robust justification must be provided where this is the case, and land ownership does not provide such justification”.

- 7.22 Although it was withdrawn on 7 March 2014, the PPS4: Practice Guidance on Need, Impact and the Sequential Approach provides a more detailed overview of the approach in respect to assessing a Sequential Site Assessment and the issue of the definition of the catchment area. Whilst this document has been withdrawn and superseded by more condensed guidance in the NPPG, the approach advocated within it remains and therefore the guidance within it is applicable in explaining how, one should undertake a Sequential Site Assessment. This document contained a section entitled “Planning Applications: Area of Search” which confirmed the following:

“Where LDF’s are up to date and based upon sound evidence, the scale and form of development likely to be appropriate in each centre should have been considered carefully. On this basis, it should be self-evident which centre(s) are likely to be appropriate to include in any sequential search of sites appropriate for development. Difficulties tend to arise where this exercise has not been undertaken, the hierarchy is not clearly defined, and a proposal comes forwards for a scale of development which is not solely related to the needs of an individual centre in its catchment, but to a wider area”. (Paragraph 6.21).

- 7.23 In particular, the guidance confirmed that when considering applications, LPA’s will need to consider the extent and the catchment area likely to be served by the proposal, and to then identify alternative sites located in the existing centres within the catchment area [our emphasis]. This would determine whether sites in the other nearby centres may represent more appropriate locations in which to accommodate the scale and former development proposed (Paragraph 6.22).
- 7.24 In determining the appropriate areas searched for an application, including whether it is appropriate to consider sites within or on the edge of established centres, it is relevant to consider the scale and form of development proposed. For example, some proposals will serve a purely localised need (e.g. ‘local’ food stores) whereas others are likely to serve a materially wider catchment area. In these instances, it would be relevant to consider whether the proposal is of an appropriate scale to the location proposed, or whether some of the need could be better met within the existing single ‘higher order’ centre (Paragraph 6.24).

- 7.25 There will be instances where a specific need for a certain type and form of development can only be realistically accommodated in specific locations (Paragraph 6.25).
- 7.26 When considering 'location specific' needs, it is important to distinguish between cases where need arises because of a gap or deficiency in the range, quality or choice of existing facilities, and where the commercial objectives of a specific developer or occupier are their prime consideration. It cannot be argued that an identified need or requirement is in itself 'location specific' because, for example, the proposed retailer/developer owns the land in question or is seeking an extension to an existing store or centre (Paragraph 6.26).
- 7.27 Obviously, the size of the catchment area can vary depending on the nature of the use and application being proposed, for example a regional shopping centre will have a sub-regional catchment area, whilst a large supermarket will have a catchment area which may be limited by the provision of other competing facilities. Equally, a small unit such as that now being proposed will have a much smaller catchment area.
- 7.28 The findings of the Applicant's Sequential Test Assessment are set out within the following Section.

Sequential Assessment

- 7.29 In accordance with current case law, the applicant must define the relevant catchment area of the proposal in order to assess any sequentially preferable sites. As a consequence of its small size, the catchment area of the proposal will be small. The proposed Greggs pod seeks to primarily serve motorists using the A58 and residents of the local area. These areas therefore define the catchment area of the proposed Greggs unit.
- 7.30 Based on the above, our assessment of potentially sequentially preferable sites seeks a site of circa 70sqm which could accommodate the development in its entirety. Given the size of the proposal and its ancillary relationship with the existing use on the site, meaning it is intrinsically linked to the service station, the number of development sites that can be considered is significantly limited as the sales building can only be located on the proposed forecourt as it is used for the payment of fuel.
- 7.31 The application site is located some 150m from the defined boundary of Littleborough town centre. A review of vacant sites in Littleborough town centre and edge of centre locations has been undertaken and has not revealed any alternatives that are both suitable and available for the proposal.

- 7.32 Accordingly, in undertaking this assessment, we have been unable to find any obvious sites which would be sequentially preferable which could meet the need for a bakery. Arising from the locational requirement of the proposed store there is no suitable, available or viable sequentially preferably alternative site that could serve the proposed catchment in a sustainable manner.
- 7.33 The sequential assessment has been addressed on the basis that the proposal meets a very different need to that within a town or local centre where Greggs or other bakeries already have facilities. Accordingly, the proposal is sequentially acceptable in terms of its location and this has previously been accepted by this LPA under the same policy background due to the presence of other main town centre uses within the local area.

Accessibility

- 7.34 It is considered that the introduction of a new Greggs bakery within the area will provide a complementary service to the general existing provision. The proposed development therefore seeks to improve the attractiveness of the area for existing visitors and increasing choice, whilst also generating further employment.
- 7.35 The local environment is attractive and is pedestrian friendly. This, therefore, means that any worker or resident within the area can easily access the application site as it is well located and visible. It is envisaged that workers in the area will use the opportunity to get a '*breath of fresh air*' when walking to the proposed facility improving their work life balance.
- 7.36 Accordingly, the site is well placed to meet the needs of motorists and those employees working and residents living within the local area in line with employment objectives, but also addressing sustainable development and transport objectives.
- 7.37 The scheme is therefore considered acceptable in highway terms.

Amenity

- 7.38 An assessment of environmental sound levels has been carried out for a proposed development by SSC, and subsequently a noise impact assessment has been carried out in line with BS 4142 methodology.
- 7.39 Cumulative rating sound levels have been predicted at the nearest residential receptors, based on illustrative manufacturer sound data and operations defining the development emission of proposed use
- 7.40 It has been concluded from the findings of the assessment that noise should not present reasonable grounds for planning refusal. The likely acoustic effects

have been established about the LOAEL threshold of the NPSE, such that noise may be heard but does not cause any change in behaviour or attitude. The development is unlikely to significantly alter the acoustic character of the area.

- 7.41 Where it is deemed appropriate to grant approval of the proposed development, commensurate noise mitigation and management can be controlled by: limiting the opening hours of the proposed Bakery Pod to 06:00 – 23:00; through appropriate selection and installation of kitchen extract silencer(s); and through solid compound screening.
- 7.42 In the absence of specific equipment selections, the local authority may wish to condition noise limits on the proposed development. It is recommended that the cumulative noise rating level should not exceed the following limits (at 1 m from the nearest habitable residential window(s)):
- 55 dB LAr, Tr in the day (07:00 – 23:00)
 - 48 dB LAr, Tr in the early morning (night-time) hour (06:00 – 07:00)
- 7.43 It is therefore not considered that there are any amenity issues arising from the proposal due to the application site's location.

Landscaping

- 7.44 The application site is set fronting Church Street (A58). The existing site is entirely hardstanding and as such there will be no detrimental impact on residential character and appearance of the area, in particular on the A58 whose visual qualities are protected.

Flooding

- 7.45 Dudleys Consulting Engineers have prepared this site-specific Flood Risk Assessment for Motor Fuel Group for the MFG Littleborough site which is an existing petrol filling station site on Church Street, Littleborough. The assessment investigates the potential flood risk impacts of the proposed development in accordance with the National Planning Policy Framework (NPPF) and supporting Planning Practice Guidance.
- 7.46 The site is in Flood Zone 3a. It is a less vulnerable development which is suitable for this flood zone. The Sequential and Exception tests are not required for this development.
- 7.47 The site is at risk from fluvial and reservoir flooding. The finished floor level of the proposed building will be 140.6mAOD as existing, which means there will be between 0.4m and 1.16m of flooding in some storm events.
- 7.48 The site is not at risk from pluvial, existing infrastructure or groundwater flooding.

- 7.49 Proposed surface water and foul water drainage for the new building will consist of utilising the existing connections from the existing jetwash building, and will not involve any new drainage works on the site. Due to there being no change in impermeable areas or levels, flood water will be unaffected by the development and discharge rates will remain the same as existing.
- 7.50 The proposed development is wholly suitable for the proposed site on the basis of national and local planning policy and will not have any implications on neighbouring properties in terms of flood risk.

Health and Safety

- 7.51 The proposal will accord with all the required health and safety regulations with consideration to the proposed location, meaning that there are no health and safety reasons why the proposal cannot be granted.



SECTION 8: DESIGN AND ACCESS STATEMENT

- 8.1 This Design and Access Statement has been prepared on behalf of MFG and is submitted in support of an application for full planning permission for the *“Demolition of existing jet wash and redevelopment to provide a ‘food to go’ pod, new bin store, car parking and all other associated works”* at Littleborough Service Station, Church Street, Littleborough, OL15 8JA.
- 8.2 The Design and Access Statement requirements of the site have evolved from an appraisal of the site’s context against the background of its location and proximity to the highway network and developed nature of the site.
- 8.3 In accordance with the requirements to formally state how design and access issues have been considered (under Section 61 of the Planning and Compulsory Purchase Act 2014) this document addresses the design principles and concepts that have been applied to the development in relation to location, use, layout, scale, appearance and landscaping in relation to the site’s context.
- 8.4 The Design and Access Statement should be read in context with the planning application’s supporting reports, drawings and accompanying material.

Site Evaluation

- 8.5 There are a number of key issues which have informed the design solution for the site’s development. Effectively, it balances the site’s opportunities and constraints arising from the assessment of the site to deliver a development that achieves high quality design, is sustainable, is economically viable and enhances the established locality.
- 8.6 The principal constraints can be identified as:
- The need to retain the service station sales building and forecourt as existing but enhance the site’s offer ensuring the needs and expectations of motorists are met.
- 8.7 There are a number of opportunities afforded by the potential redevelopment of the site that are a relevant material consideration in evaluating the proposals. In summary these are:
- Enhance the retail offer to existing customers through a food-to-go pod;
and
 - Provide additional parking facilities at the application site.



Design Considerations

Use

- 8.8 The existing petrol filling station is a sui generis use, and the petrol filling station is an established use on site. Accordingly, the principle of the extended retail offer at the existing site is acceptable in planning policy terms considering the wider established use, the context of the site and national and local policy.

Layout

- 8.9 The proposed layout of the scheme is shown on the accompanying planning application drawings. The layout shows the removal of the existing car wash facility will be replaced by a new food-to-go pod, 5 no. car parking spaces and bin store.

Scale

- 8.10 The proposed food-to-go pod will comprise 85sqm GEA which represents a decrease from the existing jet wash building of circa 105sqm GEA. The proposed food-to-go pod will be single storey and flat roofed, which has been designed to match the height of the existing sales building and will be seen as a logical addition to the existing building and is of an appropriate scale.

Appearance

- 8.11 The food-to-go pod comprises a single storey extension with a flat roof to minimise its visual impact and to tie in with the existing sales building. The extension has been designed so that the fabric of the building is functional and modern in design.
- 8.12 The proposal is of a high quality and functional design, whilst respecting the site boundaries and adjacent neighbours.

Materials

- 8.13 The proposed materials are shown on the Proposed Building Elevations and reflect the modern and functional requirements of a petrol filling station. The introduction of a glazed frontage creates an attractive modern feel to the building, whilst also making the site and building appear lighter and more airy.

Community Safety

- 8.14 Consideration has been given to creating an attractive safe environment through the development of a high-quality public realm and creating enhanced overlooking onto the forecourt and surroundings.



Landscaping

- 8.15 The existing site does not feature any landscaping. Therefore, although no landscaping is proposed as part of the proposed development, it will not affect the existing landscaping value of the site.

Refuse Management

- 8.16 The proposals include a dedicated bin store immediately adjacent to the food-to-go pod. Waste will be collected by a private contractor as per the existing arrangements.

Accessibility

- 8.17 The Applicant is committed to a policy of equality, inclusion and accessibility for those who live and visit the site and has strived to exceed all required standards and achieve a development which promotes inclusion and accessibility.
- 8.18 The provision of an accessible and inclusive environment has been an integral theme throughout the design process from its initial conception to its current form. The concept of inclusive design seeks to remove barriers which create undue effort, separation and special treatment which enables everyone to participate equally regardless of gender, disability or age.
- 8.19 The use of the site as a petrol filling station is well established and the current access arrangements are also well-established. The provision of a food-to-go offer will not change the existing access arrangements.

Inclusive Access

- 8.20 In respect to inclusive access, all of the petrol filling station operators agree that it is not merely physical barriers that can cause difficulties for customers. Employees of all the major national chains receive Disability Awareness Sessions as part of their basic training, to understand the challenges customers with disabilities may face, and to ensure that their needs are met.
- 8.21 For operational and design reasons the site will remain level, with level access provided to the facilities, including clearly marked pedestrian area to and from the car parking area. Services are therefore provided with access that meets the needs of those who are less able bodied, as well as those with pushchairs.

Conclusions

- 8.22 The proposal responds positively to the site's opportunities and constraints and consideration has been given to layout, scale, appearance and landscaping.



Access to and within the site has been carefully reviewed. It is considered that, based on the above, an appropriate and site sensitive design solution has been found to provide a food-to-go facility which accords with planning policy at national and local level.



SECTION 9: CONCLUSIONS AND PLANNING BALANCE

- 9.1 This planning application seeks full planning permission for the “*demolition of existing jet wash and redevelopment to provide a 'food to go' pod, new bin store, car parking and all other associated works*” at Littleborough Service Station, Church Street , Littleborough, OL15 8JA.
- 9.2 The proposal addresses evolving customer expectations by enhancing the range of on-site amenities. The proposed 'Food to Go' pod will complement the existing sales building, providing customers with an improved and more convenient retail experience.
- 9.3 This proposal will also provide jobs for local residents, particularly residents who wish to be flexible in the hours they work. The proposal will therefore bring a wide range of economic benefits and accord with the role and the focus of relevant planning policy as contained within the NPPF and the adopted Development Plan, making a significant contribution to the economy.
- 9.4 With respect to retail matters, National Guidance and local retail policy has been addressed defining a catchment area and demonstrating that there are not suitable, available or viable sites for the proposal and the proposal will have no adverse impact upon the operations of protected retail uses.
- 9.5 Overall, it is considered that the application proposal is of significant benefit to the Council and it is respectfully requested that planning permission be granted.