

PLANNING AND RETAIL STATEMENT

August 2025

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Signing off Sheet

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Project: St Marys Gate, Rochdale

Document: Planning and Retail Statement

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Final

Authorised for and on behalf NJL Consulting

Nick Lee
Managing Director

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1. Introduction

1.1 This Planning and Retail Statement has been prepared by NJL Consulting for a planning application, submitted by ERP (Accrington) Limited, to remove existing food and drink goods restrictions to a retail unit located at, the former Carpetright unit, Whitworth Road, St Mary's Gate Retail Park, Rochdale to enable the unit to be operated by Farmfoods Ltd.

1.2 The proposed development is to vary the existing goods controls:

'Removal of Condition 3 of permission 00/D37893 to allow the unit to be used for use as a food store (unrestricted Use Class E)'

1.3 Contextually, the original planning permission ref. 88/D37893 for the retail park restricted the retail use of the site to the sale of DIY goods only. Planning permission ref. 93/D29657 then expanded the retail use to include the sale of furniture and electrical goods in addition to DIY goods. The most recent permission, ref. 00/D37893 found at **Appendix A**, allowed open A1 retail use with the exception of food and drink, controlled under Condition 3. As such, this application seeks the removal of the restrictive condition.

1.4 A separate application for external plant and signage will be submitted alongside.

1.5 The statement includes information on the retail planning issues relevant to the proposed development including compliance with the sequential test. It also reviews the proposed development in terms of the requirements of centre policies contained in the development plan and other material considerations.

1.6 The principal conclusions of the assessments are:

- It has also been shown that the proposal is fully compliant with the sequential test.
- The proposal will allow for a vacant unit to be brought back into active use.
- The proposal will provide 20 new jobs and significant new investment.
- The proposal will provide a significant improvement to the existing retail unit enhancing local amenity and the visual quality of the local area.

- The proposal will not have any adverse impact on highways or residential amenity.
- The site is easily accessible by a choice of modes of transport including walking, cycling and public transport. Reflecting its location very close to town centre.

1.7 The proposal has been assessed against the centre policies and proposals contained in the development plan and other material planning policy documents. It has been demonstrated that the proposal is in full accordance with the development plan and is also supported by significant material considerations.

1.8 In terms of the structure of this report:

- **Section 2** sets out the factual background of the proposal, including the site and surrounding area, the relevant planning history;
- **Section 3** sets out the proposed development;
- **Section 4** outlines the planning policy framework within which the proposals should be considered;
- **Section 5** demonstrates compliance with the sequential test;
- **Section 6** provides a summary of the supporting technical reports and conclusions; and
- **Section 7** provides a summary of the application and the conclusions drawn.

Supporting Documents

1.9 The following drawings, forms and reports are enclosed with this application:

- Location Plan
- Existing Site Plan
- Proposed Site Plan
- Existing Elevations
- Proposed Elevations
- Planning and Retail Statement (this document)

- Transport Assessment
- Noise Assessment

Farmfoods Ltd

- 1.10 The planning application is to enable the use of the existing retail unit (formally occupied by Carpetright) for Farmfoods Ltd for the retail of convenience goods. The development would provide a total of 932 sqm GFA foodstore but with no change in the total retail floorspace provided in the unit.
- 1.11 Farmfoods Ltd is a family-owned grocery business specialising in frozen food. Originally founded in Aberdeen in 1954 the company now has over 340 stores throughout Great Britain. In addition to frozen food, Farmfoods also sells long shelf-life groceries, chilled foods, key bread lines, fresh fruit and vegetables, pet food, household and personal care products. The company does not sell alcohol, lottery tickets, tobacco, newspapers, and many of the other convenience and non-food lines found in many supermarkets.
- 1.12 Farmfoods do not provide home deliveries, and many customers want to be able to push their trolleys to their cars. In part this also reflects the fact that a large proportion of goods sold are frozen food lines and it is important that customers are able to return home without these goods defrosting. Store locations must therefore be close to frequent bus services, within a short walk of the local population and with the ability for customers to park on-site.
- 1.13 Since the onset of the 2008-2010 recession, the grocery market has become extremely competitive – initially reflecting the squeeze on and slow recovery of household incomes and more recently because of a combination of radical changes in shoppers' spending habits and grocery price deflation. To remain a viable and successful business Farmfoods has had to continue to develop and evolve its format to be able to compete and survive.
- 1.14 As a result of these trends the company has sought to retail from new units in excess of 750 sqm GFA and larger and which have the capability of providing customer car parking adjacent to the store entrance. The St Marys unit provides an ideal opportunity to provide a modern store and has the added benefit that it is located in an edge of centre location. Farmfoods wish to invest in a store that would be modern, accessible and attractive to local residents.

2. Site and Surrounding Area

The Site

- 2.1 The site is located in Rochdale to the east of the A671 Whitworth Road and around 120m north of the A58 St Mary's Gate. The site is only around 150 m north of Rochdale town centre, which lies to the south on the opposite side of the A58 St Mary's Gate.
- 2.2 Whitworth Road Car Park is attached to and forms part of the curtilage of the retail units with the unit in question connected to a larger unit occupied by Dunelm. The car park stretches from Queen Street to the north to St Mary's Gate to the south between Whitworth Road/Duke Street to the east and Whitehall Street/the Dunelm and Carpetright units to the west. The car park as a whole provides a total of 244 car parking spaces, including the 8 EVCPs and 6 accessible spaces.
- 2.3 The units and associated car park are owned by the applicant. Dunelm and the former Carpetright store front onto and are served by the car park, but under agreement between the applicant and RMBC, the car park is managed by the Council as a pay and display car park. The management of the car park by the Council reflects its dual role of serving customers of the retail park along with visitors to the town centre.
- 2.4 Vehicular access to the site is provided via two access points, one an ingress only access from Duke Street/Whitworth Road (via Duke Street) at the north eastern corner of the car park and one a two-way access to Whitehall Street along the western boundary to the south of the application site.
- 2.5 Access to the car park entrance from Duke Street from the A58 St Mary's Gate to the south of the car park is via Whitworth Road and Duke Street. The car park access to Whitehall Street links back to the A58 St Mary's Gate via Howard Street and Whitworth Road. An additional pedestrian access from the junction of St Mary's Gate and Whitworth Road is located at the south eastern corner of the car park.
- 2.6 The unit itself was formally occupied by Carpetright however they have since vacated the unit in January 2025 having gone into administration in July 2024. As such, the unit is now vacant and in need of a forthcoming operator such as Farmfoods to ensure the continued use and wide-ranging benefits.

Surroundings

- 2.7 To the immediate north of the site is Duke Street Mill, a four-storey mill building and non-designated heritage asset which accommodates various commercial uses. To the west of the site are two-storey residential properties and a children's day-care nursery. To the east is a tool hire shop and a large B&M Homestore retail unit.
- 2.8 Rochdale town centre is located immediately south of Whitworth Road Car Park on the opposite side of the A58 St Mary's Gate. As such, the site is in proximity to the range of retail and leisure facilities as well as associated town centre services that comprise Rochdale town centre.
- 2.9 The surrounding area beyond the immediate vicinity of the site encompasses predominantly commercial uses to the north and east, reflecting the proximity of the site and surrounding area to Rochdale town centre. The mix of commercial uses includes many retail operators, predominantly offering bulky goods such as furniture, DIY, car and construction products. The area to the west of the site is predominantly residential and characterised by two-storey terraced properties and small blocks of low-rise flats.
- 2.10 In summary, the site is in close proximity to a range of uses. It is located within a predominantly commercial area located immediately north of Rochdale town centre and adjacent to a residential area that lies to the west. Its 'edge of centre' location dictates that it is close to a wide range of town centre services and facilities and accordingly the food store proposition is well in keeping with the surroundings.

Planning History

- 2.11 The following planning permissions on site available on Rochdale Council's website are listed below and of relevance to this application:
- 85/d18389 - formation of private car park on site formed by demolition of part of engineering works. Approved 17/10/1985.
 - 89/d23785 - erection of lighting columns to access road car park and garden centre. Approved 12/10/1989.
 - 88/d22473 - retail development (class A1-none food) incorporating garden centre and ancillary car park. Approved 08/12/1988.
 - 93/d29657 - continued use as retail premises with amendment to condition no 2 of planning permission ref. d22473 to permit the sale of do-it-yourself furniture and electrical goods. Approved 12/08/1993.

- 00/d37893 - continued use as a retail unit without compliance to Condition 2 of planning permission number d22473 (restricting A1 use to do-it-yourself goods only) to allow full A1 use with the exception of food. Approved 25/08/2000.
- 03/a5295 - 3 non-illuminated wall mounted signs, 1 non-illuminated double sided gantry sign and two entrance/exit signs. Approved 11/12/2003.
- 23/01279/ful - erection of drive thru cafe (class e) with access from duke street together with associated parking and landscaping. Approved 01/11/2024.
- 24/00055/ful - proposed change of use of two existing units from retail (use class E(a)) to mixed-use/flexible retail (class E(a)) and storage/distribution (use class B8), including trade counter uses with ancillary office space (use class E(g)). Withdrawn 14/11/2024.

Pre-application Engagement

- 2.12 A pre-application request was submitted to the LPA in early 2025 to understand the main concerns and issues with the proposed development as described in this statement. A formal response was received on 11th April 2025 under ref. PREAPP/00128/24 and provided under **Appendix 1**.
- 2.13 The response has been summarised below:
- *Principle:* The overall principle of development of retail use at the site, in an edge of centre location, has been established through the previous planning permissions. However, given the previous restrictions in place for the building, the proposals would introduce a new form of retail floorspace which has not previously been assessed and as such it is considered relevant to apply the sequential test.
 - *Highways:* TfGM advised that the percentage of pass-by / linked / diverted trips should be calculated based on firm evidence and the following junctions should be modelled. In addition, junctions experiencing an increase of 30 vehicles per hour should be modelled. TfGM advised that the assessments should also use demand flows rather than counted flows which can be determined using detailed queue surveys.
 - *Residential Amenity:* The Council's Environmental Health Officer raised no objection subject to the submission of a Noise Impact Assessment at the

application stage to ensure the development does not have an adverse impact on existing residential properties.

- 2.14 The feedback received has been a key consideration in the preparation of this application and has been responded to in full through this planning and retail statement as well as the supporting transport assessment and noise impact assessment.

3. Proposed Development

- 3.1 This application seeks the removal of Condition 3 of application ref. 00/D37893 to allow for an unrestricted Class E unit.
- 3.2 Contextually, the original planning permission for the unit ref. 88/D37893 restricted the retail use of the site to the sale of DIY goods only. Planning permission 93/D29657 expanded the retail use to include the sale of furniture and electrical goods in addition to DIY goods. The most recent permission, ref. 00/D37893, allowed open A1 retail use with the exception of food and drink.
- 3.3 The most recent changes to the Use Class Order replaced Use Class A1 with Use Class E which comprises a range of commercial, business and service uses including Use Class E (a) for the display or retail sale of goods, other than hot food, principally to visiting members of the public. Given the most recent consent, ref. 00/D37893, allowed for open A1, this would now be considered Class E which the only restriction places upon food and drinks retailing.
- 3.4 The intention for this application is to remove this restriction and allow for an unrestricted Class E to allow for Farmfoods to trade.
- 3.5 A separate application will be submitted concurrently to this application to provide details on the external plant and signage.

4. Planning Policy

- 4.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 confirms that the determination of planning applications should be made in accordance with the Development Plan unless material considerations indicate otherwise.

Local Policy

Places for Everyone

- 4.2 The Places for Everyone Joint Development Plan was adopted and became part of the statutory development plan for each of the 9 authorities covered by the plan on 21st March 2024. The following policies are relevant:

- JP-Strat12: Main Town Centres
- JP-S1 Sustainable Development
- JP-S4 Flood Risk and the Water Environment
- JP-J1 Supporting Long-Term Economic Growth
- JP-J2 Employment Sites and Premises
- JP-J4 Industry and Warehousing Development
- JP-G7 Trees and Woodland
- JP-G8 A Net Enhancement of Biodiversity and Geodiversity
- JP-P4 New Retail and Leisure Uses in Town Centres
- JP-C8 Transport Requirements of New Development

Rochdale Core Strategy

- 4.3 The following policies of the adopted Rochdale Core Strategy are relevant:-

- SO1 Delivering a more prosperous economy
- E1 Establishing thriving town, district and local centres
- E2 Increasing jobs and prosperity
- SO3 Improving design, image and quality of place
- P1 Improving image
- P2 Protecting and enhancing character, landscape and heritage

Relevant saved Rochdale Unitary Development Plan (UDP):

- G/D/1 Defined Urban Area
- G/S/1 Shopping and the Role of Centres

National Policy

4.4 The following documents have also been reviewed as part of the application:

- National Planning Policy Framework (NPPF)
- National Planning Practice Guidance (NPPG)

5. Sequential Assessment

- 5.1 The National Planning Policy Framework (NPPF) at paragraph 91 requires the sequential test to be applied to all development proposals for main town centre uses that are not in an existing centre and not in accordance with an up-to-date Local Plan. Main town centre uses are defined by the NPPF as retail development, leisure, entertainment facilities, the more intensive sports and recreation uses (including health and fitness centres,) offices and arts, culture, and tourism development.
- 5.2 There are clear locational benefits for the development, not least it reuses existing land and buildings in an established retail area. This context is important, as the site evidently has a longstanding retail use.
- 5.3 Through the pre-application discussions, it was determined that a sequential test would be required to support the application and as such one has been prepared and submitted as detailed below. Core Strategy Policy E1 requires the completion of a Retail Impact Assessment where proposals would exceed the 2,000sqm threshold. Given the site measures 932sqm, a Retail Impact Assessment is not required to be submitted.

Application of the sequential test

- 5.4 The practical application of the sequential test has been the subject of clarification through appeal decisions and the Courts. It is accepted that flexibility is required when applying the test and the test must operate '*in the real world*' (see The Supreme Court in '*Tesco vs Dundee*'¹). This means the practical application must consider the context of the site and realities of delivering development. For example, imposing a site that would require an operator to compromise their business to a commercially unrealistic or unviable extent not be 'suitable' for the purposes of the sequential test.
- 5.5 '*Tesco vs Dundee*' goes on to establish that an alternative site must be suitable for the development proposed not another hypothetical form of development. This approach was ratified in '*Aldergate*' (*Aldergate Properties Ltd v Mansfield District Council & Anor* [2016]).

¹ Tesco Stores Ltd v Dundee City Council (Scotland) [2012] UKSC 13 (21 March 2012)

- 5.6 Appeal and Secretary of State Call-In decisions (notably see, Rushden Lakes², Exeter³, Tollgate⁴ and Kingswood⁵ decisions) provide further practical guidance on applying the test. The 'Cribbs Causeway' decision⁶ (paragraph 572) summaries the issues and the Inspector's decision is clear the test should be applied proportionately on a case-by-case basis recognising specific issues. Disaggregation is also no longer a policy requirement, but flexibility must be considered with commercial realities in mind.
- 5.7 The methodology and approach to implementing the test is also clarified in the PPG which established the sequential test should be flexibly applied by both the applicant and local planning authority. Specifically, PPG paragraph 2b-011-20190722 states:
- 'The application of the test will need to be proportionate and appropriate for the given proposal.'*
- 5.8 PPG paragraph 2b-012-20190722 goes on to state:
- '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.'*
- 5.9 This is entirely relevant to this application, which seeks to improve existing retail facilities in a highly accessible location where the Local Plan encourages development in such locations. In this instance, there is a clear rationale that the proposed unit can only be provided in this location as it relates to an existing established retail location and is entirely the type of development which is suited for this location.
- 5.10 The need for development to take place in this location is established by the development context and overall benefits as detailed earlier in the report. This approach is not driven by land ownership or site assembly criteria, rather a beneficial approach to reusing an existing retail site.
- 5.11 For a consideration of a site to be sequentially preferable to the application site, it must be suitable, available, and viable. If a site does not meet **all** the following criteria, then it can be discounted from the sequential test:

² Rushden Lakes - APP/G2815/V/12/219017

³ Exeter - APP/Y1110/W/15/3005333

⁴ Tollgate (Colchester) - APP/A1530/W/16/3147039

⁵ Kingswood (Hull) - APP/V2004/W/17/3171115

⁶ Cribbs Causeway - APP/P0119/V/17/3170627

- Availability – whether sites are available now or are likely to become available for development within a reasonable period;
- Suitability – whether a site could be developed for the proposal, having regard to the requirement to demonstrate flexibility and whether the site is suitable to accommodate the specific need or demand the proposal is intended to meet; and
- Viability – whether there is a reasonable prospect that the development will occur on the site at a particular point in time, again having regard to the specific nature of the need or operator demand the proposal is intended to meet.

5.12 The NPPF/PPG and various relevant judgements have set out what the sequential test is and how it is to be applied. Its purpose also needs to be considered. The test is the practical application of the Government's "town centres first" policy; it makes town centres the preferred location for such development.

5.13 However, this is a preference, not a complete requirement on development outside of town centres. Indeed, the NPPF confirms that there is a presumption in favour of sustainable development. Thus, it is a town centres first policy, not a town centres only policy.

Methodology And Scope

5.14 In this context, a robust approach to the sequential test has been undertaken. The following methodology has been followed for this sequential test:

Define the primary catchment area.

5.15 The primary catchment area for the proposed development has been confirmed with the LPA which extends to Rochdale Town Centre only.



Figure 1 Rochdale Town Centre Boundary (UDP)

Define the operator's requirements.

5.16 It is important to note that in theory any site of any size situated in or edge-of- centre could be included in the sequential assessment. However, this would not be either practical or realistic, as the majority of sites would be in active use or not for sale/let and would therefore immediately fail the assessment of availability alone. For a site to be considered a genuinely sequentially preferable location, it must be deemed to be suitable (having regard to the applicant's/developer's needs), available and viable (from a commercial perspective).

5.17 The requirements of the operator are detailed below:

- Site area/property floor area (+ or -10% of the existing floorspace at the site at 932 sqm which sits between 838.8 sqm and 1,025 sqm);
- Last known use / planning status to be unrestricted retail use;

- A goods-in door wide enough and located adjacent a safe loading area for larger deliveries to be taken in and out of the property.

Identify vacant units/sites within or on the edge of identified town centres.

- 5.18 Our assessment has followed a plan-led review of sites suggested in various policy and evidence-based documents, as well as previous applications and a review of availability on the market.
- 5.19 The adopted Local Plan comprises the saved policies of the Unitary Development Plan. This includes site allocations, which were proposed to be superseded by a Site Allocations Plan not yet come forward.
- 5.20 The policies include R/4(e) which allocates the "Riverside Area of Opportunity, Rochdale" for mixed use including retail. This site has since been developed has is home to the Rochdale Borough Council offices, Rochdale Interchange and a Gym.
- 5.21 A desktop review was conducted of any additional sites to include in this sequential assessment utilising the 2010 'Rochdale Retail, Leisure and Cultural Facilities Study' as a basis with a follow-on review using google earth and property sites (Completely Retail, Zoopla, Right Move ect.) to establish the position as of July 2025.
- 5.22 Further to reviewing the relevant property search sites, the following local agents were also reviewed for additional sites.
- Barker Proudlove
 - Martin&Co
 - PurpleBricks
 - MBRE
 - Ryder & Dutton
 - Knight Frank

- 5.23 All agents confirmed no currently available premises that fit the operator requirements.

Assess those identified based on their suitability, availability, and viability

- 5.24 The table (as shown at **Appendix 2**) shows a full breakdown of the sites assessed in Rochdale Town Centre with current vacancy position, unit size, availability of parking,

planning applications, and conclusions of the assessment. A high-level breakdown of this table is detailed below:

Number of Sites Assessed	17	100%
Sites discounted due to being unavailable and unsuitable	1	6%
Available sites discounted due to being unsuitable	16	94%
Suitable sites discounted due to being unavailable.	0	0%
Discounted sites due to viability	0	0%

- 5.25 Within this centre, all units are below requirements for space and therefore too small and not suitable for the proposed development.
- 5.26 Considering this analysis there is therefore strong evidence to suggest that there are no suitable and available units or sites within Rochdale town centre that can accommodate the scale and form required by Farmfoods.

Conclusion

- 5.27 In summary, the assessment demonstrates that there are no sequentially preferable sites within or on the edge of, the identified town centre that are available and suitable to accommodate development broadly similar to that proposed by this application after allowing for a degree of flexibility.
- 5.28 The application proposals will make use of an existing unit and its supporting infrastructure, with minimal external alterations proposed to the unit.

6. Technical Assessment

- 6.1 The following section presents the assessment of all other material considerations, not covered within the previous sections.

Highways

- 6.2 A Transport Assessment (TA) has been prepared by Arcadis Consulting UK Limited (Arcadis) to support the application.
- 6.3 Detailed junction modelling for three key junctions, as agreed with the LPA, revealed that the proposed development would have no material impact on the operational performance of the network, even when combined with the committed Starbucks Drive-Thru development.
- 6.4 The development is expected to increase pedestrian activity around the site, but the existing infrastructure, including footways and crossings, is sufficient to accommodate the additional demand comfortably. Similarly, the expected increase in cycling activity is minimal and can be supported by the existing infrastructure without requiring modifications.
- 6.5 The development will be served by an existing car park which provides 166 spaces which incorporates disabled bays, cycle parking and motorbike parking. It is considered that the proposal will be sufficiently accommodated by the existing parking arrangement.
- 6.6 As such, the application accords with Policies DM1 and T2 of the Rochdale Core Strategy and the NPPF.

Noise

- 6.7 Noise Solutions Ltd (NSL) have prepared the supporting Noise Impact Assessment to support the application. The report presents the results of an environmental noise survey, the applicable policies and guidance, and outline noise impact assessments of plant, deliveries and car park activity to demonstrate that it is suitable for those uses without introducing adverse noise effects on the neighbouring areas.
- 6.8 Noise levels were predicted from the following receptors:

- Receptor R1, 21 Whitehall Street, to the northwest of the site, currently operating as a nursery
- Receptor R2, houses to the west of the site across Union Street;
- Receptor R3, houses to the northwest across Hope Street

- 6.9 The following conclusions were made that Noise from deliveries during the night-time are likely to result in an adverse noise impact on the occupants of the nearest houses. During the daytime, noise from and deliveries at the site are likely to result in no worse than a low impact, according to the methodology set out in BS 4142:2014+A1:2019.
- 6.10 Noise from plant is likely to result in no worse than a low impact according to the methodology set out in BS 4142:2014+A1:2019 even running throughout the daytime and night-time periods.
- 6.11 An assessment of the noise impact of customer visits shows that noise from the car park is below the Lowest Observed Adverse Effect level inside the nearest noise-sensitive receptors, even during the busiest one-hour periods and with the receptor windows open.
- 6.12 As such, the application accords with Policies G9 and DM1 of the adopted Core Strategy apply, the SPD and the NPPF.

7. Summary and Conclusions

7.1 This Planning and Retail Statement has been prepared by NJL Consulting in support of a planning application submitted on behalf of the applicant, ERP (Accrington) Limited, to Rochdale Borough Council. This application is seeking to remove the existing goods controls detailed within Condition 3 of application ref. 00/D37893.

7.2 The full description of development is set out below:

'Removal of Condition 3 of permission ref. 00/D37893 to allow the unit to be used for use as a food store (unrestricted Use Class E)'

7.3 The overall principle of development of retail use at the site, in an edge of centre location, has been established through the previous planning permissions and in principle, the use of the site as a supermarket is acceptable subject to sequential testing being addressed alongside key technical matters, namely highways and noise being acceptable.

7.4 This assessment alongside the supporting technical reports which covered transport and noise have been prepared and conclude that the development will not have any adverse impacts.

7.5 To reiterate the benefits that this application can bring, it will result in a retail unit that has been vacant for a significant period being brought back into beneficial use, alongside the additional social, economic, and environmental benefits, which are summarised as follows:

- Local investment;
- Reuse of a vacant retail unit in an edge of centre location;
- Creation of up to 20 full time jobs;
- Further job creation through fitting out, security, repairs, and maintenance;
- New consumer choice and enhancement of qualitative retail offer.

7.6 Accordingly, we conclude that these proposals are in accordance with the development plan and there are no policy-based conflicts or other material consideration which outweigh the benefits of granting planning permission.

Appendix 1 – Pre-application Response



PLANNING AND DEVELOPMENT

Melanie Hale
Head of Planning Services

Number One Riverside, Smith Street,
Rochdale, OL16 1XU

Enquiries to: Claire Ringwood
Web: www.rochdale.gov.uk
Email:
claire.ringwood@rochdale.gov.uk
Direct Line: 01706 925844

Reference: PREAPP/00128/24

Date: 11 April 2025

Mr D Page
Partner
Newmark Planning and Development
No. 1 Marsden Street
Manchester
M2 1HW

BY EMAIL ONLY
Dominic.Page@nmrk.com

Dear Mr Page,

Reference No:	PREAPP/00128/24
Proposal:	Pre-application advice for the use of the existing retail unit as a supermarket
Location:	Carpetright Plc, Whitworth Road, Rochdale, OL12 0TY

Further to your pre-application request validated on 14th November 2024 here is my advice in relation to your proposal. This follows our Teams meeting on 28th March 2025 attended by yourself, Scott Reynolds – Newmark Planning and Development, Huw Nicholas – ARCADIS, John Gillingham – RBC Highways and Ryan Grant, Claire Ringwood – RBC Planning.

The following information has been submitted:

Covering Letter
Drawing No: 11390 PL U2 L01 – Site Location Plan
Transport Scoping Note by ARCADIS
Received 14th November 2024

Updated Transport Scoping Note by ARCADIS
Received 13th February 2025

SITE

The pre-application site comprises the former Carpetright retail unit which lies north of Rochdale town centre and the Town Head Conservation Area. The site adjoins a further retail unit to the south currently occupied by Dunelm. There are two vehicular access points, one from Duke Street and the other off Rope Street. The site is located north of the arterial route of St Marys Gate at the junction with Whitworth Road, this is a busy section of road networks and is identified as a Key Route Network in the Proposals Map of the saved UDP. The site is surrounded by a mix of light industrial, warehouse and retail units along with residential to the north-west.

The site is within the Defined Urban Area (Policy G/D/1) as identified in the Proposals Map of the saved UDP.



PROPOSAL

Background

Planning permission 88/D37893 restricted the retail use of the site to the sale of DIY goods only. Planning permission 93/D29657 expanded the retail use to include the sale of furniture and electrical goods in addition to DIY goods. The most recent permission, 00/D37893, allowed open A1 retail use with the exception of food and drink.

The most recent changes to the Use Class Order replaced Use Class A1 with Use Class E which comprises a range of commercial, business and service uses including Use Class E (a) for the display or retail sale of goods, other than hot food, principally to visiting members of the public.

The pre-application enquiry relates to the use of the existing retail unit as a supermarket (the covering letter states the applicant is in discussions with Farmfoods). The submitted covering letter states at this stage there are no proposed external alterations and the access arrangement to the wider retail park will remain unchanged.

RELEVANT PLANNING POLICY

National Guidance

National Planning Policy Framework (NPPF)
National Planning Practice Guidance (NPPG)

Sub-Regional

Places for Everyone Joint Development Plan (PfE)

The Places for Everyone Joint Development Plan was adopted and became part of the statutory development plan for each of the 9 authorities covered by the plan on 21st March 2024. The following policies are relevant:

JP-Strat12: Main Town Centres
JP-S1 Sustainable Development
JP-S4 Flood Risk and the Water Environment
JP-J1 Supporting Long-Term Economic Growth
JP-J2 Employment Sites and Premises
JP-J4 Industry and Warehousing Development
JP-G7 Trees and Woodland
JP-G8 A Net Enhancement of Biodiversity and Geodiversity
JP-P4 New Retail and Leisure Uses in Town Centres
JP-C8 Transport Requirements of New Development

Rochdale Core Strategy:

The following policies of the adopted Rochdale Core Strategy are relevant:-

- | | |
|------------|--|
| SO1 | Delivering a more prosperous economy |
| E1 | Establishing thriving town, district and local centres |
| E2 | Increasing jobs and prosperity |
|
 | |
| SO3 | Improving design, image and quality of place |
| P1 | Improving image |
| P2 | Protecting and enhancing character, landscape and heritage |



P3	Improving design of new development
SO4	Promoting a greener environment
G1	Tackling and adapting to climate change
G2	Energy and new development
G7	Increasing the value of biodiversity and geodiversity
G8	Managing water resources and flood risk
G9	Reducing the impact of pollution, contamination and land stability
SO5	Improving accessibility and delivering sustainable transport
T2	Improving accessibility
DM1	General development requirements

Relevant saved Rochdale Unitary Development Plan (UDP):

G/D/1	Defined Urban Area
G/S/1	Shopping and the Role of Centres

Supplementary Planning Documents (SPD):

Guidelines and Standards for Residential Development (June 2016).

RELEVANT SITE HISTORY

79/D09756 - Land Use For Car Parking And Erection Of Boundary Fence. Approved.

79/D09757 - Fencing Of Land And Use For Vehicle And Caravan Sales. Refused.

85/D18389 - Formation Of Private Car Park On Site Formed By Demolition Of Part Of Engineering Works. Approved 17/10/1985.

89/D23785 - Erection Of Lighting Columns To Access Road Car Park And Garden Centre. Approved 12/10/1989.

88/D22473 - Retail Development (Class A1-None Food) Incorporating Garden Centre And Ancillary Car Park. Approved 08/12/1988.

93/D29657 - Continued Use As Retail Premises With Amendment To Condition No 2 Of Planning Permission D22473 To Permit The Sale Of Do-It-Yourself Furniture And Electrical Goods. Approved 12/08/1993.

00/D37893 - Continued Use As A Retail Unit Without Compliance To Condition 02 Of Planning Permission Number D22473 (Restricting A1 Use To Do-It-Yourself Goods Only) To Allow Full A1 Use With The Exception Of Food. Approved 25/08/2000.

03/A5295 - 3 Non Illuminated Wall Mounted Signs, 1 Non Illuminated Double Sided Gantry Sign And Two Entrance/Exit Signs. Approved 11/12/2003.

23/01279/FUL - Erection of Drive Thru Cafe (Class E) with access from Duke Street together with associated parking and landscaping. Approved 01/11/2024.

24/00055/FUL - Proposed change of use of two existing units from retail (Use Class E(a)) to mixed-use/flexible retail (Class E(a)) and storage/distribution (Use Class B8), including trade counter uses with ancillary office space (Use Class E(g)). Withdrawn 14/11/2024.



SUMMARY OF CONSULTATION RESPONSES

Transport for Greater Manchester (TfGM)

Summary: Initial comments were received 17th December 2024 – additional information was required. Updated comments were received 27th February 2025 - The Technical Note has been reviewed and the only additional comments from a TfGM perspective are that the gravity model data would need to be provided for review alongside the application before the trip distribution can be accepted.

[Officer Note: Full comments have been provided to the applicant's agent].

Highways

Summary: No objections in principle but the Transport Study must be robust at this critical location on the Transport Network.

Environmental Health (Noise)

Summary: No objections in principle to the proposal subject to a Noise Impact Assessment and appropriate conditions.

ANALYSIS

Principle of Development

As detailed in the submitted Covering Letter, the overall principle of development of retail use at the site, in an edge of centre location, has been established through the previous planning permissions and Officers are satisfied that in principle, the use of the site as a supermarket is acceptable subject to other material considerations being addressed, of which the main technical matter is primarily the highway implications.

Policies JP-Strat12: Main Town Centres, JP-J1 - Supporting Long-Term Economic Growth and JP-P4 - New Retail and Leisure Uses in Town Centres of P/E, Policies E1 - Establishing thriving town, district and local centres and E2 - Increasing jobs and prosperity of the Rochdale Core Strategy, Policy G/D/1 of the saved UDP and the NPPF apply.

Sequential Assessment

The submitted Covering Letter suggests that as the principle of retail use has already been established, a sequential assessment would not be required in this instance. However in the case that the sequential test is applied the Covering Letter highlights indicates a scope of any sequential assessment as follows:

- Location of sites (Town Centre only);
- Site area/property floor area (+10% of the existing floorspace at the Site);
- Last known use / planning status (unrestricted retail use permitted);
- Availability (currently marketed to let);
- Suitability (in line with specific retailer requirements e.g. floor to ceiling heights, aisle widths, parking availability, other specific commercial and/or operational requirements);
- Viability (no requirement for significant (re)development / fit-out works).



Paragraph 91 of the NPPF states that Local Planning Authorities should apply a sequential test to planning applications for main town centre uses which are neither in an existing centre nor in accordance with an up-to-date plan. Paragraph 92 continues that *‘when considering edge of centre and out of centre proposals, preference should be given to accessible sites which are well connected to the town centre. Applicants and local planning authorities should demonstrate flexibility on issues such as format and scale, so that opportunities to utilise suitable town centre or edge of centre sites are fully explored’*.

Given the previous restrictions in place for the building, the proposals would introduce a new form of retail floorspace which has not previously been assessed and as such it is considered relevant to apply the sequential test. The council does not have any significant concerns with the scope proposed but would make the following comments. With regard to site area / floor area, unless justification can be provided that the proposal is a minimum acceptable quantum that the 10% allowance is applied to both larger and smaller sites. Secondly, with regards to suitability and viability, that some flexibility within reason is also shown on these aspects, in particular it is noted the wording of the covering letter suggests fit-out works could render sites unviable however in most cases this would form a typical part of bringing a retail space into use.

Retail Impact Assessment

The submitted Covering Letter highlights that Core Strategy Policy E1 requires the completion of a Retail Impact Assessment where proposals would exceed the 2,000sqm threshold. The site measures approximately 932sqm. Officers confirm a Retail Impact Assessment is not required with any future planning application.

Highways

Policy T2 of the adopted Core Strategy is regarding improved accessibility and parking. Policy JP-C8 of PfE states ‘we will require new development to be located and designed to enable and encourage walking, cycling and public transport use, to reduce the negative effects of car dependency, and help deliver high quality, attractive, liveable and sustainable environments’.

The pre-application enquiry was initially reviewed by the Council’s Highways Officer who advised that a proposal of this nature requires an appropriate Transport Assessment being undertaken. The Council’s Highways Officer did not accept the (initial) Transport Scoping Note suggestion that 75% of trips would be pass-by trips and 25% would be diverted trips from the existing store. 75% of trips should be considered as new trips. A Transport Assessment should consider all existing uses for the site and committed developments in the vicinity and this should also be considered in the rationalisation of the Parking Strategy. Without an appropriate Transport Assessment being completed the Highways Officer cannot comment on the suitability of this proposal.

TfGM initially advised that the area is very congested and it is considered that even a small uplift in the number of vehicles could have a detrimental impact on the network. TfGM advised that the percentage of pass-by / linked / diverted trips should be calculated based on firm evidence and the following junctions should be modelled (regardless of whether trip generations exceed 30 vehicles per hour): Whitworth Road / John Street / St Marys Gate; St Marys Gate / Spotland Road / Hunters Lane; and John Street / Molesworth Street / Entwistle Road. In addition, junctions experiencing an increase of 30 vehicles per hour should be modelled. TfGM advised that the assessments should also use demand flows rather than counted flows which can be determined using detailed queue surveys. TfGM recommends an increase of about 30vehs/hr at a junction as an



appropriate threshold for considering the necessity of a traffic impact assessment. A full copy of TfGMs comments have been sent to you separately.

An amended Transport Scoping Note was submitted which took into consideration the comments from TfGM and the Council's Highways Officer. The Highways Officer raised no further comments and TfGM advised that the gravity model data would need to be provided for review alongside the application before the trip distribution can be accepted. This seemed to be accepted at the meeting.

Policies DM1 and T2 of the Rochdale Core Strategy and the NPPF apply.

Residential Amenity

Paragraph 135 of the National Planning Policy Framework advises that planning decisions should always seek to secure a good standard of amenity for all existing and future occupants of land and buildings. Policy DM1 of the Core Strategy requires that proposals do not adversely affect the amenity of residents or users through visual intrusion, overbearing impact, overshadowing or loss of privacy. Also, impacts including noise, air, dust, light and odour pollution are required to be mitigated where necessary. Further to the above are the considerations of the Council's Supplementary Planning Document (SPD) 'Guidelines and Standards for Residential Development' which states that new developments *'should be carefully designed to protect the amenity of the occupants of adjoining properties.'*

Although the pre-application site is located close to a busy road network and close to other commercial/retail uses, there are residential properties to the north-west of the site. The Council's Environmental Health Officer has reviewed the pre-application enquiry and raised no objection subject to the submission of a Noise Impact Assessment at the application stage to ensure the development does not have an adverse impact on existing residential properties. A demolition and construction management plan would also be conditioned, to cover areas such as noise, vibration, mud and dust suppression and given the close proximity to existing residential properties it is also recommended to restrict the site hours to 08:00-18:00 Monday – Friday, 09:00-14:00 Saturdays and no work on Sundays or Bank holidays

Policies G9 and DM1 of the adopted Core Strategy apply, the SPD and the NPPF apply.

Visual Amenity

Although the pre-application enquiry states there are no current plans to alter the external appearance of the building, should plans change there would be opportunities to improve the external appearance of the building. Policy P1 of the Council's adopted Core Strategy seeks to require design which is of a high standard, demonstrating innovation and originality, and maximising the potential for heritage assets to provide a sense of place and image. Policies DM1 and P3 of the Council's adopted Core Strategy requires development proposals to adhere to high quality design and enhance the borough's identity and sense of place.

Polices DM1, P1 and P3 of the Rochdale Core Strategy, Policies G/D/1 and EC/2 of the saved UDP and the NPPF apply.

Summary and Making an Application

The principle of development on the site is considered acceptable subject to any future planning application addressing the concerns and comments made by TfGM and the Council's Highways Officer. Other material considerations as detailed above will also



need to be addressed.

Validation Requirements

The Council has adopted a Local List | Rochdale Borough Council which sets out the expectations of what supporting information should be submitted with a planning application. In respect of the proposed development, the following supporting information should be provided, at a minimum (scale bars on all drawings would be helpful and Do Not Scale disclaimers removed):

- Location Plan to scale 1:1250 showing the direction of north, with the application site clearly edged in red (and the new residential development to the west/north-west);
- Existing and Proposed site plans to scale 1:200/1:500 (showing car parking, bin and cycle storage);
- Existing and Proposed Elevations in full to scale 1:100/1:50 (if applicable);
- Existing and Proposed Floor Plans in full to scale 1:100/1:50;
- Compliance with National Information Requirements;
- Planning Statement;
- Sequential Assessment;
- Transport Assessment taking into account TfGM and Highways Officer comments;
- Parking Strategy to demonstrate that adequate parking is available for the existing and proposed units;
- Details of delivery and servicing arrangements;
- Noise Impact Assessment

Please note that any advice provided above is an informal opinion only and is made without prejudice to any formal determination which may be given in the event of an application being submitted. In particular, it does not constitute a formal decision of the Council with regard to any future planning applications, which will be subject to wider consultation and publicity, and provides no guarantee of a future decision.

I hope this is of assistance. However, if you have any questions or wish to discuss more detailed proposals prior to formal submission of an application then please do not hesitate to contact me using the details contained at the top of this letter.

Yours Sincerely,

C. Ringwood

Claire Ringwood
Senior Planning Officer



Appendix 2 – Sequential Assessment Table



Site Address	Our Reference	Size of Unit	Use	Parking	Goods-in Door	Available	Suitable	Outcome
St, Mary's Gate	RO01	46,416 sqft	Class E	262 spaces	Yes	Yes	Yes	Proposed Site
17 Baillie Street, OL16 1BE	RO02	858sqft	Class E	527 spaces (shopping centre)	No	Yes	No	Unsuitable due to size and lack of goods-in door. Parking inappropriate due to distances from car park to store with trolley.
19 Baillie Street, OL16 1BE	RO03	1,884sqft	Class E	527 spaces (shopping centre)	No	Yes	No	Unsuitable due to size and lack of goods-in door. Parking inappropriate due to distances from car park to store with trolley.
21a Baillie Street, OL16 1BE	RO04	1,501sqft	Class E	527 spaces (shopping centre)	No	Yes	No	Unsuitable due to size and lack of goods-in door. Parking inappropriate due to distances from car park to store with trolley.
Riverside unit 13, OL16 1BE	RO05	2 - small	Class E	527 spaces (shopping centre)	No	Yes	No	Unsuitable due to size and lack of goods-in door. Parking inappropriate due to distances from car park to store with trolley.
Riverside Unit 9, OL16 1BE	RO06	2 - small	Class E	527 spaces (shopping centre)	No	Yes	No	Unsuitable due to size and lack of goods-in door. Parking inappropriate due to distances from car park to store with trolley.
44-46 Yorkshire Street	RO07	1,901sqft	Class E	No - close to Rochdale Exchange Shopping Centre	No	No	No	No longer being advertised by the agents.
20-21 Market Place, OL16	RO08	3,363sqft	Class E	850 spaces	No	Yes	No	Unsuitable due to size and lack of goods-in door. Parking inappropriate due to distances from car park to store with trolley.
50a Market Way, OL16	RO09	4,173sqft	Class E	850 spaces	No	Yes	No	Unsuitable due to size and lack of goods-in door. Parking inappropriate due to distances from car park to store with trolley.
52 Market Way, OL16	RO10	1,142sqft	Class E	850 spaces	No	Yes	No	Unsuitable due to size and lack of goods-in door. Parking inappropriate due to distances from car park to store with trolley.
28 Market Place, OL16	RO11	630sqft	Class E	850 spaces	No	Yes	No	Unsuitable due to size and lack of goods-in door. Parking inappropriate due to distances from car park to store with trolley.
Unit 4-5 Market Way, OL16	RO12	2,023sqft	Class E	850 spaces	No	Yes	No	Unsuitable due to size and lack of goods-in door. Parking inappropriate due to distances from car park to store with trolley.
Unit 12-23 Market Place, OL16	RO13	989sqft	Class E	850 spaces	No	Yes	No	Unsuitable due to size and lack of goods-in door. Parking inappropriate due to distances from car park to store with trolley.
61-62 Market Way	RO14	1,635sqft	Class E	850 spaces	No	Yes	No	Unsuitable due to size and lack of goods-in door. Parking inappropriate due to distances from car park to store with trolley.
38 Yorkshire Street	RO15	1,539sqft + FF ancillary	Unknown	No - close to Rochdale Exchange Shopping Centre	No	Yes	No	Unsuitable due to size and lack of goods-in door. Parking inappropriate due to distances from car park to store with trolley.
Cheetham Street, OL16	RO16	280sqft	Unknown	On street parking	No	Yes	No	Unsuitable due to size and lack of goods-in door. Parking insufficient.
22-24 St.Marys Gate, OL16 1DZ	RO17	1,920sqft	Class E	No	No	Yes	No	Unsuitable due to size and lack of goods-in door. Parking insufficient.

This report takes into account the particular instructions and requirements of our client. It is not intended for and should not be relied upon by any third party. Any such party relies on this report at their own risk.

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