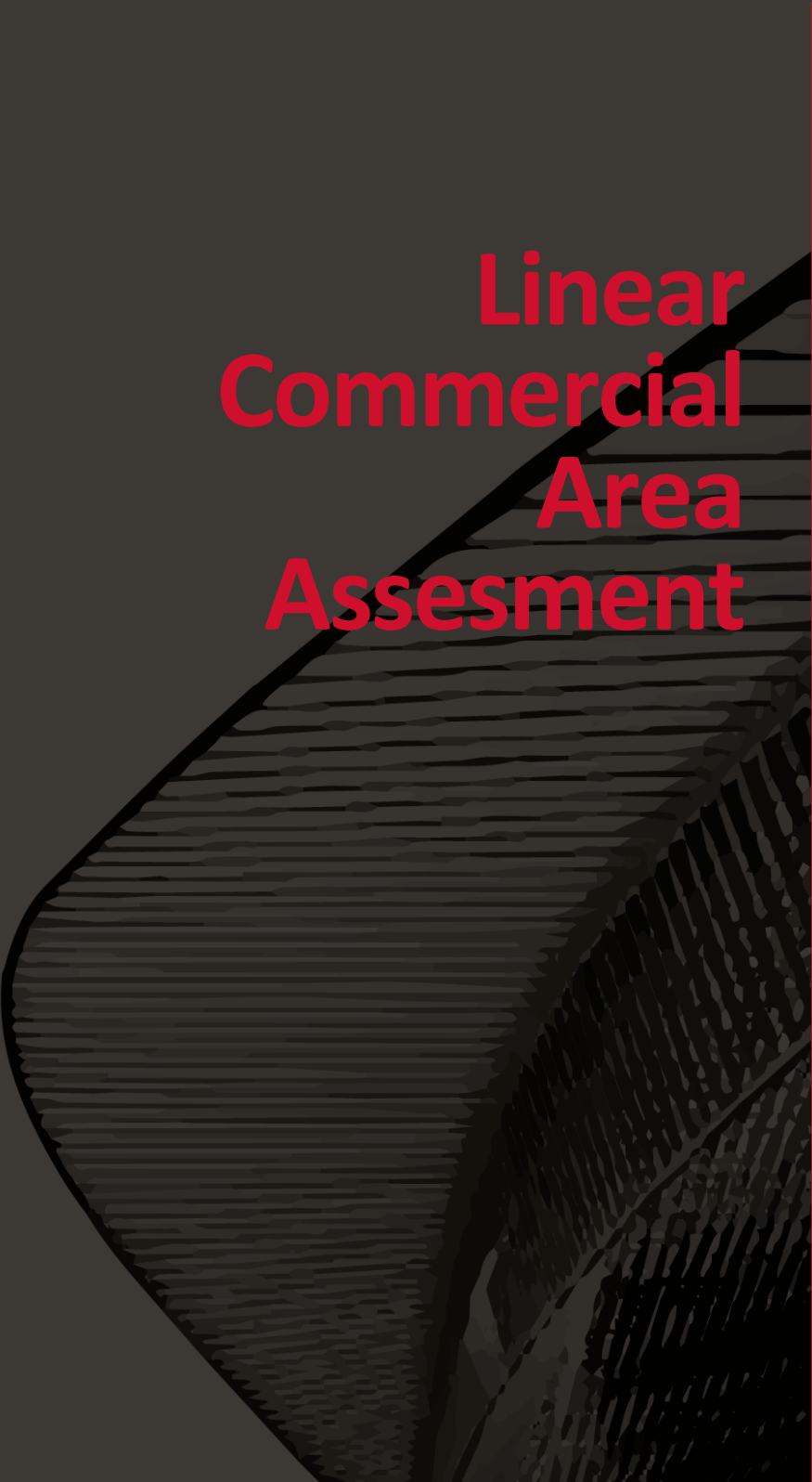




# **Linear Commercial Area Assesment**

**105 Oldham Road  
Rochdale OL16 5QT**

**Proposed change of use  
from shop/ plumbers  
merchants to two  
apartments**

**Mr E Shah**

**Prepared by:**

Richard Moffat - Director

**Reviewed by:**

Richard Moffat - Director

Planning, Regeneration + Infrastructure

**Final Report Issue Date:** January 2026

This document has been prepared and checked in accordance with the Lambert Smith Hampton Quality Assurance procedures and authorised for release.

Signed: .....

For and on behalf of Lambert Smith Hampton

## CONTENTS PAGE

|     |                         |    |
|-----|-------------------------|----|
| 1.0 | INTRODUCTION .....      | 3  |
| 2.0 | POLICY S/6.....         | 6  |
| 3.0 | LINEAR ASSESSMENT ..... | 9  |
| 4.0 | CONCLUSIONS .....       | 10 |

**Appendix A** – Plan of Linear Area

**Appendix B** – Plan showing vacancy and non-commercial uses

## 1.0 INTRODUCTION

- 1.1 This assessment has been prepared on behalf of Mr E Shah, [“the Applicant”], on the instructions of AJ Cocker Associates in respect of an application for “*Change of use from ground floor shop/plumbers’ merchants to two apartments with associated alterations to front and rear elevations at ground floor.*”
- 1.2 The proposal is the subject of a planning application reference 25/01080/FUL. The Local Planning Authority for the area is Rochdale Council [“LPA”]. The LPA have indicated by letter dated 12<sup>th</sup> November 2025 that, to validate the application, it requires a “*Linear Commercial Area Assessment*”, and that such an assessment needs to address the text within saved UDP policy S/6
- 1.3 Policy S/6 of Rochdale UDP states:-

*In Milnrow District Centre and in local centres and linear commercial areas (as identified on the Proposals Map and listed in Appendix B), the development of, or change of use to, shops, financial and professional services, food and drink outlets, offices, community and cultural facilities and other uses appropriate to a district or local centre will be permitted provided that:*

- a) It will be of a scale and character appropriate to the size, role and function of the centre or area; and*
- b) It will be compatible with surrounding land uses and will not harm local residential amenity.*

*For retail development over 500 square metres gross, the applicant should also demonstrate 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.*

*In local centres and linear commercial areas, the conversion of residential premises to commercial use will only be permitted where there are no suitable vacant premises available in the centre or immediate vicinity, or it can be demonstrated that the property is no longer suited to residential use due to poor amenity.*

***The conversion or redevelopment of vacant commercial premises to residential use will only be permitted in local centres that have a high overall vacancy rate and where it will assist regeneration.***

[Emphasis added]

- 1.4 The Linear Commercial Areas are listed in Appendix B of the UDP. In this case the area in question is:-

*1. Oldham Road, Rochdale, east side from Milnrow Road to the Rochdale Canal;*

- 1.5 The extent of the area is shown on the plan attached as Appendix A to this Assessment.

- 1.6 This Assessment considers the relevant policy, the degree to which it can be regarded as up to date, and the outcome of the assessment. We have concluded that:-

- Saved Policy S/6 of the Rochdale UDP is out of date and no longer consistent with current national regulations and guidance
- The Linear Centre, the subject of this assessment, is subject to high vacancy rates, and accordingly, policy S/6 of the Rochdale UDP is not breached, and the proposal would assist regeneration by bringing a currently vacant unit back into beneficial occupation.
- The proposal comprises sustainable development, being the delivery of new homes within the existing urban area in an accessible location, and accordingly enjoys the benefit of the general presumption of support set out in paragraphs 10 and 11 of the National Planning Policy Framework

- 1.7 In preparing and submitting this Assessment LSH, and the Applicant are mindful of

the advice contained in paragraph 39 of the National Planning Policy Framework: -

***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, including brownfield registers and permission in principle, and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible.***

[Emphasis added]

## 2.0 POLICY S/6

- 2.1 The policy, the subject of this assessment, is a “saved” policy of the Rochdale UDP. The UDP was adopted by the council in June 2006, nearly twenty years ago. Much of the background work and evidence base used to prepare the UDP were completed well over 20 years ago.
- 2.2 Whilst Policy S/6 was “saved” when the Rochdale Core Strategy was produced, the Core Strategy did not reconsider the concept of Linear Commercial Area. Policy E1 of the Core Strategy does not refer to “Linear Commercial Area and was itself prepared over 10 years ago. Although never “progressed the “Allocations Plan” did not attempt to identify the current assessment area as:-
  - A Retail Centre
  - A Primary Shopping Frontages;
  - A Secondary Shopping Frontages
- 2.3 Finally, we note that Regulation 18 Rochdale Draft Local Plan published in November 2025 abandons the concept of Linear Centres and the area of Oldham Road from its junction with Wood Street to the point at which it is crossed by the railway line, within which the application site sits, is not subject to any specific policy allocation whatsoever. Thus, the LPA’s published intention is that the wording of policy S/6 as it applied to the application site should be abandoned entirely.
- 2.4 We also note that after the publication of Policy S/6, the government has “reorganised” the Use Class classification in England and introduced Permitted Development Rights, which provide a background to the proposed change of use.
- 2.5 The current use of the site falls within Class E of the Town and Country Planning (Use Classes) Order 1987 as amended. Class E now encompasses the

following:-

- ***E(a) Display or retail sale of goods, other than hot food***
- *E(b) Sale of food and drink for consumption (mostly) on the premises*
- *E(c) Provision of:*
  - *E(c)(i) Financial services,*
  - *E(c)(ii) Professional services (other than health or medical services), or*
  - *E(c)(iii) Other appropriate services in a commercial, business or service locality*
- *E(d) Indoor sport, recreation or fitness (not involving motorised vehicles or firearms or use as a swimming pool or skating rink,)*
- *E(e) Provision of medical or health services (except the use of premises attached to the residence of the consultant or practitioner)*
- *E(f) Creche, day nursery or day centre (not including a residential use)*
- *E(g) Uses which can be carried out in a residential area without detriment to its amenity:*
  - *E(g)(i) Offices to carry out any operational or administrative functions,*
  - *E(g)(ii) Research and development of products or processes*
  - *E(g)(iii) Industrial processes*

2.6 The last use of the site as a shop/plumbers' merchants open to members of the public means that the site falls within Class E. In addition to the reordering of the Use Classes Order, the Government has introduced Class MA in Part 3 of Schedule 2 to the Town and Country Planning (General Permitted Development) (England) Order 2015. The relevant Class provides for "*Development consisting of a change of use of a building and any land within its curtilage from a use falling within Class E (commercial, business and service) of Schedule 2 to the Use Classes Order to a use falling within Class C3 (dwellinghouses) of Schedule 1 to that Order.*". Whilst the right is subject to Prior Approval, such Approval does not involve the assessment of planning policy. Essentially, the Government is keen to encourage by removing excessive planning control and regulation, precisely the type of development envisaged in this case.

2.7 In light of the foregoing, we conclude that Policy S/6 is "out-of-date" and, as

described above, even the council intends that it be abandoned in its emerging  
Local Plan.

2.8

### **3.0 LINEAR ASSESSMENT**

- 3.1 Even though we consider Policy S/6 to be out of date and worthy of very limited or no weight in the determination of the current application, we have considered the area in question. We have undertaken a complete assessment of the Linear Area defined on the adopted UDP proposals map and described in the relevant Appendix of the UDP.
- 3.2 We attach as Appendix B to this Assessment a plan showing those units within the Area which are either vacant or with no active frontage. The results were obtained through an on-site physical survey. The survey was conducted in good weather during the middle of the day, on a standard working week (Monday to Friday), when shops and other commercial businesses are expected to be open.
- 3.3 The survey plan shows the application site shaded red, vacant units shaded in purple and those properties along the frontage which have already been turned into dwellings shown shaded brown.
- 3.4 It will be seen from the onsite survey that the level of vacancy within the Linear Commercial area is very high and accordingly, the requirement set out in Policy S/6 is met. As of mid-2025, the average vacancy rate for shops in UK town centres is approximately 13% to 14.5%. While the high street has faced significant challenges, vacancy rates have shown signs of stabilising and, in some prime locations, beginning to tighten as the market moves closer to pre-COVID levels of roughly 12.4%. The area the subject of this Assessment comprises 36 separate units, of which 18 are vacant, and 3 are in residential use. Thus, the vacancy rate is 50%.
- 3.5 The development will result in the re-use of a vacant property in an area of high vacancy, contributing to the regeneration of the area

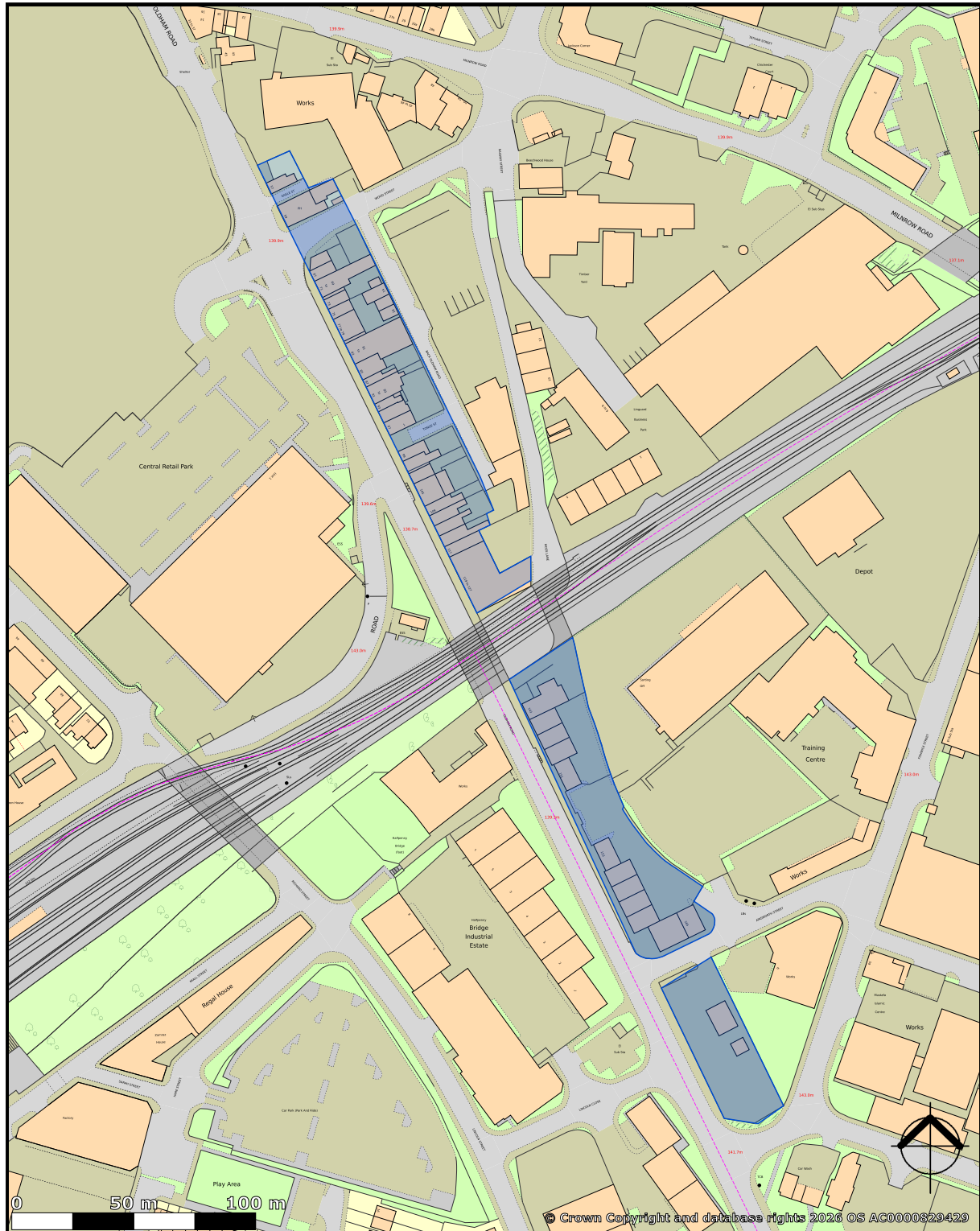
## **4.0 CONCLUSIONS**

- 4.1 In light of our Assessment, we believe the area is experiencing high vacancy levels and that the property's reuse for residential purposes is regenerative. Thus, the proposal accords with Policy S/6
- 4.2 We have also shown that Policy S/6 is out of date and is, in any event, worthy of limited weight. In relation to the council's emerging Local Plan, the area within which the application site is located is not shown to be the subject of any particular allocation.
- 4.3 We consider that the site involves the sustainable reuse of a vacant property, which will deliver homes within the existing urban area in an accessible location.
- 4.4 We consider that the general presumption in favour of development set out in paragraphs 10 and 11 of the NPPF applies and this application ought to be approved without delay.

## APPENDIX A

Plan showing Linear Area

Oldham Road, Rochdale, OL11 1AD



created on **edo**zo

Plotted Scale - 1:2,500

## APPENDIX B

Plan showing vacancy and non-commercial uses

Oldham Road, Rochdale, OL11 1AD

