

Contents

1. Disclaimer	2
2. Site Description and Proposal	3
3. Executive Summary	5
4. Policy Background	6
5. Sequential Test (Methodology)	12
6. Sequential Test	15
7. Conclusion	33
8. List of Accompanying Appendices	34
Appendix 1: Proposed Plans	34
Appendix 2: Tesco vs Dundee Case Law	34
Appendix 3: PSA Maps	34

1. Disclaimer

- 1.1 The findings presented in this report are based on a desktop study of information supplied by third parties. The purpose of this report is to provide Rochdale Borough Council (RBC) with a sequential assessment to justify whether development at the subject site, 120 Hare Street, Rochdale, OL11 1JT, is sequentially acceptable or not subject to the relevant reasonably available alternative sites.
- 1.2 The proposed development seeks to change the use of the existing vacant building to a ground floor jewellery shop (Class Ea) with ancillary storage being located on the first floor.
- 1.3 This document has been prepared for this specific reason and should not be used for any other purpose without the prior written authority of ET Planning. Whilst we assume that all information is representative of past and present conditions, we accept no responsibility or liability for the consequences of this document being used for a purpose other than for which it was commissioned.

2. Site Description and Proposal

- 2.1 The site comprises of an existing building which was previously utilised as an elderly nursing home. It is thought that the previous care home use was abandoned at some point between 2016 and 2017, ensuring that the site has been vacant and underutilised for some time.
- 2.2 The surrounding area is predominantly residential, although to the east on the opposite side of Hare Street is a community centre and to the south, on the opposite side of Milkstone Road, is a mosque. An elderly person's nursing home lies to the south east of the site at the junction of Milkstone Road and Philip Street.
- 2.3 The location of the building subject to the application is highlighted below on aerial imagery.



Figure 1: Aerial Image.

- 2.4 The site is served well by transport links to the wider area, being located in close connectivity to the Rochdale Bypass as well as the A627, M62, as well as Rochdale Train Station.
- 2.5 In abandonment, the building lost some of its features, with all of the fenestration on site being removed and replaced with boarding. The building is located in a prominent position within the street scene and, thus, requires a new use to ensure that the building can be restored to its previous condition.
- 2.6 The proposed development seeks to change the use of the building on the ground floor to a jewellery shop, whilst the second floor is sought to be utilised as storage in association with the jewellery retail use.
- 2.7 No extensions are proposed to the space with the only external changes seeking to change the principal elevation with relevant marketing materials and fenestration changes, which largely do not require planning permission.
- 2.8 The footprint of the building is circa 200 sqm, ensuring that the ground floor jewellery shop is proposed to be a similar size.
- 2.9 The proposal also includes an area for parking to the front of the unit. In accordance with the updated parking standards, 1 space is required per every 25sqm of commercial floor space resulting in a requirement for 8 vehicles.
- 2.10 The site is subject to a previous planning application, 10/D53643, which sought permission for the change of use of the care home into 5 retail units and 3 apartments to the rear within No 118 Hare Street.
- 2.11 This application was approved with subsequent applications being submitted to clear the relevant conditions. Therefore, previous

permission was obtained for a commercial/retail led use in this location, but it appears that this permission was not implemented.

2.12 However, just to note, this application only seeks to change the use of No 120 Hare Street.

2.13 Please see the attached proposed plans (appendix 1) for further details regarding the proposed development.

3. Executive Summary

3.1 After an assessment of the relevant policy, it is clear that a sequential assessment is required in this instance as the previous use was residential in nature.

3.2 The building subject to this application is circa 350 sqm, ensuring that an impact assessment is not required in accordance with Policy PR5 of the emerging Rochdale Plan, as well as Policy E1 of the core strategy.

3.3 Crucially, Policy PR3 of the emerging plan denotes the requirements for primary shopping areas (PSA) within town centre locations. Crucially, paragraph 7.36 of the Policy confirms the following:

"for sequential testing purposes, the PSA represents an in centre location for Class E retail proposals... Therefore, unless policies specifically state otherwise, Class E retail proposals outside of the PSA but within centre boundaries will be considered as out of centre or edge of centre depending on the distance from the Primary Shopping Area"

"For District and Local Centres, it is not appropriate to have a PSA and therefore all main town centre proposals outside of the centre boundary will be considered as out or edge of centre if it is immediately adjacent to the centre boundary"

- 3.4 This policy is crucial to the methodology of this test as it confirms that the only suitable, and deemed central, location for retail uses is Primary Shopping Areas (PSA). This ensures that Rochdale Council can ensure that all retail provision is located within these areas to encourage footfall and the retention of the high street.
- 3.5 Therefore, this sequential assessment must assess whether there are alternative locations for the development within the PSA or immediately adjacent to it, as per the above policy. Any other locations for this type of development are viewed to be out of centre and, thus, are not suitable alternative sites.
- 3.6 The results of the Sequential Test (as discussed below) indicate that there are no suitable Sites which could accommodate the proposed development within any of the listed centers or on within any edge of centre locations. As such, the Sequential Test is passed.

4. Policy Background

National Planning Policy

- 4.1 Firstly, a town centre use is defined within the Framework on page 75. The description states that 'retail development' would be deemed to be a main town centre use. Therefore, it is clear that a sequential assessment is required in this instance.
- 4.2 National Planning Policy Framework (NPPF) paragraph 91 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. Main town centre uses should be located in town centres, then in edge of centre locations; and only if suitable sites are not available (or expected to

become available within a reasonable period) should out of centre sites be considered.

- 4.3 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.
- 4.4 Paragraph 94 of the NPPF further states *“when assessing applications for retail and leisure development outside town centres, which are not in accordance with an up-to-date plan, local planning authorities should require an impact assessment if the development is over a proportionate, locally set floorspace threshold (if there is no locally set threshold, the default threshold is 2,500m² of gross floorspace).”*
- 4.5 RBC does have a local policy which details a lower threshold for an impact assessment. Policy PR5 of the emerging plan confirms that applications in the wider Rochdale area should undertake an impact assessment if the floor area exceeds 2000m². However, as the proposed use does not meet this requirement an impact assessment is not required.

National Planning Guidance

- 4.6 National planning guidance on town centres and retail uses explains the purposes of a sequential test. It states that the sequential test guides main town centre uses towards town centre locations first, then, if no town centre locations are available, to edge of centre locations, and, if neither town centre locations nor edge of centre locations are available, to out of centre locations (with preference for accessible sites which are well connected to the town centre). It

supports the viability and vitality of town centres by placing existing town centres foremost in both plan-making and decision-taking.

- 4.7 It states that it is for the applicant to demonstrate compliance with the sequential test (and failure to undertake a sequential assessment could in itself constitute a reason for refusing permission). Wherever possible, the local planning authority is expected to support the applicant in undertaking the sequential test, including sharing any relevant information.
- 4.8 The application of the test will need to be proportionate and appropriate for the given proposal.
- 4.9 The checklist below sets out the considerations that should be taken into account in determining whether a proposal complies with the sequential test:
1. With due regard to the requirement to demonstrate flexibility, has the suitability of more central sites to accommodate the proposal been considered? Where the proposal would be located in an edge of centre or out of centre location, preference should be given to accessible sites that are well connected to the town centre. It is important to set out any associated reasoning clearly.
 2. Is there scope for flexibility in the format and/or scale of the proposal? It is not necessary to demonstrate that a potential town centre or edge of centre site can accommodate precisely the scale and form of development being proposed, but rather to consider what contribution more central sites are able to make individually to accommodate the proposal.
 3. If there are no suitable sequentially preferable locations, the sequential test is passed.

- 4.10 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 will need to be provided where this is the case, and land ownership does not provide such a justification.
- 4.11 The sequential test supports the Government's 'town centre first' policy. However as promoting new development on town centre locations can be more expensive and complicated than building elsewhere, local planning authorities need to be realistic and flexible in applying the test.
- 4.12 Again, some uses do require buildings of a larger size, or with specific height, size or surroundings requirements that need to be respected and considered when undertaking and assessing a sequential assessment.
- 4.13 In addition, paragraph 010 of the NPPG is clear in which it states, *"When identifying sites, the **suitability**, **accessibility**, **availability** and **viability** of the site should be considered"*. Therefore, each of these aspects should be considered in regard to each alternate site.

Local Planning Policy & Status

- 4.14 As discussed above, Policy PR3 confirms that for sequential assessments for retail provisions, the RPA should be viewed as the only suitable and central location. Any other location is viewed to be out of centre, unless it is immediately located on the edge of the RPA and adjacent to the RPA. In such situation it can be viewed to be an edge of centre site.
- 4.15 Policy PR4 of the emerging plan confirms the relevant district and local centres within the borough. The policy also states that proposals for shops in out of centre locations will be accepted when

- i) The development is of an appropriate scale and is not within 400m of another similar provision
- ii) The development must not have a negative impact on neighbouring amenity
- iii) The proposal must be well connected.

4.16 Therefore, this policy does confirm that development in out of centre locations can be viewed to be acceptable, subject to its location and specific policy requirements.

4.17 When the proposal is assessed, the site is located on a main road, Milkstone Road, whilst multiple other commercial shops are located alongside a mosque and community centre. The road is served by commercial and community led uses which denote its character.

4.18 The site is not located within 400m of another similar jeweller whilst the proposal is well connected with public transport (train/bus) and road connections. The proposal will have no impact on neighbouring amenity and will reuse an existing abandoned building.

4.19 Policy PR5 of the emerging plan highlights that sequential tests are required for out of centre retail and leisure uses subject to national policy, whilst this policy clarifies that an impact assessment is not required in this instance.

4.20 The subtext to policy PR5 further reiterates the national policy requirements, confirming that centre sites should first be assessed followed by edge of centre sites.

4.21 Policy E4 of the Core Strategy also confirms that brownfield sites within the urban area should be the first sites that are utilised to meet employment and commercial needs if no suitable sites are found to be available.

Case Law

4.22 Key to town centre sequential assessments is the *Tesco Stores Limited v Dundee City Council* (appendix 2) case law where a new Asda was approved within 800 metres of an existing Tesco superstore.

4.23 Paragraph 28 of the decision states that,

"The application of the sequential approach requires flexibility and realism from developers and retailers as well as planning authorities. The need for flexibility and realism reflects an inbuilt difficulty about the sequential approach. On the one hand, the policy could be defeated by developers' and retailers' taking an inflexible approach to their requirements. On the other hand, as Sedley J remarked in R v Teesside Development Corporation, Ex p William Morrison Supermarket plc and Redcar and Cleveland BC [1998] JPL 23, 43, to refuse an out-of-centre planning consent on the ground that an admittedly smaller site is available within the town centre may be to take an entirely inappropriate business decision on behalf of the developer."

4.24 This case law highlights again the need for flexibility and understanding for the proposed business and the Council.

5. Sequential Test (Methodology)

- 5.1 The Sequential Test should be applied to demonstrate that there are no 'reasonably available sites' in centre or edge of centre locations, that would be appropriate to the type of development or land use proposed.

Stage 1 (Location)

- 5.2 As highlighted above, for retail provisions within the borough the Councils RPA areas are the relevant locations in which retail provisions should be provided. These areas are viewed to be 'centre' locations whilst all other locations are viewed to be out of centre for retail provision.
- 5.3 Appendix 3 is provided of each PSA, with one being located in Rochdale Town Centre, one is Middleton Town Centre, one is Heywood Town Centre, and one in Littleborough Town Centre.
- 5.4 Any edge of centre locations will also be assessed as suitable alternatives, but as per the above policy these must lie immediately adjacent to the PSA area.
- 5.5 Clearly there is no requirement to compare out of centre sites to other out of centre sites. If a site is out of centre, it is no more suitable for retail provision than the subject site from a sequential perspective. Therefore, out of centre sites must not be assessed as suitable alternatives.

Stage 2 (Size)

- 5.6 The proposed development seeks to utilise circa 200 sqm of retail floorspace at the subject site. The retail unit does need to be of a certain size to ensure that it can be utilised correctly for the intended

use. If the space was only 50 sqm for example, it would be too small to be able to accommodate a viable retail shop of this type.

- 5.7 However, some flexibility is required as per the relevant case law. It is viewed that a retail floor area that is 50% smaller, could be suitable. As such, any units that have a minimum of 100 sqm are seen to be acceptable.
- 5.8 In comparison a unit that is too large would result in a retail shop that exceeds the special requirements for a jewellery shop. This would make such a shop completely unviable. It would not be suitable for the applicant to rent or purchase a 1000 sqm plot/unit for a 200 sqm shop.
- 5.9 It is thought that a maximum size of 300 sqm is sought in this instance to allow for potential expansion and storage associated with such use. It is thought that this is an acceptable and flexible limit given it is 100% larger than the proposed retail space.
- 5.10 Any site within the primary shopping area would be served by public parking or public transport ensuring that no space would be required to provide individual parking for the proposed jewellery shop. However, an alternate site must be able to serve the public during the following opening hours:
 - 08:00-18:00 on weekdays/Saturdays
 - 09:00-16:00 on Sundays.
- 5.11 Therefore, an alternate site must have a building between 100sqm (1000 sqft) - 300 sqm (3000 sqft) that could be utilised for the proposed use.
- 5.12 This size requirement is extremely large and flexible and ensures that a flexible approach has been undertaken to finding alternative sites.

- 5.13 It is not possible, nor flexible, and not required; to search the whole of the borough for commercial units of every size. This would be counter intuitive and unfair, as it would be impossible to pass any such test. These parameters ensure that any suitable and available sites within the RSA's are assessed within this statement.

Additional Factors

- 5.14 As per paragraph 10 of the NPPG, the **suitability**, **accessibility**, **availability** and **viability** of alternate sites must be considered *within* the assessment of alternate sites.
- 5.15 A site is seen to be available if it is allocated within any local planning documents for commercial/employment use and is within the required size range. A site is seen to be available if it is up for sale for either rent or purchase.
- 5.16 As discussed, a site must be viable for purchase and use by the applicant. The purpose of a sequential assessment is not to act as a barrier to development; it is to find the best and most suitable location for such development.
- 5.17 Therefore, if the sequential assessment fails, in reality this should result in a single site (or list of reasonably available alternatives) where the applicant can contact the land owners and utilise one of the alternate sites instead. Hence, why viability is a key consideration.
- 5.18 Deliverable- To be considered deliverable, sites should be available now and offer a suitable location for development now.
- 5.19 Developable - To be considered developable, sites should be in a suitable location with a reasonable prospect that they will be available and could be viably developed at the point envisaged.

6. Sequential Test

- 6.1 Any site which is suitable as per the above methodology is assessed in more detail below. The search is split into the relevant resources in which information was ascertained from with appendices providing screenshots of the wider search.

Brownfield Land Register (2018)

- 6.2 As per the Rochdale Council website, for a site to qualify for the brownfield land register it must be capable of accommodating 5 or more units of residential accommodation or it must be larger than 0.25 hectares.
- 6.3 As the proposed site is smaller than 0.25 hectares and is not for residential accommodation it would be impossible to find any suitable alternative sites within the Brownfield Land Register.

Rochdale Retail, Leisure and Cultural Facilities Study (2011)

- 6.4 The above study is relevant from a planning perspective, regarding the need to retail uses within the borough and existing provision. However, the sites are put forward within this document regarding further provision or opportunities.

Rochdale Employment Land Study (2008)

- 6.6 The above employment land review again did not offer individual sites whilst the document was a wider discussion-based item regarding need, demand and supply.

Market Search

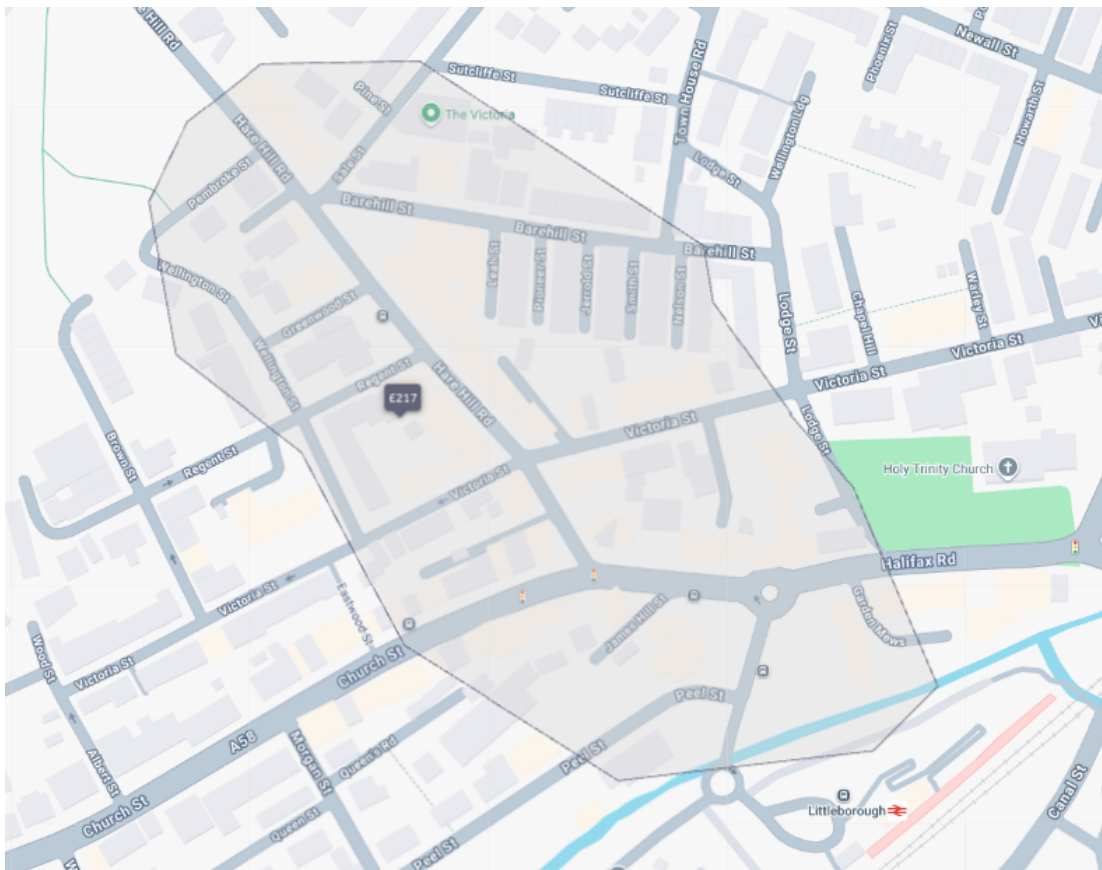
- 6.7 As no available and suitable public documentation had any list or record of allocated sites that would be suitable for commercial uses,

the only left means of obtaining possible alternate sites is via a market search.

- 6.8 To note, the market search considered any building which is an office, retail, leisure, industrial, warehousing, or vacant land which could be utilised commercially as a retail unit.

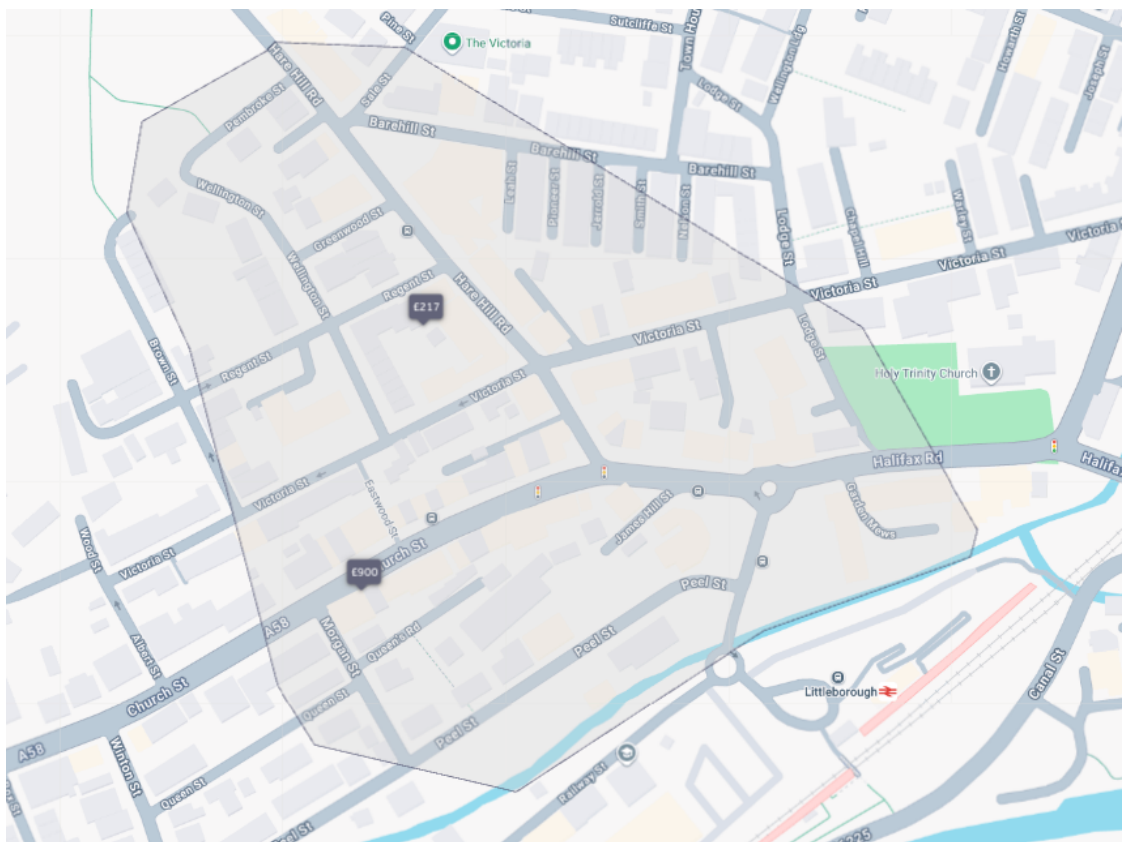
Littleborough RSA

- 6.9 Firstly, the Littleborough RSA and edge of RSA was searched with one property being available for rent. However, this property was only 68 sqm ensuring it was extremely small and did not meet the search requirements.

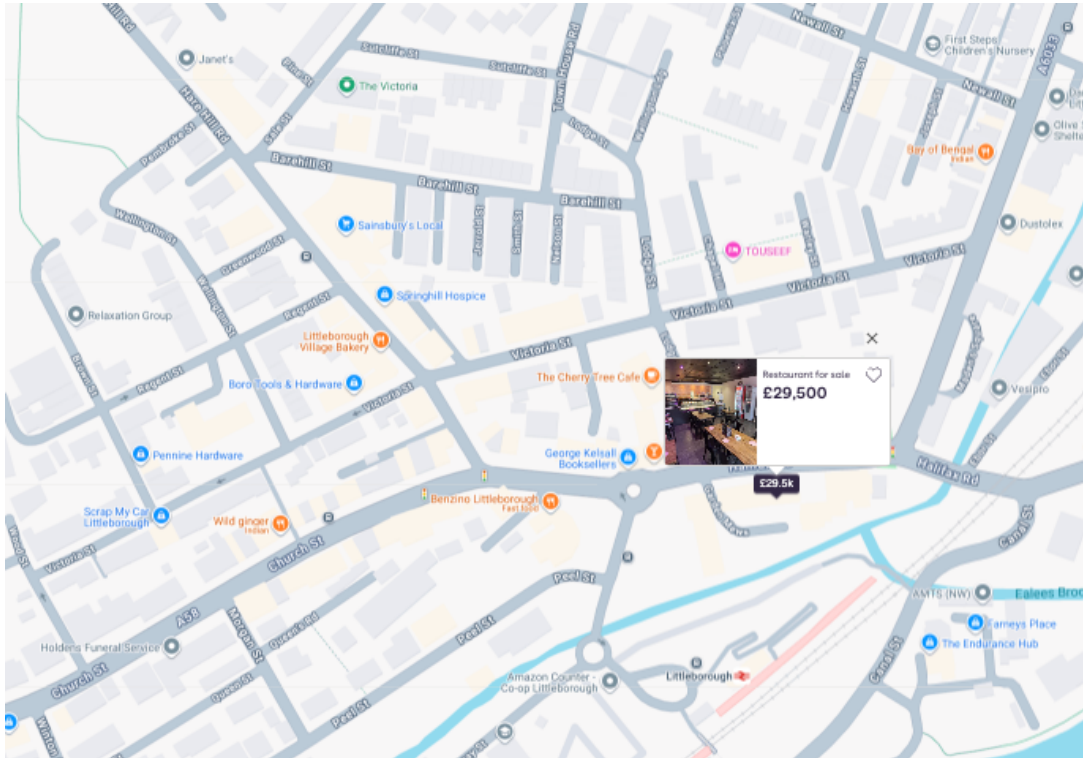


- 6.10 https://www.rightmove.co.uk/properties/170211542#/?channel=COM_LET

- 6.11 A search was then made for commercial premises to buy. This then resulted in a further site, Alina's Curry & Pizza - which appears to now be a One Stop in more recent google street view images (81 Church Street)
- 6.12 This site is available for a long term let at £10,800 per annum, however, it again is a small two storey terraced unit with a maximum floor area of 80sqm. This unit is too small to accommodate the proposed use.



- 6.13 https://www.rightmove.co.uk/properties/172954442#/?channel=COM_LET
- 6.14 A further search was made on Zoopla as per the below screenshot in which one more additional site was found which required further assessment.



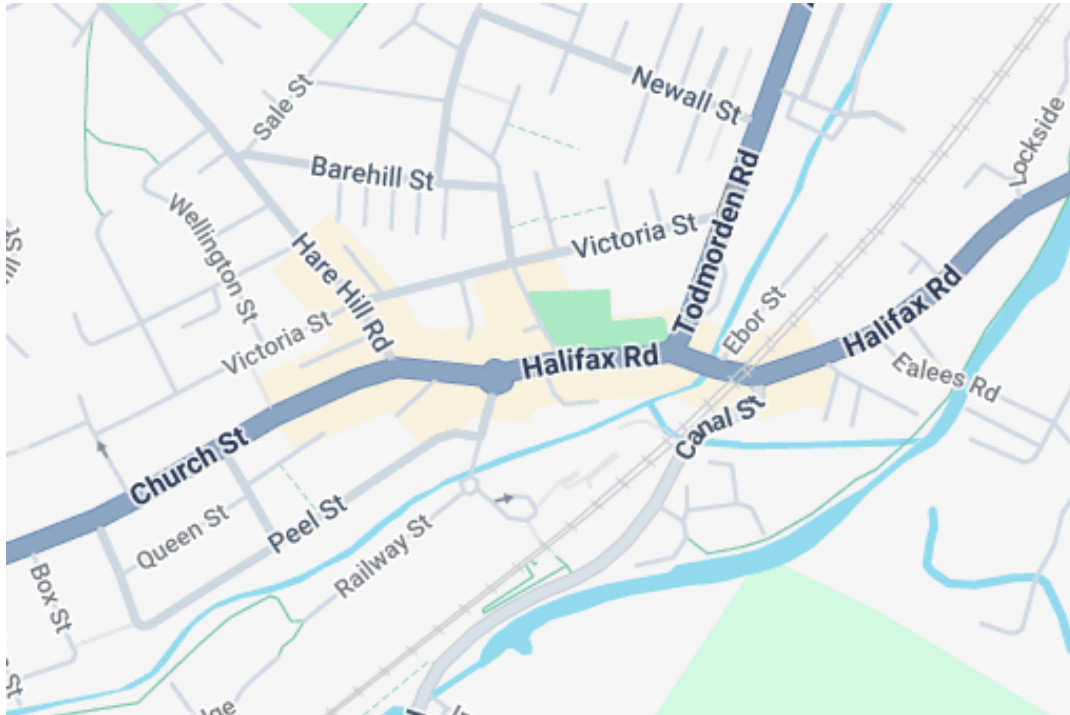
6.15

6.16 https://www.zoopla.co.uk/for-sale/commercial/details/72811721/?search_identifier=a9d72a1a3e37ebed9927785ef2de639963ef87100b113abd962046e172aee2e4

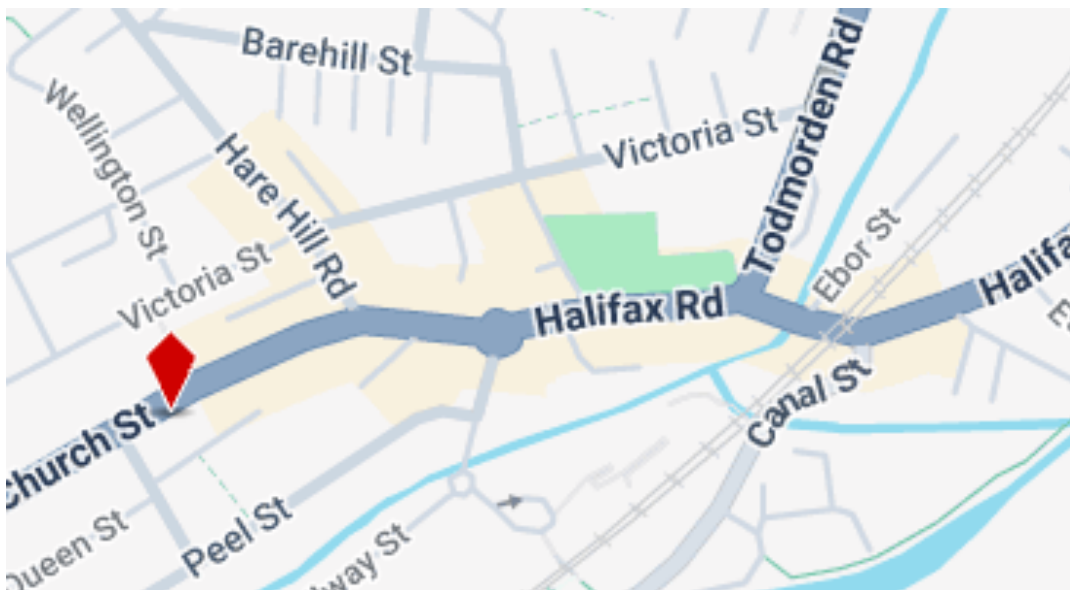
6.17 Again, no floorspace measurements are provided but after a rough measure on google it appears that the unit is circa 65 sqm. As such this alternative site does not meet the 100sqm requirement for the jewellery shop and should be removed from the search.

6.18 Finally, a search was made on LoopNet for sites that are for sale and for rent.

6.19



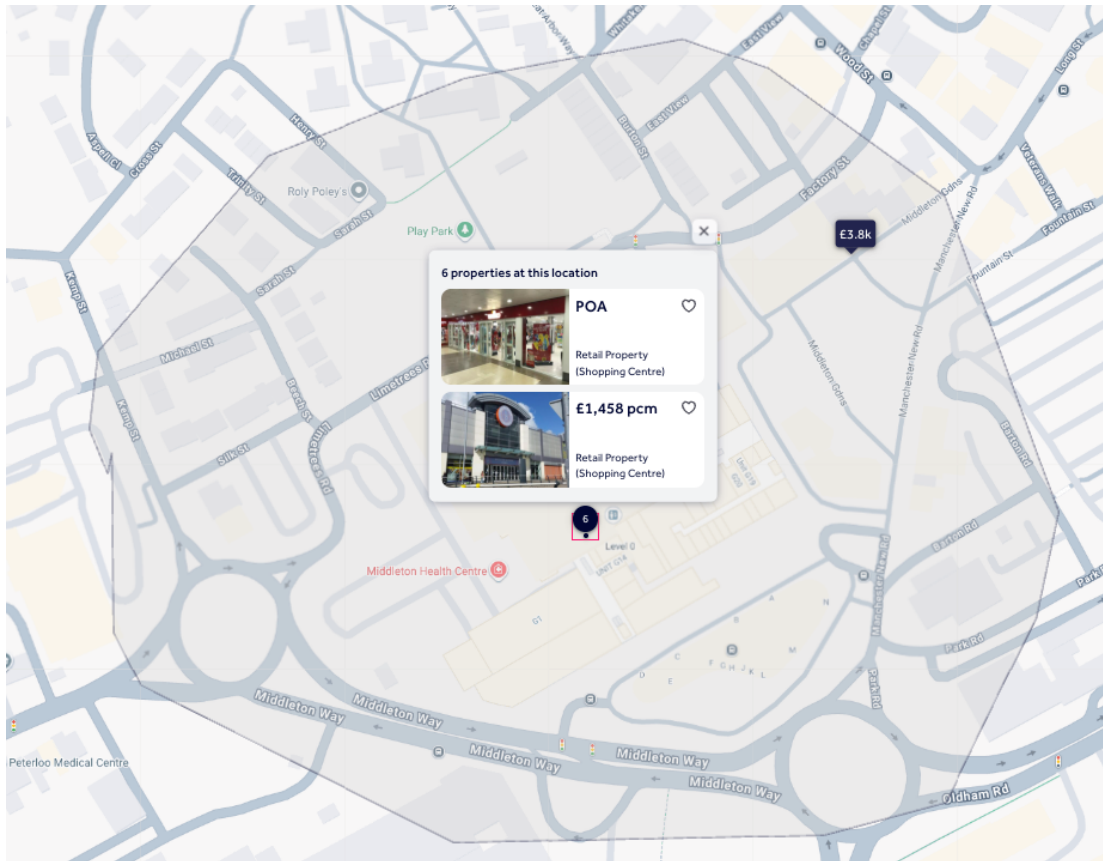
6.20



6.21 The for-sale search did not locate any alternative sites whilst the for-rent search did locate one site, but the retail unit at 81 Church Street has already been viewed to be too small.

Middleton RSA

6.22 Firstly, the Rightmove (rent) search is provided below in which 7 locations within or on the edge of centre were available for rent.



6.23

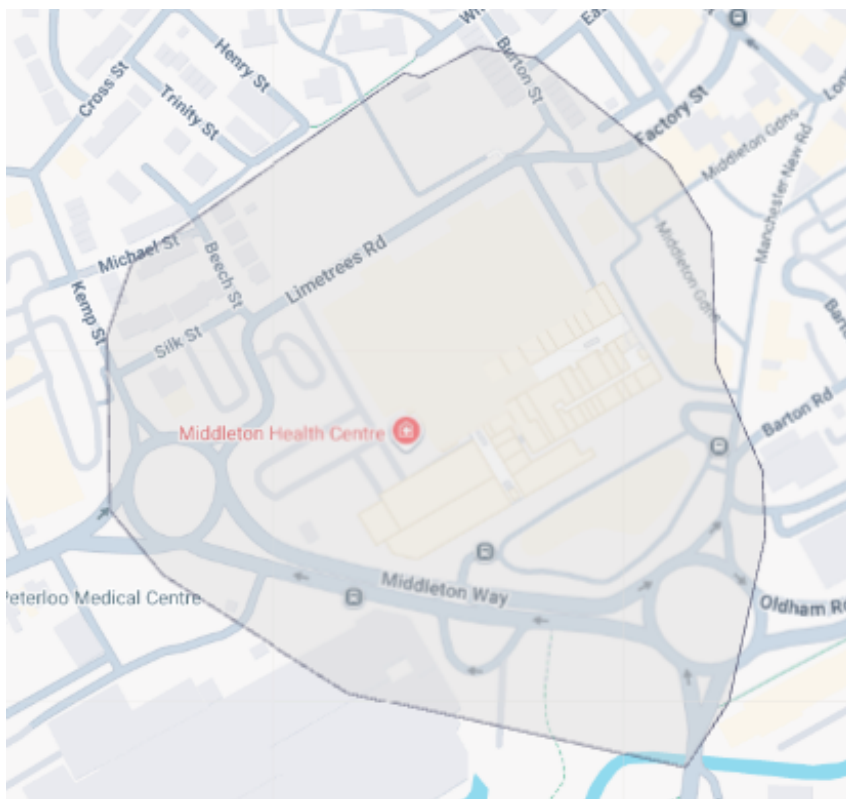
6.24 One of the sites require further assessment as they fall within the parameters of the search.

6.25 https://www.rightmove.co.uk/properties/169788353#/?channel=COM_LET

6.26 Firstly, the previous Halifax at Middleton Gardens is assessed. The site has some parking to the rear whilst it is also located in a suitable location on the high street that sits adjacent to the main centre. The site has a similar sized ground floor to the subject site with a similar upstairs space, ensuring that the size of the site is extremely similar.

6.27 The site is marketed at £3,750 PCM (£45,000 per annum) which results in a location which is unviable for the proposed use. In addition, another Jewellery shop, C.J Jewellers, is already located immediately adjacent to this site ensuring that a large majority of the market and demand is already being met by this use.

- 6.28 Given the existing retail provision for a jeweller, which does satisfy some of the demand in this location, and the expensive cost of large unit in this location, this proposal is seen to be unviable. Even when this site is compared to other sites within Middleton, it is 3 times the cost of these units in this location which are of a similar size.
- 6.29 The adjacent jeweller has a unit which is a quarter of the size of this unit, which makes it more viable. But this unit is too large to accommodate such a use in this location given the contextual circumstances in this instance.
- 6.30 If the proposed use utilised this site, the business would be out of practice in months given the high rent and competition factors. As such this site is rightly removed from the search as viable alternatives.
- 6.31 The for-sale search did not locate any alternative sites within the centre or the edge of centre as per the below map.



6.32

6.33 A further search was made on Zoopla in which no alternate sites were for sale on this estate agent platform. The map search can be seen below for clarity.



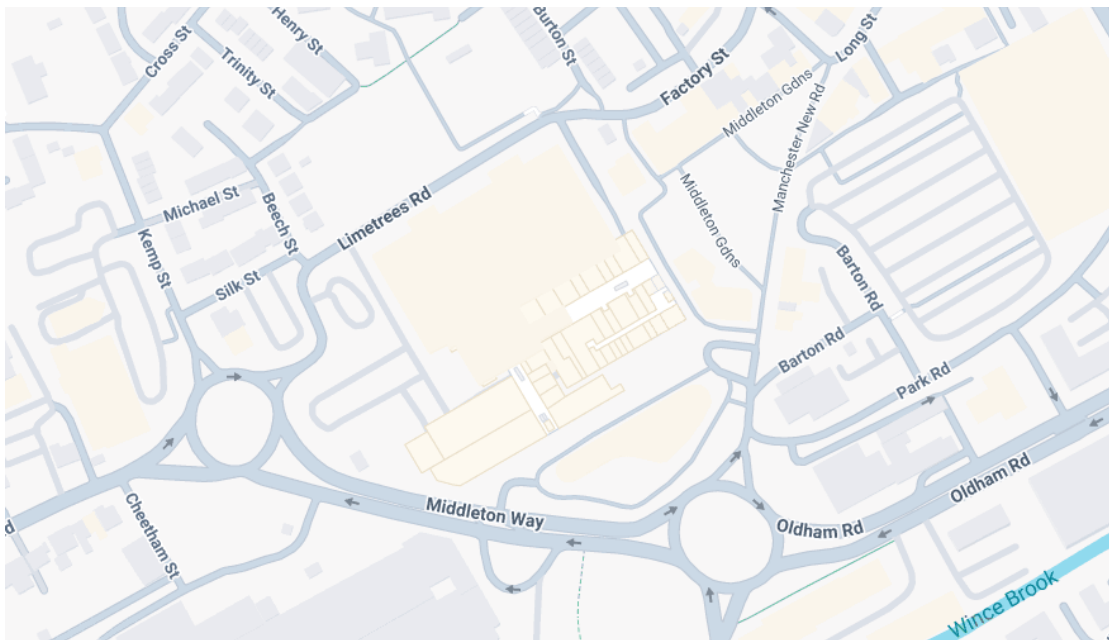
6.34

6.35 Finally, LoopNet was searched for additional sites whilst only 1 site was available for rent on this platform. This site was the same Halifax site that was assessed above and, as such, no further assessment of sites was required in this instance.

6.36



6.37

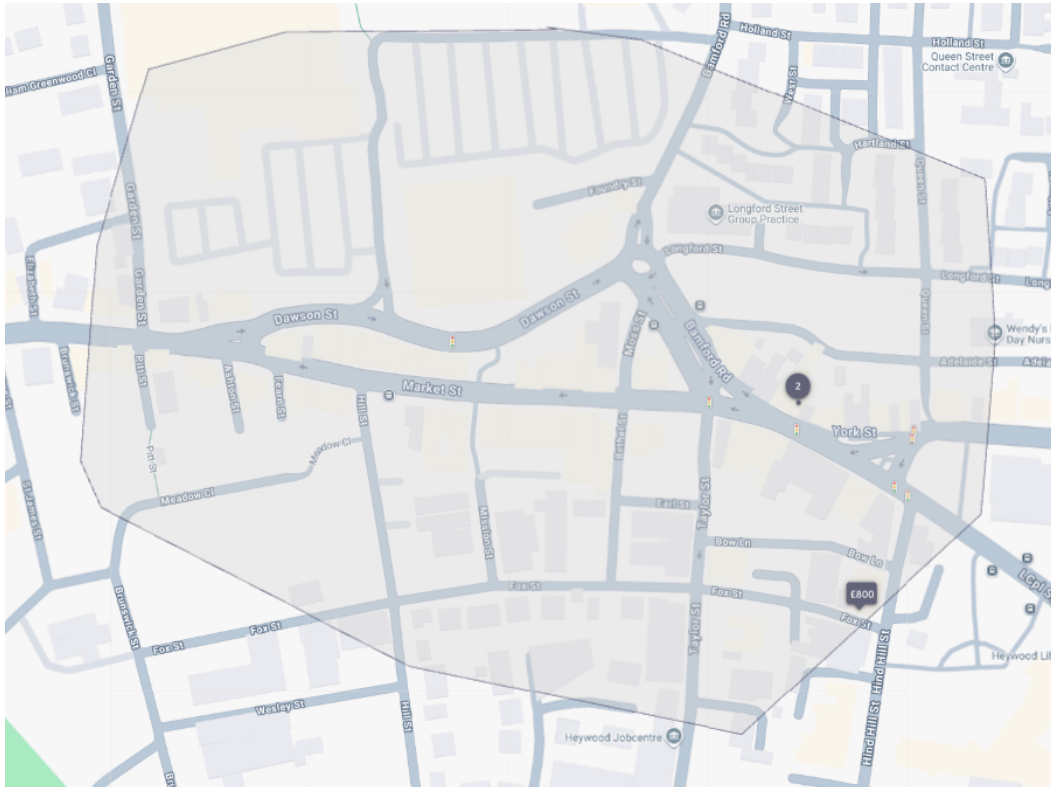


Heywood RSA

- 6.38 Firstly, a search was made on Rightmove for properties that were available for rent within the Heywood centre of adjacent to the centre.

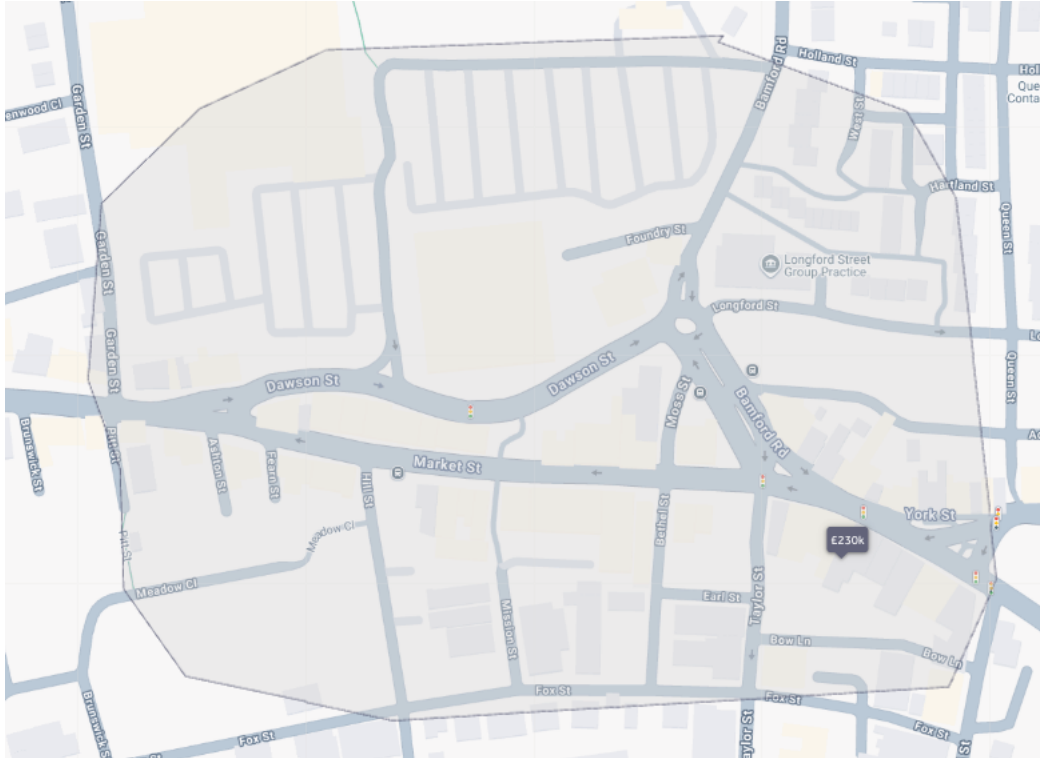
6.39 Three sites were available, but all of these sites had floor areas of circa 50sqm. Therefore, all of the sites were too small to accommodate the proposed use and were not to the desired size.

6.40 As such, none of these sites required further assessment.



6.41

6.42 A search was also made for units that are for sale with one unit being for sale and of a suitable size.



6.43

6.44 https://www.rightmove.co.uk/properties/172496060#/?channel=COM_BUY

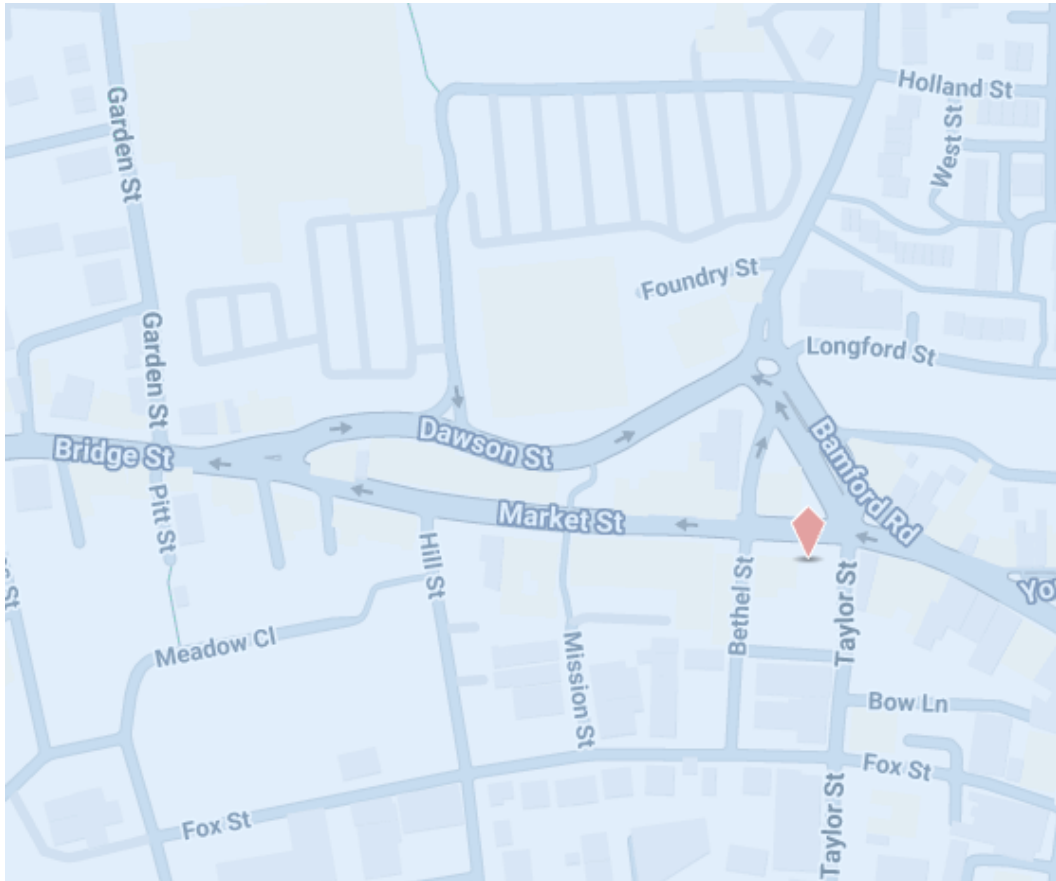
6.45 However, the above unit is available as an investment opportunity, with a long outstanding lease in place for the existing tenant. Therefore, it is not possible to purchase this building to utilise it in a way which would be desired.

6.46 A Zoopla search was also made whilst no sites within the search area were found. Therefore, under this market agent no alternative sites required further assessment.



6.47

6.48 Finally, Sites for sale on LoopNet were assessed with one site being of a suitable size, 3 Market Street, and located within the relevant search area.

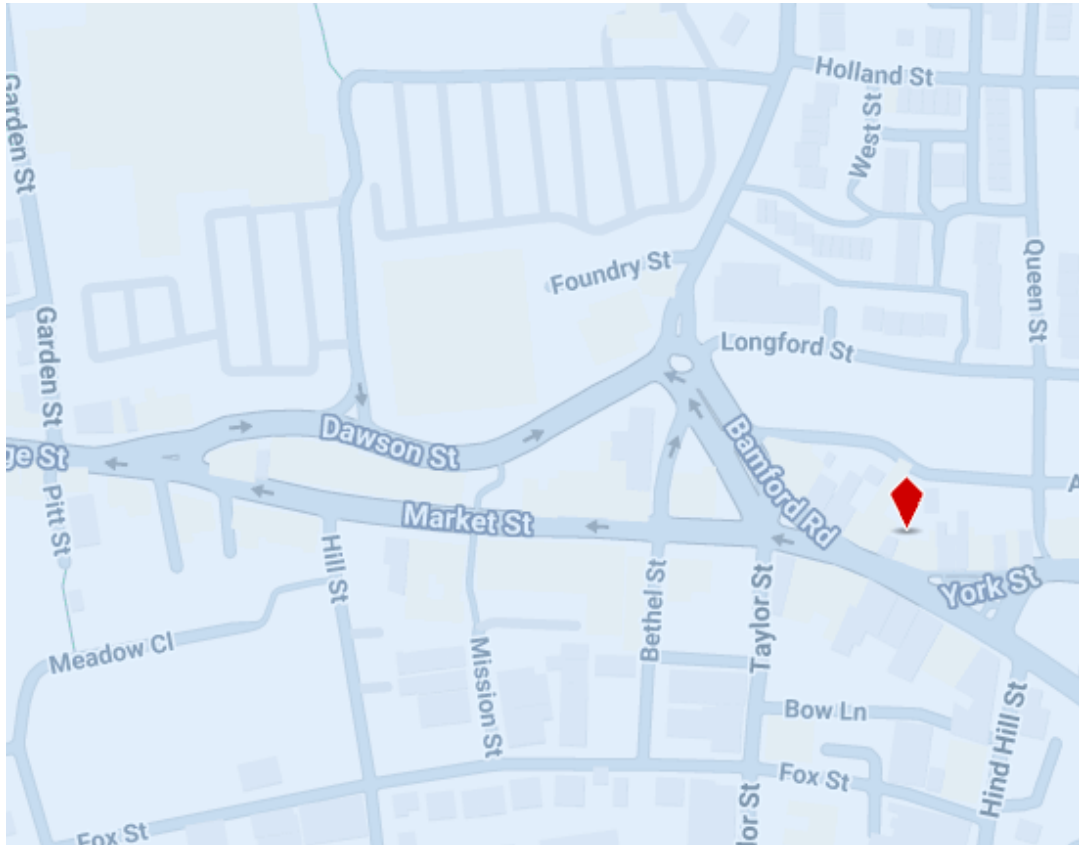


6.49

6.50 <https://www.loopnet.co.uk/listing/3-market-st-heywood/39359078/>

6.51 The property is again an investment opportunity only and is tenanted. Therefore, it is thought that the site is not available within the immediate future and, thus, it is not a suitable or realistic alternative.

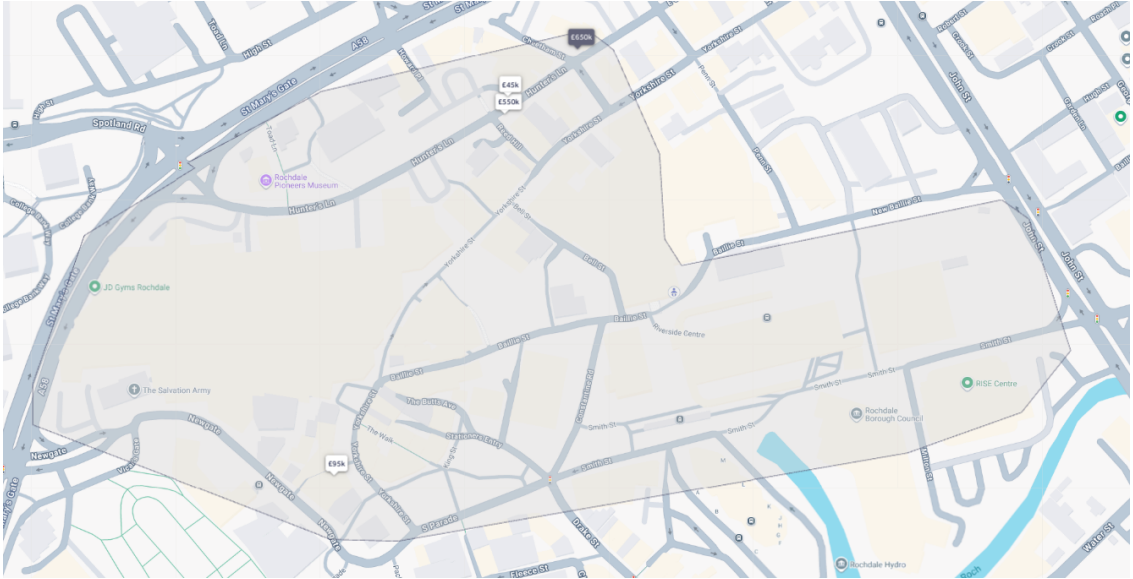
6.52 A search was made for properties for rent, but only one size was available with a circa 50sqm floor area, matching the sites found on Rightmove. As such this site did not require further assessment.



6.53

Rochdale RSA

- 6.54 Finally, the main Rochdale Town Centre was assessed for alternate sites. Firstly, sites available for sale were assessed below. One of the sites was a mixed-use site with 6 flats located above 2 ground floor commercial units which are currently tenanted.
- 6.55 The second site was a larger office block which would not be suitable for such a provision due to it being located on multiple floors whilst the over site was a small 40 sqm hot food takeaway which again was an investment opportunity with contracts in place for tenancy.
- 6.56 As such, none of the sites for sale were viewed to be of a suitable size or were available for purchase for occupation and not only for an investment opportunity.



6.57

6.58 Sites for rent are assessed below with multiple sites being up for rent. After an initial assessment regarding suitable sized units; 3 sites remain available and off a suitable size, requiring assessment below.

6.59 https://www.rightmove.co.uk/properties/143465501#/?channel=COM_LET

6.60 Firstly, 28 Market Place, is available at 232 sqm with the unit being located within the Rochdale Exchange Shopping Centre. However, the ground floor shop is only 58 sqm whilst ancillary space of 162 sqm is provided. Therefore, the shopfloor in this instance would be too small to accommodate the proposed works and development in this instance.

6.61 No financial information is available regarding the cost of letting such unit; however, due to its prominent location within the main shopping centre within the main town it is fair to assume that this unit will be expensive to let.

6.62 When small local businesses are considered, like the proposed jewellery end occupier, a location within the shopping centre is often viewed as unviable. Other larger jewellers and retailers are located

in shopping centres and these providers struggle, even with the marketing and brand reliance that serves to assist such operators.

6.63 As such, it is fair to conclude that this unit is too small but also unviable. When any tenant has to commit to a 10-year contract as per the marketing information, this also creates an issue for a small local business owner in which they would not be able to absorb such risk when agreeing a contract.

6.64 https://www.rightmove.co.uk/properties/87396597#/?channel=COM_LET

6.65 14 Market Place is available, also located within the shopping centre, with a ground floor of 122 sqm making it a more suitable size for the proposed use. However, the same issues as the above site stand in regard to cost and the length of such a contract.

6.66 It would not be viable to rent such a unit for a smaller local business, nor would it be possible for such a business to agree to a 10-year contract. The business seeks to utilise a vacant and deteriorating building at the subject site, restoring this back to its previous condition. When compared to this alternate site, it would not be viable to tenant this unit given the context of the proposed use.

6.67 https://www.rightmove.co.uk/properties/171829592#/?channel=COM_LET

6.68 4-6 St Mary's Gate is available with the unit having a circa 150sqm ground floor shop. The site is an edge of centre location and is available for £1350 PCM and £16,200 per annum.

6.69 This unit is currently under off which ensures that it is not available as an alternative site. Therefore, it can be removed from the search for this reason. However, the site is still retained within this document for further assessment in case the site does become available again.

6.70 The site is of a suitable size, in a suitable location and is not limited in terms of price and viability. This unit would have been a suitable alternative if it was not under offer.



6.71

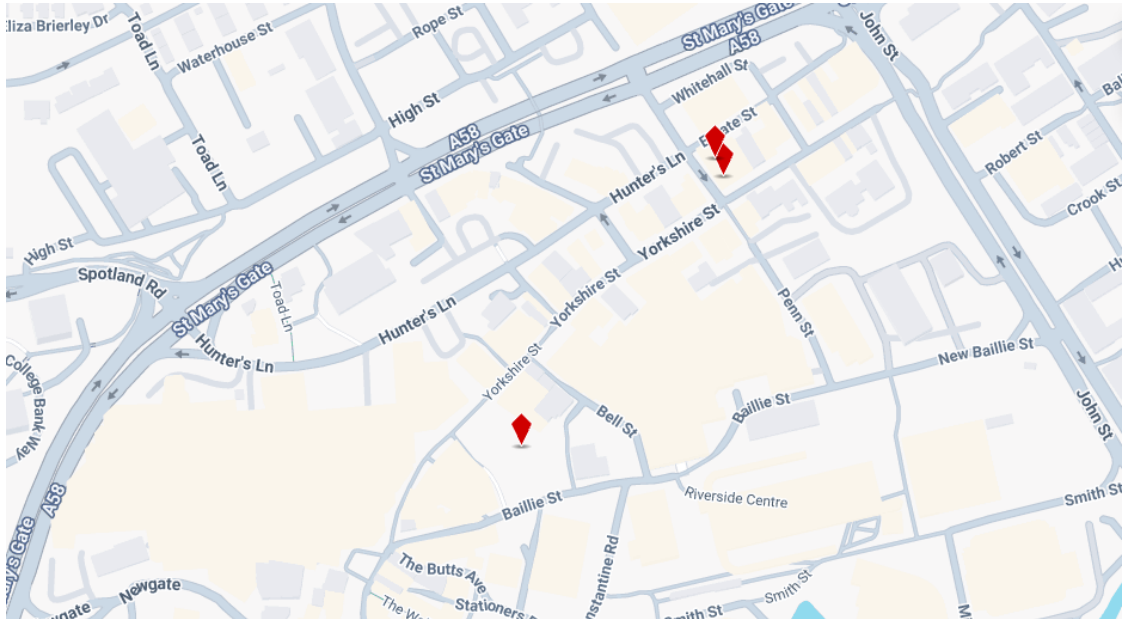
6.72 Zoopla was then searched to ascertain further sites; however, no additional sites were found in this instance.



6.73

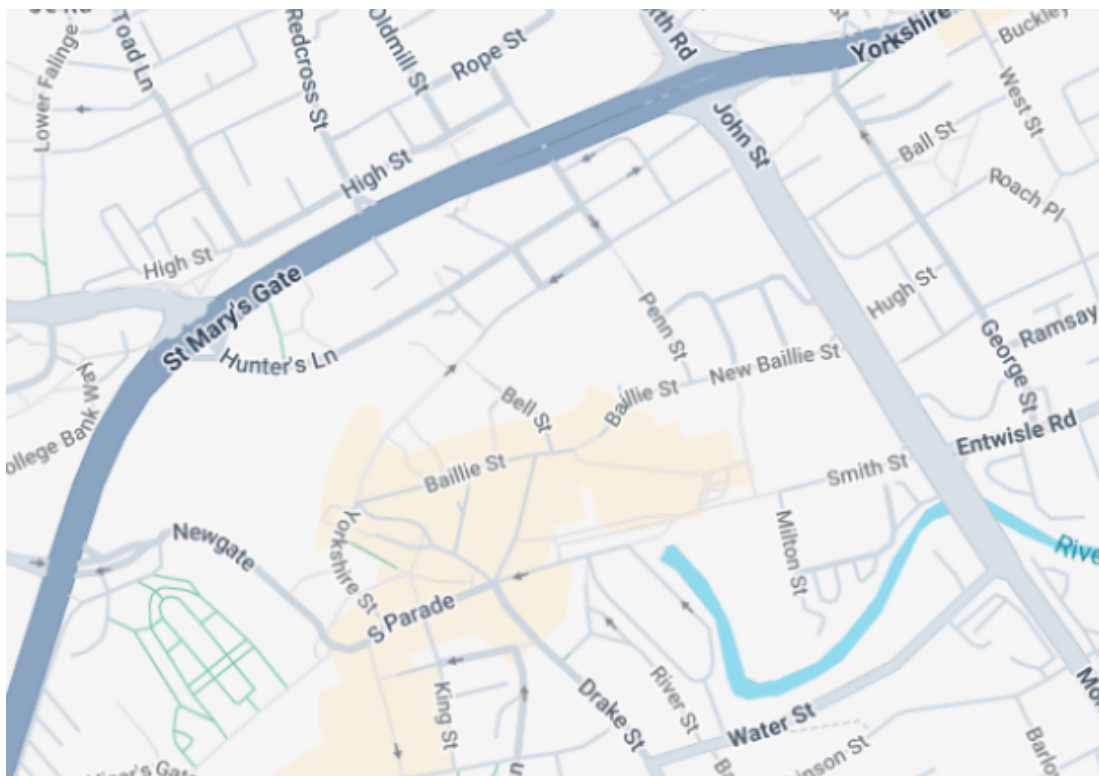
6.74 Units for sale via LoopNet, for rent, are provided below with 3 units available within the search area. However, two of these sites was not

viewed to be, edge of centre, whilst the remaining site in the search area was not of a suitable size.



6.75

6.76 When sites for sale were sought via LoopNet no alternate sites were available in this instance.



6.77

7. Conclusion

- 7.1 This test included a flexible and suitable search which included every RSA (centre) within the borough. Assessments were made of the Council's relevant allocation documents alongside a search of public sites for sale, or rent (via a range of platforms).
- 7.2 Within the search it was clear that there was a real lack of sites available for development. There were some sites available, but these were mostly located in large shopping centres where it was unviable for the owner of a small business to purchase or rent such a unit. If all retail units are expected to be located within large shopping centres with significant overheads, no independent and small local businesses will be available. This has a detrimental impact on the local economy in conflict with local and national policy.
- 7.3 The sites that were largely available in centres where significantly smaller units that would not be able to accommodate the proposed retail unit.
- 7.4 The assessment of suitable sites is provided above, and it is concluded that no suitable sites are available within the borough in this instance.
- 7.5 The Sequential Test therefore passes, showing that no sites would be readily available and developable as alternatives to the proposal at the application site.

Sam Peacock BA (Hons) MSc

Principal Planner | ET Planning

200 Dukes Ride Crowthorne RG45 6DS

sam@etplanning.co.uk 01344 508048

8. List of Accompanying Appendices

Appendix 1: Proposed Plans

Appendix 2: Tesco vs Dundee Case Law

Appendix 3: PSA Maps