



# Planning and Retail Statement

**Land at Victoria Avenue East, New Moston**

February 2022

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**Report title:** Planning and Retail Statement

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**For and on behalf of Avison Young (UK) Limited**

# 1. Introduction

- 1.1 This Planning and Retail Statement has been prepared by Avison Young ('AY') on behalf of Aldi Stores Limited ('Aldi') (hereafter referred to as 'the applicant'). It forms part of a suite of documents in support of an application which seeks 'full' planning permission for the demolition of all existing structures and the erection of a Use Class E foodstore with a new vehicular access and egress to Victoria Avenue East, new internal vehicular access roads, car parking, servicing area, and hard and soft landscaping.
- 1.2 The application also proposes the creation of a new vehicular access and egress for the adjacent sports facility (North Manchester Rugby Club and Assheton Bowmen) which would be taken from the proposed discount foodstore's new vehicular access / egress to Victoria Avenue East. The scheme is proposed on the site of The Imperial Lounge Restaurant, Victoria Avenue East, Moston, M9 7HW. A small amount of surplus land associated with the adjacent sports facility is also utilised. The easting and northing co-ordinates for the site are as follows, Easting: 388196, Northing: 403356.
- 1.3 The application site extends to approximately 2.10 acres (0.85 ha) and is irregular in shape. It occupies a prominent location on the northern side of Victoria Avenue East (A6104), an arterial vehicular route which runs adjacent to the M60 motorway between Blackley and Moston. The site currently comprises a 'Use Class E' restaurant (The Imperial Lounge) which extends to 915 sq. m Gross Internal Area ('GIA') and its sizable associated car park. However, this no longer represents a viable use for the building and it has therefore been marketed for either re-occupation or re-development.
- 1.4 Re-occupation for an alternative commercial use is a realistic option, with the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020 coming into force on 1<sup>st</sup> September 2020, which amend the Town and Country Planning (Use Classes) Order 1987. This has created a new broad '*Commercial Business and Service*' use class (Class E), which incorporates a wide range of previous use classes including both restaurants (Class A3) and shops (Class A1). As a result, the 'change-of-use' of the site's existing building from a 'restaurant' (Use Class E(b)) to 'shop' (Use Class E(a)) no longer constitutes an act of development. The retail use of the site's 915 sq. m building could therefore be lawfully established without the need for planning permission and this represents an important material planning consideration.
- 1.5 The site's proposed redevelopment by Aldi for an alternative 'Class E' use represents a far more economically advantageous option than the building's re-occupation. It offers the chance to bring this prominent site into beneficial use through the provision of a modern, accessible discount foodstore

which is proportionate to the future needs of the Blackley and Moston area. A scheme that will also notably improve the visual appearance of what is presently a tired and dated site.

- 1.6 The scheme will enhance consumer choice and will provide further competition within the area's food retail sector, with it not currently served by a discount foodstore. Meeting day-to-day food retail needs on a localised basis will give rise to considerable benefits in terms of promoting social inclusion and facilitating sustainable travel patterns – with residents no longer needing to travel to Middleton, Failsworth or Manchester city centre to visit an Aldi foodstore.
- 1.7 Added to this, it is important to acknowledge that the foodstore will contribute a range of good quality, flexible retail positions which are within walking distance from the surrounding residential area. A discount foodstore of the scale proposed would typically employ 40 to 50 members of staff.
- 1.8 The scheme is eminently deliverable, with Aldi targeting construction within 18-months of obtaining planning permission. Furthermore, it will deliver a much needed new vehicular access and egress for the adjacent local sports clubs – improving road safety for those using this facility. Indeed, North Manchester Rugby Club and Assheton Bowmen are fully supportive of the proposals and this is articulated in a letter which forms **Appendix I** to this Planning and Retail Statement. The overall investment value of the development will be in excess of £5m.
- 1.9 Discussions between the applicants and Manchester City Council regarding the redevelopment of this site have taken place in advance of the planning application's submission via a pre-application meeting. Amendments have been made in light of comments received and these are reflected in the submitted plans and supporting information.
- 1.10 In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004, this Planning and Retail Statement assesses the development proposal against relevant policies contained within the adopted Development Plan, key national planning policies and all other relevant material considerations. In addition, the report also seeks to demonstrate the wider social, environmental and economic benefits of the scheme.
- 1.11 The application is accompanied by detailed layout, floorplans and elevational drawings prepared by The Harris Partnership. This Planning and Retail Statement should be read in conjunction with the following documents submitted with the application:
  - Design and Access Statement (including Waste Management Strategy) prepared by The Harris Partnership;
  - Transport Assessment (including Travel Plan) prepared by Cameron Rose Associates;

- Flood Risk and Drainage Assessment prepared by Integra Consulting;
- Crime Impact Statement prepared by Design for Security;
- Environmental Standards Statement prepared by Watt Energy & Consulting Engineers Ltd;
- Air Quality Assessment prepared by BWB Consulting Limited;
- Ecological Impact Assessment Report prepared by Collington Winter;
- Nocturnal Bat Survey Report prepared by Collington Winter;
- Updated Bat Inspection prepared by Collington Winter;
- Phase I Geo-Environmental Desk Study prepared by Earth Environmental;
- Coal Mining Risk Assessment prepared by Earth Environmental; and a,
- Noise Impact Assessment prepared by BWB Consulting Limited.

1.12 This statement is structured as follows;

- **Section 2** – Provides a description of the application site and its surroundings;
- **Section 3** – Sets out the details of the application proposals;
- **Section 4** – Offers an overview of Aldi and outlines some of the key benefits that the business hopes to bring to the Blackley and Moston areas;
- **Section 5** – Contains an overview of relevant local and national planning policies;
- **Section 6** – Tests the application proposals against the sequential approach to site selection as defined under Paragraph 86 of the National Planning Policy Framework ('NPPF');
- **Section 7** – Discusses the trading effects of the proposed development, acknowledging that a full retail impact assessment is not required for the scale and form of retail development proposed (based on the local and national town centre policy context);
- **Section 8** – Provides evidence of the proposal's compliance with relevant policies contained within the Local Plan and the National Planning Policy Framework (the 'NPPF') (other than those relating to retail or 'town centre' development); and,
- **Section 9** – Evaluates the development proposals against the policy balance set out under Paragraph 11 of the National Planning Policy Framework and provides our overall conclusions.

1.13 This Statement is also supported by the following appendices;

- **Appendix I** – Letter of Support on Behalf of North Manchester Rugby Club and the Assheton Bowmen;
- **Appendix II** – Catchment Area Plan;
- **Appendix III** – Sequential Site Assessment Pro-Formas; and,
- **Appendix IV** – Health Check Assessments – Hollinwood Avenue Local Centre and Victoria Avenue Local Centre.

## 2. Site Description

- 2.1 This section describes the site's location, its surroundings and the specific characteristics of the site itself.

### Site Location

- 2.2 The application site occupies a prominent location on the northern side of Victoria Avenue East (A6104), an arterial vehicular route, which runs adjacent to a section of the M60, connecting the residential areas of Blackley (2km west of the site), Moston (500m east of the site), and Hollinwood (2.5km east of the site). The site lies approximately 2.5km north-east of the nearest defined district centre, Harpurhey. The closest defined local centre is Hollinwood Avenue Local Centre, which is 800m to the east. Accordingly, the site must be classified as an '*out-of-centre*' location in town centre policy terms.
- 2.3 The site is in close proximity to a range of residential, commercial and leisure uses as described in more detail in the below sections. With regards to the site's wider locational context; the town centre of Oldham is some 4.5km north east of the site, the town centre of Middleton is 5.5km north of the site, and Manchester city centre is located 7km south east of the site.

### Site Description and Features

- 2.4 The application site is irregular in shape and extends approximately 0.85ha in size. Vehicular access/ egress is currently taken from the southern boundary of the site from an existing access point on Victoria Avenue East (A6104). Victoria Avenue East links directly to the A664 (Rochdale Road), which in turn provides access to the M60 (Manchester Outer Ring Road). As part of this application a new vehicular access/ egress junction will be developed approximately 20m east of the existing junction.
- 2.5 The site presently contains a restaurant "*The Imperial Lounge Indian Restaurant*", which is located on the southern half of the land. The restaurant extends to 915 sq. m GIA and is a Class E use. The northern half of the site contains car parking and landscaping which is associated with the restaurant.
- 2.6 The western section of the site contains a small area of landscaping associated with the North Manchester Rugby Club. However, notably the section of landscaping which is proposed to form part of the application site does not contain a rugby pitch and is very much surplus to the sport club's requirements. In return for its inclusion in the scheme, a small piece of land which currently

comprises car parking associated with the restaurant use on site is proposed to be transferred to the rugby club in order to benefit the rugby club site, so the land is square with the rugby pitches.

- 2.7 In summary, the application site is irregular in shape, extends approximately 0.85ha, and currently contains a Use Class E restaurant, associated car park and a small area of landscaping which comprises part of a neighbouring rugby club's playing fields. Accordingly, there can be little doubt that the site represents previously developed (or brownfield) land, based on the definition set out within the glossary to the NPPF.
- 2.8 It is also of significance that the 'change-of-use' of the site's existing building from a 'restaurant' (Use Class E(b)) to 'shop' (Use Class E(a)) would not constitute an act of development given the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020. The retail use of the site's 915 sq. m building could therefore be lawfully established without the need for planning permission and this represents an important material planning consideration.
- 2.9 It is evident that the land's redevelopment has the potential to bring about significant economic, environmental and visual improvements by replacing what is currently underutilised brownfield land with a modern foodstore development, which is of a better design quality than the restaurant which occupies the site at present. Such development will improve the appearance of this prominent site on a key vehicular route between Moston and Blackley, to the overall benefit of the surrounding area.

## Site Surroundings

- 2.10 In terms of the site's surroundings, immediately north is a thin area of landscaping, beyond which is the M60/ Manchester Outer Ring Road. On the opposite side of the M60 is a large, landscaped area associated with Blackley Golf Club. Approximately 300m north east of the site is Oldham Broadway Business Park, an extensive industrial/ manufacturing park. This business park houses a wide range of occupiers including DPD Middleton, LWC Drinks Manchester, Andrew James Kitchen Supply Shop, and Middleton Car Centre.
- 2.11 Immediately west of the site is an existing residential apartment building which is mostly 4 storeys in height, with one part of the building extending to 5 storeys. Beyond this is a Use Class E gym complex (Pure Gym) and associated car park, which currently utilises the same vehicular access point as the Imperial Restaurant from Victoria Avenue East. Further west the land comprises predominantly green space and landscaping.
- 2.12 Immediately south of the site is Victoria Avenue East (the A6104). On the opposite side of this road is a large residential housing estate. This housing estate comprises predominantly 2-storey detached

and semi-detached housing. Although it is noted that within the residential housing estate there are several commercial premises including a van retailer and a furniture shop.

- 2.13 Finally, located immediately east of the site is a sports facility occupied by North Manchester Rugby Club and the Assheton Bowmen, which comprises sports pitches and an associated club premises. Further East, on the opposite side of Greengate, the road adjoining North Manchester Rugby Club is another extensive area of residential housing. The housing here comprises predominantly two-storey semi-detached properties. Again, there are several premises within this area of predominantly housing which are of commercial/ educational use. These include a nursery, a soft drink manufacturing facility, and a primary school.
- 2.14 In summary, the site and its surroundings can be characterised as being of mixed use, with residential uses predominating to the south and east, whilst a large industrial estate resides to the north east and a gym is located immediately west. There is a substantial amount of green space to the west of the site. These surroundings represent an important context when considering this site's overall character and setting, and the visual effects of any changes in the future.

## Site Accessibility

- 2.15 A new vehicular access point to the site will be incorporated as part of the proposals. This will be just east of the existing access point, off Victoria Avenue East on the southern boundary of the site. This new access point will be located approximately 25m east of the existing access point. Victoria Avenue East (the A6104) provides a link road between Moston and Blackley, and also provides a direct link between this site and the nearby M60. The M60 in turn connects the site to the surrounding towns of Ashton-under-Lyne (7km south east) and Bury (11km north west). In addition, the site is easily accessible from the nearby towns of Oldham (4km north east), and Rochdale (10km north), as well as being accessible via the A664 or A62 from Manchester City Centre, which is located roughly 7km south east of the site.
- 2.16 The application site is appropriately served by public transport with a bus stop located just 30 meters west of the site on Victoria Avenue East, as well as 2 further bus stops located 300m west of the site. The publication 'Planning for Public Transport in Developments' produced by the Institution of Highways and Transportation ('IHT') specifies that new developments should be located within 400m of the nearest bus stop. This is evidently the case in this instance.
- 2.17 The bus stops located on Victoria Avenue East are visited approximately two times per hour in each direction by the 115, 116, 149, 711 and 722 services. These services provide access to a variety of destinations within the surrounding area, including Oldham, Harpurhey, Monsall, Middleton, and

Crumpsall. Further information regarding bus routes and frequencies serving the site is contained in the accompanying Transport Assessment prepared by Cameron Rose Associates.

- 2.18 Moston Train Station is located just 500m south east of the application site, being less than a 10-minute walk. Having regard to the proximity of the bus stops, the frequency of buses, and the areas that the existing local buses serve, in addition to the nearby train station, the site is evidently highly accessible by public transport.
- 2.19 With regards to pedestrian access, the site benefits from a sizable walk-in catchment given the extensive surrounding residential areas to the south and east. The IHT guidance document titled 'Providing for Journeys on Foot' identifies a maximum walk distance of 2.0km for commuter, school and sightseeing walk trips, 800m for town centre walk trips, and 1.2km for trips elsewhere.
- 2.20 Based on the walk catchment distances identified by the IHT, there are a considerable number of residences within the 800m 'customer' walk catchment area including a large proportion of the Moston area. Furthermore, the vast majority of the housing in Moston falls within the 2km commuter walk catchment along with much of White Moss and Blackley to the east and Hollinwood to the west, meaning that many staff employed from the Moston area could reasonably walk to work.
- 2.21 In terms of the pedestrian highway infrastructure, all immediately surrounding roads are flanked by footways and are appropriately lit, including Victoria Avenue East. In light of the local pedestrian facilities present, the site is evidently well connected to the local pedestrian network with opportunities for customers to make trips by foot. There are also opportunities for future staff members to walk to work.
- 2.22 It should be noted that the application site is also accessible by bicycle, with Victoria Avenue East benefiting from dedicated cycle lanes in both directions. Given that the roads local to the site are urban in character, cycling provides the opportunity to access the future foodstore by this sustainable mode of transport. Cycle parking for both staff and customers will be provided in accordance with the prevailing guidance and will be included within the development, as highlighted in the supporting Transport Assessment prepared by Cameron Rose Associates.
- 2.23 In summary, the application site is highly accessible by private car and other motorised vehicles (such as heavy goods vehicles). This is to be expected given that the primary function of the proposed foodstore is to cater for 'bulk' food shopping needs. This typically involves customers leaving the foodstore with several heavy bags full of goods and, as such, ready access to a private vehicle is often required. Notwithstanding this, it has also been demonstrated that the land is readily accessible by public transport, bicycle and on foot from the surrounding area. This will cater, amongst other things,

for those undertaking smaller top-up shopping trips and also for many of the foodstore's locally based staff. Given its location and evidently accessible nature, the application site represents a suitable and sustainable redevelopment opportunity for the scale and form of foodstore development proposed, in accordance with planning policy.

## Planning History

- 2.24 There are no previous planning permissions that are directly relevant to the discount foodstore currently proposed. A history of planning applications on this site is outlined in the following table.

| Date     | Description                                                                                                                                                                                                                                    | Reference           |
|----------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------|
| 05/05/95 | Demolition of existing buildings and development of business units units/food retail/ pub/restaurant with access, servicing, car parking and landscaping. Withdrawn                                                                            | 047684/OO/NORTH1/95 |
| 21/09/95 | Development of retail (Class A1) and a pub/restaurant (Class A3) with related vehicular, cycle & pedestrian access, servicing, car parking and landscaping. Approved.                                                                          | 048529/OO/NORTH1/95 |
| 24/11/97 | Development of retail (Class A1) and a pub/restaurant (Class A3) with related vehicular, cycle & pedestrian access, servicing, car parking and landscaping. Approved.                                                                          | 053327/FO/NORTH1/97 |
| 12/02/98 | Various illuminated brewery signage. Approved.                                                                                                                                                                                                 | 053813/AO/NORTH1/98 |
| 30/03/98 | Various illuminated brewery signage. Approved.                                                                                                                                                                                                 | 053813/AO/NORTH1/98 |
| 05/09/02 | Various illuminated and non-illuminated fascia and freestanding signage. Refused.                                                                                                                                                              | 066050/AO/NORTH1/02 |
| 28/03/08 | Retrospective application for installation of 6 no. non-illuminated building mounted signs, 2 no. freestanding information signs to front and rear entrance and 1 no. internally illuminated double-sided signage panel to existing totem sign | 085572/AO/2008/N1   |

2.25 The evidence that planning permission was granted in both 1995 and 1997 for a retail unit on this site demonstrates that the Local Planning Authority has previously accepted the principle of such development in this location. It is unclear whether the retail aspect of the approved 1995 and 1997 proposals ever came to fruition. The associated decision notice provided with the 1997 application (ref: 053327/FO/NORTH1/97) contains conditions associated to the retail development aspect of the proposal. It is anticipated that the restaurant was ultimately constructed instead of the retail unit.

### 3. The Proposed Development

- 3.1 This section provides an overview of the proposed development's business format, layout, design, access and servicing arrangements.
- 3.2 The planning application seeks 'full' planning permission for the demolition of all existing structures and the erection of a Use Class E foodstore with a new vehicular access and egress to Victoria Avenue East, new internal vehicular access roads, car parking, servicing area, and hard and soft landscaping. The application also proposes the creation of a new vehicular access and egress for the adjacent sports facility (North Manchester Rugby Club and Assheton Bowmen) which would be taken from the proposed discount foodstore's new vehicular access / egress to Victoria Avenue East. The scheme is proposed on the site of The Imperial Lounge Restaurant, Victoria Avenue East, Moston, M9 7HW. A small amount of surplus land associated with the adjacent sports facility is also utilised.

#### Pre-Application Engagement

- 3.3 The redevelopment proposals have been the subject of pre-application discussions with Manchester City Council as the local planning authority. These discussions have informed the applicants' approach to the planning application, including the design of the scheme and the submission materials that have been prepared to accompany it. Overall, it can be seen that through pre-application discussions with the Council, the application proposals represent the output of a collaborative process undertaken in-line with best practice guidance.

#### Specifics of the Development Proposals

- 3.4 The precise nature of the development proposal is set out below. The planning application seeks 'detailed' planning permission for the following:

##### *The Foodstore Element of the Scheme*

- Demolition of the existing restaurant building and site clearance;
- Erection of a Use Class E foodstore with a Gross External Area (GEA) of 1,974 sq. m, Gross Internal Area (GIA) of 1,884 sq. m, and a net sales area of 1,331 sq. m;
- Provision of 119 car parking spaces including 8 accessible spaces and 9 parent and child spaces;
- Of the proposed 119 parking spaces, 4 will also be equipped with Electric Vehicle Charging Points ('EVCP') and below ground infrastructure will be put in place to provide a further 20 EVCPs in the future;

- 14 short-stay bicycle parking spaces (7 Sheffield cycle hoops) for customers, and long stay bicycle parking spaces (located within the store's warehouse) for staff;
- Areas of public realm throughout the foodstore site, including the creation of a pedestrian walkway into and out of the site from Victoria Avenue East;
- Soft and hard landscaping works, including new landscaping to improve the site's aesthetic appearance. This planting will include the introduction of 10 new trees;
- Servicing provision (a dock-levelling system) at the north-western corner of the proposed neighbourhood foodstore, and,
- Provision of an internal vehicular route through the site from the access junction at its north-western corner.

*Works Proposed in Connection with the Adjacent Sports Club*

- Construction of a new vehicular access and egress for the sports club, which would be taken from the proposed foodstore's vehicular access / egress with Victoria Avenue East;
- Extension of existing playing fields at the north-western corner of the sports club's site (into land currently occupied by restaurant car parking), increasing separation distance with the site of the proposed foodstore;
- Relocation of the western boundary fencing to the playing fields and addition of ball strike netting; and,
- Relocation of floodlighting piers and provision of new floodlight heads.

## Overview of Aldi Discount Foodstore Format/ Business Model

3.5 The following section provides a brief overview of the scale and form of food retail development proposed. In terms of format, the proposed Aldi foodstore will have a Gross Internal Area ('GIA') of 1,884sq.m and a net trading area of 1,331sq.m. The trading floorspace within every Aldi store is consistent at around 1,200sqm to 1,400sqm. This is to enable the range of identical products sold within each Aldi store to be arranged and displayed on a consistent basis. The gross floor area of new Aldi stores (i.e. the trading floorspace plus back of house area) varies slightly within a range of approximately 1,700sqm to 2,000sqm. Again, the aim is to ensure that the stores are built to a consistent specification in order to facilitate efficient delivery and distribution of products to each Aldi store in the portfolio.

3.6 With regards the nature of the food retail development proposed, it is significant that Aldi operate as a 'deep-discount' retailer. This essentially means that the number of core food product lines stocked

within each Aldi store is identical and deliberately restricted to around 2,000. This is in stark contrast to the 20,000+ product lines that you would find in a superstore operated by one of the UK's 'mainstream' convenience retailers, and is the reason why all Aldi foodstores are of a uniform size and format.

- 3.7 The core retail offer within an Aldi store (approximately 80% of the net sales area) seeks to replicate the most regularly purchased items within a family's weekly or 'bulk' food shopping trip. The vast majority of products stocked are Aldi branded and through economies-of-scale these goods can be sold at heavily discounted prices without impacting upon quality. Stock is generally presented on pallets or shelves within display ready packing cases to aid efficiency and reduce unnecessary overheads. Savings which can then be passed directly on to the consumer.
- 3.8 Aldi's focus on the key products that typically make up 'bulk' food shopping trips means that they do not sell certain 'ancillary' lines that are normally found in mainstream supermarkets, including tobacco. In addition, there is no staffed butchery, fishmonger, delicatessen or hot food-counter, and Aldi's foodstore format does not accommodate customer restaurants or in-store franchises such as a Post Office, dispensing pharmacy, dry-cleaning, betting offices, opticians, or photo processing. These factors are important when considering the trading effects of an Aldi foodstore; as clearly in Aldi's case the potential for cross-over with the offer of independent high-street retailers is far less than it is for 'mainstream' food retailers that stock a far wider spectrum of goods.
- 3.9 Notwithstanding the above, the Aldi foodstore, as with all modern supermarkets, will also stock a very limited range of non-food goods (approximately 20% of the net sales area). The range of non-food goods in an Aldi store is purely ancillary to the food offer in floorspace terms, and it is also significant that the products stocked mirror seasonal demand such that there is a constant variety in terms of range and choice, with no particular type of comparison goods predominating. In this fashion, the potential for an Aldi foodstore to compete with high-street retailers is extremely limited. This point is also considered in greater detail as part of the retail impact section of this Planning and Retail Statement.

## Layout

- 3.10 In terms of layout, as the submitted Proposed Site Layout Plan (Ref. 16223BOL-101A) illustrates, the foodstore will be positioned at the south-western corner of the site with the internal vehicular routes and customer car parking predominantly occupying a central location as well as the southern and eastern boundaries. Vehicular egress will be via a newly constructed junction onto Victoria Avenue

East at the site's south-eastern corner. This is some 25m east of the site's current vehicular access point.

- 3.11 In relation to customer car parking provision and access, the accessible parking spaces (8) will be located directly in front of the foodstore building, along with the parent and child spaces (9); both will offer straightforward access to the store entrance. Four electric vehicle charging point spaces will be positioned immediately north of the parent and child spaces.
- 3.12 The foodstore's entrance will be located at the north-eastern corner of the building, with its glazed active frontage facing east and clearly visible from Victoria Avenue East. It will be positioned to offer the best prospect of fostering linkages with the pedestrian highways on Victoria Avenue East, whilst also providing sufficient circulation space for those entering and leaving the foodstore with a shopping trolley. The foodstore's servicing area will be positioned at its north-western corner, ensuring that it does not detract from any key views into the site from the surrounding area.
- 3.13 The positioning of the foodstore within the application site such that occupies the south-western corner is necessitated by the shape of the site itself and the fact that an existing United Utilities underground water utility runs through it and it is not possible to build over this. However, such an orientation would have been favoured by Aldi in any case, as it enables the store's entrance to provide a strong presence and frontage onto Victoria Avenue East (as demonstrated in the submitted CGI Ref. 16223 BOL New Moston M\_02 CGI\_02), which will attract customers as well as improving the visual amenity of the area. This is also important given the site's prominent location. Finally, the orientation ensures that the foodstore's servicing area is screened from view at the back of the site, as opposed to being visible to passers-by when travelling along Victoria Avenue East.
- 3.14 In summary, the proposed layout clearly offers the greatest potential for integration with surrounding uses, with the foodstore occupying the same part of the site which currently contains the existing restaurant. The existing restaurant on site is of a similar scale to the proposed foodstore being largely single-storey with a small two-storey element. Accordingly, the positioning of the foodstore will not have a negative visual impact on the surrounding occupiers and would improve the appearance of the area due to the proposal's high-quality design and sympathetic use of hard and soft landscaping.
- 3.15 A key objective of the development from the applicants' perspective (both commercially and in layout terms) is to provide a scheme which responds appropriately to what is a prominent site for those travelling between Blackley and Moston on the A6104. Positioning the foodstore along the southern boundary in the fashion proposed offers the potential to provide an active frontage onto Victoria Avenue East, as well as towards the site's new vehicular access road and will also give passers-by a view that will take in the unit's active frontages and boundary landscaping – highlighting pedestrian

movement and providing visual interest. The orientation also maximises linkages with the pedestrian highway.

## Design

- 3.16 In terms of its design, the proposed foodstore, which is broadly rectangular in shape, promotes a clean, contemporary approach utilising extensive glazing on its southern, eastern and north-eastern elevations and a combination of predominantly brick finished with sections of composite anthracite cladding above the glazed windows. The building, which will be flat-roofed in nature, will benefit from a feature glazed entrance façade facing east; and will also incorporate a striking anthracite grey fascia canopy which projects from its eastern and north-eastern elevations in a consistent manner.
- 3.17 The material palette has been selected as it is in-keeping with the adjoining apartments and is also sensitive to the residential properties to the south. The brickwork helps to soften the elevations with a traditional material. The vertical cladding provides a contemporary aesthetic which combines well with the modern form, whilst glazing adds transparency and lightness to the facades.
- 3.18 The extensive use of glazing on the foodstore's most prominent elevations will offer views into the sales area for passers-by along Victoria Avenue East, adding interest to these elevations and creating an inviting, active frontage to the scheme. Glazing will also be a key feature at the north-eastern corner of the retail unit, to provide an expansive customer entrance and allow natural light to permeate throughout the store, thus reducing lighting requirements and creating a more pleasurable shopping experience.
- 3.19 With regards scale and massing, the proposed foodstore would be broadly the height of a two-storey residential property. This means that the building will be of a similar height to the existing restaurant located on the site which is due to be demolished as part of this application. The foodstore will be lower in height than many of the surrounding buildings including the 4/5 storey residential apartment building neighbouring it to the west. Accordingly, it is clear that the scale and massing of the proposed foodstore will be appropriate for its context.
- 3.20 Whilst it is evident that considerable articulation is proposed on the southern, eastern and north-eastern elevations, the nature of the foodstore and the operation in terms of use means that the rear elevation, facing the car park and rear of the site is relatively blank in appearance. However, the building has been carefully positioned such that the rear elevations are not in public view and will be largely screened by adjacent development.

- 3.21 In summary, the proposed foodstore will be of a contemporary design with a strong horizontal emphasis and constructed using modern methods and materials. The predominantly red brick façade will ensure it remains in-keeping with the materials palate of surrounding buildings. The foodstore will be of steel framed construction and will incorporate, in addition to extensive glazing, high-quality composite white and grey cladding to provide a clean modern finish. The structure will be reflective of the scale and massing of other, existing buildings in the locality and will not appear out of place in the street scene, replacing as it does an existing commercial structure.
- 3.22 Overall, the design philosophy adopted, drawing upon a simple palate of quality materials, will ensure that the proposed foodstore complements existing commercial development within the locality. A comprehensive overview of the foodstore's design rationale is set out in detail in the accompanying Design and Access Statement.

## Landscaping

- 3.23 Hard and soft landscaping works are proposed both within and around the perimeter of the proposed customer car park in order to frame the development. Low-level screen planting along the Victoria Avenue East frontage will seek to soften the edge of the site from the highway, whilst various pockets of landscaping will be introduced to the car parking area.
- 3.24 The proposed landscape planting will include the introduction of at least 10 new trees across the site. Whilst it is acknowledged that a number of trees will need to be removed to accommodate the foodstore development, it is clear from the submitted landscaping scheme that the new tree planting proposed will largely mitigate this tree loss.
- 3.25 The scheme involves the redevelopment of a relatively small amount of vegetation at the far south-western end of the adjacent sports facility's playing fields. However, the clubs that use this facility have confirmed that the loss of this land does not impact on the layout of the rugby club's existing pitches or the enjoyment of the fields (please see **Appendix I**). By way of compensation, Aldi are also giving the clubs back land at the north eastern corner of the restaurant's car park which will be converted to grass and will form part of the playing fields. This will remove an existing pinch point at the north western end of one of the rugby pitches, providing better separation distance to the boundary and improving maintenance at this point.
- 3.26 The key design principles that the landscaping scheme will adhere to are detailed within the accompanying Design and Access Statement.

## Vehicular Access Arrangements

- 3.27 As the Proposed Site Layout Plan shows, the foodstore will be accessed via a new 'T-junction' with Victoria Avenue East. This will replace the existing T-junction which is located roughly 20m west of the proposed junction. It should be noted that both the existing and proposed T-junctions also provide access to the neighbouring apartments and gym to the west of the site. The rugby club to the east of the site currently has its own vehicular access junction off Victoria Avenue East, however it is proposed as part of this development that the rugby club will share the new T-junction with the proposed foodstore, gym and apartments. Coming off this junction there will be a new access point to the east which will provide vehicular access to the rugby club.
- 3.28 This means that the proposal will lead to there being one junction off Victoria Avenue East to replace the two which exist at present. The sports clubs have confirmed in a letter of support (see **Appendix I**) that the new vehicular access point is much needed. It will offer a safer route into and out of their site for club members when compared with the existing narrow gated access point directly onto Victoria Avenue East which they currently use.
- 3.29 The site's new vehicular access arrangements and the wider proposed highways works are presented in detail in the supporting Transport Assessment prepared by Cameron Rose Associates. See specifically Drawing 562-01/GA-01, which is provided at Appendix C of their report.

## Car and Cycle Parking

- 3.30 The proposed car park will provide a total of 119 car parking spaces which will be dedicated to those wishing to use the foodstore, although there will also be scope for informal usage by other visitors – such as those wishing to use other nearby commercial facilities. Aldi can confirm that the level of car parking proposed is entirely adequate for their operation / requirements, based upon their wider store portfolio. This matter is examined in greater detail in the accompanying Transport Assessment prepared by Cameron Rose Associates.
- 3.31 It is envisaged that a 90-minute time limit will be placed upon the car park's usage, to enable linked trips to take place whilst preventing long-term abuse. This matter will be subject to further discussions with the Local Planning Authority during the course of the application's determination, should this be necessary.
- 3.32 As part of the total number of car parking spaces proposed, 8 accessible spaces for disabled customers and 9 spaces for parents with children will be provided. Importantly, the car park will also include 4 spaces that are equipped with Electric Vehicle Charging Points ('EVCP'), an important

sustainability feature of the foodstore. Below ground infrastructure will be put in place to add up to a further 20 EVCPs in the future, future proofing the Aldi foodstore in terms of this emerging mode of private travel. Aldi will provide electricity free of charge to customers whilst retaining the option to charge customers in the future.

- 3.33 The site will include 14 short-stay cycle spaces (7 Sheffield cycle hoops) located in front of the northern and eastern elevations of the foodstore. These spaces will be largely covered by the store's canopy and have good visibility from both inside the foodstore and from those using the car park/ internal access road. Long-stay cycle spaces will be provided in the foodstore's warehouse for staff.

## Servicing

- 3.34 Servicing access will be taken from Victoria Avenue East, utilising the same vehicular access point as provided for customer traffic. The servicing area will be located at the Aldi store's north western corner, so that it is not visible from the wider locality. This will incorporate a delivery ramp, sheltered canopy, and dock leveller system which means products can be unloaded without any external activity, such as forklift trucks, scissor lifts or cages. Servicing is therefore a much swifter and quieter process than it is for larger mainstream foodstores with a traditional 'service yard' arrangement.
- 3.35 In terms of the servicing procedure itself, in the case of Heavy Goods Vehicle ('HGV') deliveries, this would typically take 30 - 60 minutes and is a straightforward exercise given that Aldi's stock is delivered on pallets which are simply rolled into the warehouse, utilising the automated dock levelling system. Furthermore, as part of Aldi's delivery process the responsibility for the unloading of a servicing vehicle rests with its driver, as such there is no potential for delay in the process as it is not necessary to wait for store staff to deal with the vehicle on its arrival (as is the case with many other mainstream convenience retailers). Goods deliveries will be received to the 'back of house' area which will be accommodated in the southern part of the Aldi foodstore.
- 3.36 It is anticipated that the Aldi foodstore will receive an average of four HGV deliveries per day. Three articulated HGV deliveries per day come from the Regional Distribution Centre (RDC) and there is one delivery per day of milk by a local supplier, usually using a medium sized goods vehicle. Daily deliveries of milk, bread and morning fresh produce are received prior to, or as early as possible after, the store opening in the morning, and are delivered by one Aldi HGV and one milk delivery vehicle.
- 3.37 All Aldi delivery vehicles are equipped with Reversing Cameras and Audible Warning Systems enabling the driver and customers to be aware of the reversing vehicle. Where required, a trained 'Pedestrian Marshal' is utilised by the store to guide pedestrians in a safe manner whilst a service vehicle is manoeuvring. HGV access to the service area has been designed to accommodate the required

turning manoeuvres of the largest servicing vehicle in Aldi's fleet (a 16.5m articulated goods vehicle) and a 'swept path analysis' is presented as part of the accompanying Transport Assessment (prepared by Connect Consultants) showing this entering and leaving the site safely and in forward gear.

3.38 Deliveries will be required on every day that the foodstore is open for trade to ensure the availability of fresh produce, including Sundays and Bank Holidays<sup>1</sup>. Accordingly, the applicant is seeking to negotiate through an appropriately worded planning condition minimum servicing hours at the discount foodstore of:

- 06:30 hours to 23:00 hours – Mondays to Saturdays
- 08:00 hours to 17:00 hours – Sundays

3.39 The accompanying Noise Impact Assessment prepared by BWB justifies the servicing hours proposed across the development.

## Hours of Operation

3.40 Aldi's foodstores are open seven days per week (including the majority of Bank Holidays) but the company does not promote 24-hour trading, as is the case with many of the UK's other 'mainstream' food retailers. Accordingly, Aldi could accept a planning condition setting out minimum opening hours of:

- 08:00 hours to 23:00 hours – Mondays to Saturdays; and,
- 09:00 hours to 18:00 hours – Sundays

*(Note – Sunday trading laws mean that the Aldi store can only open for up to six hours on a Sunday. This will typically be 10:00 hours to 16:00 hours.)*

## Minor Works to Adjacent Sports Facility

3.41 Alongside the foodstore development, this planning application also proposes a series of minor works to the adjacent sports club facility, including the construction of a new vehicular access and egress, which would be taken from the proposed foodstore's vehicular access / egress with Victoria Avenue East. Linked to this there would be a compensatory extension of the existing playing fields at the north-western corner of the sports club's site (into land currently occupied by restaurant car

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<sup>1</sup> It should be noted that the majority of Bank Holidays are treated as a typical trading day by Aldi and as such standard Monday to Saturday opening and servicing hours are observed. However, all Aldi stores are closed on Easter Sunday, Christmas Day, Boxing Day and New Year's Day.

parking), increasing the separation distance with the site of the proposed foodstore. Additional works proposed include the relocation/ replacement of the western boundary fencing to the playing fields, the addition of ball strike netting, the relocation of floodlighting piers, and the provision of new floodlight heads.

## **Summary**

- 3.42 In summary, the proposed Aldi discount foodstore scheme will represent a high-quality development and will promote a contemporary design using an appropriate materials palette which also respects the site's context, to the benefit of the local and wider environment. Full details regarding the design of the foodstore building and proposed materials are contained in the plans and elevations submitted with this application as detailed in the accompanying Design and Access Statement, which should be referred to for further design related information.

## 4. Aldi Stores Limited

### About Aldi

- 4.1 Aldi is the applicant for this scheme and one of the world's leading grocery retailers. The company has built a network of stores in Europe, the USA and Australia. Aldi first entered the UK market in 1990 and has now expanded to over 880 stores across England, Scotland and Wales.
- 4.2 Aldi stores offer the customer a carefully selected range of high quality, exclusive own label groceries at heavily discounted prices. These prices are guaranteed across the entire range of products. The aim is for goods to be sold with discounts of between 20–30% for a full shopping trolley. This is evidenced by the below chart published by independent consumers' association 'Which?' in March 2020. The chart compares the average cost of a trolley of 108 groceries and household essentials (i.e. a bulk food shopping trip) and shows, for example, that an equivalent shop at a mainstream foodstore such as Tesco, Morrisons or Sainsbury is at least 27% more expensive.

Figure 4.1 - Chart Comparing Average Cost of Groceries and Household Essentials (Source: 'Which?' March 2020)



- 4.3 Aldi regularly receives industry awards recognising the quality of its products and customer experience. Aldi was voted the nation's Favourite Supermarket and Favourite Wine Retailer at the 2019 Good Housekeeping Food Awards; named Best Value Supermarket at the Moneywise Home Finances Awards 2019; and Best Grocer at the Retail Week Awards 2019. For recognition of investment in people, Aldi was crowned Employer of the Year at The Grocer Gold Awards 2017, whilst they were named Grocer of the Year at The Grocer Gold Awards 2018.

## How Aldi is Different

- 4.4 Aldi has a very different approach to food retailing than other food retailers based on simplicity and maximum efficiency at every stage of the business, from supplier to customer. This enables Aldi to sell high quality products, from a limited core range (compared to other supermarkets) of mainly exclusive own labels, at the lowest possible price consistently across the entire range. Aldi is a 'deep discount' retailer.
- 4.5 The key aspects of the trading philosophy include:
- Maximum operational efficiency and cost control;
  - Standard merchandising through the stores;
  - Bulk displays in original shipping cases;
  - Efficient operation from supplier to customer;
  - Unique delivery system;
  - Efficient checkout system;
  - Carefully selected and limited core range of 2,000 products;
  - Own label high quality products;
  - Formidable buying power;
  - High volume and turnover per product; and,
  - Heavily discounted prices providing an average 20-30% saving across the entire range, compared with similar quality products.
- 4.6 The consequence of providing this value retailing concept and service, of high quality food at heavily discounted prices, is that the design of the store and the sales area are uniform, in order to accommodate bulk food displays and provide the operational efficiency that a discount foodstore requires. These efficiencies are found across the entire operation from supplier to retail store and result in an enviable cost structure which allows Aldi to sell quality food at low prices, and operate on much smaller margins than other foodstores.
- 4.7 As stated, Aldi stores offer a carefully selected and limited core range of good quality exclusive own labels at heavily discounted prices. Predominantly, the limited range of goods relates to a reduced range of variations on the same product line compared to most other supermarkets. These are the most popular items: the ones most used and needed in every household.

- 4.8 By limiting the core range, Aldi suppliers typically only need to produce one package size instead of multiple packages within the same category. With the higher volume of one item, Aldi achieve greater purchasing power. The limited core range further allows Aldi to apply its own label to most of its products (c.90%) which do not include costs that the national brands pass on through higher prices. This allows Aldi to gain a significant cost advantage over competitors without compromising quality.
- 4.9 The deliberate intention is to restrict the range of core goods to approximately 2,000 products in the interests of the consumer and operational efficiencies and pass these savings onto the customer. The restricted core range ensures a high volume and turnover of each individual item, resulting in a favourable cash flow with products effectively sold through the checkouts before they have been purchased centrally.
- 4.10 This is unlike the larger supermarkets which stock in the region of 20,000 – 40,000 product lines, and more modest sized operators, with floor areas of 1,000 – 1,500sqm selling 2,500 – 4,000 products. Aldi do not sell cigarettes and tobacco products and their trading philosophy does not include a staffed butchery, fishmonger, bakery, delicatessen or hot food counter, which are commonplace in larger supermarkets. Aldi stores also do not accommodate in store cafes / restaurants or franchises such as a Post Office, dispensing pharmacy, dry-cleaning, opticians, betting office, travel agent, mobile phone shop or photo processing.
- 4.11 Whilst the core range of products is limited, Aldi offers a significant choice of locally sourced produce. Where possible Aldi's fresh meat and produce is UK sourced. Fresh fruit and vegetables are also sourced in the UK when in season and Aldi leads the way in supporting British farmers. In addition, Aldi works with a range of local businesses and suppliers in order to supply fresh bread, milk and other dairy products.
- 4.12 Aldi's stores dedicate approximately 20% of their floorspace to comparison goods. These goods are sold as 'special purchases' on a 'when it's gone, it's gone' basis. This approach is highly seasonal and there is a continued variation in the type of goods that may be on offer. This is a key difference for Aldi when compared to larger supermarkets that typically have 30-40% of their floor area for comparison goods, the majority of which is occupied by permanent product ranges.
- 4.13 How Aldi differs is demonstrated clearly by the trading philosophy. Aldi complement, rather than compete with, existing local traders, independent retailers and other supermarkets, as well as service providers, as Aldi customers use other facilities to fulfil their grocery and local service needs. This generates a propensity for linked trips and associated spin-off trade which brings qualitative benefits.

## Sustainable Development

- 4.14 Aldi supports sustainable development and has a strong track record in delivering schemes which contribute to the needs of the local economy.

### Catchment

- 4.15 As Aldi stores are of modest scale and fulfil a local shopping role, it means more than one store can be accommodated in a Local Authority area. In high population density areas such as towns and cities several Aldi foodstores can be sustained, reflective of the fact that each is modest in size. They work together as a network to serve the community, as opposed to mainstream foodstores whereby a single 'superstore' serves a much wider geographic area. The catchment for a new Aldi foodstore is therefore typically local in nature and often a proportion of the shoppers attracted are existing Aldi customers who have been travelling to their nearest store (possibly several miles away), but with a new store opening close by, this can reduce their need to travel.
- 4.16 Aldi's local presence can assist in clawing back expenditure being spent elsewhere by providing a foodstore where perhaps such a facility was not available. This is most important in locations where shops and services are limited and access to stores elsewhere is difficult. A new store helps to retain expenditure within a given catchment area, to the benefit of the community.

### Store operation and design

- 4.17 The uniform internal layout of an Aldi store reflects the company philosophy of offering value for money through cost effective management and efficiency. The shop fittings are specifically designed and constructed to display the goods as received in their packing cases so there isn't a double handling of goods from packing cases to the shelves. It means new stock can be moved from the warehouse area to the shop floor quickly and in large quantities.
- 4.18 The operation of the store is designed to be efficient and practical for use by customers; ensuring the store offers inclusive accessibility to all. The efficient layout with typically only 4 or 5 aisles means customers can move through the store quickly. There is ease of access to goods with all shelving being within easy reach. As the range of goods is limited customers can find what they are looking for quickly. With goods being pre-packaged, such as fruit and vegetables, customer can identify goods quickly and shop efficiently. Importantly, there are long conveyors at the check-out that hold a customer's full shop to allow goods to be unloaded for scanning and payment quickly. Goods are re-loaded back into the trolley at the check-out and packing is undertaken at the customer's leisure beyond the check-out area.

- 4.19 Aldi recognises that design is a key consideration in the determination of applications for its stores. The external design has evolved over time and now the design for each store is consistent across Aldi's portfolio, promoting modern, smart buildings with clean lines and glazed frontages which meet customer expectations.

#### Accessibility

- 4.20 The local nature of many of Aldi's stores encourages high levels of pedestrian shoppers and users of public transport. At new stores, cycle stands are provided, close to the store entrance for natural surveillance and mostly under the store canopy, to encourage cycling as a mode of transport.
- 4.21 Aldi requires new stores to have car parking adjacent to cater for customers who choose this mode of transport. Most car trips to new Aldi stores are not new to the network but rather transferred or linked trips. A full explanation of this principle is set out in the accompanying Transport Assessment.

#### Residential amenity

- 4.22 The opening hours of Aldi stores are more limited than some other larger supermarkets which operate 24-hour. Currently Aldi stores operate 0800 to 2200 Monday to Saturday and for six hours between 1000 to 1800 on Sundays, to comply with Sunday Trading Laws. As Aldi stores are located in residential areas, Aldi is committed to being a responsible neighbour and seeks to ensure the amenity of residents is maintained.

## **Job Creation and Training**

- 4.23 New Aldi stores generally employ between 40 - 50 staff. The company's remuneration and training policy reflects Aldi's firm belief that a well-trained and highly motivated workforce is essential to the success of the business. All hourly paid wages for store employees exceed the Government's National Living Wage and the Living Wage Foundation's recommended national rate. Aldi offers full training for all its positions and the schedule and facets of the training are tailored to the individual.
- 4.24 Aldi ensure that its foodstores have a positive impact on the local communities that they are located within as recruitment is focused locally. Job vacancies are advertised in nearby stores and in the local press alongside Aldi's website. This approach usually results in the majority of staff being recruited from the local area. In addition, it is not unusual for the retailer to work with the local Job Centre Plus when recruiting for a new foodstore so that residents of the local area are specifically targeted.

- 4.25 It should be noted that part-time staff are placed on a 15, 20 or 25 hour contracts at above industry average pay. As such, many part-time positions at Aldi would actually be viewed as full-time positions in other industries, including the retail sector.
- 4.26 Aldi has two of the most successful apprentice schemes and graduate programmes in the UK. Apprentices are trained to work in all parts of the business including at store, distribution, logistics and management level, as well as progression through to the Store Management Team.
- 4.27 Aldi's on-going graduate scheme secures an annual intake for the Area Management Programme. Trainee Area Managers spend a year shadowing an Area Manager before they take on three to four stores of their own to manage. The training covers the entire spectrum of running a retail operation and is a UK-wide programme.
- 4.28 The construction of a new store requires the services of local building trade contractors which provides employment opportunities during the build out period. Usually a range of skills such as ground works, steel, brick and block work and shop fitting are sourced locally, as well as cleaners and labourers.
- 4.29 Finally, during the construction of the foodstore, by working with their chosen contractor Aldi are often able to identify individuals that are seeking work placements and may be able to accommodate these during the project. Aldi typically identify candidates that will benefit the most from the opportunity, particularly those that are currently undertaking some form of construction related education and training, and those that are looking to re-enter the industry after a period of absence. Aldi works with its appointed supply chain to support work placements.

## Aldi Foodstore Sustainability Features

- 4.30 The following table sets out a summary of the sustainability features that are incorporated into each new Aldi foodstore as standard:

| Main themes                | Sub Theme                   | Proposed Measures to be Incorporated into the Development                 |
|----------------------------|-----------------------------|---------------------------------------------------------------------------|
| <b>Minimise Energy Use</b> | Improving Building Envelope | Improve building fabric performance by using materials with low U values. |
|                            |                             | Reduce Air Permeability for the development.                              |
|                            | Reducing Energy Demand      | Use of LED technology for internal / external lighting.                   |
|                            |                             | Detailed Specification of energy saving fitting for refrigeration system. |

|                                                |                                |                                                                                                                                                                                                         |
|------------------------------------------------|--------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                | Allocation of Renewable Energy | Re-use of waste heat from refrigeration system to heat the retail area.                                                                                                                                 |
| Sustainable Building Materials                 | Material Specification         | Use of recycled and secondary aggregates where possible.                                                                                                                                                |
|                                                |                                | Use of timber from sustainable sources, including the reuse of timber where possible, whilst procuring new timber from sustainable sources such as FSC and PEFC sources.                                |
|                                                |                                | Use of materials that where possible have a low embodied energy, including making firm commitments to procure materials from local sources where possible.                                              |
|                                                |                                | Procuring materials will be done with consideration to manufacturers and suppliers with accredited EMS and ISO Standards.                                                                               |
| Sustainable Transport and Accessibility        |                                | Cycle parking for the site would be provided in accordance with LPA cycle parking standards.                                                                                                            |
|                                                |                                | One twin-headed Faster Charger for Electric Vehicles will be provided at all new stores with two dedicated parking bays. Ducting to a further four bays for potential future use.                       |
| Water Conservation and Management              | Water Use within the Retail    | A pulsed water meter would be proposed for the development to monitor water use.                                                                                                                        |
|                                                |                                | 2/4 litres wc's in retail store.                                                                                                                                                                        |
|                                                | Minimising Flood Risk          | Proposals would be put forward that would not add to the flood risk in the area. A number of SUDS and engineering solutions could be put forward for this purpose, subject to site specific conditions. |
| Waste Management                               | Construction Waste             | Recycling would occur during the construction phase where waste would be segregated and split into recyclable components.                                                                               |
|                                                |                                | General waste would be disposed of responsibly and sent to licensed waste handling facilities.                                                                                                          |
| Reduction of detrimental Environmental Effects |                                | Hydrocarbon traps will be placed around the perimeter of the car park area where necessary.                                                                                                             |
|                                                |                                | The development does not include materials that are toxic to humans.                                                                                                                                    |
|                                                |                                | All insulation materials and refrigerants have an ODP value of 0 and a GWP of 5 or less.                                                                                                                |
|                                                |                                | Where necessary, land contamination would be remediated.                                                                                                                                                |
|                                                |                                | External lighting will be compliant to best practice guidelines from the Institute of Lighting.                                                                                                         |
| Site Management                                | Commissioning and Handover     | A building user guide and building education would be provided as part of the development's handover.                                                                                                   |

#### Heat Recovery System (Re-Usable Energy)

- 4.31 Perhaps the most significant sustainability feature which is provided as standard on all new Aldi foodstores is their 'heat recovery system', which constitutes a 're-usable' energy source. In order to

minimise energy demand in stores, Aldi seek to re-use and re-cycle any waste energy where possible. The greatest area to recover energy in the store is the 'waste heat' generated by the refrigeration system and this is recovered to heat the building.

- 4.32 Aldi use a system to recover waste heat from the food refrigerator circuits which would otherwise be discharged into the atmosphere. The heat from the refrigerator would previously have been rejected when the refrigerant hot gasses are cooled in the condensers by external air. Previously a gas heating system was used to make up any shortfall in heating demand.
- 4.33 With the input and detailed design of a 'refrigeration engineer' and a 'mechanical services engineer', the waste heat is harnessed via a CO2 refrigerant lead heat recovery system that rejects the waste heat into a low temperature hot water heating circuit which in turn provides heat to an underfloor heating array or a number of ceiling mounted convectors on the sales floor if the store is leasehold. **This system provides 100% of the total building heating demand.** The heat recovery system has totally removed the need for an independent gas heating system. The underfloor heating system provides heat to the store with a high percentage of radiant heat, minimising the negative affect that the sales floor chillers have on the store heating.
- 4.34 To demonstrate the effectiveness of this system, Aldi have used a typical model in Leicester which, being in the Midlands, represents the average for the whole of the UK. The typical energy demand for an Aldi Development in the Midlands is 271,624 kwh per year. The total energy demand for heating to an Aldi Store is 115,416 kwh. The refrigeration installation would generate 150,000 kwh which is more than sufficient to heat all the store.
- 4.35 With all the energy demand required to heat the building, being recovered from re-usable energy, 115,416 kwh of the total energy demand for the building of 271,624 kwh is generated from re-usable energy. **This represents over 40% of the energy demand for the development being created by re-usable energy.** Whilst it is acknowledged that this system is not technically a form of 'renewable energy', it results in the foodstore being exceptionally efficient in terms of the off-site energy requirements. This is a more environmentally friendly approach than an otherwise inefficient building that benefits from a limited on-site renewable energy source.

## 5. Planning Policy Context

- 5.1 This section provides a review of relevant planning policy and guidance at the national and local level in so far as it is material in assessing the merits of the site for the proposed development.

### Introduction

- 5.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that decisions should be made in accordance with the **development plan** unless material considerations indicate otherwise. The Development Plan for the purpose of this planning application comprises the **Manchester Core Strategy (2012)** and the **Extant Unitary Development Plan policies (1995)**. The Core Strategy largely superseded the Unitary Development Plan and, as such, only a handful of policies contained within the Unitary Development Plan remain 'saved'.
- 5.3 Accordingly, the 'starting point' in the determination of planning applications within the Manchester area are the policies contained within the Core Strategy. However, Annex 1 of the National Planning Policy Framework ('NPPF') (July 2021) is clear that the weight to be afforded to policies within plans of this age should be proportionate to their degree of consistency with the policies contained within this national policy document. In short, where entire policies or key components of them are out-of-date, equivalent guidance contained within the NPPF represents a very significant material consideration.
- 5.4 Alongside the Core Strategy (the development plan), there are other local and national planning policy documents that represent **material considerations** in the determination of this planning application, and these are also summarised (where relevant) in this section of our Planning Statement. These policy documents include:

- **National Planning Policy Framework (July 2021)**- The National Planning Policy Framework sets out the Government's planning policies for England and how these should be applied. The policies contained within the NPPF are important material considerations which should be taken into account when dealing with individual planning applications.
- **Places for Everyone Greater Manchester Joint Development Plan (Draft August 2021)**- The draft version of the Places for Everyone Joint Development Plan was published in August 2021 and has been produced by Greater Manchester Combined Authority to provide a long-term plan for jobs, new homes, and sustainable growth for nine of Greater Manchester's districts. Once the Places for Everyone Plan is adopted it will form part of Manchester's

development plan. As this plan is at an advanced stage it would now be considered as a material consideration for planning applications.

## The Development Plan

### Manchester Core Strategy (2012)

- 5.5 The relevant policies of the Manchester Core Strategy are summarised below:
- 5.6 **Policy SP1 (Spatial Principles)-** The Regional Centre will be the focus for economic and commercial development, beyond this, the emphasis will be on the creation of neighbourhoods of choice. Developments in all parts of the City should create well designed places that enhance or create character, make a positive contribution to the health safety and wellbeing of residents, consider the needs of all members of the community and protect and enhance the built and natural environment. Furthermore, development should improve access to jobs, services, education and open space by being located to reduce the need to travel and provide good access to sustainable transport provision.
- 5.7 **Policy C1 (Centre Hierarchy)-** Development of town centre uses will be prioritised within Manchester City Centre, District Centres, and Local Centres in order to maintain their vitality and viability, provide services as locally as possible and minimise the need to travel by car. Within North Manchester the district centres are defined as Cheetham Hill and Harpurhey, and the local centres are defined as Victoria Avenue/ Rochdale Road (Charlsetown), Hollinwood Avenue/ Greengate (Moston), Landowne Road/ Crumpsall Lane (Crumpsall), Worsley Avenue/ Kenyon Lane (Lightbowne), Moston Lane (Harpurhey), and Collyhurst (as part of redevelopment).
- 5.8 **Policy C8 (Local Centres)-** Local shopping and service provision in local centres should be retained where it remains viable and provides an important service to the local community. The provision of new small scale retail facilities will be encouraged where they would provide for local every day needs and would not be harmful to the vitality and diversity of nearby centres.
- 5.9 **Policy C9 (Out-of-centre Development)-** Development of town centre uses in locations which are outside a centre identified in policy C1 or a strategic location identified for such uses will be inappropriate unless there are no sequentially preferable sites, or allocated sites within the area the development is intended to serve that are available, suitable and viable, the proposal would not have unacceptable impacts on the vitality and viability of the City Centre and designated district and local centres, and the proposal is appropriate in terms of its scale and function to its location.

Development that improves the environment of an existing out-of-centre facility or its relationship with surrounding uses will be supported, providing that it also meets the other criteria in this policy.

- 5.10 In terms of a retail impact testing threshold, it is noted that Policy C9 states that the impacts of out-of-centre development will vary across the City and will need to be considered on a case-by-case basis. It is stated that development of less than 650 sq. m GIA will generally be of local significance only, the implication being that larger schemes are of greater significance and warrant some form of impact justification. However, Policy C 9 is clear that *“the level of detail within impact assessments for proposals of less than 2,500 Sq.m GIA floorspace should be proportionate to the scale and nature of the development proposed and its likely effects on designated centres”*.
- 5.11 **Policy T2 (Accessible Areas of Opportunity and Need)-** The Council will actively manage the pattern of development to ensure it is located within good access to the City's main economic drivers and is easily accessible by walking cycling and public transport. New development should include Traffic Impact Assessments and Travel Plans for all major applications. Food retail developments located in areas which are not within the City Centre or District Centres should provide a maximum of 1 parking space per 14sqm, and developments with up to 200 parking spaces should provide disabled spaces at a proportion of at least 6% of the total number of spaces, with a minimum requirement of 3 disabled parking bays. Additionally, developments should provide a minimum of 1 bicycle parking space per 140 sqm, with a minimum requirement of 2 spaces.
- 5.12 **Policy EN1 (Design Principles and Strategic Character Areas)-** All developments in Manchester will be expected to follow the seven principles of urban design and have regard for the strategic character area in which the development is located.
- 5.13 **Policy EN4 (Reducing CO<sub>2</sub> Emissions by Enabling Low and Zero Carbon Development)-** Wherever possible new development and retrofit projects, including energy generation plant, must be located and designed in a manner that allows advantage to be taken of opportunities for low and zero carbon energy supplies.
- 5.14 **Policy EN6 (Target Framework for CO<sub>2</sub> reductions from low or zero carbon energy supplies)-** Applications for developments over 1,000 sq. m will be expected to meet specified CO<sub>2</sub> reduction targets as outlined within this policy.
- 5.15 **Policy EN8 (Adaptation to Climate Change)-** All new development will be expected to be adaptable to climate change in terms of the design, layout, siting, and function of both buildings and associated external spaces.

- 5.16 **Policy EN9 (Green Infrastructure)-** New development will be expected to maintain existing green infrastructure in terms of its quantity, quality and multiple function. Where the opportunity arises and in accordance with current Green Infrastructure Strategies the Council will encourage developers to enhance the quality and quantity of green infrastructure, improve the performance of its functions and create and improve linkages to and between areas of green infrastructure. Where the benefits of a proposed development are considered to outweigh the loss of an existing element of green infrastructure, the developer will be required to demonstrate how this loss will be mitigated in terms of quantity, quality, function and future management.
- 5.17 **Policy EN10 (Safeguarding Open Space, Sport and Recreation Facilities)-** The Council will seek to retain and improve existing open spaces, sport and recreation facilities and provide a network of diverse, multi-functional open spaces. Proposals on existing open spaces and sport and recreation facilities will only be permitted where equivalent replacement space will be provided in the local area or the site has been demonstrated to be surplus.
- 5.18 **Policy PA1 (Developer Contributions)-** Where needs arise as a result of development, the Council will seek to secure planning obligations. The nature and scale of any planning obligations sought will be related to the form of development and its potential impact upon the surrounding area.
- 5.19 **Policy DM1 (Development Management)-** All development should have regard to layout, scale, form, materials, impact on the surrounding area, effects on amenity, accessibility, safety, health impacts, refuse storage and collection, vehicular access and parking, green infrastructure, flood risk and drainage, and sustainable construction techniques.

## Material Planning Considerations

### National Planning Policy Framework (July 2021)

- 5.20 On 20<sup>th</sup> July 2021 the Government published a revised version of the NPPF. The most recent NPPF is a material consideration in the determination of all planning applications and fully replaces the previous editions.
- 5.21 The NPPF does not change the statutory status of the Development Plan as the starting point for decision making. It advises that proposed development that accords with an up-to-date Local Plan should be approved, and proposed development that conflicts should be refused unless other material considerations indicate otherwise.

- 5.22 The overall emphasis of the NPPF is to reiterate the Government's key objectives of facilitating economic growth and securing sustainable development. These overarching policies seek to deliver development in the most appropriate locations, thereby protecting and enhancing the environment.

Presumption in Favour of Sustainable Development

- 5.23 Central to the NPPF is a presumption in favour of sustainable development and the need for the planning system to support economic growth in line with the Planning for Growth Ministerial Statement. Paragraph 11 sets out the presumption in favour of sustainable development and the application of the policy for decision making. It states:

*"Plans and decisions should apply a presumption in favour of sustainable development.*

*For **decision-taking** this means:*

*Approving development proposals that accord with an up-to-date Development Plan without delay; or*

*Where there are no relevant Development Plan policies, or policies which are most important for determining the application are out-of-date, granting permission unless:*

- i. the application of policies in the Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*
- ii. Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole".*

- 5.24 Paragraph 12 sets out that the presumption in favour of sustainable development does not change the statutory status of the development plan as the starting point for decision making. Where a planning application conflicts with an up-to-date development plan (including any neighbourhood plans that form part of the development plan), permission should not usually be granted. Finally, Paragraph 12 is clear that Local Planning Authorities can take decisions that depart from an up-to-date development plan, but only if material considerations in a particular case indicate that the plan should not be followed.

Ensuring the vitality of town centres

- 5.25 Town centre policies are dealt with at Section 7 of the NPPF, under the title 'ensuring the vitality of town centres'. With regards the sequential test in particular, Paragraph 87 of the national policy document explains 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”.*

- 5.26 ‘Main town centre’ uses are defined within Annex 2 of the NPPF as: retail development, leisure, entertainment facilities, more intensive sport and recreation uses (including restaurants), offices, arts, culture and tourism development (including hotels).
- 5.27 For the purposes of the application of the sequential test, Annex 2 of the NPPF explains that an ‘edge-of-centre’ retail development site is defined as a location that is ‘well connected and up to 300m from the primary shopping area’ (NPPF, Annex 2, Page 66). By implication, and ‘in-centre’ site is one which falls within the primary shopping area, whilst an out-of-centre site is one which is beyond 300m from the primary shopping area and is not ‘well connected’ to it. The NPPF is clear that in determining whether a site falls within the definition of ‘edge-of-centre’, account should be taken of local circumstances.
- 5.28 Importantly, Paragraph 88 of the NPPF explains that when considering edge-of-centre and out-of-centre proposals in the context of the sequential approach, preference should be given to accessible sites which are well connected to the town centre. It also states that applicants and local planning authorities should demonstrate flexibility on issues such as format and scale, so that opportunities to utilise suitable town centre sites are fully explored.
- 5.29 Paragraph 90 states that when assessing applications for retail and leisure development outside town centres, which are not in accordance with an up-to-date plan, LPAs should require an impact assessment if the development is over a proportionate, locally set threshold (or otherwise over 2,500 sq. m). This should include an assessment of:
- the impact of the proposal on existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposal; and,
  - the impact of the proposal on town centre vitality and viability, including local consumer choice and trade in the town centre and the wider retail catchment (as applicable to the scale and nature of the scheme).
- 5.30 Finally, Paragraph 91 of the NPPF states that where an application fails to satisfy the sequential test it should be refused. The implication being that were such a policy conflict is not identified planning permission should be granted.

#### Making Effective Use of Land

- 5.31 Paragraph 122 of the NPPF explains that planning policies and decisions need to reflect changes in the demand for land. It states that where the Local Planning Authority considers there to be no reasonable prospect of an application coming forward for the use allocated in a plan:
- a) they should, as part of plan updates, reallocate the land for a more deliverable use that can help to address identified needs (or, if appropriate, deallocate a site which is undeveloped); and,
  - b) in the interim, prior to updating the plan, applications for alternative uses on the land should be supported, where the proposed use would contribute to meeting an unmet need for development in the area.
- 5.32 Paragraph 123 adds that Local Planning Authorities should also take a positive approach to applications for alternative uses of land which is currently developed but not allocated for a specific purpose in plans, where this would help to meet identified development needs. This very much echoes Paragraph 22 of the 2012 version of the NPPF, which was also clear that planning policies should avoid the long term protection of sites allocated for employment uses where there is no reasonable prospect of the site being used for that purpose.

## Other Guidance

### National Planning Practice Guidance

- 5.33 On 6th March 2014 the Department for Communities and Local Government ('DCLG') launched the Planning Practice Guidance ('Practice Guidance') web-based resource. The Practice Guidance does not constitute a statement of Government policy; however, as a guide to interpreting how policy should be applied, it may be material to individual planning decisions.
- 5.34 Of particular relevance to applications for retail development is the chapter titled 'Town Centres and Retail'. This provides guidance on the interpretation of the sequential and impact tests, amongst other matters. A summary of the key sections within this chapter are set out below.
- 5.35 The section, '*What is the sequential test?*' explains that the purpose of the sequential test is to guide 'main town centre uses' towards town centre locations first, and then, if no town centre locations are available, to out-of-centre locations, with a preference for accessible sites which are well connected to the town centre.

- 5.36 When applying the sequential test as part of the decision-making process, the Practice Guidance explains that it is for applicants to demonstrate compliance and that failure to undertake the exercise could in itself constitute a reason for refusing planning permission.
- 5.37 There are a number of considerations that should be taken into account in determining whether a proposal complies with the sequential test. Of particular significance is the requirement to examine whether there is scope for 'flexibility' in the format and/or scale of the proposal? In the case of retail and leisure development, this typically involves considering whether there is any 'flexibility' in a specific business model. For example, are multi-level formats possible? Whether flexible car parking arrangements can be pursued? Innovative servicing solutions introduced? Or a willingness to depart from standard formats explored. It is significant that 'disaggregation' (breaking a scheme up across several sites) is not identified as a matter necessary for consideration in demonstrating 'flexibility' in the context of the sequential test.
- 5.38 The section, '*How should locational requirements be considered in the sequential test?*' highlights that the use of the sequential test should recognise that some 'main town centre uses' have particular market and locational requirements. This means that certain uses may only be accommodated in specific locations and Local Planning Authorities should be acceptant of this where a robust justification is provided. See Paragraph: 012 / Reference ID: 2b-012-20190722.
- 5.39 The section, '*How should viability be promoted?*' emphasises that whilst the sequential test seeks to deliver the Government's 'town centre first' policy, promoting new development on town centre locations can be more expensive and complicated than building elsewhere and Local Planning Authorities therefore need to be realistic and flexible in terms of their expectations.
- 5.40 In terms of the retail impact test, of greatest relevance to any quantitative analysis is considered to be paragraph 15 (Reference ID: 2b-015-20190722) of the guidance, which explains that as a guiding principal impact should be assessed on a like-for-like basis in respect of that particular sector (e.g. it may not be appropriate to compare the impact of an out of centre DIY store with small scale town-centre stores as they would normally not compete directly). It continues that retail uses tend to compete with their most comparable, competitive facilities and that conditions may be attached to appropriately control the impact of a particular use.
- 5.41 With regards impact on investment, paragraph 15 (Reference ID: 2b-015-20190722) explains that where wider town centre developments or investments are in progress, it will also be appropriate to assess the impact of relevant applications on that investment and that key considerations will include:
- the policy status of the investment (i.e. whether it is outlined in the Development Plan);

- the progress made towards securing the investment (for example if contracts are established); and,
- the extent to which an application is likely to undermine planned developments or investments based on the effects on current/forecast turnovers, operator demand and investor confidence.

5.42 Paragraph 17 (Reference ID: 2b-017-20190722) explains that the retail impact test should be undertaken in a proportionate and locally appropriate way, drawing on existing information where possible. Meanwhile, paragraph 18 (Reference ID: 2b-018-20190722) states that the judgement as to whether the likely adverse impacts are 'significant' can only be reached in light of local circumstances. For example, in areas where there are high levels of vacancy and limited retailer demand, even very modest trade diversion from a new development may lead to a significant adverse impact.

#### **Emerging Places for Everyone ('Pfe') Joint Development Plan (Draft August 2021)**

- 5.43 The key policies of the emerging Pfe Joint Development Plan are as follows:
- 5.44 **Policy JP-Strat 5 (Inner Areas)-** The continued regeneration of the inner areas will be promoted and will be linked to reducing levels of deprivation and poverty and supporting the improved health and wellbeing of the communities. High levels of well-designed new development will be accommodated in this highly accessible and sustainable location, prioritising the use of previously developed land.
- 5.45 **Policy JP-S 1 (Sustainable Development)-** To help tackle climate change, development should aim to maximise its economic, social and environmental benefits. Preference will be given to previously developed (brownfield) land.
- 5.46 **Policy JP-S 2 (Carbon and Energy)-** Development should support the aim of delivering a carbon neutral Greater Manchester no later than 2038. Non-residential developments should achieve at least BREEAM excellent standard.
- 5.47 **Policy JP-G 2 (Green Infrastructure Network)-** A strategic approach will be taken to the protection, management and enhancement of our Green Infrastructure.
- 5.48 **Policy JP-G 6 (Urban Green Space)-** To ensure there is an appropriate scale, type, quality and distribution of accessible urban green space, existing urban green space will be protected and enhanced, and developers should deliver new high quality urban green space.
- 5.49 **Policy JP-G 9 (A Net Enhancement of Biodiversity and Geodiversity)-** Development will be expected to follow the mitigation hierarchy of firstly avoiding harm to biodiversity, followed by

mitigating any harm caused and finally compensating for any remaining harm caused. In addition, development will be expected to avoid fragmentation of existing habitats, achieve a net gain in biodiversity, and make appropriate provision for the long-term management of habitats. Any off-site habitat creation required as part of the mitigation hierarchy (or to achieve a measurable net gain in biodiversity of no less than 10%) should be local to the site.

- 5.50 **Policy JP-C 7 (Transport Requirements of New Developments)**- 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.

## Summary

- 5.51 This section has detailed the relevant policies of the adopted and emerging Development Plan as well as policies at a national level and other material considerations which have been considered as part of the preparation of this application. These matters will be weighed in the planning balance.

## 6. The Sequential Test

- 6.1 Policy C9 of the Manchester Core Strategy and Paragraph 87 of the NPPF (2021) require that the sequential approach to site selection is applied to all proposals for '*main town centre uses*' on sites that are not 'in' an existing centre nor allocated in an up-to-date development plan.
- 6.2 In this instance, the nearest defined centre is Hollinwood Avenue local centre, which is located some 800m to the east of the planning application site. As the application scheme is evidently more than 300m from this local centre (the closest defined centre) it must be classified as an 'out-of-centre' development opportunity in town centre policy terms. It is therefore necessary to assess 'in' and 'edge-of-centre' alternatives.

### Scale and Form of Development, Catchment Area and Centres Assessed

- 6.3 Whilst both the NPPF and Planning Practice Guidance ('PPG') are silent on the appropriate area of search for sequentially superior sites, a conventional approach is to consider the extent of the catchment area likely to be served by the proposal and then to identify alternative sites, located within or on the edge of existing centres which serve an equivalent catchment, and which could accommodate the scale and form of development proposed.

#### *Scale and form of Development*

- 6.4 In this instance, the scale and form of retail development is a discount foodstore of 1,884 sq. m GIA (1,331 sq. m net sales) alongside requisite customer car parking (119 spaces), vehicular access roads, servicing area, and associated hard and soft landscaping. Accordingly, it is necessary to define an area of search for sequentially preferable sites based purely on the specific trading characteristics of a discount foodstore of this size.

#### *Primary Catchment Area*

- 6.5 The '*Town Centres and Retail*' section of the Planning Practice Guidance explains that the "*application of the [sequential] test will need to be proportionate and appropriate for the given proposal*" (Reference ID: 2b-011-20190722). To our mind this statement is of particular significance to the delineation of a primary catchment area for the purposes of the sequential test's application. It reflects the conventional and long-standing approach of defining a catchment for the retail use in question based upon: the area from which the majority of its trade will be drawn (i.e. its sphere of influence based on

size, offer, etc.); and, existing surrounding competition which might equally influence future patterns of trade.

6.6 A discount foodstore's limited size and offer provides a strong indication that its catchment area will not be particularly extensive and is unlikely to extend significantly beyond the localised Blackley, Moston and Charlestown residential areas – which is the customer base that Aldi is intending to serve by virtue of this new store. Aldi foodstores within urban areas such as this tend to draw the vast majority of their trade from within a 5-minute drive-time catchment area. This represents their '*Primary Catchment Area*'.

6.7 It should be made clear that this five-minute drive-time catchment area is not just some arbitrary distance based on Aldi's commercial preferences, instead it is a reasonable and realistic geographic area from which a foodstore of this size will draw the vast majority of its trade. For example, Aldi's property website is clear<sup>2</sup> that a new discount foodstore requires a catchment population of some 15,000 people. We anticipate that other discount food retailers such as Lidl seek a comparable customer base in view of their equivalently sized format. Based on up-to-date Experian population data, a five-minute drive-time catchment area from the planning application site contains some 23,200 people (Source: Experian 2022). This clearly demonstrates that the size of catchment area defined is sufficient in terms of accounting for the proposed foodstore's sphere of influence.

#### *Centres Assessed*

6.8 The only defined centre within a five-minute off-peak drive-time of the planning application site is Hollinwood Avenue local centre in Moston (800m to the east), as identified by Policy C1 (Centre Hierarchy) of the Core Strategy. This is highlighted on the catchment area plan provided at **Appendix II** of this Planning and Retail Statement. Notwithstanding this, it is acknowledged that Victoria Avenue Local Centre – which is 2km to the west of the application site – is only just outside a five-minute drive-time and therefore, in the interests of robustness, it is appropriate to regard this centre as forming a peripheral part of the defined catchment area.

6.9 No other defined centre within Manchester's retail hierarchy is close to falling within a five-minute off-peak drive-time catchment area, with the next closest being Newton Heath district centre, which is 2.9km south-east by car, and Harpurhey district centre, which is over 3.2 km south-west by car.

6.10 In line with both local and national planning policy it is therefore appropriate to assess whether there are any sequentially preferable alternative sites within **Hollinwood Avenue local centre** (Moston)

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<sup>2</sup> <https://www.aldi.co.uk/about-aldi/property>

and **Victoria Avenue local centre** (Blackley) as part of the sequential test's application. A site in any other of Manchester's defined centres would clearly be unable to meet the same broad market demand, in terms of the proposed store's sphere of influence. This evidence and approach was accepted by the Local Planning Authority as part of pre-application discussions.

*Summary (Scale and Form of Development, Catchment Area and Centres Assessed)*

- 6.11 Drawing the above together, in this case a logical area of search for sequentially preferable sites should encompass 'in-centre', 'edge-of-centre' and better connected 'out-of-centre' opportunities within (and immediately surrounding) Hollinwood Avenue local centre (Moston) and Victoria Avenue local centre (Blackley). Within the defined area of search, candidate sites must be able to accommodate (as a minimum) an Aldi discount foodstore and its associated car parking, access arrangements and hard and soft landscaping – as this is the scale and form of development that is proposed. A site will be considered sequentially preferable where it is 'suitable' and 'available' which necessarily includes consideration of deliverability / viability.
- 6.12 Whilst in this case the total site area is 0.85 ha and the scheme involves not only a discount foodstore but also works associated with the adjacent sports facility, it is necessary for applicants and Local Planning Authorities to demonstrate 'flexibility' in their approach, in-line with Paragraph 88 of the NPPF. This can involve reducing down the site area for testing purposes to one which is commensurate purely with the scale and form of the 'main town centre' use floorspace proposed and its essential supporting infrastructure. This policy requirement and relevant legal / appeal precedents are examined in detail under the following headings.

## The Requirement to Demonstrate Flexibility / Legal and Appeal Precedents

- 6.13 Paragraph 88 of the NPPF requires applicants and Local Planning Authorities to demonstrate 'flexibility' on issues such as format and scale when considering sites in, or on the edge, of existing centres as part of applying the sequential test. Whilst no indication as to what degree of flexibility is required is contained within the NPPF or indeed the Practice Guidance (other than 'format and scale') the 'Rushden Lakes' Secretary of State ('SoS') Call-in decision<sup>3</sup> (which post-dates their original publication) has clarified the position, with the Inspector (Paragraph 8.49) highlighting that 'flexibility' concerns matters including *"flexibility in a business model, use of multi-level stores, flexible car parking requirements or arrangements, innovative servicing solutions and a willingness to depart from standard*

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<sup>3</sup> Land Adjacent Skew Bridge Ski Slope, Northampton Road, Rushden; Inspectorate Ref. APP/G2815/V/12/2190175; 11 June 2014.

*formats*". In Paragraph 15 of the decision letter, the SoS agrees with the Inspector that these are issues of principal relevance in demonstrating flexibility.

- 6.14 This important Call-in decision has also provided clarity on whether there remains a requirement to consider 'disaggregation'<sup>4</sup> when demonstrating flexibility as part of the sequential test. The Inspector is quite clear at Paragraph 8.47 of his report that *"there is no longer any such requirement stated in the NPPF"* and that *"had the Government intended to retain disaggregation as a requirement it would and should have explicitly stated this in the NPPF"*. In Paragraph 16 of the decision letter, the SoS agrees with the Inspector that there is no requirement to consider disaggregation when applying the sequential test. This approach has been followed in subsequent cases (see below).
- 6.15 A final matter of seminal importance when considering 'flexibility' and indeed interpreting the sequential test more widely is the Tesco Stores Ltd v Dundee City Council ('Dundee') Supreme Court Decision (2012). In summary, this establishes that:
- a) if a site is not suitable for the commercial requirements of the developer in question then it is not a 'suitable' site for the purposes of the sequential approach; and,
  - b) that in terms of the size of the alternative site, provided that the applicant has demonstrated 'flexibility' with regards to format and scale (explained in the paragraph above), the question is then whether the alternative site is suitable for the proposed development, not whether the proposed development could be altered or reduced so that it can be made to physically fit the alternative site.
- 6.16 The implications of the Dundee decision were also considered by the SoS as part of the 'Rushden Lakes' Call-in decision. In Paragraph 15 of the decision letter, the SoS agrees with the Inspector that the sequential test relates entirely to the application proposal and whether it can be accommodated on an actual alternative site. In other words, the Dundee decision clearly applies to the NPPF.
- 6.17 Two further relatively recent High Court decisions<sup>5</sup> have also considered (inter alia) the sequential test and confirmed the importance of demonstrating flexibility on issues such as format and scale. A developer's own intentions may be taken into account and have a bearing – for instance when considering what demand a proposal is intended to meet. However, the sequential approach should be 'operator blind' and not become a self-fulfilling activity and divorced from the public interest.
- 6.18 Specifically, in Aldergate Properties Limited v Mansfield District Council [2016] EWHC 1670 [Admin] the judgement emphasised that in considering how to apply 'suitability' and 'availability' the general

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<sup>4</sup> Consideration being given to the separation of a retail scheme across a number of sequentially superior sites.

<sup>5</sup> Warners Retail (Moreton) Ltd v Cotswold District Council (2016) and Aldergate Properties Ltd v Mansfield District Council (2016).

meaning would be that a site should be "...‘suitable’ and ‘available’ for the broad type of development which is proposed in the application by approximate size, type and range of goods. This incorporates the requirement for flexibility in [24] NPPF, and excludes, generally, the identify and personal or corporate attitudes of an individual retailer...." (Paragraph 35 of Judgement).

- 6.19 In summary, whilst it is necessary for applicants to demonstrate ‘flexibility’ on issues such as format and scale when applying the sequential test, it is clear that under the NPPF there is no requirement to consider ‘disaggregation’ nor to explore changes that would materially alter the application proposal such that it no longer met commercial requirements (i.e. a material reduction in size). These matters have been considered as part of numerous ‘call-in’ and appeal decisions<sup>6</sup> which post-date the publication of the NPPF and in which the SoS / Planning Inspectorate clearly draw heavily on the key caselaw referenced in this section when interpreting the sequential test (and specifically the requirement for disaggregation).

## Flexibility in the Context of the Application Proposals

- 6.20 Aldi recognises the need for ‘flexibility’ in promoting sites for development and the retailer pursues non-standard stores where this will assist in meeting planning policy requirements. When considering the scope for flexibility, however, the inherent nature of Aldi’s operation as a ‘deep discount’ food retailer must be borne in mind. Accordingly, there are a number of key areas where it is not possible to alter the core design of the store; as to do so would undermine the operational efficiency of the business model and hence its viability.
- 6.21 The fundamental requirements of a modern Aldi foodstore’s design and layout are therefore as follows:
- **Retail Sales Area:** This is the most important aspect of store building design. A circa 1,300 sq. m floor area is required to provide approximately 2,000 core product lines, and the dimensions of the retail area are determined by the need to ensure adequate product display space is provided. The rectangular shape of the retail sales area is also specifically designed to enable efficient transfer of products. In view of its critical importance to the trading and operational success of Aldi’s business, the size and proportions (shape) of net retail floorspace is one area where it is not possible for Aldi to depart from their core design, as to do so would undermine

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<sup>6</sup> See for example: APP/P0119/V/17/3170627 - The Mall, Cribbs Causeway, Patchway, South Gloucestershire BS34 5DG (October 2018); APP/T3725/W/18/3204311 - Leamington Shopping Park, Tachbrook Park Drive, Warwick, CV34 6HR (March 2019); and, APP/R0660/V/17/3179610, APP/R0660/V/17/3179605 and APP/R0660/V/17/3179609 - Land at Earl Road, Handforth Dean, Cheshire, SK9 3RW (June 2019).

trading viability. Such a configuration is coincidentally an optimum solution to enable shoppers to shop whilst respecting social distancing and cannot reasonably be reduced.

- **Storage and Ancillary Non-Retail Floorspace:** Where the size and shape of a particular site requires reconfiguration, Aldi can exhibit flexibility, such as compromising service and storage facilities. However, the foodstore must be capable of being serviced by a HGV delivery vehicle and the site layout must enable the delivery vehicle to enter and leave in forward gear, and for the vehicle to be able to dock correctly and safely in the purpose built delivery area of the store (a dock-leveller).
- **Customer Car Parking:** Aldi foodstores are required to have immediately adjacent surface-level car parking facilities. This is because an Aldi foodstore's primary function is to cater for 'bulk' food shopping needs and therefore very many customers will be visiting to undertake a 'weekly' shopping trip, involving several heavy shopping bags. Customers may also be visiting to purchase a product from Aldi's non-food 'special buy' range which could be large / heavy and therefore unmanageable on foot. Accordingly, it is a pre-requisite that most customers have the opportunity to take their goods home via private car, irrespective of the accessibility of the store location via sustainable modes of transport, for those undertaking smaller basket shopping.

6.22 In light of the above, with regards the application of 'flexibility' to the planning application scheme when applying the sequential test, the following is proposed:

- The 119 car parking spaces could be reduced by 16% to 100 – which is Aldi's minimum requirement for their current foodstore format. Additional spaces have been provided on this particular site as there is surplus land available. This change would result in a reduction in the overall required site area.
- It is acknowledged that the scheme proposed at The Imperial Restaurant also contains land associated with the adjacent sports facility and the application proposals involve provision of a new vehicular access for the clubs and other modifications / improvements to their boundary (all of which fall within the application site's red line boundary). It is recognised that a foodstore scheme could theoretically be delivered without these works, if located in a different context. This again could reduce the minimum required site area.

6.23 Based on the above identified areas where 'flexibility' can be demonstrated in relation to this specific scheme, it is considered that a site area broadly **20%** smaller than the planning application site (which is presently 0.85 ha) could be used for sequential testing purposes. This would result in a site

requirement of **0.7ha**, which is regarded as the minimum realistically necessary to accommodate a discount foodstore of 1,974 sq. m GEA and its supporting site infrastructure (i.e. customer car parking, vehicular access/egress, servicing area, pedestrian circulation space and basic landscaping).

- 6.24 In summary, measures have evidently been taken in the design of the scheme to maximise 'flexibility' in terms of the scale and form of foodstore development proposed. Notwithstanding this, for the purposes of the sequential assessment, the applicants have tested a considerably smaller site area than is actually proposed as part of this planning application (reduction by some 20% from 0.85ha to 0.7ha). Thus, the applicants are clearly demonstrating 'flexibility' in line with the NPPF's requirements.

## Sequential Site Assessment

- 6.25 Having established the appropriate catchment area, the centres to be assessed within it, and the scale and form of retail development to be tested (having regard to flexibility); this analysis now turns to consider any candidate sites which are potentially 'suitable' and 'available'. A detailed Sequential Site Assessment Summary Schedule is set out at **Appendix III which covers each of the three sites identified in detail**. However, we briefly summarise the position in relation to each below:

| Site                                                                         | Summary                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
|------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Site 1 – Land north-east of Symond Road, Victoria Avenue Local Centre</b> | <p>This site is irregular in shape and extends to approximately 0.3ha. It predominantly comprises an area of hardstanding which appears to be used as a surface car park for the Higher Blackley Conservative Club, which adjoins the site to the north. Within the curtilage of the site is also an area of mature landscaping. The site is located within the Victoria Avenue Local Centre boundary. As such, it represents an 'in-centre' opportunity in town centre policy terms.</p> <p>In terms of our assessment of this site, given its very limited size, it is evidently not a 'suitable' alternative for the scale and form of discount foodstore proposed. Additionally, the fact that the site appears to be currently in use as surface level car parking associated with the neighbouring Higher Blackley Conservative Club means that there is no evidence the site is 'available'. Further, there is no sign of it being marketed for alternative uses at the present time.</p> <p>In conclusion, land north-east of Symond Road in Victoria Avenue Local Centre is therefore neither 'suitable' nor 'available' and cannot be considered a sequentially preferable alternative to the application site.</p> |

|                                                                                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Site 2 - Land south of Victoria Avenue East, Victoria Avenue Local Centre</b>         | <p>The site extends to approximately 0.18ha and is broadly rectangular in shape. It is currently in use as green recreational space and there is a mature tree bounding the site to the north. The land is located within the defined boundary of 'Victoria Avenue Local Centre'. As such, land South of Victoria Avenue East represents an in-centre development opportunity in town centre policy terms.</p> <p>Based on our appraisal, the very limited scale of the site means that it must be regarded as unsuitable and dismissed on the basis of its size. Furthermore, as the site is currently in use as green space it is likely that the Local Planning Authority will be opposed to its loss, in accordance with Policy EN9 (<i>'Green Infrastructure'</i>).</p> <p>Additionally, there is no evidence that the site is currently being marketed for redevelopment. As such, the site evidently cannot be considered 'suitable' or 'available' for retail development within a timeframe comparable with the application site.</p>                                                                                                                                                                                |
| <b>Site 3 - Land South of shops on Hollinwood Avenue, Hollinwood Avenue Local Centre</b> | <p>This site is irregular in shape and extends approximately 0.29 ha. It currently comprises a grassed area accessed via Hollinwood Avenue which leads to a small area of hardstanding. It is bounded to the north by a row of shops which front onto Hollinwood Avenue and to the west by Moston Railway Station and a railway line. The site is located within the defined boundary of '<i>Hollinwood Avenue Local Centre</i>'. As such, it represents an 'in-centre' opportunity in town centre policy terms.</p> <p>Having regard to our analysis of this site, in view of its very limited size, it cannot be considered a 'suitable' alternative to the application site. Additionally, there are question marks surrounding the land's 'availability' as it is not presently being marketed for redevelopment and all past planning applications on the site have been for temporary uses.</p> <p>In conclusion, land south of the shop units on Hollinwood Avenue is not 'suitable' to accommodate the scale and form of development proposed and may also not be 'available'. It subsequently cannot be considered a sequentially preferable alternative to the application site and is dismissed on this basis.</p> |

- 6.26 The sequential assessment set out above (and in greater detail at **Appendix III** of this report) has demonstrated that there are no sequentially preferable development sites within or on the edge of Hollinwood Avenue local centre (Moston) and Victoria Avenue local centre (Blackley) which could realistically accommodate the scale and form of retail development for which planning permission is sought – even when demonstrating significant flexibility in terms of developable area.
- 6.27 This outcome is not particularly surprising given the physically constrained nature of these traditional local centres, with both tightly defined by traditional terraced dwellings and / or road infrastructure.

These factors severely limit the potential for the expansion of both centres and mean that the reality is that new retail floorspace can only be accommodated in out-of-centre locations, such as the planning application site.

- 6.28 Overall, for the reasons outlined in this section, it is considered that there are no more 'suitable' and 'available' more centrally located sites for the scale and form of development proposed and compliance can therefore be demonstrated with the sequential approach to site selection as set out in Paragraph 87 of the NPPF.

## 7. The Retail Impact Assessment

### *Local Policy Context*

- 7.1 Paragraph 90 of the NPPF (July 2021) explains that a conventional quantitative ‘*retail impact assessment*’ is only required where the proposed retail development exceeds a default (national) testing threshold of 2,500 sq. m gross floorspace, unless a locally set retail impact testing threshold indicates otherwise.
- 7.2 Against this context, local planning policy (Core Strategy Policy C 9) states that a conventional full and detailed quantitative retail impact assessment is only required for retail proposals of 2,500 sq. m and over. Paragraph 10.56 of the Core Strategy goes on to explain that the level of detail for schemes below this floorspace quantum should be proportionate to the scale and nature of development proposed.
- 7.3 Policy C 9 is clear that retail proposals of less than 650 sq. m are of ‘*local significance only*’ and do not generally need to be supported by a retail impact justification. Those retail schemes above this threshold (but of less than 2,500 sq. m GIA) are of ‘*more than local significance*’ and should be supported by a retail impact justification which is proportionate to the scale and nature of the development proposed, and its likely effects on designated centres.
- 7.4 In the case of Aldi’s proposals for The Imperial Lounge Restaurant, it is clear that the scale and form of ‘main town centre’ use development proposed falls well below both the Core Strategy and NPPF’s quantitative retail impact testing threshold, with the foodstore only extending to 1,884 sq. m. Accordingly, there is no procedural requirement in this instance undertake a conventional full quantitative ‘retail impact assessment’, in line with the approach set out in Paragraph 90 of the NPPF (July 2021).
- 7.5 Notwithstanding this, it is recognised that ‘retail impact’ is a matter that the Local Planning Authority will need to have regard to in the determination of this planning application, based on the supporting justification to Core Strategy Policy C9. In terms of our approach to this retail impact commentary, we are mindful that a quantitative retail impact assessment (involving economic tables) is only required for retail proposals of 2,500 sq. m gross and over. The level of analysis for schemes below this floorspace quantum must therefore evidently be proportionate to the scale and nature of development proposed and the facts and circumstances of the given case.

- 7.6 In this regard, a discount foodstore in a densely populated urban area such as north Manchester – where there is a substantial population<sup>7</sup> and various competing foodstores – will typically have a relatively limited catchment area which extends to broadly a five-minute drive-time. The foodstore will therefore be of relatively localised significance, concerning the immediately surrounding high-density residential areas of Blackley, Moston and Charlestown. Our retail impact commentary will therefore need to be reflective of this fact.
- 7.7 Accordingly, it has been agreed with the Local Planning Authority at pre-application stage that our approach to the planning application's retail impact justification will be to provide a qualitative analysis of the proposed discount foodstore's likely effects on the surrounding centres which are within and just outside a defined five-minute drive-time catchment area.

## Retail Impact Qualitative Analysis

- 7.8 When assessing the trading effects that will arise as a consequence of the introduction of a discount foodstore on land at Victoria Avenue East, it is important to have regard to the approach advocated within the Planning Practice Guidance when examining the diversion of trade. This confirms that a guiding principle is that '*like affects like*' in impact terms (NPPG, Reference ID: 2b-015-20190722). Accordingly, it stands to reason that a new discount foodstore on the application site will in turn divert the vast majority of its trade from equivalent surrounding food shopping destinations (i.e. other medium / large-scale mainstream foodstores). This assumption / approach is entirely consistent with the Practice Guidance and was discussed and accepted by planning officers as part of pre-application discussions.

### Trading Impact on Surrounding Mainstream Foodstores

- 7.9 In terms of the specific mainstream foodstores which are most likely to be affected in this particular case, in our view these will be as follows:
- Morrisons Superstore, Tweedale Way, Chadderton, Oldham (7,484sq. m Gross / 3,583 sq. m Net Sales);
  - Tesco Superstore, Victoria Avenue East, Blackley (3,310 sq. m Gross / 2,319 sq. m Net Sales);
  - Lidl, Jardine Way, Chadderton (1,588 sq. m Gross / 1,050 sq. m Net Sales);
  - Morrisons, Poplar Street, Failsworth (5,729 sq. m Gross / 3,242 sq. m Net Sales);
  - Asda, Harpurhey Shopping Centre, Harpurhey (6,745 sq. m Gross / 3,932 sq. m Net Sales);

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<sup>7</sup> Over 23,200 people within a five-minute drive-time catchment area based on Experian Location Analyst data (January 2022).

- Aldi, Sisson Street, Failsworth (1,700 sq. m Gross / 990 sq. m Net Sales); and,
- Tesco Extra, Ashton Road West, Failsworth (8,147 sq. m Gross / 4,714 sq. m Net Sales).

- 7.10 As **Appendix II** highlights, none of these foodstores are located within a five-minute drive-time of the planning application site – which comprises a catchment of some 23,200 people. This of itself suggests that the Blackley and Moston areas are underserved in terms of ‘main’ food shopping provision and residents currently look further-a-field to the out-of-centre Morrisons and Lidl foodstores in Chadderton (Oldham), the Tesco superstore to the north-west on Rochdale Road, or the food retail facilities in Failsworth (Aldi and Tesco) and Harpurhey (Asda). The Aldi foodstore will therefore fill a locational gap in the offer provided by larger format, mainstream food retailers.
- 7.11 In following the NPPG’s *‘like-affects-like’* principle, it stands to reason that the majority of the turnover of a new Aldi foodstore on the planning application site will be diverted from these surrounding, competing, mainstream food retailers. This is in view of the fact that these facilities are those most likely to be used by the catchment population, albeit they are not necessarily local to the Moston area. As **Appendix II** shows, because all of the foodstores identified are in the broad locality of the proposal’s catchment area but that equally no single foodstore can be regarded as serving an equivalent catchment, it stands to reason that trading impact of Aldi will be disbursed across a range of different facilities – rather than being focussed on one specific shopping destination.
- 7.12 In terms of the anticipated trading effects on the foodstores identified, it is important to highlight that two of the closest (Morrisons, Tweedale Way, Chadderton and Lidl, Jardine Way, Chadderton) are *‘out-of-centre’* facilities and therefore do not benefit from ‘town centre policy protection’. Any trading impact upon them by Aldi is not therefore of consequence from a decision making perspective, other than as a planning benefit insofar as a new discount foodstore at Victoria Avenue East will have the positive effect of further improving competition with these facilities to the benefit of local consumers.
- 7.13 Foodstores in Harpurhey, Newton Heath and Failsworth are also very unlikely to suffer a *‘significant adverse’* trading impact as a consequence of Aldi’s introduction. This is in view of the fact that Asda (Harpurhey) and Tesco (Failsworth) are both several times larger than the planning application scheme and draw the vast majority of their trade from entirely separate densely populated catchment areas (Harpurhey and Failsworth respectively). In the case of Failsworth’s Aldi store, the retailer can confirm that they do not anticipate that this will suffer any meaningful trade loss as a consequence of a new foodstore opening in the Moston / Blackley area. They remain wholly committed to both locations – which they regard as serving two distinctly different catchment areas.

7.14 The final foodstore which requires consideration is the Tesco superstore at Victoria Avenue East, Blackley, which is located some 2.0km north-west of the application site. This foodstore forms part of Victoria Avenue Local Centre and therefore occupies an 'in-centre' location. In terms of the proposed Aldi foodstore's trading effects on Tesco and the likely significance of these, there are several factors to consider and we summarise these below:

- **Size and Offer:** The net sales area of the Tesco superstore is 77% larger than that of the proposed Aldi foodstore, at 2,319 sq. m compared to 1,315 sq. m. The gross floor area of Tesco is also notably larger than Aldi (by some 76%) – at 3,310 sq. m compared to 1,884 sq. m. Furthermore, having visited the Tesco superstore, it is clear that its range is considerably wider and more varied than that of Aldi's offer. This includes a more extensive range of fresh and ambient goods set across approximately 14 isles, in addition to several staffed counters – including a pharmacy, hot-food deli, and bakery. Such counters do not form part of Aldi's offer. Finally, the car park is more than double the size.
- **Catchment and Accessibility:** Whilst the catchment area of the Tesco superstore is anticipated to overlap – to a degree – with that of the proposed Aldi on Victoria Avenue East in an easterly direction, it is evident that Tesco occupies a strategically significant location and likely benefits from a relatively extensive catchment area. This is firstly because it is positioned next to Rochdale Road, which is a key arterial route between Manchester City Centre and Rochdale. This road cuts through much of north Manchester and means that the store will be highly accessible to many thousands of residents who live along this corridor. Furthermore, the store is immediately adjacent to Junction 20 of the M60 motorway and is therefore well placed to pick-up pass-by trade and to attract those who live further-a-field. Finally, the Tesco superstore caters for the residents of Higher Blackley, a densely populated urban area to the west. It is the closest foodstore of any scale to this community and likely attracts the majority of their 'main' food shopping trips. Indeed, even on the basis of a five-minute drive-time (which is considered conservative for a foodstore of this size) there are some 30,000 residents within its catchment.
- **Trading Impressions:** Having visited the Tesco superstore on a number of occasions, we have consistently found it to be generally busy and evidently well used. This is both in terms of those arriving by car to complete a 'main' food shopping trip and by those walking in from the surrounding densely populated residential area to undertake 'top-up' food shopping. With regards the store's car park in particular, this contains some 250 spaces and therefore indicates that it is geared up to accommodate a significant number of shoppers at any one time. Accordingly, there are no signs to suggest that the foodstore might be

underperforming and indeed this is reflected in the fact that it has now successfully served the surrounding area for more than a decade.

- **Other Factors:** The Tesco superstore is complemented by a Tesco Petrol Filling Station ('PFS'). This is the only PFS in the Blackley area and is well placed to serve both Rochdale Road and the M60 (at Junction 20). Accordingly, we anticipate that the PFS is very well used (with on-site observations confirming this) and a proportion of those who do so will inevitably also visit the superstore itself. Accordingly, the provision of fuel adds another dimension to the Tesco store's offer and undoubtedly enhances its attraction as a shopping destination.

7.15 Drawing the above observations together, it appears highly unlikely that the proposed Aldi foodstore on Victoria Avenue East will result in a '*significant adverse*' impact on the trade and turnover of the Tesco superstore some 2.0 km north-west. This is in view of the fact that Tesco is some 77% larger than Aldi, appears to be trading well based on on-site observations, occupies a strategic location close to Rochdale Road and Junction 20 of the M60 which results in an extensive catchment area, and benefits from associated features such as a PFS which only enhances its attraction locally. Aldi's introduction will not change its role and function as a popular and well used 'main' food shopping destination on one of the arterial routes through north Manchester / southern Rochdale.

#### *Conclusion - Trading Impact on Surrounding Foodstores*

7.16 To summarise our appraisal of the scheme's potential to impact on the trading performance of surrounding foodstores, it is clear from our analysis that there are various mainstream foodstores within the surrounding urban area (albeit all of these are outside a five-minute drive-time of the application site). As such, logic suggests that the Aldi store's impact will be spread across a variety of surrounding facilities in a disbursed fashion. Several of these foodstores occupy out-of-centre locations and do not benefit from town centre policy protection. Meanwhile, almost all are significantly larger than the Aldi foodstore and none serve the same core catchment area of east Blackley / Moston. Finally, having visited the surrounding foodstores and noted the density of the population that they serve, we can confirm that each appears to be popular and well-used by their respective catchments. Given these points of differentiation from the application proposal, it can be concluded that the Aldi foodstore is very unlikely to result in a '*significant adverse*' impact on the trading performance of any surrounding mainstream foodstore.

#### Trading Impact on Surrounding Centres

7.17 Having regard to the above section and in following the '*like-affects-like*' principle, it stands to reason that the vast majority of the turnover of a new Aldi foodstore at Victoria Avenue East will be diverted

from surrounding, competing, mainstream foodstores. Based on a range of factors, we have demonstrated that these facilities are very unlikely to suffer 'significant adverse' impacts on their long-term trading performance.

7.18 Accordingly, on the face of it, the prospect of any residual trade being diverted from the smaller shops and services within the closest defined centres of Hollinwood Avenue local centre (Moston) and Victoria Avenue local centre (Blackley) is very limited. Notwithstanding this, we have undertaken a proportionate health check assessment of both of these centres in order to understand their role and function and current 'vitality and viability' – such that the implications of any residual impacts can be fully considered. This is particularly important in the case of Victoria Avenue local centre, as this contains a Tesco superstore (Victoria Avenue East).

7.19 The detailed health check assessments are set out at **Appendix IV** of this Planning and Retail Statement. The summary position and our views on the trading effects of the Aldi foodstore on these centres is set out below:

*Hollinwood Avenue local centre (Moston)*

7.20 By way of a summary overview, our health check analysis of Hollinwood Avenue (Moston) has revealed that it is a relatively large and diverse local centre which benefits from a number of qualities. Significantly, it has a healthy balance of uses, with no one individual category predominating at the expense of all others – albeit service uses are clearly particularly popular with visitors to the centre. The proportion of retail, leisure and financial service uses in the centre are (in combination) notably higher than the national average position – reflective of the centre's role as an important 'service centre' meeting the day-to-day needs of a densely populated residential area.

7.21 Convenience goods retail provision at Hollinwood Avenue is more limited but is still just above the national average in terms of proportion. Such shops appear to cater exclusively for shoppers' day-to-day 'top-up' food shopping needs, as oppose to their 'bulk' food shopping needs. This is reflected in the centre's small convenience stores (Spar and Go Local) and confirmed by our on-site observations.

7.22 There are various other beneficial amenities serving the centre, including a railway station. Hollinwood Avenue has a mixed environmental quality, with shop units generally well-maintained but the public realm in clear need of investment. However, this does not appear to deter shoppers. Meanwhile, access to the centre via a variety of means (including public transport) is straightforward and the centre also appears to benefit from a sizable walk-in catchment area from surrounding high-density residential areas.

- 7.23 Finally, at some 6.4%, the centre's vacancy rate (a key health check indicator) is well below the national average of 14.1% (Feb 2022) and this is a strong indicator that it is a healthy, well-used and popular local service centre.
- 7.24 Drawing the above analysis together, it is clear that Hollinwood Avenue local centre serves an important role in meeting the retail and service needs of the surrounding high-density residential population. The centre undoubtedly shows strong signs of 'vitality and viability' and can be regarded as healthy at the present time.
- 7.25 In understanding and outlining the current vitality and viability of Hollinwood Avenue, we consider that this reinforces the notion that the provision of a new discount foodstore on its outskirts to the west will not have a particular bearing on its future health. The Aldi foodstore will appeal largely to 'bulk' food shoppers and will be most attractive to the many local people who are already leaving the local area to undertake their 'bulk' food shopping. It is therefore self-evident that the local centre's small convenience stores (i.e. Londis and Go Local) will continue to have an important role to play as 'top-up' shopping destinations. This is particularly given the 'own brand' focus of Aldi, which means that should residents want to purchase branded food products they will continue to look to the likes of Londis and Go Local.
- 7.26 The Aldi store will not compete directly with Hollinwood Avenue's independent food and non-food retail offer or its retail and leisure service sectors. For example, Aldi does not contain cafes, staffed counters (i.e. butchery or deli), or concessions. This means that it will not compete 'like-for-like' with the Local Centre's independent convenience retail, leisure service, or retail service offer. Similarly, local people will still visit the centre for amenities such as its community facilities and the Post Office (neither of which Aldi will provide).
- 7.27 Accordingly, it is clear that the introduction of an Aldi discount foodstore will not have any bearing on the 'vitality and viability' already enjoyed by Hollinwood Avenue local centre. As emphasised by the low vacancy rate in particular, the centre is successfully performing its role and function within the local retail hierarchy and, for the reasons given, this role will not change following the opening of a discount foodstore elsewhere in the urban area.

*Victoria Avenue local centre (Blackley)*

- 7.28 Victoria Avenue (Blackley) is a diverse, well-used local centre which provides a good range of services which are suitable to serve the 'day-to-day' smaller-scale needs of the surrounding walk-in catchment population. It also serves 'main' food shopping needs via a circa 3,300 sq. m Tesco superstore, which occupies a peripheral location just north-east of the core concentration of shop units.

- 7.29 Whilst the centre benefits from a popular and well used Tesco superstore, from our observations this is by no means the sole attraction within the centre. As might be expected of a local centre within a densely populated residential area such as Blackley, the services sector is actually the most dominant in terms of the number of units occupied. For example, hot-food take-aways (leisure service) occupy 10 of the 38 units in the centre, with there also being a notable number of retail services (barbers, salons, a nail bar and Post Office for example).
- 7.30 Significantly, Victoria Avenue local centre's vacancy rate (a key health check indicator) is just 10.5%, which is well-below the national average position of 14.1%. This is perhaps the strongest indicator available that Victoria Avenue is a healthy and popular local centre and one which independent businesses in particular are prepared to invest in.
- 7.31 Victoria Avenue has a relatively good environmental quality, with shop units generally well-maintained and efforts made to introduce landscaping within existing areas of public realm. It is acknowledged however that parts of the public realm itself merit investment. Meanwhile, access to the local centre is good via a variety of means (including public transport) and the centre also benefits from a sizable walk-in catchment area from surrounding high-density residential areas. A free-of-charge Tesco car park (located off Victoria Avenue) serves the centre to cater for those wishing to arrive via this mode of transport, albeit we noted in particular that a sizable proportion of visitors arrived on foot from the south and west. At the time of our visit, decent levels of pedestrian activity were noted along Rochdale Road in particular, where the majority of the centre's smaller units are located.
- 7.32 Drawing the above health check analysis together, our research suggests that Victoria Avenue local centre plays an important role in meeting the day-to-day retail and service needs of the population of Blackley and its surrounding residential area. It is evident that the local centre has a diverse offer comprising both national multiples and independents, a below-average vacancy rate, good accessibility, and is well used by the catchment population. In summary, Victoria Avenue unquestionably shows strong signs of 'vitality and viability' and can therefore be regarded as a very healthy local centre at the present time.
- 7.33 In terms of the Aldi foodstore's implications for the local centre, the only operator likely to be affected is Tesco given that the other units present are of a small-scale and evidently serve a localised catchment – with a particular focus on the retail and leisure service sectors. Victoria Avenue East has a good range of retail service, leisure service, and other key local amenities (i.e. a Library and Learning Centre, community centre and two churches). These will ensure its continued day-to-day usage following Aldi's introduction, alongside the service sector which will be completely unaffected given

the contrasting offer of Aldi. In short, a discount foodstore over 2.0km away on Victoria Avenue East is likely to be of very little consequence for the centre's smaller independent operators, with their role and function entirely different and their attraction not related to the 'main' food shopping trips. Victoria Avenue local centre will therefore continue to successfully perform its role and function irrespective of the application proposals.

- 7.34 With regards the Aldi's foodstore's impact on Tesco, this has been explored at length as part of the preceding sub-section of this Planning and Retail Statement. Our professional opinion it that it will not have a dramatic effect on how Tesco is used and by whom. This is in view of the fact that Tesco is some 77% larger than Aldi, appears to be trading well based on on-site observations, occupies a strategic location close to Rochdale Road and Junction 20 of the M60 (which results in an extensive catchment area), and benefits from associated features such as a PFS which only enhances its attraction locally. Aldi's introduction will not change its role and function as a popular and well used 'main' food shopping destination on one of the arterial routes through north Manchester / southern Rochdale.
- 7.35 Based on our on-site observations there is little to suggest that the '*vitality and viability*' of Victoria Avenue is underpinned by the presence of the Tesco Superstore, and any linked shopping trips associated with it. As already explained, the smaller independent facilities are largely focused on the retail and leisure service sectors and their attraction is not in any way linked to Tesco or its offer. Indeed, from our visits, the Tesco superstore largely appears to function in isolation from the centre, which is unsurprising given it's dramatically larger size and very different role as a 'main' food shopping destination. Accordingly, there is little to suggest that any trade loss from Tesco as a consequence of Aldi's introduction would translate into an adverse impact on the '*vitality and viability*' of the local centre as a whole.
- 7.36 In conclusion, the introduction of an Aldi foodstore will not result in '*significant adverse*' impacts upon the '*vitality and viability*' already enjoyed by Victoria Avenue local centre. This centre is quite clearly effectively performing its role within the local retail hierarchy and, for the reasons given, this will not change materially following the opening of a discount foodstore over 2.0km away to the east given the densely populated nature of this part of the North Manchester urban area.

#### *Trading Impact on Surrounding Centres - Conclusions*

- 7.37 On the basis of our qualitative analysis, it has been demonstrated that the anticipated trade diversions of the proposed Aldi foodstore will not result in a '*significant adverse*' impact on any surrounding centre within the defined catchment area and, as such, '*vitality and viability*' will remain largely unaffected. Both of the centres examined as part of the health check assessments at

**Appendix IV** currently appear to be serving an important role within the local retail hierarchy in meeting (to differing degrees) the day-to-day needs of their respective local residential populations. Significantly, neither of the centres were found to have a vacancy rate above the national average and this reinforces the notion that they are successfully performing their respective roles. There is no evidence to suggest that the centres will cease to do this following the introduction of an Aldi foodstore on Victoria Avenue East. No conflict is therefore anticipated with Paragraph 89 of the Framework or Policy C 9 of the Core Strategy in respect of the scheme's retail impact. This policy test is therefore passed.

## **Aldi Business Model – Factors Relevant to Future Trading Effects**

7.38 In addition to the centre specific health check analyses which have been undertaken and the retail impact commentary on each, there is merit in setting out a number of further qualitative factors which underline why an Aldi foodstore in this location will not result in a '*significant adverse*' impact on the 'vitality and viability' of surrounding defined local centres such as Hollinwood Avenue (Moston) and Victoria Avenue (Blackley). In particular, there are some key themes to outline in relation Aldi's business model which are relevant when considering impact upon vitality and viability as a whole:

- Firstly, an Aldi discount foodstore does not represent an 'everything under one roof' shopping destination as is the case with many mainstream foodstores. The retailer will largely stock their 'own brand' versions of the staple food products that typically comprise a family's weekly shop alongside a very limited non-food offer. This means that mainstream foodstores and other independent convenience retailers (such as those in the surrounding Local Centres – i.e. Tesco at Victoria Avenue) would still be relied upon where consumers are seeking mainstream branded goods.
- Secondly, in contrast to many larger foodstores, the proposed Aldi will not include an in-store café, post-office, dispensing pharmacy, dry-cleaners, travel agent, opticians or photo processing. Nor will there be staffed butchery, fishmonger, delicatessen or greengrocery counters. Also, Aldi do not stock tobacco – a staple of many local newsagents. Given this position, a future Aldi shopper will still be wholly reliant upon existing traders in surrounding centres for the vast majority of their specialist food retail (i.e. butcher), non-food retail, retail service, and leisure needs. These local centres will therefore inevitably retain a strong customer base.
- Thirdly, in terms of Aldi's non-food retail offer, this only accounts for 20% (or 263 sq. m) of the store's sales area and the range of goods stocked is seasonal and continuously rotated on a

'when it's gone it's gone' basis, with no single product range predominating. Therefore, the potential for impact is very limited; with non-food goods which may cross over with a local trader's offer on sale for only a very limited period, rather than all year-round.

## Impact on Vitality and Viability – Conclusions

- 7.39 On the basis of the qualitative retail impact analysis agreed with officers at pre-application stage, it has been demonstrated that (in following the *'like-affects-like'* principle) the anticipated trade diversions of the proposed Aldi foodstore will fall almost entirely on surrounding, competing, mainstream foodstores. This is in view of the fact that these facilities are those most likely to be used by the catchment population, albeit they are not necessarily local to the Moston area. As **Appendix II** shows, because all of the foodstores identified are in the broad locality of the proposal's catchment area, but that equally no single foodstore can be regarded as serving an equivalent catchment, it stands to reason that trading impact of Aldi will be disbursed across a range of different facilities – rather than being focussed on one specific shopping destination.
- 7.40 In terms of the scheme's potential to impact on the trading performance of surrounding foodstores, it is clear from our analysis that several occupy out-of-centre locations and do not benefit from town centre policy protection. Meanwhile, almost all are significantly larger than the Aldi foodstore and none serve the same core five-minute drive-time catchment area centred on east Blackley / Moston. Finally, having visited the surrounding foodstores and noted the density of the population that they serve, we can confirm that each appears to be popular and well-used by their respective catchments. Given these points of differentiation from the application proposal, it can be concluded that the Aldi foodstore is very unlikely to result in a 'significant adverse' impact on the trading performance of any surrounding mainstream foodstore.
- 7.41 Having regard to the *'like-affects-like'* principle and fact that the vast majority of the turnover of a new Aldi foodstore at Victoria Avenue East will be diverted from surrounding, competing, mainstream foodstores, the prospect of any residual trade being diverted from the smaller shops and services within the closest defined centres of Hollinwood Avenue local centre (Moston) and Victoria Avenue local centre (Blackley) is very limited. Notwithstanding this, we have undertaken a proportionate health check assessment of both of these centres in order to understand their role and function and current *'vitality and viability'* – such that the implications of any residual impacts can be fully considered.
- 7.42 Both of the centres examined as part of the health check assessments at **Appendix IV** currently appear to be serving an important role within the local retail hierarchy in meeting (to differing

degrees) the day-to-day needs of their respective local residential populations. Significantly, neither of the centres were found to have a vacancy rate above the national average and this reinforces the notion that they are successfully performing their respective roles. There is no evidence to suggest that the centres will cease to do this following the introduction of an Aldi foodstore on Victoria Avenue East.

- 7.43 On the basis of our qualitative analysis, it has been demonstrated that the anticipated trade diversions of the proposed Aldi foodstore will not result in a '*significant adverse*' impact on any surrounding centre within the defined catchment area and, as such, '*vitality and viability*' will remain largely unaffected and favourably maintained. No conflict is therefore anticipated with Paragraph 89 of the Framework or Policy C 9 of the Core Strategy in respect of the scheme's retail impact. This policy test is therefore passed.

## 8. Other Planning Policy Matters

- 8.1 The purpose of this section is to assess the application proposals in the context of all remaining relevant planning policy and guidance at the national and local level.

### Principle Of Development

- 8.2 Given that the scheme is proposed on accessible, brownfield land which is set well within the urban boundary and would result in its favourable regeneration to provide appropriately scaled economic development which would create a range of local employment opportunities, it is considered that the proposals are supported by many of the overarching Strategic Objective policies of the Manchester Core Strategy. This includes; SO1 and SP1 (Spatial Principles), SO2 and EC1 (Economic Growth), CC5 and T1 (Transportation), and DM1 (Development Management).
- 8.3 The principle of development is also supported by the economic policies of the NPPF, which confirm that the Government is committed to ensuring the planning system does everything it can to support economic growth. Paragraph 81 states that 'significant weight' should be placed on the need to support economic growth through the planning system. The contribution which Aldi's Victoria Avenue East proposals will make to the local and wider economy should therefore be accorded substantial weight in the determination process.

### Transportation and Access

- 8.4 Transport and accessibility issues are covered in detail in the supporting Transport Assessment prepared by Cameron Rose Associates. Some of the key conclusions which are relevant to the objectives of Policy T2 (Accessible Areas of Opportunity and Need) of the Core Strategy are set out below.
- 8.5 In terms of accessibility, the application site is appropriately served by public transport with a bus stop located just 30 meters west of the site on Victoria Avenue East, as well as 2 further bus stops located 300m west of the site. The publication 'Planning for Public Transport in Developments' produced by the Institution of Highways and Transportation ('IHT') specifies that new developments should be located within 400m of the nearest bus stop. This is evidently the case in this instance. The bus stops located on Victoria Avenue East are visited approximately two times per hour in each direction by the 115, 116, 149, 711 and 722 services. These services provide access to a variety of destinations within the surrounding area, including Oldham, Harpurhey, Monsall, Middleton, and Crumpsall.

- 8.6 Furthermore, Moston Train Station is located just 500m south east of the application site, being less than a 10-minute walk. Having regard to the proximity of the bus stops, the frequency of buses, and the areas that the existing local buses serve, in addition to the nearby train station, the site is evidently highly accessible by public transport.
- 8.7 With regards to pedestrian access, the site benefits from a sizable walk-in catchment given the extensive surrounding residential areas to the south and east. The IHT guidance document titled *'Providing for Journeys on Foot'* identifies a maximum walk distance of 2.0km for commuter, school and sightseeing walk trips, 800m for town centre walk trips, and 1.2km for trips elsewhere.
- 8.8 Based on the walk catchment distances identified by the IHT, there are a considerable number of residences within the 800m 'customer' walk catchment area including a large proportion of the Moston area. Furthermore, the vast majority of the housing in Moston falls within the 2km commuter walk catchment along with much of White Moss and Blackley to the east and Hollinwood to the west, meaning that many staff employed from the Moston area could reasonably walk to work.
- 8.9 Finally, it should be noted that the application site is also accessible by bicycle, with Victoria Avenue East benefiting from dedicated cycle lanes in both directions. Given that the roads local to the site are urban in character, cycling provides the opportunity to access the future foodstore by this sustainable mode of transport. Provision for safe and convenient walking and cycling provision is to be made within the site itself, with level pedestrian routes and cycle parking provided for both foodstore customers and staff. These measures will allow the foodstore to be easily accessed on foot from both the surrounding residential areas and the wider district centre, and will encourage customers and employees to travel by cycle.
- 8.10 As the Proposed Site Layout Plan shows, the foodstore will be accessed via a new 'T-junction' with Victoria Avenue East. This will replace the existing T-junction which is located roughly 20m west of the proposed junction. It should be noted that both the existing and proposed T-junctions also provide access to the neighbouring apartments and gym to the west of the site. The rugby club to the east of the site currently has its own vehicular access junction off Victoria Avenue East, however it is proposed as part of this development that the rugby club will share the new T-junction with the proposed foodstore, gym and apartments. Coming off this junction there will be a new access point to the east which will provide vehicular access to the rugby club.
- 8.11 This means that the proposal will lead to there being one junction off Victoria Avenue East to replace the two which exist at present. The sports clubs have confirmed in a letter of support (see **Appendix I**) that the new vehicular access point is much needed. It will offer a safer route into and out of their

site for club members when compared with the existing narrow gated access point directly onto Victoria Avenue East which they currently use.

- 8.12 The Transport Assessment confirms that HGV access to the site / service area has been designed to accommodate the required turning manoeuvres of the largest servicing vehicle in Aldi's fleet (a 16.5m articulated goods vehicle) and a 'swept path analysis' is presented showing this entering and leaving the site safely and in forward gear. Furthermore, personal injury accident data presented as part of the Transport Assessment suggests that there is no particular trend or pattern of road accidents in the vicinity of the site resulting from any deficiencies in the local road network, or the operation of the site.
- 8.13 Significantly, the traffic impact section of the accompanying Transport Assessment concludes that the proposal will not have an adverse impact upon the safe and efficient operation of the existing local highway network both now and in the future. This is based on operational capacity assessments of various surrounding junctions.
- 8.14 In summary, it has been demonstrated that the proposed development will accord with Core Strategy Policy T 1 ('Sustainable Transport') and Policy T2 ('Accessible Areas of Opportunity and Need') and, more generally, the transportation and access policies of the NPPF.

## Design and Built Environment

- 8.15 The Built Environment and Design policies of Manchester's Core Strategy (Policy DM1 – Development Management) establish a number of urban design principles that new development within the borough should reflect, and also seeks to ensure that all developments display innovative, sustainable designs that contribute to good urban design and development. Schemes should also be compatible with the surrounding area with regard to scale, massing, landscaping and materials.
- 8.16 In response to these requirements, a detailed assessment of the design characteristics and benefits of the scheme is provided in the accompanying Design and Access Statement. However, in summary, with regards the foodstore's proposed layout, this clearly offers the greatest potential for integration with existing surrounding commercial uses and residential areas. This is given that straightforward pedestrian access will be achieved to Victoria Avenue East and that clear desire lines will also be established from the foodstore's proposed entrance to surrounding uses.
- 8.17 A key objective of the development from the applicants' perspective (both commercially and in layout terms) is to provide a scheme which responds appropriately to what is a prominent site for those travelling between Blackley and Moston on the A6104. Positioning the foodstore along the southern

boundary in the fashion proposed offers the potential to provide an active frontage onto Victoria Avenue East, as well as towards the site's new vehicular access road and will also give passers-by a view that will take in the unit's active frontages and boundary landscaping – highlighting pedestrian movement and providing visual interest. The orientation also maximises linkages with the pedestrian highway.

- 8.18 In terms of its design, the proposed foodstore, which is broadly rectangular in shape, promotes a clean, contemporary approach utilising extensive glazing on its southern, eastern and north-eastern elevations and a combination of predominantly brick finished with sections of composite anthracite cladding above the glazed windows. The building, which will be flat-roofed in nature, will benefit from a feature glazed entrance façade facing east; and will also incorporate a striking anthracite grey fascia canopy which projects from its eastern and north-eastern elevations in a consistent manner.
- 8.19 The material palette has been selected as it is in-keeping with the adjoining apartments and is also sensitive to the residential properties to the south. The brickwork helps to soften the elevations with a traditional material. The vertical cladding provides a contemporary aesthetic which combines well with the modern form, whilst glazing adds transparency and lightness to the facades.
- 8.20 The extensive use of glazing on the foodstore's most prominent elevations will offer views into the sales area for passers-by along Victoria Avenue East, adding interest to these elevations and creating an inviting, active frontage to the scheme. Glazing will also be a key feature at the north-eastern corner of the retail unit, to provide an expansive customer entrance and allow natural light to permeate throughout the store, thus reducing lighting requirements and creating a more pleasurable shopping experience.
- 8.21 With regards scale and massing, the proposed foodstore would be broadly the height of a two-storey residential property. This means that the building will be of a similar height to the existing restaurant located on the site which is due to be demolished as part of this application. The foodstore will be lower in height than many of the surrounding buildings including the 4/5 storey residential apartment building neighbouring it to the west. Accordingly, it is clear that the scale and massing of the proposed foodstore will be appropriate for its context.
- 8.22 The proposed scheme also takes into account the needs of crime and safety. For example, the customer entrance has a high degree of glazing which will offer unobstructed views into and out of the building and provide good natural surveillance. Customer cycle stands are located in front of the northern elevation where good natural surveillance is available from both the building and car park. Finally, the surface car park and external public spaces are generally open and provide good uninterrupted sight lines with clearly defined through routes and circulation. Overall, design

measures have been incorporated into the scheme to limit the opportunities for crime, and to reduce the risk of crime, disorder and disturbance occurring.

- 8.23 Overall, it has been demonstrated that the design of the proposed foodstore will be of a high-quality modern standard and sympathetic to the scale, form and character of existing surrounding structures. The design philosophy adopted, drawing upon a simple palate of contemporary materials, will ensure that the proposed development does not appear out of place in the context of surrounding land uses. Further, it has been shown that the development will improve the character of the site and bring new life to this part of Victoria Avenue East. Finally, design measures have been incorporated into the scheme to limit the opportunities for crime. Compliance can therefore be demonstrated with Policy DM11 of the Manchester Core Strategy and the design policies of relevance contained in the NPPF.

## **Residential Amenity and Noise**

- 8.24 Policy DM1 (Development Management) concerns, amongst other things, the impact of development proposals on surrounding residential amenity. Accordingly, a Noise Impact Assessment has been prepared in support of the planning application by BWB. A baseline noise survey was undertaken in January 2021. The survey, and subsequent assessment work, have been undertaken in accordance with current standards and guidance, following consultation with Manchester City Council.
- 8.25 Based on fieldwork to establish background sound levels, the noise environment was found to be dominated road traffic from the M60 to the north and Victoria Lane East to the south. A detailed noise impact assessment has been undertaken to determine the likely impact of the proposed development on the nearest noise sensitive receptors.
- 8.26 The noise assessment indicates that the proposed foodstore is unlikely to give rise to an adverse noise impact at the nearest noise sensitive receptors. This is given that the forecast noise rating level will be more than 10dB below the existing daytime and night-time noise levels at the closest receptors (given the proximity of major highway infrastructure). It is therefore considered unlikely that an adverse impact at these receptors would be perceivable and accordingly noise need not be a determining factor in the granting of planning approval for the proposed development. Compliance can consequently be demonstrated with the relevant part of Policy DM1 (Development Management).

## **Biodiversity and Ecology**

- 8.27 An Ecological Appraisal has been prepared in support of the planning application by Collington Winter Environmental Ltd. This has found that the site comprises habitats which are of limited value for

wildlife, being predominantly comprised of hardstanding. The site has very limited value for birds and bats. However, further nocturnal bat surveys were recommended to determine the usage of the site by bats and inform any further mitigation required.

- 8.28 As part of these further nocturnal surveys no bats were observed roosting within the building, and roosting bats were therefore assessed as being absent from the site. No further survey work was recommended regarding bats. By way of mitigation measures, the report recommends that a Sensitive Lighting Strategy is provided which details lighting levels within the proposed development and provision of "Dark Zones". Proposed "Dark Zones" would be located along the northern boundary of the site to ensure this treeline can continue to be used by commuting and foraging bats. It is also recommended that post development, multipurpose bat boxes are installed within the site to provide opportunities for roosting bats. It is anticipated that four boxes would be appropriate for the size of the site.
- 8.29 Finally, given the length of time since the first bat survey (over 12 months), it was recommended that a Verification Visit be undertaken (August 2021) to ensure the building remained in the same state as when previously surveyed, and that there had been no increase in bat roosting potential. An updated Bat Inspection was therefore undertaken on 25<sup>th</sup> August 2021 by Collington Winter Environmental Ltd. The survey included a full external and internal walkover of the building.
- 8.30 During the updated survey, the building was found to be in the same condition as when previously surveyed in August 2020 and no new roosting features were identified. No further survey work is deemed necessary for development to proceed at this site, subject to suggested mitigation measures (which remain the same as those identified in the August 2020 Nocturnal Bat Survey Report).
- 8.31 In conclusion, based on the supporting Ecological Appraisal, Nocturnal Bat Survey, and the 2021 Verification Inspection it is clear that overall the site is of generally low ecological significance. Nocturnal surveys have demonstrated that no bats are roosting within the building, and roosting bats are therefore assessed as being absent from the site. Notwithstanding this, a range of mitigation measures have been proposed by the submitted ecological assessments which will actively seek to protect those animals that do use it. Accordingly, there is no potential for conflict with nature conservation Policy REN 1 of the Manchester Core Strategy, or those policies of relevance contained within the NPPF.

## Flood Risk and Drainage

- 8.32 This application is supported by a Flood Risk and Surface Water Drainage Assessment, prepared by Integra Consulting. The assessment has been undertaken in accordance with national and local guidance and consultation has taken place with the Environment Agency and LLFA.
- 8.33 The report explains that the planning application site falls wholly within Flood Zone 1 (lowest risk of flooding). There are to be no off-site surface water routes generated by the development during an enhanced 1 in 100 year storm. All surface water run-off will remain on site in the 1 in 100 year +20% climate change event.
- 8.34 In terms of site surface water drainage, it is proposed to discharge suitably attenuated post development surface water into underground crate storage within the 'red-line' site boundary which in turn will discharge through a flow control chamber to limit the discharge to a runoff rate that provides a 50% betterment on the pre-development brownfield surface water flow rate for the existing brownfield site extent, with post development surface water flows limited to greenfield run-off rates over the existing greenfield areas of the site, all subject to detailed drainage design.
- 8.35 It is proposed that post-development foul drainage discharges from the new foodstore to the existing adjacent adopted combined sewerage system beneath the northern section of Victoria Avenue East, to the south of the site.
- 8.36 The Flood Risk and Surface Water Drainage Assessment concludes that with careful design of the drainage elements as described above, there will be no residual flood related risks remaining after the development has been completed. As the proposed development will reduce flow rates and not lead to any adverse impacts, it is considered compliant with the NPPF and the relevant flood risk policies of Manchester's Core Strategy.

## Air Quality

- 8.37 At the request of the Local Planning Authority, an Air Quality Impact Assessment ('AQA') has been undertaken by BWB Consulting in support of the proposed Aldi foodstore. This seeks to demonstrate that the scheme is compliant with the relevant air quality requirements of the Manchester Core Strategy. The site is partially located within the Greater Manchester Air Quality Management Area, which was designated for the potential exceedance of the annual mean nitrogen dioxide air quality objective.

- 8.38 A qualitative construction phase assessment has been undertaken and measures recommended for inclusion in a Dust Management Plan to minimise emissions during construction activities. With the implementation of these mitigation measures the impact of construction phase dust emissions is considered to be '*not significant*' in accordance with Air Quality Management guidance.
- 8.39 A detailed road traffic emissions assessment has also been undertaken as part of the AQA to consider the impact of development-generated road traffic on local air quality at identified existing receptor locations. The modelling assessment was undertaken in accordance with Defra Local Air Quality Management Technical Guidance. The AQA's findings are that the development is not predicted to result in any new exceedances of the relevant air quality objectives and the impact of the development on local air quality is predicted to be 'negligible' in accordance with all relevant national Air Quality Management guidance.
- 8.40 Whilst the development was therefore concluded not to give rise to harmful air quality impacts based on assessment work, appropriate mitigation for the development is proposed in any case. This includes the provision of a Travel Plan, cycle spaces, and several electric vehicle charging car parking spaces. The scheme is therefore evidently compliant with the relevant air quality requirements of the Manchester Core Strategy.

## **Sustainability / Environmental Standards / Renewable Energy**

- 8.41 The accompanying Design and Access Statement provides an overview of Aldi's approach to sustainability. The Statement sets out that the development will seek to minimise energy use, minimise waste and use sustainable building materials.
- 8.42 Furthermore, the planning application is supported by an Environmental Standards Statement prepared by Watt Energy Consulting Engineers. This statement has assessed the proposed development against the relevant climate change and sustainability policies and targets, as outlined within: the Manchester City Council Core Strategy (July 2012), Our Manchester Strategy, Manchester: '*A Certain Future and The Zero Carbon Framework*', through the following of the energy hierarchy, the modelling of the development in the IES VE software using the SBEM methodology, and addressing all aspects of a sustainable development.
- 8.43 As part of this process, the development is to be designed with a fabric first approach; with U-values, design air permeability and ventilation targets all bettering Building Regulations Part L 2013 standards. Following this, high efficiency air source heat pumps are proposed to meet the heating and cooling demands of the development, alongside LED lighting with absence/presence control to

minimise the electrical energy demand of the development. This approach demonstrates a holistic low energy design concept, resulting in low carbon emissions and energy demand.

- 8.44 The predicted site wide CO2 emissions reduction following energy efficiency measures and the implementation of LZC technologies is **12.6%**, or a **9563Kg.CO2 / annum** reduction compared with the Building regulations L2A 2013 baseline.
- 8.45 In addition to the following of the energy hierarchy through the efficient design and renewable technology measures mentioned and meeting all relevant Manchester City Council carbon targets, the proposal will include many sustainability measures throughout construction and once completed, which will contribute significantly to the development's sustainability performance and accord with the requirements of the NPPF. The key measures to be included are outlined in the Environmental Standards Statement.
- 8.46 Based on the various sustainability measures proposed as part of the Aldi foodstore, the sustainable design and energy strategy demonstrates that the development will comply with Manchester City Council's Core Strategy planning policy requirement concerning environmental standards and is also in-line with all targets put forward in their various associated planning documents. Accordingly, no conflict is anticipated with the relevant parts of local and national planning policy concerning sustainable design and development.

## Security and Designing-out-Crime

- 8.47 The proposed discount foodstore has been designed with safety and crime prevention in mind. A number of physical security measures are proposed to reduce the opportunity for and perception of crime. This includes:
- Good natural surveillance across the car park;
  - Cycle parking located in a location with good visibility;
  - Well-maintained planting and vegetation; and,
  - CCTV and alarm systems.
- 8.48 The planning application submission is accompanied by a Crime Impact Statement prepared by Greater Manchester Police's Design for Security team. Having assessed the development using the principles of '*Crime Prevention Through Environmental Design*' in order to identify any opportunities for crime and the fear of crime, the Crime Impact Statement has found the scheme to be generally acceptable and one which Greater Manchester Police support. Whilst further consideration of some

aspects is advised, it is considered that these can be addressed (if necessary) as part of planning application determination stage discussions.

- 8.49 As the development will comply with the requirements of Greater Manchester Police in terms of safety and security, it is considered to accord fully with the relevant Core Strategy development management policies concerning safety and security.

## Overview

- 8.50 This section has clearly demonstrated that the proposals meet the requirements of the policies contained within the Manchester Core Strategy (2012) relating to economic growth, noise, layout and design, transportation, flood risk, ecology, air quality, security, renewable energy and sustainability; as well as the relevant, corresponding policies contained within the NPPF. The above analysis, when considered alongside separate qualitative justifications for the sequential test and retail impact test, demonstrate the development is acceptable in planning policy terms.

## 9. Summary and Conclusions

### Overview

- 9.1 This Planning and Retail Statement has been prepared on behalf of Aldi Stores Limited in support of a 'full' planning application which seeks permission for the demolition of all existing structures and the erection of a 'Use Class E' discount foodstore with new vehicular access and egress to Victoria Avenue East, new internal vehicular access roads, car parking, servicing area, and hard and soft landscaping.
- 9.2 The application also proposes the creation of a new vehicular access and egress for the adjacent sports facility (North Manchester Rugby Club and Assheton Bowmen) which would be taken from the proposed discount foodstore's new vehicular access / egress to Victoria Avenue East. The scheme is proposed on the site of The Imperial Lounge Restaurant, Victoria Avenue East, Moston, M9 7HW. A small amount of surplus land associated with the adjacent sports facility is also utilised.
- 9.3 The site's potential for redevelopment is self-evident. It occupies a prominent location on the northern side of Victoria Avenue East (A6104), an arterial vehicular route which runs adjacent to the M60 motorway between Blackley and Moston. The site currently comprises an aging 'Use Class E' restaurant and its sizable associated car park. However, this no longer represents a viable use for the building and it has therefore been marketed for either re-occupation or re-development.
- 9.4 Re-occupation for an alternative commercial use is a realistic option, with the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020 coming into force on 1st September 2020, which amend the Town and Country Planning (Use Classes) Order 1987. This has created a new broad '*Commercial Business and Service*' use class (Class E), which incorporates a wide range of previous use classes including both restaurants (Class A3) and shops (Class A1). As a result, the 'change-of-use' of the site's existing building from a 'restaurant' (Use Class E(b)) to 'shop' (Use Class E(a)) no longer constitutes an act of development. The retail use of the site's 915 sq. m building could therefore be lawfully established without the need for planning permission and this represents an important material planning consideration.
- 9.5 However, the site's proposed redevelopment by Aldi for an alternative 'Class E' use represents a far more economically advantageous option than the building's re-occupation. It offers the chance to bring this prominent site into beneficial use through the provision of a modern, accessible discount foodstore which is proportionate to the future needs of the Blackley and Moston area. A scheme that will also notably improve the visual appearance of what is presently a tired and dated site.

- 9.6 The scheme will enhance consumer choice and will provide further competition within the area's food retail sector, with the densely populated Moston and Blackley areas not currently served by a discount foodstore. Meeting day-to-day food retail needs on a localised basis will give rise to considerable benefits in terms of promoting social inclusion and facilitating sustainable travel patterns – with residents no longer needing to travel to Middleton, Failsworth or Manchester city centre to visit an Aldi foodstore.
- 9.7 Added to this, it is important to acknowledge that the foodstore will contribute a range of good quality, flexible retail positions which are within walking distance from the surrounding residential area. A discount foodstore of the scale proposed would typically employ 40 to 50 members of staff.
- 9.8 Finally, the scheme is eminently deliverable, with Aldi targeting construction within 18-months of obtaining planning permission. It will also will deliver a much needed new vehicular access and egress for the adjacent local sports clubs – improving road safety for those using this facility. The overall investment value of the development will be in excess of £5m.

## Policy Compliance

- 9.9 This Planning and Retail Statement has considered the application proposals against the relevant policies contained within Manchester's development plan, as well as other material considerations including national planning policy guidance. Specific consideration has been given to the sequential and retail impact tests of the development plan, which are considered to be the '*main planning issues*' in this case.
- 9.10 It is important to note that there is no procedural requirement in this instance to undertake a conventional full quantitative '*retail impact assessment*'. This is given that the retail floorspace proposed falls below the testing threshold set out in Paragraph 90 of the NPPF (July 2021) and the Core Strategy (Policy C9) is also clear that a quantitative retail impact assessment (involving economic tables) is only required for retail proposals of 2,500 sq. m gross and above.
- 9.11 The level of analysis for schemes below this floorspace quantum (such as the application proposal) must therefore evidently be proportionate to the scale and nature of development proposed and the facts and circumstances of the given case. Accordingly, it has been agreed with the Local Planning Authority at pre-application stage that our approach to the planning application's retail impact justification will be to provide a qualitative analysis of the proposed discount foodstore's likely effects on the surrounding foodstores and centres which are within and just outside a defined five-minute drive-time catchment area.

9.12 We summarise the applicants' conclusions in relation to each of these key matters below:

*Sequential Test*

- 9.13 The sequential assessment set out in Section 6 (and in greater detail at **Appendix III** of this report) has demonstrated that there are no sequentially preferable development sites within or on the edge of Hollinwood Avenue local centre (Moston) and Victoria Avenue local centre (Blackley) which could realistically accommodate the scale and form of retail development for which planning permission is sought – even when demonstrating significant flexibility in terms of developable area.
- 9.14 This outcome is not particularly surprising given the physically constrained nature of these traditional local centres, with both tightly defined by traditional terraced dwellings and / or road infrastructure. These factors severely limit the potential for the expansion of both centres and mean that the reality is that new retail floorspace can only be accommodated in out-of-centre locations, such as the planning application site.
- 9.15 Overall, for the reasons outlined in Section 6 of this report, it is considered that there are no more 'suitable' and 'available' more centrally located sites for the scale and form of development proposed and compliance can therefore be demonstrated with the sequential approach to site selection as set out in Paragraph 87 of the NPPF.

*Retail Impact*

- 9.16 Section 7 of this report has demonstrated that (in following the '*like-affects-like*' principle) the anticipated trade diversions of the proposed Aldi foodstore will fall almost entirely on surrounding, competing, mainstream foodstores. This is in view of the fact that these facilities are those most likely to be used by the catchment population, albeit they are not necessarily local to the Moston area. As **Appendix II** shows, because all of the foodstores identified are in the broad locality of the proposal's catchment area, but that equally no single foodstore can be regarded as serving an equivalent catchment area, it stands to reason that the trading impact of Aldi will be disbursed across a range of different facilities – rather than being focussed on one specific shopping destination.
- 9.17 In terms of the scheme's potential to impact on the trading performance of surrounding foodstores, it is clear from our analysis that several occupy '*out-of-centre*' locations and do not benefit from town centre policy protection. Meanwhile, almost all are significantly larger than the Aldi foodstore and none serve the same core five-minute drive-time catchment area centred on east Blackley / Moston. Finally, having visited the surrounding foodstores and noted the density of the population that they serve, we can confirm that each appears to be popular and well-used by their respective catchments.

Given these points of differentiation from the application proposal, it can be concluded that the Aldi foodstore is very unlikely to result in a 'significant adverse' impact on the trading performance of any surrounding mainstream foodstore.

- 9.18 In view of the fact that the vast majority of the turnover of a new Aldi foodstore at Victoria Avenue East will be diverted from surrounding, competing, mainstream foodstores, the prospect of any residual trade being diverted from the smaller shops and services within the closest defined centres of Hollinwood Avenue local centre (Moston) and Victoria Avenue local centre (Blackley) is very limited. Notwithstanding this, we have undertaken a proportionate health check assessment of both of these centres in order to understand their role and function and current '*vitality and viability*' – such that the implications of any residual impacts can be fully assessed (See **Appendix IV**).
- 9.19 Both of the centres examined as part of our health check assessments are serving an important role within the local retail hierarchy in meeting (to differing degrees) the day-to-day needs of their respective local residential populations. Significantly, neither of the centres were found to have a vacancy rate above the national average and this reinforces the notion that they are successfully performing their respective roles. There is no evidence to suggest that the centres will cease to do this following the introduction of an Aldi foodstore on Victoria Avenue East.
- 9.20 On the basis of our qualitative impact analysis at Section 7, it has been demonstrated that the anticipated trade diversions of the proposed Aldi foodstore will not result in a '*significant adverse*' impact on any surrounding centre within the defined catchment area and, as such, '*vitality and viability*' will remain largely unaffected and favourably maintained. No conflict is therefore anticipated with Paragraph 89 of the Framework or Policy C 9 of the Core Strategy in respect of the scheme's retail impact.

#### *Other Planning Policy Matters*

- 9.21 Section 8 of this report has clearly demonstrated that the proposals meet the requirements of the policies contained within the Manchester Core Strategy (2012) relating to economic growth, noise, layout and design, transportation, flood risk, ecology, air quality, security, renewable energy and sustainability; as well as the relevant, corresponding policies contained within the NPPF. This analysis, when considered alongside separate qualitative justifications for the sequential test and retail impact test, demonstrate the development is acceptable in planning policy terms.

## Overview, Benefits and Planning Balance

- 9.22 The NPPF is clear that development proposals which accord with an up-to-date development plan should be approved 'without delay'. This Planning and Retail Statement has demonstrated that the application proposals are compliant with the adopted Manchester development plan and permission should therefore be granted.
- 9.23 Notwithstanding this robust conclusion, Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications are determined in accordance with the development plan unless material considerations indicate otherwise. Accordingly, even if the Local Planning Authority considers that the scheme would technically fail to comply with any specific development plan policy, consideration must also be given to other material planning considerations and whether these outweigh the local policy conflict identified.
- 9.24 Our report has identified a number of very positive impacts that the proposed development will give rise to (reflective of NPPF, Paragraph 8). It is appropriate to weigh these material considerations into the planning balance as part of the determination of the application. The positive impacts can be summarised as follows:
- The introduction of an Aldi discount foodstore will play an important role in further enhancing consumer choice and competition within Moston and Blackley's food retailing sector;
  - Meeting day-to-day food retail needs on a more localised basis will give rise to considerable benefits in terms of promoting social inclusion and facilitating sustainable travel patterns – with residents no longer needing to travel to Middleton, Failsworth or Manchester city centre to visit an Aldi foodstore;
  - Aldi will create 40-50 quality full and part-time jobs; delivering further indirect jobs through services supporting the new foodstore, and also providing a range of temporary construction jobs. The vast majority of positions will be made available to local people via targeted work with organisations such as Job Centre Plus;
  - The proposal offers the guarantee of deliverable economic development by a national retailer which will help boost the local economy and will assist in attracting further investment. Indeed, the overall economic value of Aldi's investment alone is anticipated to exceed £5m;

- The introduction of Aldi will reduce health inequality within the surrounding local catchment area, by providing straightforward access to a wide range of fresh produce and healthy food at heavily discounted prices;
- The scheme will deliver a much needed new vehicular access and egress for the adjacent local sports clubs – improving road safety for those using this facility. Indeed, North Manchester Rugby Club and Assheton Bowmen are fully supportive of the proposals and this is articulated in a letter which forms **Appendix I** to this Planning and Retail Statement; and,
- Finally, Aldi's introduction will offer sustainability benefits, including the provision of four car parking spaces that are equipped with Electric Vehicle Charging Points ('EVCP'). Furthermore, below ground infrastructure will be put in place to add up to a further 20 EVCPs in the future – future proofing the Aldi foodstore in terms of this emerging mode of private travel. Aldi will provide electricity free of charge to customers.

9.25 Overall, it has been demonstrated that the proposed foodstore development accords with the key policies of Manchester's adopted development plan, as well as the relevant policy tests contained within the NPPF. The applicants' position is therefore that planning permission should be granted on this basis.

9.26 Notwithstanding this, we have highlighted above that the application proposals will deliver some very significant positive benefits which weigh heavily in favour of the scheme. We consider that these benefits demonstrably outweigh any minor perceived negative impacts or policy conflicts that the Local Planning Authority may consider arise as a consequence of the foodstore development. The application proposals are therefore acceptable in planning terms and it is respectfully requested that planning permission is granted.

# **Appendix I**

Letter of Support on Behalf of North Manchester  
Rugby Club and the Assheton Bowmen

Development Management  
Planning Department  
Manchester City Council  
Town Hall Extension  
Manchester  
M60 2LA  
18<sup>th</sup> February, 2022.

**CONSTRUCTION OF A NEW ALDI FOODSTORE**

**THE IMPERIAL LOUNGE RESTAURANT, VICTORIA AVENUE EAST, MOSTON, M9 7HW**

**COMMENTS OF NORTH MANCHESTER RUGBY CLUB AND THE ASSHETON BOWMEN**

Dear Sir / Madam,

I write jointly on behalf of North Manchester Rugby Club and the Assheton Bowmen, who occupy the sports club and fields at Tudor Lodge, Victoria Avenue East, Moston, M40 5SH. The purpose of this short letter is to confirm the support of both sports clubs for the planned Aldi foodstore on the site of the Imperial Lounge Restaurant, Victoria Avenue East, Moston.

The scheme involves the redevelopment of a relatively small amount of land at the far south-western end of our playing fields. I can confirm that this slight loss of land does not impact on the layout of our existing rugby pitches or the enjoyment of the fields, except for some relocation of our floodlight stanchions, land drains and boundary fencing which Aldi have incorporated into their redevelopment plans of our site.

The redevelopment of this land will allow Aldi to construct a new junction with Victoria Avenue East that will also serve our car park and club building. This new access point is much needed and will replace the existing access point to our grounds and should be an improvement. It will offer a safer route into and out of our site for club members when compared with the narrow gated access point directly onto Victoria Avenue East that we currently use.

Aldi are also giving the clubs back land at the north eastern corner of their site which will be converted to grass and will form part of our playing fields. It will remove an existing pinch point at the north western end of one of our rugby pitches, providing better separation distance to the boundary and improving maintenance at this point. Aldi have also agreed as part of the relocation of the boundary fencing to improve the fencing with the addition of ball strike netting and the relocation of floodlighting piers with new floodlight heads.

In summary, we have worked with Aldi and their representatives in advance of this planning application being made and can confirm that both clubs are fully supportive of the proposals, which will benefit our members and the operation of our clubs. This development will also help with the sustainability of both clubs and help to continue the promotion of sport and social cohesion in our community for future generations. I would be grateful if you could take these comments into account when considering this application.

Yours sincerely,

Mr .Gopal Malhotra  
Honorary Treasurer  
North Manchester RUFC.

18<sup>th</sup> February. 2022.

Mr. Steve Gill  
Projects Manager  
North Manchester RUFC.

18<sup>th</sup> February, 2022.

Mr. Philip Riley  
Chairman  
Assheton Bowmen

19<sup>th</sup> February 2022.

Mrs. Kate Campbell  
Club Secretary  
Assheton Bowmen

19<sup>th</sup> February 2022.

# Appendix II

## Catchment Area Plan

# Plan Showing Five-Minute Drive-Time Isochrone From Application Site Alongside Surrounding Centres and Foodstores



# Appendix III

## Sequential Site Assessment Pro-Formas

# Sequential Site Assessment Pro-Formas

## Site 1 – Land North-East of Symond Road, Victoria Avenue Local Centre

|                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|-----------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Aerial Image</b>                     |  An aerial photograph showing a site outlined in red. The site is irregular in shape and contains a mix of green grass and dark, possibly paved or hardstanding areas. The text '0.3ha' is overlaid on the image. The site is bordered by a road to the west and south, and residential buildings are visible to the north and east.                                                                                                                                                                                                                                                            |
| <b>Site Size</b>                        | The site is irregular in shape and extends to approximately 0.3ha.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| <b>Existing Uses</b>                    | The site predominantly comprises an area of hardstanding. The hardstanding appears to be used as a surface car park for the Higher Blackley Conservative Club which adjoins the site to the north. Within the curtilage of the site is also an area of mature landscaping.                                                                                                                                                                                                                                                                                                                                                                                                        |
| <b>Neighbouring Uses</b>                | <p>Symond Road borders the site to the west. The site is bound to the north by Higher Blackley Conservative Club. To the east of the site is a grassed area, beyond which is Rochdale Road. The site is bound to the south by a small row of shops, fronting onto Victoria Avenue, comprising Food Shack, Perfect Pizza, Mr Pizza and Pound Store.</p> <p>The wider surrounding area is predominantly residential in character, with housing comprising the 'Blackley' urban area surrounding the site on all sides. The houses closest to the site are predominantly 2-storey semi-detached properties. There is a large Tesco Superstore some 150m to the east of the site.</p> |
| <b>Relationship with Nearest Centre</b> | The site is located within the Victoria Avenue Local Centre boundary. As such, this site represents an ' <i>in-centre</i> ' opportunity in town centre policy terms.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |

|                                                             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|-------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Development Plan Allocation</b>                          | <p>The site is located within Victoria Avenue Local Centre. Policy C8 ('Local Centres') states that the provision of new small-scale retail facilities will be encouraged where they provide for local everyday needs and would not be harmful to the vitality and diversity of nearby centres. Careful consideration will be given to the impacts of new commercial development on residential amenity.</p> <p>Manchester City Council's Interactive Proposals Map states that the site is also allocated as part of the 'Inner Area' and 'North Manchester'. Accordingly, the site is subject to Policy SP1 ('Spatial Principles') which states that Inner Areas will be a focus for residential developments and that neighbourhoods of choice should be created which meet local needs in a distinctive environment. The site is also subject to Policies EC4 (North Manchester) and H3 (North Manchester), which outlines the housing and employment development objectives within North Manchester.</p> |
| <b>Planning Permissions / Current Development Proposals</b> | <p>According to Manchester City Council's planning application database, the site has been subject to the following planning applications:</p> <ul style="list-style-type: none"> <li>• Application for certificate of appropriate alternative development erection of dwelling houses (ref: 045402/AAD/NORTH1/94). This application was withdrawn on 3<sup>rd</sup> July 1995. The area to which this application relates includes the Higher Blackley Conservative Club as well as this site.</li> <li>• Construction of a 25-metre-high telecommunications mast and associated equipment (ref: 052314/FO/NORTH1/97). This application was refused on 13<sup>th</sup> August 1997.</li> <li>• Installation of a 17.5m high monopole telecommunications tower, 3 cross polar antennae and associated equipment cabin (ref: 065534/FO/NORTH1/02). This application was withdrawn on the 16<sup>th</sup> August 2002.</li> </ul>                                                                               |
| <b>Suitability</b>                                          | <p>At just 0.3ha this site is clearly far too small to accommodate the scale and form of retail development proposed, even allowing for considerable flexibility (i.e. 0.7 ha site size minimum). It must therefore be dismissed as unsuitable on this basis.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| <b>Availability</b>                                         | <p>With regard to 'availability', it appears that the area of hardstanding within the site is used as a surface level car park for the Higher Blackley Conservative Club which adjoins the site to the north. There is also no evidence that the site is being marketed for redevelopment, or that it is likely to come forward for redevelopment within a timeframe comparable to that of the application site. Land north-east of Symond Road must therefore be dismissed as currently unavailable.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| <b>Conclusions</b>                                          | <p>Drawing on the above analysis together, in view of the very limited size of the site, it is evidently not a 'suitable' alternative for the scale and form of discount foodstore proposed. Additionally, the fact that the site appears to be currently in use as surface level car parking associated with the neighbouring Higher Blackley Conservative Club means that there is no evidence the site is 'available'. Further, there is no sign of it being marketed for alternative uses.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |

|  |                                                                                                                                                                                                                       |
|--|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|  | In conclusion, land north-east of Symond Road in Victoria Avenue Local Centre is therefore neither 'suitable' nor 'available' and cannot be considered a sequentially preferable alternative to the application site. |
|--|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

## Site 2 – Land South of Victoria Avenue East, Victoria Avenue Local Centre

|                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|-----------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Aerial Image</b>                     |                                                                                                                                                                                                                                                                                                                                                                                             |
| <b>Site Size</b>                        | <p>The site extends to approximately 0.18ha and is broadly rectangular in shape.</p>                                                                                                                                                                                                                                                                                                                                                                                          |
| <b>Existing Uses</b>                    | <p>It is currently in use as green recreational space. There is a mature tree bounding the site to the north.</p>                                                                                                                                                                                                                                                                                                                                                             |
| <b>Neighbouring Uses</b>                | <p>The site is bound to the west, south and east by residential dwellings. This housing comprises predominantly two-storey, semi-detached properties. The site is bound to the north by Victoria Avenue East (the A6104). On the opposite side of Victoria Avenue East is a large Tesco superstore.</p> <p>The wider area is predominantly residential in character, with the 'Blackley' urban area surrounding the site on all sides and the M60 motorway further north.</p> |
| <b>Relationship with Nearest Centre</b> | <p>The site is located within the defined boundary of 'Victoria Avenue Local Centre'. As such, land South of Victoria Avenue East represents an in-centre development opportunity in town centre policy terms.</p>                                                                                                                                                                                                                                                            |

|                                                             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|-------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Development Plan Allocation</b>                          | <p>The site is located within Victoria Avenue Local Centre. Policy C8 (<i>Local Centres</i>) states that the provision of new small-scale retail facilities will be encouraged where they provide for local everyday needs and would not be harmful to the vitality and diversity of nearby centres. Careful consideration will be given to the impacts of new commercial development on residential amenity.</p> <p>Manchester City Council's Interactive Proposals Map states that the site is also allocated as part of the <i>'Inner Area'</i> and <i>'North Manchester'</i>. Accordingly, the site is subject to Policy SP1 (Spatial Principles) which states that Inner Areas will be a focus for residential developments and that neighbourhoods of choice should be created which meet local needs in a distinctive environment. The site is also subject to Policies EC4 (North Manchester) and H3 (North Manchester) which outlines the housing and employment development objectives within North Manchester.</p> <p>Additionally, as the site comprises greenfield land it will be subject to Manchester Core Strategy Policy EN9 (<i>'Green Infrastructure'</i>). This policy states that new development will be expected to maintain existing green infrastructure in terms of its quantity, quality and multiple function. Development will only be allowed on Green Infrastructure when the benefits associated with this are considered to outweigh the loss of an existing element of Green Infrastructure.</p> |
| <b>Planning Permissions / Current Development Proposals</b> | <p>According to Manchester City Council's planning application database, the site has not been subject to any planning applications in the recent past.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| <b>Suitability</b>                                          | <p>At just 0.18ha the site will not be large enough to accommodate the scale and form of retail development proposed, even allowing for considerable flexibility (i.e. a 0.7ha minimum size). It must therefore be dismissed as unsuitable on this basis.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| <b>Availability</b>                                         | <p>The site is currently in use as Green Infrastructure, as such, Policy EN9 (Green Infrastructure) of the Manchester Core Strategy will prevent the site being developed, unless it is evidenced that the benefit of the proposal will outweigh the loss of an existing element of Green Infrastructure. As there is currently a Tesco superstore opposite this site, it is unlikely that retail development would be regarded as being of substantial benefit to the local community.</p> <p>Additionally, there is no evidence that this site is currently <i>'available'</i> for redevelopment, with it not being marketed as such.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| <b>Conclusions</b>                                          | <p>Due to the very limited scale of the site it must be regarded as unsuitable and dismissed on the basis of its size. As the site is currently in use as green space it is likely that the Local Planning Authority will be opposed to its loss, in accordance with Policy EN9 (<i>'Green Infrastructure'</i>). Further to this, there is no evidence that the site is currently being marketed for redevelopment. As such, the site evidently cannot be considered <i>'suitable'</i> or <i>'available'</i> for retail development within a timeframe comparable with the application site.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |

### Site 3 – Land South of Shops on Hollinwood Avenue, Hollinwood Avenue Local Centre

|                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|-----------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Aerial Image</b>                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| <b>Site Size</b>                        | <p>The site is irregular in shape and extends approximately 0.29 hectares.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| <b>Existing Uses</b>                    | <p>The site currently comprises a grassed area accessed via Hollinwood Avenue which leads to a small area of hardstanding.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| <b>Neighbouring Uses</b>                | <p>The site is bound to the north by a row of shops which front onto Hollinwood Avenue (a 'Local Centre'). These units include a newsagent, several takeaways, an optician and a restaurant. The site is bounded to the west by Moston Railway Station and railway line. There is a bicycle / pedestrian pathway running along the western boundary of the site. The land is bound to the east by residential housing and a steel clad building which is used as the New Moston Constitutional Club. To the south of the site is more housing and a grassed area which forms part of the pathway running along the western side of the site.</p> <p>The wider area is predominantly residential in nature, with suburban housing estates surrounding the site in all directions.</p> |
| <b>Relationship with Nearest Centre</b> | <p>The site is located within the defined boundary of '<i>Hollinwood Avenue Local Centre</i>'. As such, the land south of the shop units on Hollinwood Avenue represents an '<u>in-centre</u>' opportunity in town centre policy terms.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |

|                                                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|--------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p><b>Development Plan Allocation</b></p>                          | <p>The site is located within Hollinwood Avenue Local Centre. Policy C8 (Local Centres) states that the provision of new small scale retail facilities will be encouraged where they provide for local everyday needs and would not be harmful to the vitality and diversity of nearby centres. Careful consideration will be given to the impacts of new commercial development on residential amenity.</p> <p>Manchester City Council's Interactive Proposals Map states that the site is also allocated as part of the 'Inner Area' and 'North Manchester'. Accordingly, the site is subject to Policy SP1 (Spatial Principles) which states that Inner Areas will be a focus for residential developments and that neighbourhoods of choice should be created which meet local needs in a distinctive environment. The site is also subject to Policies EC4 (North Manchester) and H3 (North Manchester) which outlines the housing and employment development objectives within North Manchester.</p> |
| <p><b>Planning Permissions / Current Development Proposals</b></p> | <p>According to Manchester City Council's planning applications database, the site has been subject to the following applications over the recent past:</p> <ul style="list-style-type: none"> <li>• Temporary site compound comprising 6 storage cabins enclosed by 2m high metal fence for a period of 12 months (ref: 084770/FO/2007/N1). Application approved 18<sup>th</sup> December 2007.</li> <li>• Use of vacant land to the rear of 321 Hollinwood Avenue to site 6 no containers surrounded by Paladin fencing, as storage for the nearby Moston Mill External Insulation scheme. Cabins to be sited temporarily from 19/11/12 until 29/03/13 (ref: 100717/FO/2012/N1). Application approved 14<sup>th</sup> December 2012.</li> </ul>                                                                                                                                                                                                                                                          |
| <p><b>Suitability</b></p>                                          | <p>At 0.29ha this site cannot provide the space required to accommodate the scale and form of discount foodstore development proposed, even allowing for a considerable degree of flexibility (i.e. reducing the test area to 0.7ha minimum size). This site must therefore be dismissed as 'unsuitable' on this basis.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| <p><b>Availability</b></p>                                         | <p>This site does not currently appear to be in use and is largely redundant. However, it should be noted that there is no evidence to suggest that the site is being marketed for redevelopment or that it will be within a period of time comparable with the application site's proposed redevelopment.</p> <p>In addition to this, as past applications on the site have been for temporary uses and have been granted permission under the condition that they will be returned to their previous state once the time period has expired, this may imply that the Council would not support permanent development proposals on the site. As such, it may not be 'available' for development on this basis.</p>                                                                                                                                                                                                                                                                                        |

|                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|--------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Conclusions</b> | <p>Drawing the above analysis together, in view of the very limited size of the site it cannot be considered a 'suitable' alternative to the application site. Additionally, there are question marks surrounding the site's 'availability' as it is not presently being marketed for redevelopment and all past planning applications on the site have been for temporary uses.</p> <p>In conclusion, land south of the shop units on Hollinwood Avenue is not 'suitable' to accommodate the scale and form of development and may also not be 'available'. It subsequently cannot be considered a sequentially preferable alternative to the application site and is dismissed on this basis.</p> |
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# **Appendix IV**

Health Check Assessments – Hollinwood Avenue Local  
Centre and Victoria Avenue Local Centre

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# Victoria Avenue Local Centre (Blackley)

## Health Check Assessment

### Centre Overview

The shops and services at the junction of Victoria Avenue (A6104) and Rochdale Road in Blackley are defined as a Local Centre, according to Policy C1 (Centre Hierarchy) of the Manchester Core Strategy (2012 to 2027). Victoria Avenue Local Centre is positioned immediately south of Junction 20 of the M60 motorway and is also on the very northern periphery of the borough of Manchester, with the borough of Rochdale to the north.

The centre can best be described as a traditional parade of relatively small terraced shop units which are focussed at the busy vehicular junction of Victoria Avenue and Rochdale Road. The exception to this is a Tesco superstore and Library / Learning centre which are the two largest units in the centre and are positioned to the north-east of the traditional terraced parades. These units were constructed around 2010. The Tesco store is understood to have a Gross Internal Area of 3,310 sq. m (2,319 sq. m net sales), whilst the library extends to some 550 sq. m GIA in size.

Based on fieldwork undertaken by Avison Young in February 2022, the local centre was found to contain some 38 units in total. Victoria Avenue is served by the Tesco superstore's surface level car park, which provides some 240 free-of-charge parking spaces. Uses also of note within the vicinity of the local centre include a medical centre, primary school, and petrol station (Tesco).

### Diversity of Uses

#### *Convenience Goods*

As Table I on the following page shows, Victoria Avenue's convenience sector accounts for 13.2% of all retail units in the centre, which is above the national average of 9.2% and reflective of the fact that the centre's smaller units are very much geared towards meeting the surrounding walk-in catchment's day-to-day needs (including 'top-up' food shopping). Smaller convenience units take the form of a Go Local convenience store, a smaller independent convenience store, a newsagent, and a butcher (amongst others). In terms of total floorspace, the convenience goods sector is evidently the dominant use type within Victoria Avenue local centre. This is by virtue of a 3,310 sq. m Tesco superstore's presence, which is evidently larger than all other units within the centre combined.

#### *Comparison Goods*

In terms of comparison goods provision, only 11.8% (4 no.) of the centre's retail units are categorised as this use type, in contrast to the national average of 27.1%. Uses include a hardware store, charity shop and a non-food variety store. It is unsurprising that comparison goods retailers are particularly limited in the centre given the relatively small size of the units, the centre's role and function, and the more extensive comparison goods offer in nearby town centres such as Middleton to the north.

**Table 1:** Diversity of Uses in Victoria Avenue Local Centre (Blackley) (surveyed in February 2022)

| Use Type                       | Number of Units (February 2022) |                                         |               | Difference Vs National Average |
|--------------------------------|---------------------------------|-----------------------------------------|---------------|--------------------------------|
|                                | No.                             | Victoria Avenue Local Centre (Blackley) | UK            |                                |
| Convenience                    | 5                               | 13.2%                                   | 9.2%          | 3.9%                           |
| Comparison                     | 4                               | 10.5%                                   | 27.1%         | -16.6%                         |
| Retail Service                 | 6                               | 15.8%                                   | 15.7%         | 0.1%                           |
| Leisure Service                | 13                              | 34.2%                                   | 24.8%         | 9.4%                           |
| Financial and Business Service | 6                               | 15.8%                                   | 9.0%          | 6.8%                           |
| Vacant                         | 4                               | 10.5%                                   | 14.1%         | -3.6%                          |
| <b>Total</b>                   | <b>38</b>                       | <b>100.0%</b>                           | <b>100.0%</b> | <b>-</b>                       |

### *Leisure, Retail and Business Service Uses*

Turning to service uses (i.e. leisure, retail and financial and business), it can be seen from Table 1 that these cumulatively account for 65% of all units within the local centre, which is well above the national average position of 49.6%. Based on our visit, it is evident that the main reason for the above-average level of service uses in Victoria Avenue local centre is that the leisure service sector is particularly strong.

Indeed, there are in the order of 10 take-away hot food retailers (all leisure service uses). This is not unsurprising in our view, given the role and function of Victoria Avenue as a local centre which caters for the 'day-to-day' needs of a densely-populated local residential catchment – including its hot food requirements. A number of retail services, including barbers, a nail bar, salon and Post Office were also identified to be present. Service uses (leisure, retail and business) therefore evidently play a very important and complementary role to convenience goods retailers in the overall health of Victoria Avenue local centre.

### *Vacant Units*

With regards vacant units, significantly a vacancy rate of only 10.5% of all units was identified on our visit to the local centre, which is 3.6% below the current national average of some 14.1%. Furthermore, the few vacant units that were identified on our visit were largely small and spread throughout the centre, with the consequent effect being that they are not particularly noticeable. Added to this is the fact that during our visit one vacant unit was being fitted out to accommodate an alternative retail use, as such, this will shortly be occupied. In short, Victoria Avenue has relatively few vacant units and this is a strong indicator that it is a healthy, well-used and popular centre.

### *Other Miscellaneous Uses*

Alongside these categorised uses, there are also a variety of other miscellaneous amenities serving Victoria Avenue local centre (which are not accounted for in Table 1), these include a 240 space free-of-charge surface level car park (Tesco), a medical practice, a Library and Learning Centre, two churches, and a petrol filling station (Tesco).

## **Balance Between Independent and Multiple Stores**

The local centre comprises a total of 38 units, of which five are occupied by multiple retailers / operators (Tesco, Go Local, Post Office, Ladbroke's and Co-op Funeral Care). Multiple stores therefore comprise a relatively limited

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part of the centre's overall offering, although it evidently has a strong independent retail / service offer given the low vacancy rate.

### **Accessibility**

The local centre is situated in a densely populated residential area and therefore benefits from a sizable walk-in catchment. In terms of private car travel, the local centre benefits from a large 240 space free-of-charge car park located at the Tesco superstore at the north-eastern end of the centre. From our observations, this car park is popular and well used.

Several bus stops are located within the vicinity of the local centre along Rochdale Road, Victoria Avenue East and Victoria Avenue. These bus services are relatively frequent and provide direct connections to various destinations elsewhere in the borough of Manchester and beyond, including surrounding residential areas in north Manchester. Accordingly, the local centre benefits from being accessible by this sustainable mode of public transport.

### **Pedestrian Activity**

In relation to our other observations on Victoria Avenue local centre, at the time of our visit decent levels of pedestrian activity were noted along Rochdale Road, where the majority of the centre's smaller units are located. Also popular were the retail, service and leisure units on Victoria Avenue. Whilst pedestrian activity was more limited at the very northern end of the centre, this was still evident and is aided by the presence of controlled crossing points and the attraction offered by the Tesco superstore. The Tesco superstore itself appeared well used and busy at the time of our visits to the local centre.

### **Environmental Quality**

With regards the local centre's environmental quality, from our observations the units present are largely maintained to a good standard, albeit the presence of roller shutters on the centre's various hot-food take-away units means that when these are closed (during mornings in particular) parts of the centre does offer a relatively 'blank' frontage to Rochdale Road.

Furthermore, there was no evidence of any problems with litter or graffiti in the centre on our visit. Finally, efforts have been made to introduce hard and soft landscaping to pedestrian walkways throughout the centre, with various architectural trees and raised planters positioned along Rochdale Road and Victoria Avenue. Therefore, the local centre has a generally good environmental quality in our view, particularly during the summer months when the raised planters are fully stocked. However, it is acknowledged that some elements of the pedestrian highway now require investment.

### **Summary / Conclusions**

By way of conclusion, Victoria Avenue (Blackley) is evidently a diverse, well-used local centre which provides a good range of services which are suitable to serve the 'day-to-day' smaller-scale needs of the surrounding walk-in catchment population. It also serves 'main' food shopping needs via a circa 3,300 sq. m Tesco superstore, which occupies a peripheral location just north-east of the core concentration of shop units.

Whilst the centre benefits from a popular and well used Tesco superstore, from our observations this is by no means the sole attraction within the centre. As might be expected of a local centre within a densely populated residential area such as Blackley, the services sector is actually the most dominant in terms of the number of units of occupied. For example, hot-food take-aways (leisure service) occupy 10 of the 38 units in the centre,

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with there also being a notable number of retail services (barbers, salons, a nail bar and Post Office for example).

Significantly, Victoria Avenue local centre's vacancy rate (a key health check indicator) is just 10.5%, which is well-below the national average position of 14.1%. This is perhaps the strongest indicator available that Victoria Avenue is a healthy and popular local centre and one which independent businesses in particular are prepared to invest in.

Victoria Avenue has a relatively good environmental quality, with shop units generally well-maintained and efforts made to introduce landscaping within existing areas of public realm. It is acknowledged however that parts of the public realm itself merit investment. Meanwhile, access to the local centre is good via a variety of means (including public transport) and the centre also benefits from a sizable walk-in catchment area from surrounding high-density residential areas. A free-of-charge Tesco car park (located off Victoria Avenue) serves the centre to cater for those wishing to arrive via this mode of transport, albeit we noted in particular that a sizable proportion of visitors arrived on foot from the south and west. At the time of our visit, decent levels of pedestrian activity were noted along Rochdale Road in particular, where the majority of the centre's smaller units are located.

Drawing the above health check analysis together, our research suggests that Victoria Avenue local centre plays an important role in meeting the day-to-day retail and service needs of the population of Blackley and its surrounding residential area. It is evident that the local centre has a diverse offer comprising both national multiples and independents, a below-average vacancy rate, good accessibility, and is well used by the catchment population. In summary, Victoria Avenue unquestionably shows strong signs of '*vitality and viability*' and can therefore be regarded as a very healthy local centre at the present time.

# Hollinwood Avenue Local Centre (Moston)

## Health Check Assessment

### Centre Overview

The shops and services located along Hollinwood Avenue in Moston are defined as a Local Centre by Policy C1 (Centre Hierarchy) of the Manchester Core Strategy (2012 to 2027). Hollinwood Avenue Local Centre stretches east from Greengate Roundabout along Hollinwood Avenue and terminates at the road's junction with Owler Lane. In total the centre spans some 490m. The centre can best be described as a series of traditional linear parades of relatively small terraced shop units, which are interspersed by residential properties, side roads and other infrastructure (such as Moston railway station). Based on fieldwork undertaken by Avison Young in February 2022, the local centre was found to contain a total of 47 individual shop units.

### Diversity of Uses

#### Convenience Goods

As Table I below shows, Hollinwood Avenue's convenience retailing sector accounts for 10.6% of all retail units in the local centre, which is slightly above the national average of 9.2%. Units present take the form of Londis and Go Local convenience stores, a small independent convenience store, and an off-licence (amongst other uses). It is self-evident that the scale and form of convenience retail uses present within the local centre are capable of meeting only smaller-scale day-to-day 'top-up' food shopping needs, as oppose to weekly 'main' food shopping needs. This is also reflective of our on-site observations when visiting the local centre.

**Table I:** Diversity of Uses in Hollinwood Avenue Local Centre (Moston) (surveyed in February 2022)

| Use Type                       | Number of Units (February 2022) |                                         |               | Difference Vs National Average |
|--------------------------------|---------------------------------|-----------------------------------------|---------------|--------------------------------|
|                                | No.                             | Hollinwood Avenue Local Centre (Moston) | UK            |                                |
| Convenience                    | 5                               | 10.6%                                   | 9.2%          | 1.4%                           |
| Comparison                     | 6                               | 12.8%                                   | 27.1%         | -14.3%                         |
| Retail Service                 | 12                              | 25.5%                                   | 15.7%         | 9.8%                           |
| Leisure Service                | 18                              | 38.3%                                   | 24.8%         | 13.5%                          |
| Financial and Business Service | 3                               | 6.4%                                    | 9.0%          | -2.7%                          |
| Vacant                         | 3                               | 6.4%                                    | 14.1%         | -7.7%                          |
| <b>Total</b>                   | <b>47</b>                       | <b>100.0%</b>                           | <b>100.0%</b> | <b>-</b>                       |

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### *Comparison Goods*

In terms of comparison goods provision, only 12.8% (6 no.) of the centre's retail units are categorised as this use type, in contrast to the national average position of 27.1%. Uses include a variety discount store, bed shop, pet shop, pharmacy and a sewing supplies shop. It is unsurprising that comparison goods retailers are particularly limited in the local centre, given the relatively small size of the shop units, its role and function, and the more extensive comparison goods offer in nearby town centres such as Failsworth to the south.

### *Leisure, Retail and Business Service Uses*

Turning to service uses (i.e. leisure, retail, and financial and business), it can be seen from Table 1 that these cumulatively account for 70% of all units within the local centre, which is well above the national average position of 49.6%. Based on our visit, it is evident that the main reason for the above-average level of service uses at Hollinwood Avenue local centre is that both the retail and leisure service sectors are particularly strong.

For example, we noted a wide variety of hot-food take-aways, cafés and a restaurant supporting the leisure service sector. There are also a considerable number of retail service uses, including several barbers, beauticians, a tanning salon, cobbler, dog grooming parlour, and a Post Office.

The high proportion of service uses is not unsurprising, given the role and function of Hollinwood Avenue as a local centre which caters for the 'day-to-day' needs of a densely-populated local residential catchment area. Service uses (leisure, retail and business) therefore evidently play an important role in the overall health of Hollinwood Avenue local centre as the dominant use type.

### *Vacant Units*

With regards vacant units, importantly a vacancy rate of only 6.4% of all units was identified on our visit to the local centre, which is 7.7% below the current national average position of some 14.1%. Furthermore, the three vacant units that were identified were spread throughout the centre, rather than being concentrated in one specific area. The effect of this is that they are not particularly noticeable and do not undermine the centre's overall vitality. In summary, Hollinwood Avenue evidently has a low vacancy rate, and this represents a strong indicator that it is a healthy, well-used and popular local centre.

### *Other Miscellaneous Uses*

Alongside these categorised uses, there are also a variety of other miscellaneous amenities serving Hollinwood Avenue local centre (which are not accounted for in Table 1). Perhaps the most important such use is Moston Railway Station, which occupies a central location within the centre, immediately south of Hollinwood Avenue.

## **Balance Between Independent and Multiple Stores**

The centre comprises a total of 47 units (based on our counts), of which four are occupied by national multiple retailers / operators (Londis, Go-Local, Coral and the Post Office). Multiple stores therefore only comprise a small part of the centre's offering and this highlights the particularly strong independent retail offer.

## **Accessibility**

The local centre is situated on Hollinwood Avenue (A6104) an arterial vehicular route connecting Moston to the M60 outer ring road to the east. Whilst the centre is therefore accessible by car, due to the restrictions in place on this relatively busy vehicular route, parking within the centre can be relatively difficult. There is also no

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dedicated car park for the centre but, as an alternative, there is ample on-street parking on surrounding residential streets.

Hollinwood Avenue local centre is situated within an area of dense residential development and accordingly benefits from a sizable walk-in catchment. Bus stops are also available throughout the centre, with these positioned at several points along Hollinwood Avenue. Regular services are available to Manchester city centre, Oldham and to surrounding residential areas. Accordingly, the local centre benefits from being highly accessible by this sustainable mode of public transport.

### **Pedestrian Activity**

At the time of our visit pedestrian activity was noted along the length of Hollinwood Avenue. However, this was most concentrated within the shopping parades at the eastern end of the local centre, close to Moston railway station and where the density of retail / service units is greatest. Whilst pedestrian activity was more limited at the very western end of the centre, this was still evident and is aided by the presence of popular local retail and leisure service uses.

### **Environmental Quality**

With regards the local centre's environmental quality, from our observations the units present are largely maintained to a good standard. Furthermore, there was no evidence of any problems with litter or graffiti in the centre on our visit. However, it is clear that the centre's public realm is generally of a poor quality and in need of investment. Accordingly, Hollinwood Avenue local centre is considered to have a relatively mixed environmental quality at the present time, albeit one that does not appear to deter shoppers.

### **Summary / Conclusions**

By way of a conclusion, our health check analysis of Hollinwood Avenue (Moston) has revealed that it is a relatively large and diverse local centre which benefits from a number of qualities. Significantly, it has a healthy balance of uses, with no one individual category predominating at the expense of all others – albeit service uses are clearly particularly popular with visitors to the centre. The proportion of retail, leisure and financial service uses in the centre are (in combination) notably higher than the national average position – reflective of the centre's role as an important 'service centre' meeting the day-to-day needs of a densely populated residential area.

Convenience goods retail provision at Hollinwood Avenue is more limited but is still just above the national average in terms of proportion. Such shops appear to cater exclusively for shoppers' day-to-day 'top-up' food shopping needs, as oppose to their 'bulk' food shopping needs. This is reflected in the centre's small convenience stores (Spar and Go Local) and confirmed by our on-site observations.

There are various other beneficial amenities serving the centre, including a railway station. Hollinwood Avenue has a mixed environmental quality, with shop units generally well-maintained but the public realm in clear need of investment. However, this does not appear to deter shoppers. Meanwhile, access to the centre via a variety of means (including public transport) is straightforward and the centre also appears to benefit from a sizable walk-in catchment area from surrounding high-density residential areas.

Finally, at some 6.4%, the centre's vacancy rate (a key health check indicator) is well below the national average of 14.1% (Feb 2022) and this is a strong indicator that it is a healthy, well-used and popular local service centre.

Drawing the above analysis together, it is clear that Hollinwood Avenue local centre serves an important role in meeting the retail and service needs of the surrounding high-density residential population. Overall, the centre shows strong signs of '*vitality and viability*' and can be regarded as healthy at the present time.

# Contact details

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