

Woods Mill, Mill Street, Glossop

Planning and Retail Statement
on behalf of Glossop Land Limited

October 2015



Woods Mill, Mill Street, Glossop

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Appendix 1

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1. Executive Summary

- 1.1. Glossop Land Limited proposes the redevelopment of the Woods Mill site on the edge of Glossop Town Centre to provide a mixed-use scheme comprising a new foodstore, additional retail and office floorspace and No.57 new homes. A full planning application has been submitted to the Local Planning Authority, supported by a comprehensive package of documents that assess the critical implications of the proposal on relevant matters, such as on the Conservation Area, highway network and ecology.
 - 1.2. The proposal has evolved over a significant period of time, taking guidance from a range of documents prepared by the Council to include the adopted Local Plan, the Woods Mill Interim Planning Statement, the Glossop Design and Place Making Strategy and the emerging Local Plan. The proposal will deliver the key uses promoted by these documents.
 - 1.3. The retail element will be underpinned by a new foodstore, which will be operated by Lidl. The store will be located on the site of an existing single storey weaving shed located between Howard Town Retail Park and the Woods Mill building, with the primary vehicle access being taken from a priority junction on High Street East via Mill Street. A secondary access will be provided through Howard Town Retail Park, allowing vehicles to access and egress via Victoria Street or Mill Street.
 - 1.4. Existing retail floorspace forming part of the Bulldog Centre will be demolished to make way for the new access route, being replaced by an extension to the retained element of the Bulldog Centre adjacent to Glossop Leisure Centre. The new units have been designed to complement the design of the neighbouring retail park whilst also preserving and enhancing the Conservation Area setting.
 - 1.5. The residential element of the proposals will be located on the Woods Mill site, between Mill Street and Milltown, and comprise the development of No.57 two and three-bedroom homes each of which will benefit from a garage, additional off-street parking and generous house and plot sizes. The dwellings have been designed and laid out to reflect the character of the local area, with vehicular access taken from Milltown.
 - 1.6. The proposals provide strong pedestrian linkages with the town centre and the wider urban area. A riverside walkway will be delivered alongside Glossop Brook that will link Howard Town Retail Park with Manor Park to the north west, through the application site and neighbouring Volcrepe Works (Great Eastern Shed) site, which is also the subject of redevelopment proposals that have evolved alongside and in a complementary manner to this scheme for Woods Mill.
 - 1.7. The proposals provide for the demolition of the Woods Mill building, which is also the subject of a separate current application for demolition. Several structural surveys confirm that the building is in a very poor state of repair. This has been recognised by the Local Authority, with Milltown has been closed to pedestrian and traffic for a number months due to public safety concerns. The demolition of the mill has, nevertheless, been fully justified in planning terms, with a Viability Appraisal confirming that it is not financially viable to retain the building. Further, overwhelming local support for the demolition proposals has been expressed through public consultation.
 - 1.8. This Statement, together with the other supporting reports, provides a comprehensive assessment of the proposals against the relevant planning policy tests. Overall, it is concluded that the benefits that will be delivered by the proposed development more than outweigh any adverse impacts. In accordance with the NPPF, the Local Planning Authority should, therefore, adopt a presumption in favour of sustainable development and seek to grant planning consent without delay.
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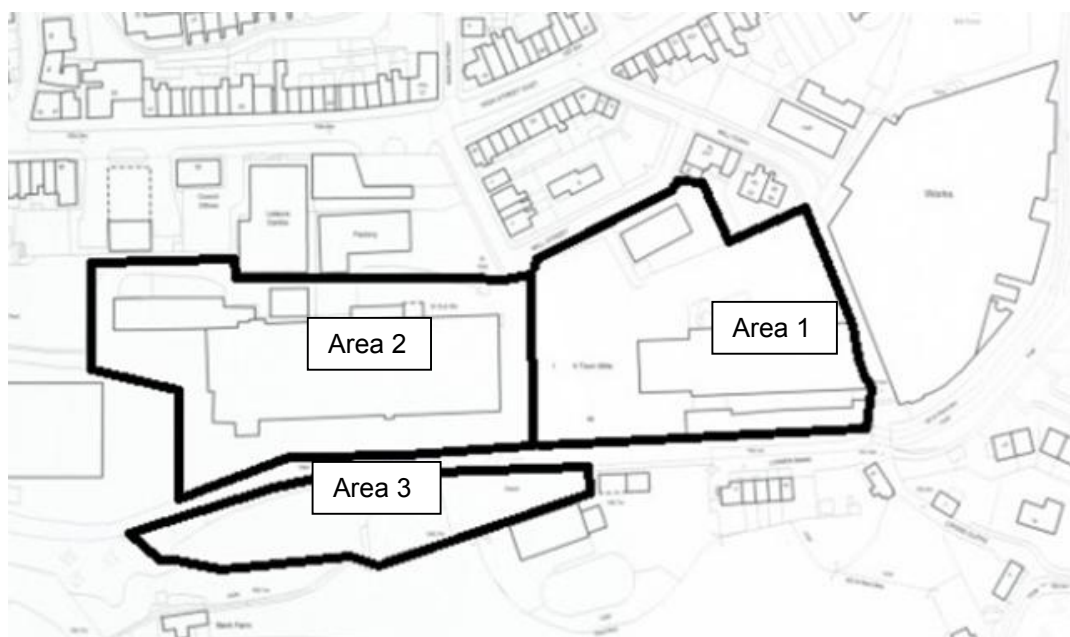
2. Introduction

- 2.1. This Planning and Retail Statement has been prepared by Plan A Limited in support of a full planning application made on behalf of Glossop Land Limited for a mixed-use development on the site of the former Woods Mill in Glossop. The proposed development comprises the erection of 57 dwellings together with a foodstore and the extension and refurbishment of an existing building for retail/office use, and associated works.
 - 2.2. This Statement sets out the merits of the proposed development in accordance with national and local planning policy guidance and details how the proposal will regenerate a strategic site and will contribute to economic prosperity of Glossop Town Centre.
 - 2.3. The Statement incorporates an Affordable Housing Statement and a Planning Obligations Statement and adopts the following structure:
 - Section 3: describes the application site and surroundings;
 - Section 4: provides the details of the proposed development;
 - Section 5: reviews relevant planning policies;
 - Section 6: considers of the principle of the proposed residential development;
 - Section 7: considers the principle of the retail development proposals;
 - Section 8: assesses the retail proposals in the context of the sequential test;
 - Section 9: assesses the impact of the proposed retail development;
 - Section 10: considers other planning matters;
 - Section 11: provides an Affordable Housing Statement and Planning Obligations Statement; and
 - Section 12: sets out the conclusions drawn.
 - 2.4. The proposal has been previously subject to an EIA Screening Opinion by High Peak Borough Council, which concluded that EIA is not required, subject to the planning application being accompanied by an agreed suite of reports and supporting information.
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3. Application Site and Surroundings

Application Site

- 3.1. The application site extends to approximately 2.4ha and comprises part of the Howard Town Mill complex which is located on the eastern edge of Glossop Town Centre. The site boundaries are formed by Milltown to the east, Glossop Brook and a public footpath beyond the Brook to the south, the Howard Town Retail Park to the west and Mill Street and the rear of properties fronting High Street East to the north.
- 3.2. The application site generally comprises the following three areas of land:
- Area 1 - Woods Mill, comprising a five storey mill building with three- and single-storey extensions together with a single storey office/transport depot located on the eastern half of the site;
 - Area 2 - a largely single storey mill shed, former engine house and converted retail units (known as the Bulldog Centre) located on the western half of the site; and
 - Area 3 - a former scrapyard site, which has now been cleared, located to the south across Glossop Brook.
- 3.3. These three areas are identified on the following plan.



- 3.4. The majority of the site is vacant, save for an office/transport depot forming part of Area 1 and a modest manufacturing use within the single storey mill shed and retail uses within the Bulldog Centre buildings, both of which form part of Area 2.
- 3.5. The former mill buildings are in a very poor state of repair. The multi-storey Woods Mill building suffers from significant water and fire damage, as detailed in the accompanying Viability Assessment and associated Structural Survey, with large sections of the neighbouring single storey mill shed having a collapsed roof and degenerating structural walls. The Heritage Statement provides a more detailed description of the physical
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condition of the existing buildings and structures.

- 3.6. The whole site is located within the Howard Town Conservation Area. However, none of the buildings within the application site are Listed.
- 3.7. Vehicular and pedestrian access to the site can currently be gained from Victoria Street through Howard Town Retail Park and from Mill Street. In addition, Woods Mill has direct vehicular access to Milltown via a large loading door. A further pedestrian access passes Glossop Leisure Centre from High Street East to the north.

Surrounding Area

- 3.8. The application site is partially located within Glossop Town Centre, with the site forming the eastern town centre boundary and the immediate area beyond up to Milltown. Given this location, the surrounding uses are predominantly of a retail and commercial nature.
- 3.9. Howard Town Retail Park, which is within the town centre boundary, is located immediately to the west of the application site. The retail park accommodates a range of food and non-food retail uses together with a hotel, public house and cafes set within historic and modern buildings. Glossop Leisure Centre, commercial and residential uses bound the site to the north, with the former Volcrepe mill (VC Works) located to the east across Milltown. The surrounding area to the south is of a rural character, however, with agricultural fields occupying a steep bank to a ridgeline running parallel to Glossop Brook.
- 3.10. The traditional town centre lies to the north and west, with retail frontages dominating both sides of High Street East and extending north to include the railway station. Predominantly residential areas are located beyond the town centre.

Planning History

- 3.11. Glossop Land Limited has pursued two separate planning applications seeking consent to redevelop the site the subject of this planning application.
 - 3.12. Application HPK/2014/0408 proposed the development of three new retail units alongside 49 dwellings. The application was withdrawn in February 2015.
 - 3.13. Application HPK/2015/0125 proposed the development of two retail units and 54 dwellings. This application was refused planning permission in June 2015 as a result of an unacceptable impact on heritage assets and insufficient information with regard to ecological matters.
 - 3.14. The proposed development hereby proposed represents the evolution of the above two applications and seeks to address the previous reasons for refusal following ongoing discussions with the Local Planning Authority.
 - 3.15. The multi-storey Woods Mill building is currently the subject of a planning application proposing its demolition (ref: HPK/2015/0442) on grounds of the building being a dangerous structure. This application is due to be determined in October 2015.
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4. Proposed Development

- 4.1. It is proposed to comprehensively redevelop the application site to deliver a mixed use scheme, which will comprise the following land uses:
- 944m² gross refurbished two-storey retail accommodation (Unit A on masterplan);
 - 739m² gross part two-storey and part single-storey extension to Unit A, comprising retail uses at ground floor level and retail and/or office uses at first floor level;
 - 2,470m² gross foodstore (Unit C);
 - No. 168 car parking spaces associated with the retail scheme; and
 - No. 48 two and three-bedroom houses and No. 9 two-bedroom apartments.
- 4.2. In addition to the above land uses, the proposals will deliver a riverside walkway along Glossop Brook between Howard Town Mill Retail Park and Milltown, with a further pedestrian link to the town centre provided adjacent to Glossop Leisure Centre. A replacement bridge is also proposed over Glossop Brook to provide access to the residential proposals to the south of the Brook. The existing Volcrepe Mill foot bridge is intended to be saved, restored and reused as a heritage asset and part of the brook side walkway
- 4.3. Further details about the residential and retail elements of the proposal are provided below.

Residential Development Proposals

- 4.4. The proposed residential development located within Areas 1 and 3 will comprise the following mix of dwelling types:
- No.46 three-bedroom houses;
 - No.2 two-bedroom houses; and
 - No.9 two-bedroom apartments.
- 4.5. The houses will be delivered in a range of different house-types, all of which will be two or three-storeys in height and served by off-street parking provision and a single garage. Details on the design and appearance of each house-type are provided in the accompanying Design and Access Statement.
- 4.6. The design of the proposed dwellings has evolved following detailed discussions with the Local Planning Authority over the past 16 months. As a result of these discussions, the Applicant has introduced dwellings fronting Mill Street and which take advantage over the change in levels. Three-storey dwellings have also been introduced along the northern frontage to Glossop Brook, where the design overcomes the location of the dwellings within the flood zone. Other house types have evolved to deliver a design compatible with the mill workers cottages that are typical of the surrounding area. Stone will be salvaged from the former mill buildings and will be reused.
- 4.7. The proposed layout seeks to maximise the potential of Glossop Brook, whilst also respecting the character of the Howard Town Conservation Area, especially along Milltown. Vehicular access will be taken from Milltown adjacent to the existing bridge over the brook, with pedestrian access also available from the proposed riverside walkway. A new bridge will be constructed over the Brook to create a suitable access to Area 3, with further
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linkages proposed, enhanced by a high quality public realm.

Retail Development Proposals

- 4.8. The proposed retail development has been designed to form an integrated extension to Glossop Town Centre and to complement the neighbouring Howard Town Retail Park.
- 4.9. The development proposals require the demolition of 726m² gross existing retail floorspace that forms part of the Bulldog Centre in order to provide a vehicular and pedestrian link between Howard Town Retail Park and the application proposals. A total of 944m² gross floorspace over two floors at the Bulldog Centre will be retained (Unit A). The retained unit will be extended to the front over two floors and with a single storey extension to the rear. The 155m² gross single storey rear extension is proposed for Class B1 office use only, with the retained and extended first floor floorspace being proposed for flexible retail or office use.
- 4.10. The extension and refurbishment of the Bulldog Centre is proposed to complement the existing role, function and appearance of the Howard Town Retail Park. The accompanying Design and Access Statement provides details about the design approach and use of materials.
- 4.11. In addition to the above, the main component of the retail development comprises a 2,470m² gross foodstore, which will be operated by Lidl (Unit C). A bespoke, high quality design approach is proposed that seeks to complement neighbouring buildings and respects the heritage value of the locality, whilst also delivering a modern, operationally efficient building that can accommodate the particular characteristics of the Lidl business model.
- 4.12. The retail development as a whole will be served by a total of 168 parking spaces, including 6 mobility impaired and 3 parent and child spaces, together with opportunities for secure cycle parking.
- 4.13. Vehicular access to the site will be taken from Mill Street and Victoria Street via Howard Town Retail Park. Layout to encourage pedestrian movement between the application site, leisure centre, Howard Town Retail park and all other areas within Glossop Town Centre, along Glossop Brook etc

Lidl 'Deep Discount' Format

- 4.14. Lidl's history dates back to the 1930s when 'Lidl and Schwarz Grocery Wholesale' was founded in Germany. Since then, the Company has diversified into hypermarkets (known as 'Kaufland') and discount foodstores (known as 'Lidl'). Today, the Schwarz Group is one of the largest grocery retailers in Europe and in the top ten largest global retailers. During the 1990s, Lidl commenced opening stores outside Germany, and are now found in 27 European countries. The Lidl format is already well established in the UK with the 600th store opening in early 2013.
 - 4.15. The Company philosophy is all about simplicity – offering customers everyday quality at the best possible prices. The Company's basic approach is equally straightforward and eminently sensible – to provide small/modest stores serving local needs at convenient locations close to residential areas. Lidl's operation is based on a traditional supermarket format with 'deeply discounted' prices and a limited range of 'own brand' goods. The ability to offer discounted prices to customers is achieved through economies of pan-European bulk purchasing, minimisation of distribution costs and the careful control of property and operational costs.
 - 4.16. A Lidl store offers a range of around 1,800 products all at discount prices. Items sold include:
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- A range of own-branded dry groceries, frozen foods and tertiary branded wines and spirits;
 - A small range of fresh and frozen pre-packaged meat, but no specialist butchery or delicatessen counter;
 - A range of fruit and vegetables, mainly pre-packaged;
 - Pre-packaged sliced bread as well as a new selection of artisan bread and cakes baked on the premises; and
 - A basic range of non-food household items accounting for up to 15% of the sales area.
- 4.17. The Lidl format differs from that of many other supermarket traders, primarily through the heavily discounted pricing structure and the very limited range of goods on offer. At around 1,800 product lines per store, the range of goods is significantly smaller than those offered by other leading retailers. For example, most modern superstores will offer up to 10,000 product lines. Moreover, Lidl does not compete in the same market as many independent or specialist traders such as confectioners, greengrocers or butchers – Lidl do not sell cigarettes or single confectionery items, do not include pharmacies or post offices and no meat or fish preparation takes place on the premises.
- 4.18. Lidl stores are clearly popular with their customers, as they offer high quality goods at very low prices. This high quality is reflected in the wide range of award winning products on offer, ranging from wines and spirits to cheeses and meats to cereals and biscuits to cleaning products. Lidl operate on far lower profit margins than the major foodstore operators and, due to their efficient productive approach, savings made operationally are passed on to the customer.
- 4.19. The proposed Lidl store will have distinctive trading characteristics, which are largely complementary to traditional high street convenience stores. Indeed, deep discounters rarely provide a one-stop shopping experience and, as such, customers also tend to use other shops and facilities in the locality to supplement their deep discount shop.
- 4.20. The deep discount format has been recognised as bringing wide range of benefits to local communities. Indeed, Lidl appeal cases offer significant support to the benefits that a Lidl store can bring to deprived areas through increased choice, high quality offer and discounted prices. The benefits are not limited to deprived areas, however, with Lidl stores throughout the Country experiencing increased custom as a result of the rising cost of food.

Operational Matters

Opening Hours

- 4.21. The proposed store's opening hours will be 7am to 10pm Monday to Saturdays and for six hours between 10am and 5pm on Sundays.

Servicing and Waste Management

- 4.22. The Lidl store will typically receive no more than four deliveries per day, which will be sourced from the regional distribution hub in Runcorn. No other service vehicles will serve the store.
- 4.23. Lidl's delivery vehicle will take all waste away from the store for recycling or disposal at the distribution centre. It typically takes 30 minutes to unload the delivery vehicle and to re-pack it with waste products and recycling.
- 4.24. All delivery vehicles will enter the site from High Street East via Mill Street. Vehicles will enter the site in forward gear and reverse down the delivery ramp to the loading dock.
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Vehicles will exit the site in forward gear.

Delivery Hours

- 4.25. Unrestricted delivery hours are sought, with the accompanying noise assessment demonstrating that such activities are unlikely to result in unacceptable impacts on neighbouring uses subject to the erection of suitable acoustic screening.

Trolley Management

- 4.26. Trolley management will be controlled by a coin deposit system. Customers will be required to make a payment in order to release a secured trolley from the trolley bay. This payment will be returned when customers return the trolley to the trolley bay and leave it securely. This system has proven an effective means of ensuring trolleys do not leave the site and, also, are returned to the trolley bay and secured appropriately.
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5. Planning Policy Review

- 5.1. This section of the Statement identifies the key planning policies and other guidance that is relevant to determination of this application. These include national, regional and local planning policy, alongside supplementary guidance and the Local Development Framework evidence base.

National Guidance

- 5.2. The National Planning Policy Framework (NPPF) was published on 27 March 2012 and represents the most up-to-date national planning guidance. It does not change the status of the Development Plan, but offers guidance which should be considered as a material consideration in determining planning applications (paragraph 12).
- 5.3. The NPPF is fundamentally based on a presumption in favour of sustainable development. As set out at paragraph 14, with regard to decision-making, this means:

‘Granting planning permission unless:

- *Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies of this Framework taken as a whole; or*
- *Specific policies in this Framework indicate development should be restricted.’*

- 5.4. At paragraph 17, the NPPF identifies a number of ‘Core Principles’ that should underpin plan-making and decision-taking. These principles include:

- Ensuring that planning is not just about scrutiny, but a creative exercise in finding ways to enhance and improve places;
- Proactively driving and supporting sustainable economic development through the planning system;
- Promoting mixed-use developments and encouraging multiple benefits from the use of land in urban areas;
- Encourage the effective use of land by reusing previously developed, brownfield land; and
- Conserve heritage assets in a manner appropriate to their significance.

- 5.5. There is an underlying ‘commitment to securing economic growth in order to create jobs and prosperity’ (paragraph 18). As such, it states that significant weight is to be placed on the need to support economic growth through the planning system (paragraph 19). In addition, paragraph 20 and 21 set out that ‘investment in business should not be over-burdened by the combined requirements of planning policy expectations’ and that local planning authorities should be proactive in meeting the needs of business.

- 5.6. Paragraph 24 confirms that the sequential approach should be applied to planning applications for main town centre uses. It states that local planning authorities should require:

‘main town centre uses to be located in town centres, then in edge of centre locations and only if suitable sites are not available should out of centre sites be considered. When considering edge of centre and out of centre proposals, preference should be given to

accessible sites that are well connected to the town centre. Applicants and local planning authorities should demonstrate flexibility on issues such as format and scale.'

- 5.7. The criterion for assessing the impact of main town centre uses in out of centre locations is set out at paragraph 26. This states that assessments should cover both:
- *'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 wider area, up to five years from the time the application is made ...'*
- 5.8. Paragraph 49 advises that housing applications should be considered in the context of a presumption in favour of sustainable development.
- 5.9. The NPPF also seeks to promote healthy communities and recognises the need to plan positively to deliver local shops and facilities to ensure that communities can meet their needs in a way that is sustainable (paragraph 70).
- 5.10. In terms of development affecting heritage assets, paragraph 131 advises that authorities should take account of:
- The desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
 - The positive contribution that conservation of heritage assets can make to sustainable communities including their economic viability; and
 - The desirability of new development making a positive contribution to local character and distinctiveness.
- 5.11. Key advice on the decision-taking process is provided at paragraph 187, which states:
- 'Local planning authorities should look for solutions rather than problems, and decision-takers at every level should look to approve applications for sustainable development where possible. Local planning authorities should work proactively with applicants to secure developments that improve the economic, social and environmental conditions of the area'.*

Development Plan Policy

- 5.12. The statutory development plan in the context of Section 38(6) of the Planning and Compulsory Purchase Act 2004 comprises the saved policies of the High Peak Local Plan (adopted in 2005). In addition to the adopted Plan, associated Supplementary Planning Documents, the emerging Local Plan and associated evidence base are also material to the decision-taking process. Policies and guidance within each of these documents that are relevant to the proposed development are identified below.

Saved Policies of High Peak Local Plan (HPLP)

- 5.13. The HPLP Proposals Map indicates that the application site is subject to a number of policy designations, which are identified below with reference to the three separate areas defined at paragraph 2.2 above that comprise the application site.
- 5.14. Area 1 comprises the multi-storey Woods Mill site, which is allocated as being within a Primary Employment Zone through Policy 56 (EMP4). This policy encourages the development of Class B1, B2, B8 and other employment generating uses and advises that retail or residential uses will not normally be permitted on such sites.
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- 5.15. Area 2, which currently accommodates the single storey mill shed and engine house, and Area 3 both form part of a Regeneration Area together with Howard Town Mill and commercial uses fronting High Street East. Policy 35 (TC11) identifies this area as a development opportunity that is suitable, in principle, to accommodate a range of uses to include retail and residential uses, subject to detailed design criteria being met.
- 5.16. Part of Area 2 is also located within Glossop Town Centre boundary. Policy 27 (TC1) confirms that permission will be granted for development that sustains and enhances the vitality and viability of Glossop Town Centre, with Policy 28 (TC2) encouraging such proposals to deliver a high quality of design.
- 5.17. Policy 29 (TC3) has regard to the development of retail stores of 500m² or more, advising that such stores will be permitted within town centres provided it is of a satisfactory design and will not harm the vitality or viability of the centre. Policy 30 (TC4) relates to such development proposals located outside town centres, requiring it to be demonstrated that the proposals satisfy the sequential approach and impact tests.
- 5.18. All three Areas forming the application site are located within the Howard Town Conservation Area. However, none of the existing buildings within the development site are Listed Buildings. The proposed development must, therefore, accord with Policy 20 (BC5), which requires development to preserve or enhance the special character of the Conservation Area, and Policy 21 (BC6), which seeks to resist demolition in Conservation Areas unless certain requirements are met.
- 5.19. The Proposals Map indicates that the majority of the site is located within an area at risk of flooding.
- 5.20. In terms of the proposed residential development, the saved housing policies are predicated on there being an over-supply of new homes when compared to the Structure Plan requirement. Accordingly, Policy 40 (H1) advises that residential development will only be permitted in Glossop in exceptional circumstances, which include as part of a mixed-use regeneration scheme in accordance with Policy 35 (TC11).
- 5.21. Policy 44 (H9) confirms that the provision of affordable homes will be required on sites of 0.5ha or more or proposals of more than 15 dwellings, with the level and type of provisions to be agreed following negotiation. Policy 46 (H11) encourages a high standard of design that reflects the setting and local distinctiveness, with Policy 47 (H12) requiring the provision of public open space in accordance with adopted standards.
- 5.22. In addition to the above key policies, a range of further saved policies are also applicable to the proposed development. These policies generally relate to the achievement of a high standard of design, taking account of amenity, landscaping and crime prevention measures, and the protection of the natural environment, including the landscape character of the area. Proposals that deliver benefits in terms of transport and accessibility are also encouraged.

Transitional Documents

- 5.23. To assist the policy transition between the adopted and emerging Local Plans, the Authority has prepared a number of documents to provide additional planning guidance beyond the Plan Period of the adopted HPLP.
 - 5.24. The Interim Housing Policy Statement seeks to provide additional guidance on the Council's approach to residential development in the period 2008 to 2011, this being when the Council had intended to have a new Core Strategy (emerging Local Plan) in place. Accordingly, given this timeframe, the Interim Statement is clearly out-of-date.
 - 5.25. The Woods Mill Interim Planning Statement (IPS) was published in January 2009 and seeks to define the Council's approach towards the redevelopment of the Woods Mill site. The
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IPS recognises that the proposed approach towards the redevelopment of the site departs from adopted HPLP policy and, therefore, the purpose of the document is to introduce an evidence-based transitional approach that pre-empts the potential future allocation of the site in the emerging Local Plan. The IPS presents a vision for the redevelopment of the Woods Mill site, which supports residential uses on Area 1 and retail and commercial uses on Area 2.

Emerging Local Plan

- 5.26. The Local Planning Authority has commenced the preparation of a Local Plan that will replace the saved policies of the adopted Plan in the near future. The Publication Local Plan was issued for consultation in April 2014 and was the subject of examination by the Secretary of State in January 2015, with additional work currently being undertaken with regard to housing matters. The draft policies that are of key relevance to the proposed development are identified below.
- 5.27. The draft Proposals Map designates the entire applications site, together with land located to the east across Milltown, as being subject to Policies DS1, H3, E5 and CF1.
- 5.28. Policy DS1 identifies the Woods Mill site (comprising Areas 1, 2 and 3 of the application site) as a Strategic Development Site/Regeneration Area where the development of a mixed-use scheme comprising up to 104 new dwellings together with a potential range of town centre uses will be encouraged. The policy advises that contributions will be sought towards the provision of infrastructure and community needs in addition to the provision of affordable housing. Any retail development proposals located outside the town centre boundary are required to satisfy the provisions of the NPPF, namely the sequential and impact tests.
- 5.29. The Reasoned Justification to Policy DS1 confirms the lengths the Local Planning Authority has gone to in order to encourage and guide the redevelopment of the Woods Mill site. It is recognised, however, that the physical integrity of the Woods Mill building is questionable and that the re-use of the building is unlikely to be viable.
- 5.30. Strategic Policy S5 supports the above approach, with the redevelopment of the Woods Mill site for a mixed-use scheme forming part of the strategy for the Glossopdale sub-area alongside meeting the housing needs of the area.
- 5.31. In further accordance with this approach, Policy E5 acknowledges that Woods Mill is constrained as an employment site and, therefore, encourages the regeneration of the site for beneficial uses.
- 5.32. Policy H3 confirms the Woods Mill site as a housing allocation, suitable for the delivery of up to 104 dwellings in the middle of the Plan Period (2021-26). Policy H4 requires new housing developments to make provision for affordable homes in accordance with Policy H5 and to provide a range of house types to promote sustainability and an inclusive community. Policy H5 subsequently confirms that 30% of housing should be affordable on sites delivering a total of 25 units or more.
- 5.33. Policy CF1 confirms that retail development proposals that will provide 200m² or more sales floorspace outside town centres will need to be justified in terms of the sequential and impact tests.
- 5.34. Relevant Environmental Quality policies require new development to commit to a low carbon future, to achieve a high standard of design and preserve or enhance the character and setting of heritage assets.

Supplementary Planning Documents

- 5.35. The Local Development Scheme (2014) confirms that the emerging Local Plan will be supported by a number of Supplementary Planning Documents (SPDs). The Local Planning
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Authority has prepared a number of SPDs in advance of the emerging Local Plan, with the documents of most relevance to the proposed development identified below:

- Residential Design Guide SPD (2005);
- Planning Obligations SPD (2005);
- Housing Restraint SPD (2006);
- Landscape Character SPD(2006);
- Glossop Conservation Area Character Appraisal SPD (2006);
- Housing Needs in High Peak SPD (2007); and
- Glossop Design and Place-Making Strategy SPD (2012).

- 5.36. References to the above documents are made, where necessary, in the context of assessing the proposed development against the requirements of relevant policies, as set out in this Statement and the accompanying Design and Access Statements and Heritage Statement.

Evidence Base

- 5.37. The following documents form part of the evidence base that supports the emerging Local Plan:

- Affordable Housing Viability Assessment;
- High Peak and Staffordshire Moorlands Quantitative Retail Study Update 2013 and February 2014 Update;
- Strategic Housing Land Availability Assessment;
- Strategic Housing Needs Survey;
- Updated Strategic Housing Market Assessment;
- Landscape Impact Assessment; and
- High Peak Local Plan Viability Study.

- 5.38. Reference may be made to these documents in subsequent chapters of this Statement and other documents submitted in support of the proposed development.

Summary

- 5.39. The policy review demonstrates that the Local Planning Authority has a clear and longstanding aspiration to see the redevelopment of the application site with a sustainable, mixed-use scheme, with suitable uses including a foodstore, other retail floorspace and residential uses. Significant weight can be attached to this vision for the site.
- 5.40. The elements of the proposed development are assessed against the requirements of policy in the following sections of this Statement.
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6. Planning Appraisal: Residential Development

- 6.1. The merits of the residential development proposals, which comprise the delivery of 57 dwellings on Areas 1 and 3 of the application site, are assessed below in the context of the requirements of planning policy.

Principle of Residential Development

- 6.2. Saved Policy 56 (EMP4) of the adopted Local Plan allocates Area 1 (the Woods Mill site) as an Established Employment Area, where residential uses will '*not normally*' be permitted. On the basis that the policy indicates that some exceptions may be allowed, the principle of the proposed residential development does not constitute a departure from Policy 56 (EMP4).
- 6.3. Indeed, it is clear that the Local Planning Authority has sought to promote the principle of residential development on this Established Employment Area, with the following documents fully supporting the principle of residential development within Area 1, as proposed:
- Woods Mill Area Action Plan (now abandoned);
 - Woods Mill Interim Planning Statement;
 - Glossop Design and Place Making Strategy SPD;
 - Emerging Local Plan; and
 - Strategic Housing Land Availability Assessment.
- 6.4. These documents confirm that the Local Planning Authority has deemed the principle of residential development on the Woods Mill site (Area 1) to be an acceptable exception in the context of saved Policy 56 (EMP4).
- 6.5. The proposed residential development on Area 3 (land south of Glossop Brook) fully accords with both the adopted and emerging Local Plans and the other documents listed in paragraph 6.3 above.
- 6.6. It can, therefore, be concluded that the principle of residential development has, therefore, already been established by the Local Planning Authority.
- 6.7. Furthermore, the Local Planning Authority has not sought to resist the principle of residential development on the site when considering previous recent planning applications.

Design and Layout

- 6.8. The design and layout of the proposed residential development has evolved in response to a number of key influences, to include the need to respect heritage assets, the relationship of the development to Glossop Brook and changes in level across the site. Further details about how these factors have influenced the proposals are set out in the Design and Access Statement.
- 6.9. In accordance with the Design Brief for the Woods Mill area that is encompassed within the Glossop Design and Place Making Strategy (GD&PMS), the proposals seek to:
- Concentrate residential development within the east half of the site;
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- Retain the existing stone wall along the western side of Milltown;
 - Retain the existing stone wall along the southern side of Mill Street, albeit in reduced height;
 - Maximise views of, and public access to, Glossop Brook;
 - Deliver development at an urban density;
 - Acknowledge and support the contrast between the height and massing of buildings on industrial and domestic scales;
 - Enhance the panoramic view down Mill Street from High Street East by providing a contrast between the residential dwellings and the rising countryside to the south;
 - Enhance views of the VC Works mill;
 - Deliver a north-south and east-west pedestrian route to and along Glossop Brook; and
 - Promote a distinctive architectural design that complements the local context.
- 6.10. The Applicant has strived to deliver the GD&PMS aspirations for the site as possible, whilst also balancing the approach with wider commercial influences. For example, the need to deliver commercially viable homes has been balanced with the historic context of the site, with car parking provision also being balanced with the back-of-pavement character of the surrounding area. Similarly, heritage conservation and highways objectives are in direct conflict in terms of delivering a new vehicular access from Milltown and the need to retain the enclosed character of the area.
- 6.11. The proposed layout seeks to propose a successful balance between conflicting objectives whilst also taking account of the need to deliver a commercially viable scheme that is attractive to the market.

Housing Size and Type

- 6.12. The Council's information on the size and type of new housing required in Glossop is set out in the April 2014 Strategic Housing Market Assessment and Needs Final Report prepared by NLP. This report provides an evidence-based approach towards identifying the size and type of housing that is likely to be in greatest demand when taking account of a wide range of factors.
- 6.13. The report provides policy guidance at paragraph 11.20, which advises that the total housing stock delivered over the period to 2031 should be encouraged to deliver the following splits between dwelling size and type:

Dwelling Size	Dwelling Type
45% 2-bedroom	30% semi-detached
35% 3-bedroom	25% detached
10% 4-bedroom	15% terrace
10% 1-bedroom	10% flats

- 6.14. The NLP report identifies a greater local need for 2 and 3-bedroom houses, with the proposed development directly contributing towards meeting this need.
- 6.15. In terms of size, the proposed houses will provide generous accommodation, widening the range and choice of the local housing stock by providing a direct alternative to the traditional homes in Glossop. The internal floorspace will be complemented by off-street parking space, garages and private garden space. Revisions to the house types have introduced three-storey terraced houses along the northern frontage to Glossop Brook, with this revision being in accordance with the GD&PMS aspiration to achieve the highest appropriate density (no actual target density is stated in the GD&PMS).

Affordable Housing

- 6.16. The requirement for the proposed development to deliver affordable housing in accordance with the Council standards is addressed in the Affordable Housing Statement at Section 11 of this Statement.

Sustainability

- 6.17. The sustainability credentials of the proposed residential development are set out in the accompanying Design and Access Statement.

Parking and Access

- 6.18. Vehicular access to the residential proposals will be taken from Milltown, adjacent to the existing bridge over Glossop Brook. The location of this access has been dictated by features within the Conservation Area, with the GD&PMS expressing a strong desire for the existing stone wall running along the western boundary of Milltown to be retained in order to maintain the enclosed character of the area. This has resulted in the site access being located where Woods Mill currently stands.
- 6.19. The vehicular access into the site will run along Glossop Brook, with the new homes orientated to face the Brook in a manner that reflects the existing cottages to the south on Lower Bank. The proposed dwellings are laid out in three cul-de-sacs in order to prevent the route being used as a short cut.
- 6.20. In accordance with the aspirations of the GD&PMS, pedestrian and cycle permeability through the site has been maximised. A riverside walkway is proposed along the northern bank of the Brook, linking the retail element of the proposals and the town centre beyond to the proposed new homes, the VC Works site and the residential areas beyond. Further linkages are proposed to assist north-south movements.
- 6.21. As stated above, each of the dwellings proposed will be served by off-street parking space and a private garage space in order to reduce the potential for on-street parking.
- 6.22. The accompanying Transport Assessment concludes that the vehicle movements generated by the residential element of the proposed development can be satisfactorily accommodated on the local highway network.

Public Open Space

- 6.23. The proposed residential development is located within close proximity of a range of public open space and other leisure facilities.
- 6.24. Manor Park will be within 700m walking distance from the site via the proposed riverside walkway (measured from middle of Woods Mill site to equipped play area). This park accommodates a wide range of facilities, to include an equipped play area, skatepark, sports fields and courts, parks and gardens, all of which will be highly accessible to the proposed development.
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- 6.25. The site is bounded by countryside to the south, with a Long Distance Path running along the boundary of Area 3 and providing direct access to open space and a route to the allotments accessed from Cliffe Road. The site is also located adjacent to Glossop Leisure Centre.
- 6.26. The proposed development will make a valid contribution to the accessibility of existing open space by delivering the riverside walkway, opening up and restoring the Glossop Brook corridor and creating a key area of public open space. It is, therefore, not proposed to make any dedicated on-site play-space or other public open space provision.

Conclusion

- 6.27. The principle of delivering residential development on the Woods Mill site fully accords with the Local Planning Authority's aspirations for the site. The residential proposals respond in a positive manner to the Conservation Area location and the design guidance prepared by the Council, whilst also balancing wider influences such as providing a satisfactory vehicular access and delivering a viable scheme.
- 6.28. Planning policies, including the NPPF, direct the Local Planning Authority to support the residential proposals unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits. However, it has been demonstrated above and at Section 10 that there are no significant adverse impacts resulting from the residential element of the proposals.
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7. Planning Appraisal: Retail Development

- 7.1. The merits of the retail element of the proposed development are assessed in accordance with the requirements of planning policy below and in the following sections.

Principle of Retail Development

- 7.2. The proposed retail development will be delivered within Area B of the application site and will comprise the following elements:
- Unit A – retention of 944m² of existing floorspace at ground and first floor level, with a two-storey 583m² gross extension to the front to deliver new shop frontages to match the neighbouring units (to compensate for loss of 726m² demolished retail floorspace), with all first floor floorspace being suitable for retail or office use. A further extension to the rear (north) of Unit A to deliver 155m² gross single storey office accommodation; and
 - Unit C - erection of a 2,270m² Lidl foodstore on the immediate edge of the town centre boundary.
- 7.3. Planning policy at all levels prioritises retail (and office) development in town centres. Accordingly, the principle of delivering the proposed works to Unit A within the town centre boundary is fully compliant with policy.
- 7.4. The proposed Lidl foodstore (Unit C) is, however, located outside (albeit immediately adjoining) the town centre boundary. As a result, the acceptability of the principle of this element of the proposals is theoretically subject to compliance with the sequential and impact tests. Therefore, the Lidl foodstore proposal is assessed against these policy tests in the following Sections of this Statement.
- 7.5. The Applicant notes, however, that the adopted Local Plan, together with a suite of Supplementary Planning Documents and the emerging Local Plan all seek to promote retail development on Area 2, amongst other town centre uses. The principle of delivering new retail floorspace within and immediately beyond the town centre boundary has, therefore, clearly been accepted in principle by the Local Planning Authority.

Design and Layout

- 7.6. In terms of the general characteristics of the site layout, the proposed retail floorspace will be located towards the western part of the Woods Mill site, which fully accords with guidance set out in the GD&PMS. The proposals will also reflect the east-west historic building grain, with the siting of the Lidl store being similar to the footprint of the existing single storey mill shed and engine house that currently occupy the site.
- 7.7. The layout also takes the opportunity to integrate the proposed retail floorspace with Howard Town Mill Retail Park, with a through route proposed between Victoria Street and Mill Street through the car parking area. This arrangement has been proposed in order to address existing concerns with the Victoria Street junction, with the proposals providing an alternative means of access/egress.
- 7.8. The accompanying Design and Access Statement details the layout options that have been explored as part of the masterplanning process. Flood risk has proven a significant influence, with the need to provide sufficient flood storage capacity directing finished floor levels, gradients and building footprints. This has been a considerable task, with previously proposed elements of the development scheme having been deleted in order to meet flood
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risk requirements.

- 7.9. The design of the proposed buildings and the use of materials has evolved following detailed discussions with officers. The design of the Lidl foodstore has, in particular, adopted a bespoke approach in order to respect the heritage value and sensitivity of the character of the area. The GD&PMS has been a key influence on the proposed design, with a unique, energy and operationally efficient store being proposed that is a significant departure from the operators standard concept.
- 7.10. The refurbishment and extension of Unit A has been designed to reflect the appearance of the neighbouring units within Howard Town Retail Park. The proposed retail development is intended to appear as an integrated extension of Howard Town Mill Retail Park.
- 7.11. The accompanying Heritage Statement provides an appraisal of the impact of the retail proposals on the Conservation Area, concluding that the proposals will have a '*neutral impact*'.

Sustainability

- 7.12. The strong sustainability credentials of the retail development proposals are set out in the accompanying Design and Access Statement.

Parking and Access

- 7.13. The primary vehicular access to the proposed retail development will be from High Street East via the existing Mill Street access, with a secondary access provided on Victoria Street through Howard Town Retail Park. All service vehicles will enter and exit via Mill Street.
- 7.14. A 168 space car park is proposed to serve the retail proposals, which will include 6 disabled parking spaces and 3 parent and child spaces adjacent to the entrance to the Lidl foodstore. The car park will essentially form a continuous extension to the neighbouring retail park car park, thereby functioning to serve the retail uses in the immediate area and the wider town centre as a whole.
- 7.15. Pedestrian accessibility through the site has been a key consideration. The riverside walkway along Glossop Brook will provide safe and convenient accessibility through the site on an east-west axis together with a footway along the southern elevation of the Lidl store. On the north-south axis, the existing pedestrian route past Glossop Leisure Centre to Unit A will be retained, with further accessibility opportunities along Mill Street. All pedestrian routes pass close to the entrance of the proposed foodstore and other retail units.
- 7.16. The accompanying Transport Assessment demonstrates that the retail element of the proposals will not have a material impact on the highway network.

Office Use

- 7.17. It is proposed that a flexible approach is taken towards the use of the first floor of Unit A. Whilst the ground floor area will be used solely for retail use, flexibility is required to either provide additional retail floorspace at first floor level or for this floorspace to be used for office use. The 155m² single storey extension to the rear (north) of Unit A will be used for office purpose only.
- 7.18. On the basis that Unit A is located within Glossop Town Centre, the principle of delivering Class B1 office floorspace is fully compliant with planning policy.

Conclusion

- 7.19. The retail element of the proposed development will be delivered within Glossop Town Centre boundary or immediately beyond that boundary. The proposals must, therefore, be
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considered to fully accord with the fundamental retail policy objective of directing new retail floorspace to town centre locations, subject to that element falling beyond the town centre being compliant with the relevant policy tests in terms of the sequential approach and impact assessment. The proposals are assessed against these tests in the following sections.

8. Sequential Approach

- 8.1. Paragraph 24 of the NPPF requires that the selection of sites for new development for all main town centre uses should proceed via a sequential approach. In short, first preference should be for town centre sites, followed by edge-of-centre sites and then well connected out-of-centre sites where there are no suitable, available and viable sites within more sequentially preferable locations.
- 8.2. On the basis that the proposed Lidl foodstore is located outside Glossop Town Centre boundary, this element of the proposals has been assessed against the requirements of the sequential approach. However, before undertaking an assessment of potential alternative opportunities, consideration is directed in turn towards flexibility.

Flexibility

- 8.3. The Planning Inspectorate and Secretary of State have both considered the inherent characteristics of the deep discount business model in detail, and it has been accepted that there are critical components of the business model that legitimately restrict the scope for flexibility. In particular, the following advice has been followed:
- At Newhaven (APP/P1425/V/03/1132932), the Inspectorate accepted that *‘the applicant has a particular operating style which limits the degree of flexibility that can be employed within the site selection process. The operation cannot be run in a style that ignores the economics that underlie a deep discounting operation. I consider that in relation to site selection, Lidl has adopted a realistic response to the constraints and opportunities of the sector within which the company seeks to operate’* (paragraph 11.17);
 - In Merton (APP/T5720/V/04/1171394), the Inspectorate had regard to the need for Lidl to adhere to a particular format, principally based upon a single level store, so as to allow the efficient movement of pallet loads of goods from the delivery bay to the sales area. It was accepted that a more labour intensive arrangement would not only increase the storage required (as goods cannot be transferred to the shop floor as quickly) but also increase costs (more staff required and specially designed displays needed), undermining the ability to sell goods at low prices; and
 - Also in Merton, the Inspectorate accepted that there was no realistic scope for disaggregation, and recognised that it has been accepted by Inspectors in a number of appeals that Lidl stores cannot feasibly be broken down into constituent parts.
- 8.4. In accordance with these decisions, it is clear that the Inspectorate has accepted there are limits to the flexibility of the Lidl business model. These key considerations have been taken into account when identifying and assessing potential sequentially preferable development opportunities.
- 8.5. The sequential assessment presented below, therefore, seeks to identify alternative opportunities to accommodate a discount foodstore of a similar scale to that proposed.

Sequential Assessment

- 8.6. The proposed foodstore is located immediately on the edge of Glossop Town Centre. As Glossop is the main centre in the local retail hierarchy, a search for suitable and available opportunities to accommodate the proposed foodstore has been undertaken within the boundary of Glossop Town Centre only, as defined by the adopted Local Plan Proposals Map. The findings of this exercise are presented below.
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Vacant Units in Glossop Town Centre

- 8.7. A survey of the town centre was undertaken that identified a number of vacant commercial units and other empty properties, to include:
- 5-7 High Street – 29m² gross at ground floor level with further accommodation at first floor;
 - 1 Jackson's Building, Victoria Street – 40m² at ground floor with further accommodation on two upper floors;
 - 24 Arundel Street – 73m² at ground floor with further basement and upper accommodation;
 - 12 Norfolk Street – 61m² gross at ground floor with further accommodation (restaurant) at first floor level; and
 - A number of vacant first floor office premises.
- 8.8. It is clear that the vacant properties in the town centre are not of a scale to accommodate the proposed foodstore, with the largest available unit being just 3% of the scale of the proposed foodstore. Furthermore, none of the vacant units are located next to each other, thereby removing the potential to amalgamate two or more vacant premises.
- 8.9. Accordingly, it can be concluded that there are no suitable and available vacant units in the town centre to accommodate the proposed discount foodstore.

Town Centre Redevelopment Opportunities

- 8.10. The survey of the town centre was unable to identify any potential redevelopment opportunities other than the application site. Accordingly, it would be necessary to displace one or more existing, operational use in order to deliver the proposed foodstore within the town centre boundary. The sequential approach does not require the Applicant to pursue the delivery the proposed foodstore within the town centre at all costs.
- 8.11. Notwithstanding this, the lack of redevelopment opportunities in the town centre is indirectly acknowledged by the Local Planning Authority. The application site is allocated in the adopted Local Plan as a suitable retail development location, with this allocation also being supported by SPDs and the emerging Local Plan.

Conclusion

- 8.12. It has been clearly demonstrated in accordance with the NPPF that there are no in-centre sites that are suitable and available to accommodate the proposed foodstore, even when allowing for an appropriate degree of flexibility.
- 8.13. Being immediately on the edge of the town centre, the site is the sequentially preferable location to deliver the proposed discount foodstore. Indeed, the entrance to the foodstore will be approximately 20m walking distance from the town centre boundary and the store will function as an integral part of the town centre. The proposal is, therefore, fully compliant with the requirements of the sequential test.
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9. Impact Assessment

- 9.1. The NPPF requires an assessment of the impact of retail development proposals over 2,500m², unless a local threshold has been set for such assessments. In this regard, saved Local Plan Policy 30 (TC4) identifies a threshold of 500m² gross, above which the impact of the proposal upon the vitality and viability of town centres will need to be assessed.
- 9.2. Whilst the wider requirements of saved Policy 30 (TC4) do not fully accord with the NPPF, the Applicant has agreed to the Local Planning Authority's request to assess the potential impact of the proposed development on Glossop Town Centre.
- 9.3. In light of the above, the potential impact of the proposed development is assessed below in accordance with the tests set out in the NPPF.

Impact on Existing, Committed and Planned Public and Private Investment in Town Centres

- 9.4. The Local Planning Authority has sought to encourage and facilitate the redevelopment of the Woods Mill site for many years. This support is culminated in the adoption of the Woods Mill Interim Planning Statement, the Design Brief for the Woods Mill Area that forms part of the Glossop Design and Place Making Strategy SPD and, most recently, the proposed allocation of the site as a Strategic Development Site in the emerging Local Plan. All of these documents support the development of retail uses, including a foodstore, on the application site.
- 9.5. The proposed development will deliver the planned development at Woods Mill, achieving the longstanding aspirations for the redevelopment of the site. The proposal will, therefore, have a direct, positive impact upon planned investment in Glossop.

Impact on Town Centre Vitality and Viability

- 9.6. Surveys have identified Glossop Town Centre to be in a good state of health when assessed in accordance with the indicators set out in the Planning Practice Guidance supporting the NPPF. In particular, the town centre was found to accommodate a diverse range of uses, to have strong pedestrian flows along the main shopping streets and to have few vacant units.
- 9.7. The introduction of a Lidl foodstore (and the other retail units proposed) will increase the attraction of the town centre as a shopping destination, reducing the need for local people to shop elsewhere. The proposals will, therefore, contribute directly towards sustaining and enhancing shopper activity in the town centre, especially given that shoppers will be able to park at the proposed store and easily undertake linked trips. Indeed, Lidl stores rarely function as a one-stop shopping destination. Therefore, the store is likely to generate linked trips with other shops and services in the town centre, thereby creating spin-off benefits for other businesses.
- 9.8. The proposals will also deliver a high quality shopping environment, making a positive contribution to the environmental quality of the town centre, especially when compared to the existing poor quality/low value situation.
- 9.9. The impact of the proposals in this regard will, therefore, be positive.

Impact on Consumer Choice

- 9.10. Consumer choice will be significantly improved by the proposal. At present, it is clear that Aldi and Tesco are the dominant food shopping destinations in Glossop, with the Aldi store,
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in particular, trading at a level significantly in excess of the company average. The introduction of Lidl will provide a direct alternative to the Aldi store, widening consumer choice in a sustainable location and enabling local residents to meet their shopping needs close to their home in a high quality, comfortable shopping environment.

- 9.11. The proposed development will, therefore, have a positive impact on consumer choice.

Impact on Town Centre Trade

- 9.12. The likely trading impact of the proposed foodstore has been assessed in terms of its individual (solus) impact on the turnover of existing centres and stores and its cumulative impact when taking account of other foodstore proposals. In this regard, the Local Planning Authority has indicated that the cumulative impact exercise should take account of a planning approval to deliver an Aldi foodstore in Chapel-en-le-Frith (ref: HPK/2013/0484).

Solus Impact

- 9.13. On the widely accepted premise that '*like effects like*', the trading impact of the proposed Lidl foodstore is most likely to fall upon the Aldi store on Arundel Street. This is particularly the case in Glossop, with the Aldi store identified by the Council's retail study to be a very popular store to the extent that it over-trades by a significant margin (it achieves a turnover four times higher than the Aldi company average).
- 9.14. This over-trading at the Aldi store suggests that the local demand for deep discount retailing in Glossop is sufficient to support a number of such stores.
- 9.15. The proposed Lidl store will provide direct competition for Aldi and will draw shoppers away from the Aldi store. Table 2 at **Appendix 1** seeks to quantify the loss of trade and express this as an impact, with the Lidl store being predicted to draw £3.37m of turnover from Aldi, resulting in an impact of -15.7% on the store. It is evident, however, that the viability of the Aldi store will not be threatened whatsoever by this loss of trade/impact, with the stores post-impact turnover (£18.07m) predicted to significantly exceed the company average.
- 9.16. Furthermore, given the accessible location of the proposed Lidl store on the immediate edge of the town centre, shoppers drawn away from the Aldi store will continue to be able to undertake linked trips with other shops and services in the town centre.
- 9.17. Table 2 confirms that no other town centre retailer is expected to individually suffer from a high level of trade loss to the proposal.
- 9.18. In terms of the impact of the proposal on the town centre as a whole, the fact that the proposed Lidl store will effectively function as part of the town centre means that it will contribute towards the total town centre turnover. Trade lost from Aldi, for example, will be retained in the town centre.
- 9.19. The proposed development will, therefore, not bring about a '*significant adverse impact*' on Glossop Town Centre and, therefore passes this impact test.

Cumulative Impact

- 9.20. At the request of the Local Planning Authority, the impact of the proposed Lidl store has also been assessed cumulatively with proposals for a new out-of-centre Aldi store in Chapel-en-le-Frith. This exercise is presented in Table 3 at **Appendix 1**.
- 9.21. The retail impact assessment that accompanied the Aldi application indicated that the proposal would draw some trade from the Aldi and Tesco stores in Glossop and the stated figures have been carried directly over into Table 3.
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- 9.22. In terms of cumulative impact, it can be seen that the Aldi store in Glossop will continue to over-trade by a significant margin (approximately £10m in excess of the company average), with the overall cumulative impact on Glossop Town Centre as a whole, including Lidl, being marginally positive (+0.68%).
- 9.23. It can, therefore, be concluded that the cumulative impact upon Glossop Town Centre will not be significantly adverse.

Conclusion

- 9.24. The proposed Lidl foodstore will be located immediately on the edge of Glossop Town Centre. It has been demonstrated that the store will function as an integral element of the town centre and will make a valid contribution towards the vitality and viability of the town centre. Whilst the store will draw trade from Aldi on Arundel Street, this will not result in a significant adverse impact on the Aldi store or the town centre as a whole. Indeed, despite the increased competition, the Aldi store is expected to continue to over-trade by a significant margin in excess of the company average.
- 9.25. In the absence of a '*significant adverse impact*', the proposed foodstore is fully compliant with the impact test.
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10. Other Planning Matters

- 10.1. The preceding sections have established the principle of delivering the proposed development on the application site and set out the credentials of the proposal in terms of the proposed design, layout and access arrangements in response to the requirements of relevant policies. However, a number of additional policy matters must also be addressed, which are set out below.

Loss of Employment Land

- 10.2. The adopted Local Plan allocates the Woods Mill building as being located within a Primary Employment Zone. Whilst Policy 11 (EMP4) advises that retail and residential uses will not normally be accepted in such locations, the policy clearly makes an allowance for some exceptions. Nevertheless, the proposed development will technically result in the loss of employment land and, therefore, this policy conflict is addressed below.
- 10.3. The Woods Mill building has been vacant for a period in excess of 10 years. Despite extensive marketing by a commercial agent, no viable, long-term interest has been expressed in the re-use of the site for employment purposes. Indeed, the few enquiries that have been received sought to use the site for open storage or as a hand car wash. Evidence indicates that, under the terms of paragraph 22 of the NPPF, the continued allocation of the site for employment use would not be sustainable.
- 10.4. Notwithstanding this, the Local Planning Authority has more recently prepared Supplementary Planning Documents that promote residential uses (amongst others) within the Woods Mill Primary Employment Zone, with this policy approach culminating in the draft allocation of the whole Woods Mill area as a Strategic Development Site in the emerging Local Plan. It must, therefore, be the case that the Local Planning Authority has already deemed residential development to be an appropriate exception under the terms of saved Policy 11 (EMP4) and/or the continued allocation of the site for employment use has been deemed by the Authority to conflict with NPPF paragraph 22.
- 10.5. The loss of employment land is not, therefore, of any weight to the decision-making process.

Impact on Heritage Assets

- 10.6. A detailed heritage appraisal has been undertaken in order to assess the impact upon the Conservation Area brought about by the loss of the existing buildings and structures on the site and by the introduction of the development proposals. This is set out at Section 6.3 of the Heritage Statement.
- 10.7. The Heritage Statement is supported by a Heritage Impact Statement, which demonstrates how the Applicant has addressed the requirements of the NPPF.
- 10.8. The demolition of Woods Mill is the subject of a separate current planning application (HPK/2015/0442), which is due to be determined by Committee in October 2015. This separate consent has been pursued by the Applicant in response to the dangerous condition of the building, as demonstrated through a series of structural reports. The Applicant has been forced to pursue a temporary road closure on Milltown in order to protect public safety.
- 10.9. The officer report to committee recommends the approval of the demolition proposals, accepting that there is a £8-9m deficit in the funding required to bring the building back in to use and no prospect of grant funding or other source of delivering such substantial
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investment. Officers accept that all options to retain the building have been exhausted.

- 10.10. Whilst the demolition of the mill is necessary, the Applicant has engaged in detailed discussions with officers to ensure that the proposed development achieves the highest possible design quality and makes a positive contribution towards the character of the local area. These design-led discussions have culminated in a range of revisions to the development scheme, to include the use of natural stone and slate materials, the reclamation of stone from the demolition works, the re-use of the Volcrepe bridge currently spanning Milltown, revisions to the proposed house types, significant changes to the design and appearance of the Lidl store and the provision of more extensive landscaping and quality public realm.
- 10.11. The discussions have reached a stage whereby the Applicant has made significant steps to address the Council's reasons for refusing the previous application.

Impact on Long Distance Trail

- 10.12. A short section of a Long Distance Trail bounds the southern boundary of Area 3. It is not proposed to divert or stop-up this footpath in any way and no adverse impacts will result from the proposed development.

Landscape Impact

- 10.13. Due to the steep gradient of the land rising up to the south, the application site is not visible from the higher ground to the south. Whilst the roof of the Woods Mill building is discernible from a limited number of viewpoints on Cliffe Road, the proposed development will adopt lower building heights.
- 10.14. The Local Planning Authority has prepared a study on Landscape Impact Assessment, which concludes that the Woods Mill site is not prominent in views from the National Park.
- 10.15. There is, therefore, no evidence to suggest that the proposed development will have an adverse landscape impact.

Impact on Flood Risk

- 10.16. The Flood Risk Assessment concludes that parts of the application site are at risk of flooding from Glossop Brook. However, measures are proposed to mitigate the associated risk, to include prescribing finished floor levels above flood levels and a proactive approach towards the internal arrangement, fit out and choice of building materials.
- 10.17. The proposals will not, however, result in a loss of flood storage capacity, as demonstrated by the Hydraulic Modelling Report. Indeed, the need to deliver sufficient flood storage capacity has been a significant influence on the design and layout of the proposed development. Flood consequences also mean that the existing flood defences supporting Howard Town Mill and Retail Park need to be retained.
- 10.18. The proposed development will not increase the risk of flooding elsewhere.

Impact on Ecology

- 10.19. The Ecology Report accompanying the planning application, which confirms that the application site has a low biodiversity value. The site is not well related to any statutorily protected sites and it is highly unlikely that the development proposals will impact upon any such sites. The Report does suggest, however, that Glossop Brook should be protected from the impact from development activities and that the proposed development provides an opportunity to enhance the biodiversity of the watercourse.
 - 10.20. Further ecology work has been undertaken of the riparian corridor, with it being previously
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agreed with the Environment Agency that the detailed design of the works to Glossop Brook should be agreed through the discharge of an appropriate planning condition.



11. Affordable Housing and Planning Obligations Statement

- 11.1. Planning policies require proposals for new residential development to make provision for affordable housing and to agree to planning obligations to support the provision of infrastructure and local services and facilities that are relevant to the proposal in hand. The requirements are set out in the High Peak Planning Obligations SPD, supplemented by the Derbyshire Developer Contributions Protocol, which indicate that the Authorities may seek contributions towards the following matters (amongst others):
- Affordable housing;
 - Education;
 - Off-site public open space;
 - Transportation;
 - Drainage;
 - Waste recycling;
 - Broadband access;
 - Health facilities; and
 - Fire and Rescue.
- 11.2. Where an applicant is unable to make the contribution in full, a detailed viability appraisal is required in order to justify a lower level of contribution.
- 11.3. A detailed Viability Appraisal has been submitted as part of the planning application package. This Appraisal concludes that, when taking account of all reasonable costs associated with bringing the proposed development forward, the returns from the proposed development will be insufficient to enable any planning obligations to be supported or affordable housing delivered.
- 11.4. This conclusion should be expected. The Local Planning Authority and the Homes and Communities Agency commissioned an independent viability appraisal for the redevelopment of the Woods Mill site in 2011. This assessment considered the preferred vision for the re-use of the site, as defined in the Woods Mill IPS, concluding that the intended scheme would not be deliverable or viable, even with the inclusion of a large supermarket.
- 11.5. Whilst the proposed development does not deliver all of the uses promoted by the IPS, the submitted Viability Appraisal is based on actual costs and returns, not estimates. It is clear that there is no ability to for the proposals to viably support contributions towards affordable housing or other such planning obligations. Indeed, should such contributions be demanded, the proposed development will not proceed, which would be contrary to the Council's longstanding objectives for this site.
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12. Conclusions

- 12.1. The NPPF strongly encourages local planning authorities to grant planning permission for sustainable development without delay, particularly when the proposals accord with an up-to-date development plan. Where the development plan is not up-to-date, the NPPF advises that planning permission should be granted unless any adverse impacts of doing so would '*significantly and demonstrably outweigh the benefits*' (paragraph 14).
- 12.2. Whilst the 2005 High Peak Local Plan is not up-to-date and its replacement is yet to be examined by the Secretary of State, it is nevertheless the case that the principle of the proposed development fully accords with local policy. The proposals generally accord with the adopted Local Plan and do not breach any saved policies. Furthermore, the proposals are fully compliant with Supplementary Planning Documents and the emerging Local Plan, which seek to encourage the comprehensive redevelopment of the application site for the precise nature of development hereby proposed.
- 12.3. On this basis, the Local Planning Authority are encouraged to seek to grant planning consent without delay, unless a significant and demonstrable adverse impact would result that outweighs the benefits of the scheme. This balancing exercise is set out below.

Adverse Impacts

- 12.4. This Statement, together with the other documents that accompany the planning application, demonstrate that the potential adverse impacts resulting from the proposed development are both limited in number and significance.
 - 12.5. The proposals will result in the loss of a number of existing buildings within a Conservation Area, which could result in harm to the character of the Conservation Area. However, the Applicant has fully engaged with the tests imposed by the NPPF that seek to assess whether the harm can be justified. It has been demonstrated that there is no future for Woods Mill building. The physical fabric of the building is poor and it is a dangerous structure that is liable to partial collapse. As a result, it has been necessary to close Milltown to preserve public safety.
 - 12.6. The Council has commissioned independent assessments of the case presented by the Applicant. It has been accepted that there is a deficit of between £8m to £9m that will need to be publically or grant funded in order to restore the building up to a re-useable standard. Such significant public or grant funding is not available to Woods Mill. A separate planning application seeking consent for the urgent demolition of the dangerous structure has been supported by officers.
 - 12.7. Other adverse impacts resulting from the proposed development are of less consequence.
 - 12.8. The development of the proposed Lidl foodstore will have an adverse impact on the trading performance of the Aldi store in Glossop Town Centre. However, it has been demonstrated that this impact will not be '*significantly adverse*' because Aldi will continue to trade at a level significantly in excess of the company average and the proposed development will contribute towards the vitality and viability of the town centre as a whole. No unacceptable impacts will, therefore, result from the proposals.
 - 12.9. Whilst traffic congestion and other highway concerns are a key local issue, the submitted Transport Assessment concludes that the proposed development will not result in a material impact on the operation of the local highway network. The proposal is, therefore, unlikely to have a '*significant and demonstrable*' adverse highway impact. This has been previously agreed with Derbyshire County Council. Indeed, it will improve the existing
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access constraints to the neighbouring Howard Town Mill Retail Park from Victoria Street.

- 12.10. The proposed development will not result in any adverse impacts on ecology, flood risk or landscape value.
- 12.11. In summary, therefore, there are no significant adverse impacts that are likely to result from the proposed development.

Benefits

- 12.12. Notwithstanding the lack of significant adverse impacts resulting from the proposals, the balancing exercise requires the benefits of the proposed development to be taken into account. These benefits are summarized as follows:
- The proposals will deliver the regeneration of a brownfield Strategic Development Site in Glossop Town Centre, bringing the largest vacant, under-used site in Glossop back in to use;
 - The proposals will deliver the long-term aspirations for the site, delivering the land uses that the Council has promoted for a period in excess of 10 years;
 - Approximately 42 Full Time Equivalent jobs will be created, which is likely to comprise 20 full time and 44 part time roles. All jobs are likely to be available to local people;
 - The retail element will make a positive contribution towards the vitality and viability of Glossop Town Centre, extending the choice for local people and enhancing competition between retail operators;
 - The potential office floorspace in the extension to Unit A will create an opportunity for an existing local business to expand;
 - The residential development proposals will directly address the local housing need, providing the type and scale of homes that are most in demand;
 - The site represents a sustainable location for new development, being within walking distance from a range of shops and services and other local amenities;
 - Each element of the proposals will be served by a separate vehicular access to ensure that the impact on individual roads and junctions is minimised;
 - A riverside walkway along Glossop Brook will be provided, enhancing accessibility to and from the town centre on foot and maximizing the potential of the Brook to contribute to the character of the area;
 - A high quality design approach is proposed that will make a positive contribution to the appearance of an area that is widely regarded as an eyesore; and
 - The proposals will accord with all of the core principles that underpin the NPPF. The proposals truly represent sustainable economic development.
- 12.13. The benefits of the proposal are both significant and wide ranging, which should be expected given the Council's longstanding promotion of the site for redevelopment.

Balancing Exercise

- 12.14. It is clear that there are no adverse impacts that significantly and demonstrably outweigh the benefits of the proposed development. Therefore, the NPPF directs the Local Planning Authority to adopt a presumption in favour of the proposed development and to grant planning permission without delay.
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Appendix 1

Table 1: Turnover of Development Proposals in 2018

Unit		Proposed Floorspace (sqm)		Sales Density (£/sqm)	Turnover (£m)	
		Gross	Net		2014	2018
Unit A Extension	Ground Floor	370	314	3,000	0.94	1.02
	First Floor	370	314	1,500	0.47	0.51
	<i>Total</i>	<i>739</i>	<i>628</i>		<i>1.41</i>	<i>1.54</i>
Unit C (Lidl)	Convenience		1,210		4.36	4.36
	Comparison		214		0.77	0.84
	<i>Total</i>	<i>2,470</i>	<i>1,424</i>	<i>3,598</i>	<i>5.12</i>	<i>5.19</i>

2012 Prices

Net floorspace assumed to be 85% of gross for Units A

Sales Density of Units A and B derived from Table 3a, Appendix 4b of High Peak Quantitative Retail Study Update with 50% reduction for first floor level

2014 Lidl Sales Density derived from Retail Rankings

Allowance for improvements in floorspace efficiency to 2018 in accordance with Experian Retail Planner Briefing Note 11

Table 2: Solus Impact of Proposed Lidl Store in 2018

Centre	Store	Pre-Impact Turnover	Lidl Trade Diversion		Post-Impact Turnover	Impact
		£m	%	£m	£m	+/- %
Glossop Town Centre	Aldi, Arundel Street	21.44	65%	3.37	18.07	-15.74%
	Co-op, Norfolk Street	5.17	5%	0.26	4.91	-5.02%
	M&S Simply Food, Howard Town Mill	4.44	3%	0.16	4.28	-3.51%
	Other Convenience Shops	2.26	1%	0.05	2.21	-2.30%
	Comparison Shops	37.62	2%	0.10	37.52	-0.28%
	Unit A Extension	1.54			1.54	0.00%
	Town Centre Total excluding Lidl	72.47			68.52	-5.44%
	Town Centre Total including Lidl	72.47			73.71	1.72%
Out-of-Centre	Tesco, Wren Nest Retail Park	42.71	17%	0.88	41.83	-2.07%
	Iceland, Wren Nest Retail Park	0.65	0%	0.00	0.65	0.00%
	Other, Wren Nest Retail Park	3.28	2%	0.10	3.18	-3.16%
Outside Study Area	All Stores		5%	0.26	-0.26	
TOTAL			100%	5.19		

2012 Prices

Pre-Impact Turnover from Table 7, Appendix 2B, High Peak Quantitative Retail Study Update February 2014

No allowances for increases in floorspace efficiency in accordance with Experian Retail Planner Briefing Note 11

Trade Diversion is Plan A 'broad brush' estimate

Post-Impact Turnover 'with Lidl' includes Lidl store turnover

Table 3: Cumulative Impact of Proposed Lidl store and Aldi Commitment in Chapel-en-le-Frith in 2018

Centre	Store	Pre-Impact	Trade Diversion		Post-Impact Turnover		Impact
		Turnover £m	Lidl, Woods Mill %	£m	Aldi, Chapel-en-le-Frith %	£m	
Glossop Town Centre	Aldi, Arundel Street	21.44	65%	3.37	10%	0.75	-19.25%
	Co-op, Norfolk Street	5.17	5%	0.26		4.91	-5.02%
	M&S Simply Food, Howard Town Mill	4.44	3%	0.16		4.28	-3.51%
	Other Convenience Shops	2.26	1%	0.05		2.21	-2.30%
	Comparison Shops	37.62	2%	0.10		37.52	-0.28%
	Unit A Extension	1.54	0%			1.54	0.00%
	Town Centre Total excluding Lidl	72.47	0%			67.77	-6.48%
	Town Centre Total including Lidl	72.47	0%			72.96	0.68%
Out-of-Centre	Tesco, Wren Nest Retail Park	42.71	17%	0.88	5%	0.38	-2.95%
	Iceland, Wren Nest Retail Park	0.65	0%	0.00		0.65	0.00%
	Other, Wren Nest Retail Park	3.28	2%	0.10		3.18	-3.16%
Outside Study Area	All Stores		5%	0.26	85%	6.41	-0.26
TOTAL			100%	5.19	100%	7.54	

2012 Prices

Pre-Impact Turnover from Table 2

No allowances for increases in floorspace efficiency in accordance with Experian Retail Planner Briefing Note 11

Aldi Turnover and Trade Diversion from Planning & Retail Statement submitted in support of application HPK/2013/0484

Lidl, Woods Mill Trade Diversion from Table 2