

October 2023



Planning, Design & Access Statement

‘CarTime’, Bell Lane, Bury

Redevelopment of the site for roadside services



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1.0 INTRODUCTION

- 1.1 This Statement has been prepared by Urban Future Planning Consultancy Ltd on behalf of the Applicant, to accompany a planning application seeking consent for the demolition of the existing car sales building and the redevelopment of the site for a new Petrol Filling Station (PFS) with associated facilities, alongside a drive thru unit and a detached block of 2no. food-to-go convenience pods at 'CarTime', Bell Lane, Bury. This Statement should be read alongside the other supporting documentation and information submitted as part of the application.
- 1.2 The application site is currently occupied by a car show room (Sui generis) and is within a readily accessible and prominent location on the edge of the town centre of Bury. The Applicant considers the site to be ideal for roadside services insofar as it is located along a main road and amongst numerous 'traffic builders' including the town centre and Moorgate Retail Park.
- 1.3 The Applicant is keen to work proactively with the Local Planning Authority (LPA) and has utilised the pre-application advice service (LPA ref no. 02864E) where the scheme was largely supported by the Case Officer. The proposal would clearly generate sustainable economic development and notable additional jobs for local people in times of economic uncertainty. In terms of economic and social benefits, the proposed development will have a significantly greater impact compared with the existing use of the site. More details of the proposal's compliancy with local and national planning policy will be set out within this Statement.
- 1.4 This Statement describes the application site and its surroundings as well as the proposed development. The relevant local and national planning policy will be set out before an assessment of the material planning considerations. The Statement concludes that consent ought to be granted.

2.0 SITE & SURROUNDINGS

2.1 The application site relates to the 'Car Time' car show room and associated car park located along Bell Lane, within a highly commercialised location, approx. 300m from the town centre of Bury¹. The site is located within a highly sustainable location which is readily accessible. Bell Lane is a B-road leading in to and out of the town centre as well as a high frequency bus corridor. The site is located within the Freetown Employment Generating Area (EGA) and is located directly opposite a retail park.



Figure 1. Application site location

2.2 The site's surroundings are highly commercialised in nature and include retail parks and industrial units. As a consequence, the immediate built form is diverse with a wide palate of materials and styles present.

¹ See Appendix 1 for proposals map extract



Figure 2. The application site occupies a prominent corner plot.



Figure 3. The application site

Planning History

2.3 There is no planning history of relevance to the site.

3.0 PROPOSED DEVELOPMENT

- 3.1 Consent is sought for the demolition of the existing car sales building and the redevelopment of the site for a new Petrol Filling Station (PFS) with associated facilities alongside a drive thru unit and a detached block of 2no. food-to-go convenience pods. The accompanying plans fully demonstrate the Applicant's intentions for the site and should be referred to further details.



Figure 4. Proposed site layout

- 3.2 The ancillary PFS shop building is to be single storey with plentiful glazing and will feature convenience 'top up' retail provision usually found at a modern PFS sites. General retail deliveries for the site will take place once a week whilst deliveries for fresh produce (milk, bread) will be daily. Fuel deliveries generally take place twice per week, however, on occasion this may increase to three times per week during busier seasons (June,

September and December). Food deliveries usually take place after closing / outside of peak traffic hours to ensure that fresh produce can be sold during operating hours. The proposed store adopts a contemporary form and appearance. Waste and recycling facilities are provided on site and stored externally although screened from the forecourt.

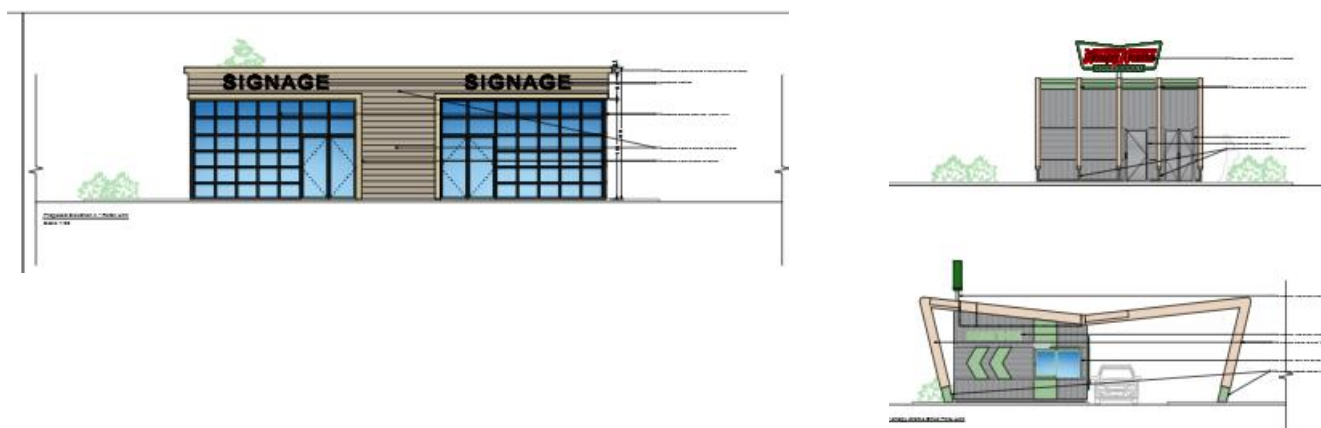


Figure 5. The scheme includes a drive-thru unit and a detached block of 2no. food-to-go convenience pods



Figure 6. Example of a branded food-to-go 'pod' at a Euro Garages site in North Wales

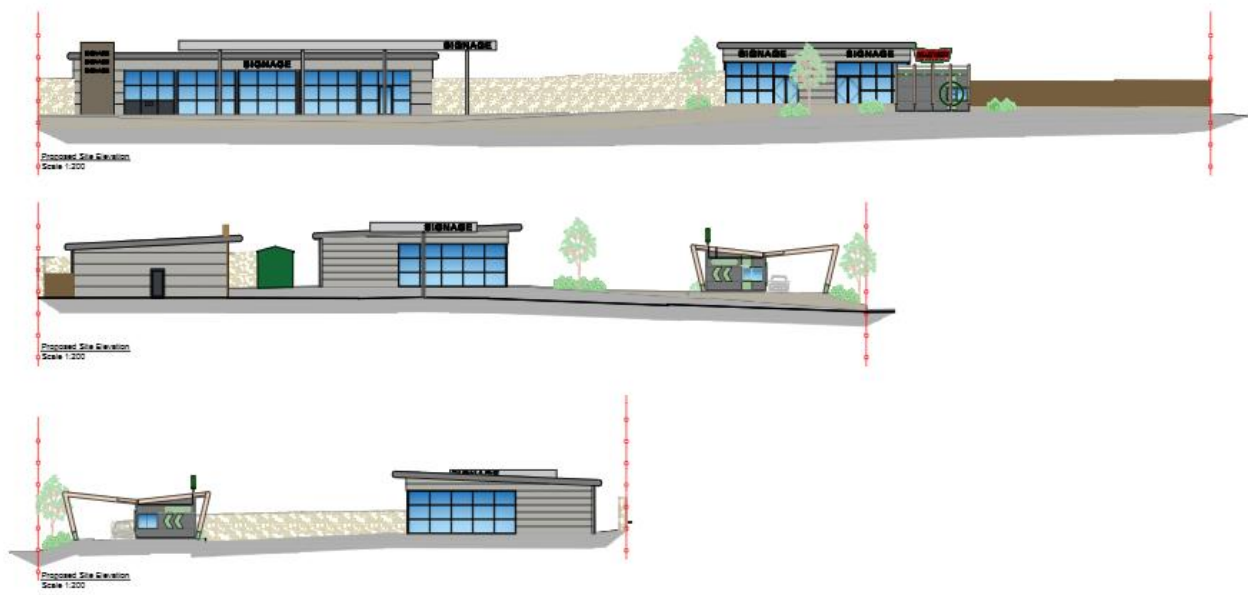


Figure 7. Proposed elevations

4.0 RELEVANT PLANNING POLICY

- 4.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires proposals to be determined in accordance with the Development Plan taking into consideration any material considerations relevant to the determination of the application. The development plan for the purposes of the application proposal comprises the Bury Unitary Development Plan (UDP) (1997). The National Planning Policy Framework (NPPF) sets out the Government's planning agenda and is also relevant.

Bury UDP

- 4.2 The following policies from the document have relevance to the application proposal:

- **Policy EN1 – Built Environment** – The Council will seek to protect, preserve and enhance the character, appearance and amenity of the Borough's built environment.
- **Policy EN1/2 – Townscape and Built Design** – The Council will give favourable consideration to proposals which do not have an unacceptable adverse effect on the particular character and townscape of the Borough's towns, villages and other settlements. Factors to be considered when assessing proposals will include the external appearance and design of the proposal in relation to its height, scale, density and layout; the relationship of the proposal to the surrounding area and the choice and use of materials.
- **Policy S4/1 - Retail Development Outside Town and District Centres -** This policy identifies a number of retailing activities which may, in principle, be acceptable in out of centre locations, subject to compliance with other policies of the Plan. This includes petrol filling stations.
- **Policy S4/2 - Assessing Out-of Centre Retail Development -** states that proposals (other than those covered by Policy S4/1) will be assessed according to the following criteria: the effect on, and contribution to, urban regeneration; economic effects; environmental and social effects on the locality; the effects on the highway network; accessibility by public and private transport; feasibility of using any alternative site; the need for and suitability of the site for other land uses.
- **Policy S4/4 - Car Showrooms, Car Sales Areas and Petrol Filling Stations** – states that car showrooms, car sales areas and petrol filling stations should be located within or adjoining established shopping areas, along classified roads or within other industrial and commercial areas within the Borough. Proposals should also take account of the following factors: potential disruption to the free flow of traffic; the provision of adequate, well laid out car parking and display facilities together with safe

and convenient arrangements for access, circulation and egress; road safety and the safety of pedestrians; the amenity of nearby residents and businesses.

- **Policy EC2/1** states that in EGAs, the Council will only allow development for the uses specified (former B1, B2 and B8). Other uses will only be permitted where they constitute limited development or do not substantially detract from an area's value as an EGA.

National Planning Policy Framework (NPPF)

4.3 The NPPF is also relevant and sets out the Government's planning agenda. According to the NPPF, the purpose of the planning system is to contribute to the achievement of sustainable development. The general perspective from the NPPF is that planning should proactively drive growth and support sustainable economic development. It also states that planning should make effective use of land by reusing land that has been previously developed. It is clear from the NPPF that the delivery of sustainable development must take into account the following aspects:

- *Building a strong, competitive economy*
- *Ensuring the vitality of town centres*
- *Supporting a prosperous rural economy*
- *Promoting sustainable transport*
- *Requiring good design*

4.4 '*Promoting sustainable transport*'; according to the NPPF, decisions should take account of whether safe and suitable access to the site can be achieved for all people and development should only be refused where the residual impacts of development are severe. Chapter 9 of the NPPF relates to the promotion of sustainable transport. Para 102 stresses the importance of development proposals addressing transportation issues at an early stage in a development in order to identify the potential impacts of a proposal and look at opportunities to reduce them together with promoting more sustainable methods of transport. Para 103 states that the planning system should actively manage patterns of growth in support of these objectives, focusing on locations that will limit the need to travel offering a genuine choice of travel modes, with the overall aim being to reduce congestion and emissions. Para 105 states that planning policies should support an appropriate mix of uses across an area, and within larger scale sites, minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities.

4.5 The NPPF states that the creation of high-quality buildings and places is fundamental to what the planning and development process should achieve.



Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.

- 4.6 The general perspective of the NPPF is that planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.
- 4.7 Ensuring the vitality of Town Centres is a crucial part of the National Planning Policy Framework (NPPF). At Para 86, the NPPF states that Local planning authorities should apply a sequential test to planning applications for main town centre uses which are neither in an existing centre nor in accordance with an up-to-date plan. Main town centre uses should be located in town centres, then in edge of centre locations; and only if suitable sites are not available (or expected to become available within a reasonable period) should out of centre sites be considered.
- 4.8 Para 87 goes on to state that, when considering edge of centre and out of centre proposals, preference should be given to accessible sites which are well connected to the town centre. Applicants and local planning authorities should demonstrate flexibility on issues such as format and scale, so that opportunities to utilise suitable town centre or edge of centre sites are fully explored.
- 4.9 Paragraph 89 of the NPPF highlights the threshold for an impact assessment for retail development outside town centres, which are not in accordance with an up-to-date local plan, the default threshold is 2,500 sqm of gross floorspace.

Other Relevant Documents / Guidance

National Planning Policy Guidance (NPPG)

- 4.9 Further guidance on what is within the NPPF regarding town centre uses outside of town a centre is provided by NPPG (Ensuring the vitality of town centres). The guidance recognises that it may not be possible to accommodate all forecast needs in a town centre: there may be physical or other constraints which make it inappropriate to do so. In those circumstances, planning authorities should plan positively to identify the most appropriate alternative strategy for meeting the need for these main town centre uses, having regard to the sequential tests. This should ensure that



any proposed main town centre uses which are not in an existing town centre are in the best locations to support the vitality and vibrancy of town centres, and that no likely significant adverse impacts on existing town centres arise.

Bury Retail Study (Drivers Jonas Deloitte) 2012

- 4.10 The study forms part of the Local Plan evidence base and assesses the need/capacity for additional retail floorspace within the Borough up to 2028. The study assessed the retail capacity for each of the catchment zones of the Borough's main town centres of Bury, Ramsbottom, Radcliffe and Prestwich.

SPD11 Parking Standards in Bury

- 4.11 SPD11 Parking Standards in Bury (May 2007) provides guidance on parking policies contained within the Bury UPD at Appendix 4. The SPD seeks to ensure that the level of car parking associated with a development proposal is appropriate, in order to support a reduction in reliance upon the private car, encouraging the use of more sustainable modes of transport.

5.0 PLANNING APPRAISAL

5.1 The purpose of this section of the Statement is to identify and assess the main planning considerations raised by the application proposals in the context of relevant national and local planning policy and guidance. The key issues are;

- the principle of the development, having regard to the provisions of the adopted Development Plan and other local planning policy documents and;
- the effect of the development on residential amenity
- the effect of the development on character and appearance
- the effect of development on the local highway network.

5.2 Each of these matters is considered below.

The principle of development / Retail Impact Assessment

5.3 As previously set out, the Applicant considers the application site an ideal location for Roadside services, which by the nature of their operation, can only be sited in certain locations where there are sufficient traffic counts to make the development viable. The development site is very much appropriate for a roadside facility and is located close to several 'traffic builders' including residential and large areas of commercial uses as well as the town centre. The NPPF confirms the provision of viable infrastructure is necessary to support sustainable transport, which includes roadside facilities for motorists. The primary function of roadside facilities for motorists should be to support the safety and welfare of the road user and the application site is considered a prime location to provide such offer to passing motorists.

5.4 The site is located within the allocated Freetown Employment Generating Area (EGA) (EC2/1/5). Policy EC2/1 states that in EGAs, the Council will only allow development for the uses specified (former B1, B2 and B8). Other uses will only be permitted where they constitute limited development or do not substantially detract from an area's value as an EGA. Given that the application site is currently used as a car show room (sui generis), it is considered that the principle of an alternative use of the site has been established and the proposed development would not detract from the area's value as an EGA as it would simply result in swapping one non-employment use to another rather than the loss of an employment generating use. Moreover, the proposal would create a notable number of jobs and

complement the business park. As such, the proposal would be in accordance with Policy EC2/1 in principle and this is confirmed in the Council's pre-app response.

- 5.5 The pre-app response makes reference to Policy S4/4 *Car Showrooms, Car Sales Areas and Petrol Filling Stations* which states that "car showrooms, car sales areas and petrol filling stations should be located within or adjoining established shopping areas, along classified road or within industrial and commercial areas within the Borough. Proposals should also take account of car parking, traffic flow, road safety, pedestrian safety and the impact upon amenity of residents". Whilst the proposal would be compliant with this policy objective, said policy is considered to be time-expired and does not correspond with the NPPF insofar as the NPPF does allocate land for such uses but instead confirms the provision of viable infrastructure is necessary to support sustainable transport, which includes roadside facilities for motorists. The primary function of roadside facilities for motorists should be to support the safety and welfare of the road user and the application site is considered a prime location to provide such offer to passing motorists.
- 5.6 This was confirmed in Appeal Ref: APP/W1525/W/14/3001905² where the main issues assessed by the Inspector were whether a proposed PFS with associated convenience store complied with the development plan policies and whether the development would fall within the description of 'local transport infrastructure'. The following paragraphs of the Inspector's decision are of note:

"Dictionary definitions of 'infrastructure' vary, and are not relied on by either of the parties in this case. However, NPPF paragraph 31 gives examples of 'infrastructure necessary to support sustainable development', and it is common ground that these are relevant."

"The examples given in that paragraph include 'roadside facilities for motorists'. The Council argues that this is qualified by the words 'large scale' and points out that the other examples cited are larger in scale than the present appeal proposal. But the paragraph in question relates specifically to plan-making and joint working between authorities, and in that context it is only to be expected that the advice should focus on larger facilities. What is clear from paragraph 31 is that the NPPF regards motorists' facilities as capable of being transport infrastructure. I can see nothing in the NPPF that prevents this from including a facility that is similar but smaller, where the context makes that scale more appropriate, as in the appeal proposal. In the present case, Policy DC2 expressly refers to 'local transport infrastructure', and to my mind the addition of this word acknowledges that it may include facilities of a smaller scale"

² Land at Fenn Roundabout, Burnham Road, South Woodham Ferrers, Essex



*“Department for Transport (DfT) Circular 02/20133 states at paragraph B2 that roadside facilities perform an important road safety function, by providing opportunities for the travelling public to stop and take a break in the course of their journey. The Circular itself relates specifically only to the strategic road network, which does not include the A132 or B10212, but I can see no logical reason why similar facilities on other main roads should not perform an equally important function. In my view, this supports the view that **roadside facilities should be considered as transport infrastructure. I am not aware of any official policy or guidance to the contrary.**”*

- 5.7 It is noted that the current Development Plan does not identify or allocate sites for roadside services (sui generis) and therefore proposals such as this would generally be in conflict with any given allocation. Therefore, in the context of the matters above, it is assumed that the Council would take a pragmatic view of the proposals in line with S.38(6) of the Act.
- 5.8 Paragraph 89 of the NPPF sets out the impact considerations which all planning applications for main town centre uses (not in a centre and not in accordance with an up-to-date development plan) should be assessed against. The NPPF requires an impact assessment for retail developments over 2,500sqm if there is no locally set threshold. There is no such threshold defined in the Bury UDP and as the proposed retail elements would have a gross floorspace less than 2,500sqm it is considered that an impact assessment is not required in this case.
- 5.9 The pre-app response also makes reference to the requirement for a Sequential Site Assessment. Whilst it is acknowledged that the scheme includes some ancillary retail floorspace associated with the PFS as well as a drive-thru and 2no. food-to-go pods, given that the purpose of the development is to provide a convenient roadside facility for motorists, it is not always appropriate to locate such uses within the city centre or local centres as this would defeat the objective. This is a position supported by the Planning Inspectorate and was highlighted in a planning appeal decision in January 2017³ where the Inspector concluded:

“...the purpose of the sequential test is to demonstrate that there are no alternative sites within a town centre or edge of centre locations. Given that the purpose of this development is to provide roadside facilities for motorists on the A43, which by definition is unlikely to be within a town centre, I consider the sequential test to be of little relevance to this appeal and this was confirmed by the Council at the hearing.

Furthermore, the Council’s statement notes that disputing whether or not there are alternative sites available will not be beneficial to either party. The Council also

³ Appeal Ref: APP/C3105/W/16/3151655, Land adjacent Esso PFS, Stoke Lyne, Baynard’s Green, Oxfordshire OX27 7SG



confirmed at the hearing that the question of alternative sites does not arise in this case, as there are none under consideration. As such, although the reasons for refusal state that there has been insufficient robust assessment of alternative locations along the A43, I have concluded that neither a consideration of alternative sites nor the sequential test are determinative”

Appeal Ref: APP/C3105/W/16/3151655

- 5.10 This was also the view taken by the Council in allowing LPA ref no. 60264 (Demolition of existing car sales/MOT garage and former petrol station canopy and erection of petrol filling station and Spar convenience store) at the site of Tottington Motor Co, Market Street, Tottington. In addition, the LPA granted consent for LPA ref no. 64138 (Erection of convenience store (Class A1) and petrol filling station) at the site of Jolly Carters, 207 Bury and Bolton Road, Radcliffe.
- 5.11 Notwithstanding the above, a site search has been undertaken in the nearest centre (the town centre) using national commercial property websites such as Rightmove. The assessment followed the definitions within the CLG Practice Guidance 'Need, impact and the sequential approach' (although now superseded) including those relating to what is 'in centre', 'edge of centre' and 'out of centre' and the 'availability, suitability and viability' tests.

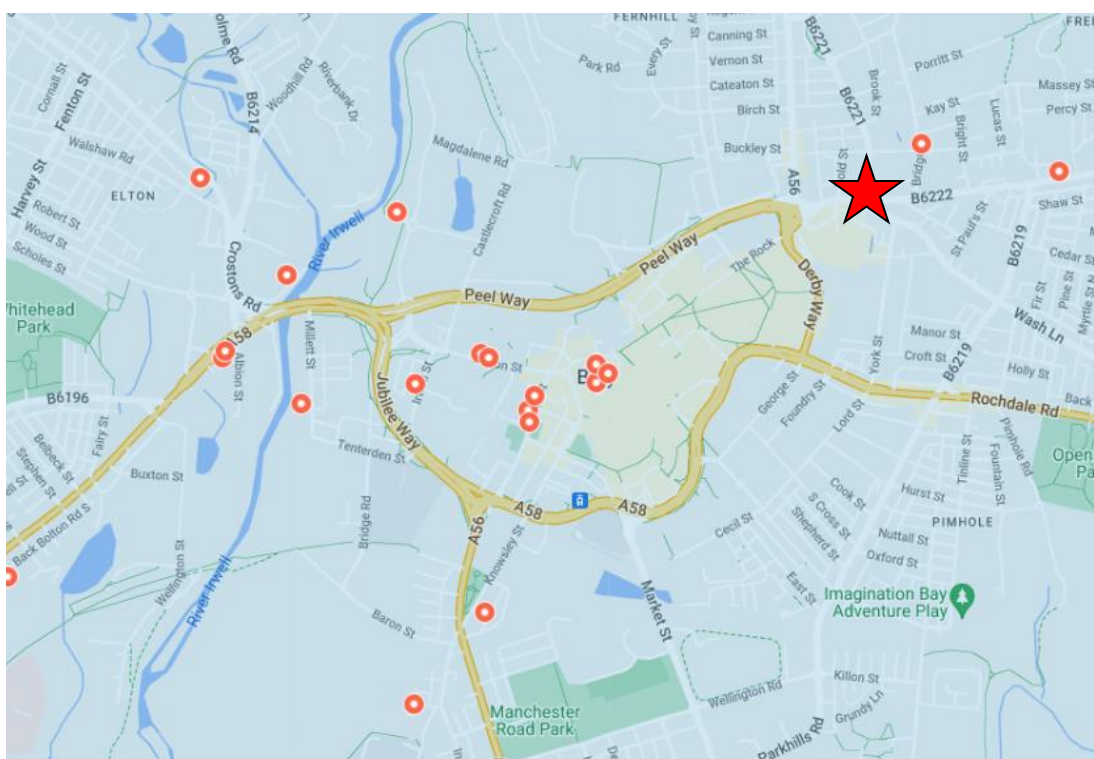
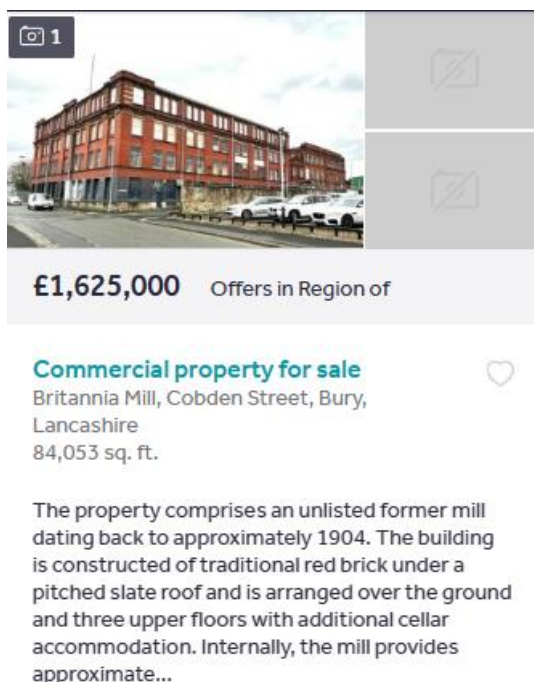


Figure 7. Location of commercial sites currently for sale within Bury. The application site is identified.

- 5.12 The site search found that within the nearest centre (the town centre), there are no suitable sites being marketed that would be able to accommodate the proposed development. The sites being marketed comprise mainly very limited sized commercial units which cannot clearly accommodate roadside services. Only two sites large enough for roadside services are being marketed:

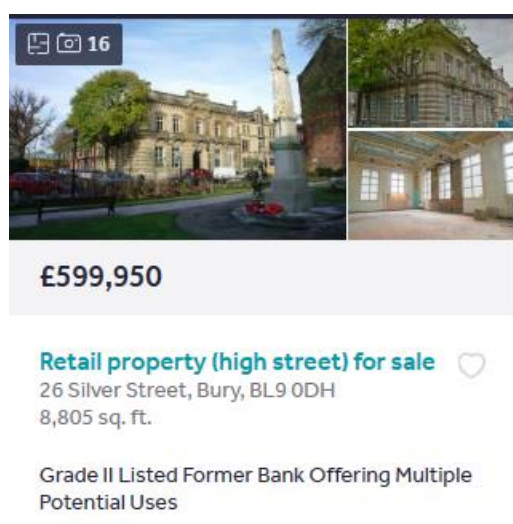


£1,625,000 Offers in Region of

Commercial property for sale
 Britannia Mill, Cobden Street, Bury,
 Lancashire
 84,053 sq. ft.

The property comprises an unlisted former mill dating back to approximately 1904. The building is constructed of traditional red brick under a pitched slate roof and is arranged over the ground and three upper floors with additional cellar accommodation. Internally, the mill provides approximate...

Although large enough, this site is not located within the defined town centre boundary and so would not be sequentially preferable compared with the application site. Moreover, given the size of the mill, demolition and site remediation costs would render the scheme unviable.



£599,950

Retail property (high street) for sale
 26 Silver Street, Bury, BL9 0DH
 8,805 sq. ft.

Grade II Listed Former Bank Offering Multiple Potential Uses

This property is grade II listed and so unsuitable for redevelopment as roadside services

- 5.13 The NPPG recognises that it may not be possible to accommodate all needs in a town centre: there may be physical or other constraints which make it inappropriate to do so. In those circumstances, NPPG advises that local planning authorities should plan positively to identify the most appropriate alternative strategy for meeting the need for these main town centre uses, having regard to the sequential tests. This should ensure that any proposed main town centre uses which are not in an existing town centre are in the best locations to support the vitality and vibrancy of town centres, and that no likely significant adverse impacts on existing town centres arise.
- 5.14 Bury Town Centre generally is considered vibrant with low vacancy rates. Permitting the proposal would in no way 'harm' the vitality of the town centre and the proposed development would cater primarily for passing motorists rather than be perceived as a 'destination'. The proposed development would complement the area's retail parks without detracting from them given the small-scale nature of the proposed development.
- 5.15 Notwithstanding the above, on a viability point, the sale of fuel on its own is not viable. In order to make a scheme viable, PFS operations have to provide an overall offer with the primary focus on passing motorists. Drivers will often seek convenience when stopping at a PFS and will use it as an opportunity to purchase other goods such as 'top-up shopping' or 'food-to-go'. Since 2001, approximately 4,000 independent petrol forecourts have closed across the UK. This is primarily as a result of increased competition from 'supermarket' filling stations which are able to offer the consumer more than just fuel and which reflect the expectations of today's consumers/motorists, who now expect more from a PFS. This will be ever more important when the Government phases out petrol and diesel and motorists will remain on site for longer to electronically recharge their vehicles.
- 5.16 In fact, in this instance, the Applicant seeks to bring to fruition a modern PFS / roadside services offer which caters for the 21st century consumer. The examples overleaf show recently redeveloped PFSs in neighbouring local authorities. Many have seen old-style kiosk buildings replaced with much larger retail units to cater for what is now considered a 'standard' PFS that caters for 'roadside' consumer need, ensuring the viability of the PFS concept into the future. The Applicant seeks to provide the same concept for the PFS element at the application site.



Figure 8. Kirklees Council granted consent in 2021 for the erection of a petrol filling station, kiosk/convenience store as well as a detached block of three commercial retail units at the Former Swan Inn, 962, Huddersfield Road, Mirfield. The site is not located within a local centre.



2008



Present day

Figure 9. The dated kiosk at the Euro Garages Blackford Bridge site in Bury was replaced with a much larger retail unit with convenience retail and food to go.



Figure 10. The PFS at Euro Garage Milnrow, Rochdale has a Greggs and Subway 'bolt on'.

- 5.16 The proposal clearly represents sustainable economic development. The general perspective of the NPPF is that planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The NPPF also promotes consumer choice and it is within this context that the proposal ought to be considered. The application proposal will provide 40 new jobs (far greater than the current use of the site).
- 5.17 To conclude, permitting the proposal would see the re-use of a brownfield, readily accessible site to bring about a much-needed roadside service, promoting consumer choice and generating employment opportunities for local people. The NPPF encourages making effective use of land by reusing land that has been previously developed and sets out a presumption in favour of sustainable development. The proposed scheme would not result in any adverse impacts that would significantly and demonstrably outweigh the benefits of its approval and this is confirmed in the following assessment of the detailed material considerations relevant to the application proposal

The effect of the development on the character and appearance of the area

- 5.18 As shown on the accompanying plans, an attractive scheme set within a pleasant, landscaped setting can be achieved which takes into consideration the site's prominent location along a main road, as well as the site's relationship to adjacent land uses. Compared with the existing situation (car sales), the proposed development will greatly enhance the site and provide an active frontage.
- 5.19 The materials to be used are sympathetic to the adjacent properties whilst providing a modern complex suitable for commercial use. It is considered that the proposed retail unit, drive-thru and canopy would be acceptable in terms of their design, given the surrounding mixed character, modestly scaled and displaying the recognised corporate branding required, but nevertheless in keeping with the surrounding built form. The orientation of the different uses would bring about an active frontage which would represent an improvement to the existing situation. A safe and secure environment is provided that reduces the opportunities for crime particularly through the use of natural surveillance from the parking and glazed shopfront areas as well as the use of CCTV necessary for petrol filling stations. In this respect, the proposed development is compliant with Policy EN1/2 – Townscape and Built Design.

The effect of development on residential amenity

- 5.20 The site is located within a highly commercialised setting with no residential properties abutting the site. The site has long been in commercial use and those residing nearby are well accustomed to comings and goings associated with the site and the main road in general. The proposed buildings are single storey and given their position close to larger buildings, would be acceptable in terms of size and scale and not considered to result in overlooking and overshadowing of nearby properties. In this respect, the proposed development is compliant with Policy EN1 – Built Environment.

The effect of development on the local highway network

- 5.21 As previously set out, the Applicant considers the site to be an ideal location for an enhanced PFS offer, along a main road with sufficient traffic counts. The local highway network has plentiful capacity and there is good visibility on to the highway; the access/egress are characterised by good visibility and there is sufficient space on site for internal manoeuvring of both customer and servicing vehicles. A swept path analysis has been undertaken of the site access, egress and internal servicing around the site for the largest expected service vehicles.
- 5.22 The scheme makes generous car parking provision (including pump and air/water bays) and there is space on site for a cycle stand. The proposed number of off-road parking spaces is in line with generic standards seen across roadside services sites in the UK. The Applicant owns a number of PFS sites and encourages locally sourced staff to attend the site using sustainable modes of travel including cycling, walking and by bus and the site is best placed to do this. Please refer to the accompanying Transport Statement for further details regarding highways matters.

6.0 CONCLUSION

- 6.1 This Statement has justified the merits and acceptability of the proposed demolition of the existing car sales building and the redevelopment of the site for a new Petrol Filling Station (PFS) with associated facilities alongside a drive thru unit at 'Car Time', Bell Lane, Bury. It has clearly been demonstrated that the application proposal would make effective use of the brownfield plot, would provide a good quality road-side service whilst promoting consumer choice and generating employment for local people. Permitting the proposal would not result in adverse impacts to the local highway network or on amenity and the scheme will enhance the street scene aesthetically.
- 6.2 The NPPF states that local planning authorities should approach decision-taking in a positive way to foster the delivery of sustainable development. It goes on to state that local planning authorities should look for solutions rather than problems, and decision-takers at every level should seek to approve applications for sustainable development where possible.
- 6.3 For the reasons set out, the LPA is kindly requested to grant planning permission.

