Town Centre Statement

New Mills, Marsden

Crowther Bruce and Company Limited

January 2026

Contents

1. Introduction

1.1 This statement has been prepared in support of an application lodged by Crowther Bruce and Company Limited at New Mills, Marsden. This site is on the edge of Marsden District Centre, at around 5m distant at it's closest point.

1.2 New Mills is a key regeneration project for the village. It occupies a large and central area of the village area. The site is around 1.7Ha and has been unused for some considerable time. It is currently falling into disrepair.

1.3 This site is allocated in the Adopted Plan (MXS11) and is the former premises of Colne Valley Spinning Co Ltd, a Marsden based business that was an important producer of woollen cloth in the late 19th and early 20th Centuries. The Crowther family, who owned the business, were also local philanthropists- dedicating both land and money towards local amenities and services in the town. The Mill was founded in 1897 but closed in March 2001. It has been vacant since that time, with some local frustration over a lack of action at the site.

1.4 The site allocation includes elements of retail use. However, this is subject to applying policy LP13. This policy enacts the "Town Centres First" approach. It defines Marsden as a District Centre, which is expected to:

- *Provide a range of shopping for everyday needs and serving specialist markets.*
- *Be the local focus for basic financial services, food and drink, entertainment, leisure and tourist facilities, and health services.*

1.5 The policy requires that any "main town centre uses"- including retail, leisure, health, offices and food and drink uses- which are located outside the defined boundary to be subject to the sequential test. The policy expects the sequential test undertaken to reflect the scale, role and function of the proposal.

1.6 It also expects an impact assessment to be undertaken for these uses, where there is more that 500sqm gross of main town centre use proposed, or where a proposal is within 800m of a district centre boundary and is greater than 300sqm gross.

2. The Proposed Development

2.1 This application seeks permission for a range of uses, designed to:

a) Make the redevelopment of the Mill site viable and attractive,

b) Support the current function of Marsden as an important service provider for the local area- providing as much of the local needs of existing residents as possible, in an effort to make the settlement more sustainable; and to

c) Support the visitor economy, which assists with the vitality and viability of Marsden as an active centre.

2.2 Whilst the latter is acknowledged to have some limited disadvantages, it is also an important factor in keeping the village attractive, well serviced and brings investment to the village.

2.3 This application proposes redeveloping the site as a series of new buildings. It is "heritage led" as far as can be reasonably achieved and, in summary, it involves:

- Demolition of the low rise mill buildings across most of the eastern and western areas of the site.
- Opening up the River Colne, through the removal of buildings that are currently built over the river.
- Retention of the main two storey mill buildings that face Brougham Road, and the two multi-storey mill buildings, located in the centre of the site.
- In order to achieve suitable site access from Brougham Road, it will be necessary to demolish part of the 2 storey buildings on Brougham Road, as well as the southern part of the western mill building.
- The conversion of the retained buildings to provide a mix of uses, including:
    - Converted light industrial units on the eastern part of the site
    - Retained offices uses in the existing "Labtex" building to the east of the site
    - Residential uses in the multistorey mill buildings
    - Mixed "town centre uses" on the lower ground and ground floors of the western mill building- generally focussed on retail and food uses in the western mill.
- New build elements to provide light industrial units on the eastern part of the site, new car parking areas, a riverside walkway and a new area of public realm fronting Brougham Road.

2.4 In total, the main town centre uses are as follows:

Use	Use Class	Total Amount (sqm)	Limits	Locations	Notes
Non-food retail Restaurant / Cafe	Ea) Eb)	456	232 sqm / max unit size	West Mill Lower Ground floor; Building E; Building D	
Food retail	Ea)	279	1 unit	West Mill Ground floor	Like occupation by Co-op relocating form their existing village centre store. 279sqm sales area + 93sqm storage / back of house
Office	Eg) i)	747		Building A / current Labtex use	Existing occupier stays, or space used for an alternative occupier or office based model- potentially serviced offices; flexible co-working space; small business spaces, etc
Gym	Ed)	181		East Mill	Residents only
Total Main Town Centre Uses	**Mixed**	**1,663**		**East of the defined centre**	**All in western mill, other than existing Labtex office space**

2.5 This report considers the potential to accommodate these uses in a more central location within Marsden, as well as considering the impact of this new space on the heath of the defined centre.

2.6 It is important to remember the purpose and intention of this regeneration project.

2.7 The Mill site is currently a major negative influence in the village. It’s state of repair detracts from visual amenity, presents safety concerns and it blocks access through the village- representing a barrier to movements to key locations in the village- including the District Centre and other key services and facilities.

2.8 The application site has many positive features, but it is also a marker of the decline of traditional industries which founded Marsden. This site needs to be regenerated, to support and cement the current positive direction of travel for the village.

2.9 This development aims to expand the capacity of Marsden to address it's own needs, strengthen it's ability to be self-sustaining and to encourage positive visitor attractors to the village- including those who come for trade, crafts, retail and food offerings.

2.10 Marsden Centre has a total of 32 units, with an average size of 77sqm. The total floorspace in the defined centre is 2,470sqm[1].

2.11 The proposed development proposes 1,633sqm of main town centre uses. The retail and café space is just under half of this (705sqm), and limits are proposed to ensure that the character of the centre does not radically change: Non-food retail units will have a maximum floorspace of 232sqm.

2.12 This maximum size is larger than the average current floorspace, but setting it at this level allows some scope for diversifying the current offer; allowing for the expansion of existing businesses, with the associated "recycling" of some existing units on Peel Street to new occupiers.

2.13 The intention is to provide smaller units, for local businesses and smaller artisan occupiers. It is not intended to attract, and nor is it likely to be attractive to, larger "national" or "chain" retailers. It is not expected that a larger retailer would be attracted to Marsden anyway, due to market scale limitations and the general trend away from high street retailing[2].

2.14 At this stage, the precise mix of uses proposed is unknown- the table above, and the wider planning application, seeks some flexibility in use. This is to test the market, establish the levels of interest in this scale and nature of "retail" offer in Marsden, and to try to find a mix of uses that gives the best potential for a viable conversion of the existing mill spaces.

2.15 This may, ultimately, mean the inclusion of some "meantime uses"; temporary provisions, and ultimately; changes or deviations away from the currently proposed mix and type of uses. Those changes, however, can be dealt with at later stages. The current application seeks a framework that is likely to be robust at this stage.

2.16 In part, this is why no allowances have been made for some potential uses in the table above- notably:

i. Health uses: There is known demand, particularly for doctors and dentists services, but the potential to secure an individual, or group, to set up and provide these services is less certain.

ii. Education uses: This site is not likely to provide a new "mainstream" school. However, there is future potential to allow occupation, for example, for a language school, craft lessons, pottery spaces, sewing knitting or other textiles workshops.

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[1] Appendix A "Hierarchy of Town Centres" Local Plan Technical Paper: Retailing and Town Centres, April 2017

[2] 'High Streets: Life beyond retail?': House of Lords Built Environment Committee - House of Lords Library

This is likely to be a modest element and would not include a high travel demand use- for example, a children's dance school, where car usage tends to be high.

2.17 These potential future uses are not specifically included in this application, but there is scope within the assumed trip generation and parking allowances to accommodate these should the future need arise.

2.18 The nature of the suggested office space also bears some discussion. The current assumption is that the existing occupier- Labtex- will stay in that area of the site. However, if they relocate the traffic and transport assumptions- including car parking provision for hat building- has been based on a new "standard" office occupier.

2.19 However, this is more likely to provide flexible co-working spaces[3], small flexible and serviced office suites[4] and potentially more "local service" offices- high street accountants or solicitors, financial advisors, etc.

2.20 The combined, total proposed amount of floorspace for "main town centre uses" is considerable, being just under half the size of the current district centre in terms of floorspace. However, the aim is to extend the potential of Marsden, to help it grow and to maintain it's undoubtedly successful character.

2.21 The applicant does not intend to compete with the existing uses, or to rely on moving existing businesses out of their current spaces, and thus creating vacancy issues in the existing units. This is discussed further in the impact assessment section of this report.

[3] See for example: The Best Coworking Spaces in Leeds | Leeds-List

[4] See for example Workspace | Offices | Leeds and Manchester | Gilbanks or Office space for rent – pricing & membership plans | WeWork

3. Sequential Test

Relevant Case Law

3.1 The site is located some 5m from the boundary of Marsden District Centre.

3.2 Since the introduction of the "Town Centres First" policy, the sequential test has been subject to considerable discussion in both the Courts, and by Inspectors at planning appeals. It's important to ensure that the relevant case law is understood, to inform the parameters of this assessment.

3.3 The main case is Tesco Stores Limited v Dundee City Council, which provides clear guidance about the application of the sequential test. Whilst this was obviously a case from Scotland, the Supreme Court's decision also applies in England- this principle was confirmed in the Rushden Lakes decision, which is also discussed below.

3.4 The Dundee case provides useful guidance on the question of "suitability" which is central to this application. Lord Hope provided the following explanation:

"….the issue of suitability is directed to the developer's proposals, not some alternative scheme which might be suggested by the planning authority. I do not think that this is in the least surprising, as developments of this kind are generated by the developer's assessment of the market that he seeks to serve. If they do not meet the sequential approach criteria, bearing in mind the need for flexibility and realism to which Lord Reed refers in para 28, above, they will be rejected. But these criteria are designed for use in the real world in which developers wish to operate, not some artificial world in which they have no interest doing so." (para 38)

3.5 Essentially, whilst some flexibility is needed, there is no need to artificially force a proposal onto a site which will not meet the same market aspirations as the application site. This message was reinforced in the 2012 Zurich Assurance Limited v North Lincolnshire Council case which stated:

"It is also important to mark that developers, and planning authorities, work in the real world. Marks & Spencer had assessed the only available town centre alternative to the site, and had concluded that a development that was smaller than that proposed, or one with a more restricted range of goods, was neither commercially viable nor suitable for their requirements".

3.6 The Rushden Lakes decision (APP/G2815/V/12/2190175) confirms that the Dundee case established the principal that, if a site is not suitable for the commercial requirements of the developer in question, then it is not a suitable site for the purposes of the sequential test. The Inspector stated:

"*There is no suggestion here that the sequential test means to refer to anything other than the application proposal*."

3.7 The same Inspector advised on the level of flexibility which should be shown as part of the sequential test:

"…in terms of the size of the alternative site, provided that the Applicant has demonstrated flexibility with regards to format and scale, the question is whether the alternative site is suitable for the proposed development, not whether the proposed development could be altered or reduced so that it can be made to fit the alternative site."

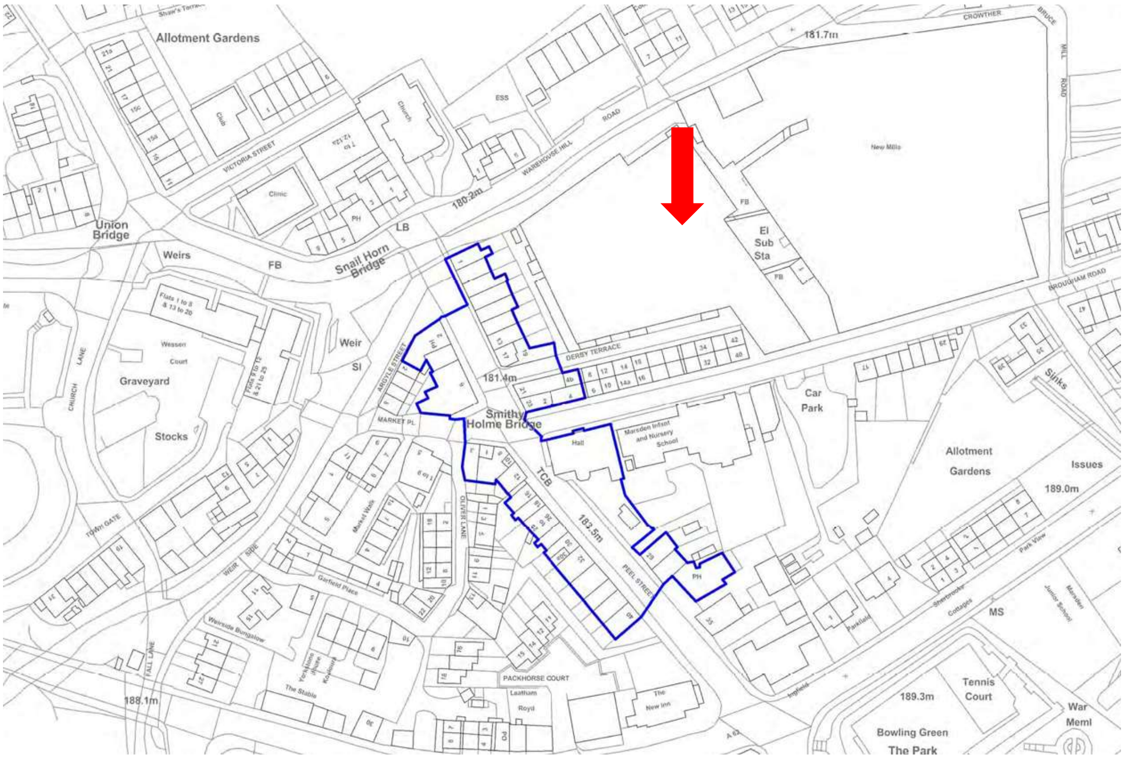
3.8 Rushden Lakes also offers guidance on when a site is to be considered "available":

"*In terms of availability, NPPF [24] simply asks whether town centre or edge of centre sites are "available". It does not ask whether such sites are likely to become available during the remainder of the plan period or over a period of some years. ….The site was not currently available and that was what was required by the sequential test."*

3.9 In light of the above, the proposal needs to be considered in context and as a whole - the purpose is to consider a "real life" view on whether the proposed development could actually be located on the alternative site.

Relevant Centres and Search Parameters

3.10 The site is 5m from the district centre boundary of Marsden, and so is in an "edge of centre" location. The boundary is shown by the blue area below, with the area of the site where most town centre uses will be located, identified by a red arrow:



3.11 The site is considerably larger that the centre itself.

3.12 Given the amount of floorspace potentially relevant to this test (1,663sqm) it would be easy to conclude that- in the absence of a requirement to disaggregate the uses- the centre is simply too small to accommodate this development. Marsden has a total capacity of 2,470sqm and thus there are no sites available that could accommodate this development.

3.13 However, that would be too simplistic.

3.14 The counter concern is that this scale of intervention may be “too much” for Marsden. It, therefore, warrants more careful consideration- including consideration of the objectives of the policy approach, and the effect this development could have on the vitality and viability of the Centre. Answers to these points are woven through this report.

3.15 In terms of identifying potentially preferable sites, there are no allocations within the defined centre. Therefore, the applicant has searched commercial property databases for available units or sites that might be suitable.

3.16 As the applicant is a major landowner in Marsden, they have also consulted their commercial property advisors on this project and reviewed their own ownership of property in and around the centre, to determine whether there are any opportunities to meet the requirements for this project.

3.17 The case law review presented earlier in this report suggests that the following approach would be considered to be reasonable, if it were reviewed by an Inspector or the Courts:

1. The suitability of a site has to be based on a “real world” comparison against the developer’s proposal.

2. Some flexibility about format and scale is required, but the test is about whether the alternative site is suitable, or not. The test is NOT about changing, reducing or splitting up the proposal to artificially fit it onto another site.

3. Expecting a developer or operator to adopt an approach which would not be acceptable to their commercial objectives, would exceed the role of the planning system.

4. Sites have to be available now- not at some undefined point in the future.

3.18 In this case, the proposal is for a c.1,633sqm mixed use development site. In order to allow a fair analysis of the suitability of any available sites, the following criteria have been applied. For a site to be suitable, it must:

- Be available now, or in a reasonable period of time, in-line with when the proposed development is intended to be operational (around Q4 2027), and:

- Have a floorspace tolerance of +/- 10%: giving a range of c.1,470sqm to 1,796sqm. This range has been adopted to demonstrate that some reasonable flexibility has been applied, in the context of the case law identified earlier in this report; and

- Be in a suitable location: Within or immediately adjacent to the centre, well related in terms of physical form and be capable of strong connections to the centre to aid linked trips.

3.19 Furthermore, any suitable sites must be financially viable.

Site Identification: Vacant Units

3.20 The applicant has searched commercial property databases to find currently available units. The following options have been identified:

New Mills, Brougham Road

3.21 The applicant is currently actively marketing an open plan office suite of 372sqm on the first floor of the Brougham Road buildings. This is available on a leasehold basis, with terms to be agreed.

3.22 This is part of the project site. If it is not let, it may be converted to light industrial provision as part of the works to the Brougham Road buildings. Whilst it is part of the application site, it is located at the point of the site which is furthest away from the town centre boundary.

3.23 This is both available and suitable. However, it is also part of the application proposal and the preference is to locate the main town centre uses closer to the town centre boundary as part of this application. This is not considered to be a suitable alternative and is, therefore, being discounted as part of this exercise.

Former "Valley Osteopaths", 28 Peel Street

3.24 This site was on the market recently with 33sqm of retail space and a total of 65sqm of leasable space. It was marketed by Bramleys Commercial, but was recently removed from the market. Therefore, it is no longer available.

Former "The Lil'Olive" café building, 16 Peel Street

3.25 This café has now closed, and the building is on the market for sale as an investment. The sales details show that it is now occupied as an osteopath with offices above. It is suggested that this is current example of a local occupier taking advantage of an opportunity to expand their facility, given the paucity of supply available for business growth.

3.26 This unit is fully let, and is being sold with the tenants in place. Whilst this is showing as being for sale in the commercial databases, it does not have any capacity for further occupation and thus is not available.

3.27 There are no other currently vacant units in Marsden Centre.

Site Identification: Vacant Land

3.28 Marsden Centre is quite tightly drawn around the existing units. There is no land available that is closer to the centre boundary than New Mills.

3.29 The nearest site which is vacant and could be developed is allocation HS130 (Land to the South west of Victoria Terrace). This is the remainder of a housing allocation, some of which has been developed recently for housing, and the remainder of which is owned by the applicant.

3.30 This site is a housing allocation. The applicant intends to pursue housing development on that site in due course. Whilst this site is available, it is less sequentially preferable than the New Mills site, and is also an important allocation for meeting housing needs in the Village. The applicant intends to pursue an application on that site once the New Mills proposal is finalised.

3.31 There are no other currently vacant sites in Marsden.

Summary of Findings

3.32 This analysis has not identified any sites worthy of further consideration. There are no vacant units on the market, and there is no suitable or sequentially preferable land that could feasibly meet the needs of this development.

3.33 Disaggregation is no longer a requirement of the policy approach. However, even if it were, there are no units available which could provide for even a small amount of the currently proposed space. The applicant could not be reasonably accused of trying to avoid this test by failing to break down the considerable amount of main town centre uses into it's component parts.

3.34 On this basis, it is considered that there are no suitable or available sites within (or on the edge of) the defined town centre, which could accommodate the proposed development and so it is concluded that the sequential test has been passed. This part of Policy LP13 policy should not impede consideration of the redevelopment proposal further.

3.35 The findings of this analysis, however, are relevant to the consideration of need and impact, which are discussed in the next sections of this report.

4. Need

4.1 Policy LP13 requires an impact assessment for retail, leisure and offices uses which are not within a defined centre and which are larger than 500sqm; or 300sqm when located within 800m of a defined District Centre boundary. The application proposal is considerably above this threshold. It is, however, below the National Policy threshold of 2,500sqm.

4.2 The policy acknowledges that an impact assessment should reflect the scale, role and function of the proposal. It is clear that the Council should not support any proposals which would have a significant adverse effect on the centre.

4.3 This section of the report first considers whether there is a need for the proposed development. Section 5 considers the impact of the current proposal in more detail.

Retail Need

4.4 The available quantitative need evidence base[5] largely focusses on retail needs. The Kirklees Retail Study is now nearly 10 years old, but as the most relevant evidence on this topic that is currently available, it has been reviewed.

4.5 Marsden sits in Zone 5 of the retail study. That encompasses Marsden, Slaithwaite and the north western part of Huddersfield (comprising Linthwaite, Golcar and Lindley).

4.6 The study estimated that, once commitments were allowed for (including the Aldi at Colne Mills[6] and Globe Mills in Slaithwaite[7]) there would only be a modest capacity for comparison goods (non-food retail) by 2031, supporting the equivalent of 200-400sqm[8] in Zone 5.

4.7 The study also estimated that the capacity for new food retail in Zone 5 in 2031 would be negative[9].

4.8 Whilst this data is now aged, it does suggest that there is no capacity for a new convenience store in Marsden. By the time this project is operational there will be some capacity for non-food retailing, in the order of 200-400sqm (2,152sqft- 4,306 sqft). This is potentially less than would be provided in this development (up to 456sqm, including café space), but the growth of non-food sales is generally greater than the spending growth on food. That need would likely continue to expand beyond the currently modelled 2031 date.

Leisure Need

4.9 The Council also commissioned a Leisure Needs Assessment to support the Local Plan, in 2014. Again, this is now around a decade old. It also only considers the need for larger commercial leisure uses, including bingo, cinemas, Gyms and leisure centres. It specifically does not control restaurant, bar and café uses- as these are generally of a more modest

[5] From the Local Plan preparation, notably the Kirklees Retail Study Update 2016.
[6] 2013/91459 Erection of single storey foodstore (use class A1)
[7] 2013/91452 Demolition of outbuildings and refurbishment/redevelopment of Globe Mills
[8] Table 5.33, 2016 Retail Study Update by WYG
[9] -1,600sqm to -2,500sqm net by 2031.

scale and there is less precise planning control over these uses, due to permitted changes of use.

4.10 The leisure study is more qualitative in nature. However, the household survey did include questions about the types of leisure activities that household participate in. Marsden is, again, in Zone 5- where the highest rated activities[10] were:

- Restaurants (68.7%)
- Pubs and Bars (57.9%)
- Cinema (42.8%)
- Theatre and concert hall (41%)
- Museum and Galleries (29.8%)

4.11 These proportions are consistent with the study area averages[11].

4.12 For indoor sports and health & fitness activities, most zone 5 residents stay in the local area, attending primarily the Colne Valley Leisure centre (24.5%) and then other zone 5 establishments (18.5%), with very small amounts of leakage to Zones 1 and 2 (central and northern Huddersfield)[12].

4.13 Most cinema attendees stayed local to the Huddersfield area, but due to the lower number of cinemas in the study area, the majority of Zone 5 cinema visits were to the Odeon in Huddersfield (79.1%), followed by the Showcase in Batley (9.7%)[13].

4.14 Most restaurant visits from Zone 5 residents were either in Huddersfield (Zone 1 at 39.7%) or at restaurants in Zone 5 (36.7%)[14]. Similarly, trips to pubs, bars and nightclubs were biased towards Huddersfield (51.8%) and then Zone 5 (31.9%)[15].

4.15 Huddersfield dominates the market for bowling, bingo and theatres, due to the lack of facilities elsewhere.

4.16 The study also asked what respondents would want to see more of in their area. The Zone 5 responses favoured a swimming pool (8.4%), formal sports facilities (7.4%), Children's facilities (5.3%) and an Ice rink (5.1%). Most respondents (60.8%) from this area either didn't know, or didn't want anything else[16].

4.17 Clearly, there is limited scope to fund and provide facilities like an ice rink, bowling alley, theatre or a swimming pool at New Mills. However, residents in this wider area of the District are consistently travelling to Huddersfield for common leisure activities- most

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[10] See table 2.2 of the 2014 Kirklees Leisure Needs Assessment by WYG
[11] Para 2.06 2014 Kirklees Leisure Needs Assessment by WYG
[12] Table 2.3 ibid
[13] Table 2.4 ibid
[14] Table 2.5 ibid
[15] Table 2.6 ibid
[16] Table 2.10 ibid

notably restaurants and drinking establishments. On this basis, there does appear to be scope to meet these needs more locally, and thereby to reduce the need to travel.

Office Need

4.18 The Kirklees Employment Land forecasts were prepared in 2008, and the office market has undergone considerable change since that time.

4.19 The rise of working from home during the pandemic, and the refocus of many small and medium sized “mainstream” office businesses favouring a more flexible office lease, based in serviced accommodation- rather than the certainty offered by long leases- has materially shifted the market. Changes in Permitted Development rights has also seen an increase in conversions from office to residential uses. This has particularly affected fringe areas and, especially, the poorer quality office spaces that would be in need of considerable upgrades to meet modern expectations.

4.20 Current data on the local office market is very limited.

4.21 The regional office market has seen Leeds increase it’s headline rents, with Leeds and other “Big Five” regional office markets seeing increased take up- mostly accounted for by Grade A space. As a result, in those locations, the best offices are in shorter supply with vacancy rates decreasing for the last couple of years. Total vacancy in Leeds is now at just under 6%, but Grade A vacancy is just 1.9%[17].

4.22 That evidence of an improving and generally high specification office market, however, only covers the strongest regional markets. Unfortunately, this does not include Huddersfield, and especially Marsden- neither of which are comparable to Leeds, which is a prime office hub, sought out by larger occupiers seeking prestigious Grade A space.

4.23 The wider market trends, however, do affect the choices that people make about where to locate both themselves, and their smaller businesses.

4.24 The home and hybrid working trend appears to be here to stay. This allows people to live in a location that they prefer for lifestyle reasons, because they are not required to travel to the office as frequently. The Trans-Pennine Upgrade will make getting to Leeds or Manchester from Marsden much easier. This is likely to increase the attractiveness of the village for this type of office worker.

4.25 Marsden has good broadband availability, with fibre to the property being available. This will support both homeworking, and small business location choice- particularly for those smaller businesses that can be more “footloose” with their locational choices- either being wholly or partly based on the internet, or working in service sector jobs which do not require a particular base, but do need the ability to get to customer sites with relative ease.

4.26 Smaller places will always need suitable services- There is very little capacity available in Marsden town centre now for office provision, so further accommodation for this niche would also make the village more self-supporting.

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[17] See Cushman and Wakefield Regional Office Marketbeat Q1 2025 Marketbeat Template - Local Markets

4.27 The NOMIS labour market profile for the Colne Valley Ward[18] suggests that this Ward has:

i. High levels of employment in professional, managerial and technical roles, as well as in skilled trades;

ii. high levels of economic activity and

iii. high levels of full-time employment.

4.28 These are all higher than the Kirklees and England averages, which suggests that office employment in this locality is likely to be quite high.

4.29 The NOMIS data for Business Counts is not available at ward level, but the Kirklees data[19] shows that the District has higher than UK rates of micro-businesses, and comparable numbers of small businesses. This suggests that the District is relatively entrepreneurial and has more businesses that employ fewer than 9 people- which might support a small office space, serviced accommodation or the use of co-working spaces.

4.30 Putting these trends together, it is considered that Marsden has high potential to attract some small businesses; and will be very attractive to people looking to work from home or who can employ a hybrid approach to working. This is likely to support provision for some co-working space, serviced accommodation and some small office suites.

4.31 There is no one source of data that suggests a strong market for new office space in Marsden. Indeed, this is not the kind of location where we would expect to see major office take up.

4.32 However, it is ideally placed to benefit from current trends, and the provision of opportunities to accommodate micro and local businesses- on a more flexible basis than traditional office solutions- would likely enhance the economic base of the village and discourage travelling out of Marsden for work purposes.

Regeneration Need

4.33 It is also important to consider the need for the New Mills site to be regenerated. The "What Matters to Marsden" survey results[20] suggest that the key employment related issues being faced by local people include:

- A lack of diversity when it comes to employment and career opportunities locally
- The impact of the mill closures, a shortage of premises and the potential opportunity to develop the mill space to bring new businesses to the area and create much needed jobs

[18] Labour Market Profile - Nomis - Official Census and Labour Market Statistics
[19] Labour Market Profile - Nomis - Official Census and Labour Market Statistics
[20] What matters to Marsden results summary

- A lack of variety in work opportunities, with limited options for skilled and professional work and meaningful chances of progression

- There are lots of opportunities available in the food preparation sector, in cafes, pubs, restaurants and the retail sector- which is good for giving young people some work experience, but can be limiting for others.

- A number of people already work from home, either sometimes or the majority of the time, especially since the pandemic. Several people said there is a need to have better internet speed in Marsden.

- The range of shops and services in Marsden is considered to be good, and the high street is active.

- There is a need for adult learning, apprenticeships and more local job search support.

4.34 The key feedback highlighted in the summary note for this exercise is a comment that the mill space offers unexploited potential to bring employment to the village. The overall scoring of that exercise left issues around parking, public transport reliability and work / economy issues being those areas that needed the most attention in the Village.

4.35 It is clear that New Mills offers considerable untapped potential for visual, community and economic improvement.

4.36 It is currently a negative influence, and has huge potential to improve the village- not just from a connectivity and visual appearance perspective, but in terms of offering more services and facilities; a wider range of job opportunity, and; allowing the already higher number of people working from home the opportunity to use shared facilities, or to grow their micro-business into suitably flexible accommodation.

4.37 New Mills needs regenerating. It is potentially a large part of the solution to the issues being raised by local people and providing a strong mix of “main town centre uses” could help to address these concerns.

Need Conclusions

Retail

4.38 There is quantitatively evidenced need for additional non-food retailing in Marsden, even allowing for the extant permission at Globe Mills in Slaithwaite. There is no need for additional food retailing, but there is anecdotal evidence that relocating the existing convenience store may help to address some practical issues around parking and servicing at the current co-op unit.

Leisure

4.39 There is evidence to support further provision of restaurant and bar space in Marsden, on the basis that this could reduce wider travel demand. However, there is also anecdotal evidence and feedback from public consultation that adding to the current “ale trail” attraction of the village may not be supported by everyone.

4.40 Other leisure uses may be supported in principle, but these are less likely to be commercially attractive- including a cinema, museum, theatre or swimming pool. Big leisure uses, like an ice rink or bowling alley are not likely to be feasible in this location, although there might be some local demand for such a use.

Office

4.41 There is no quantitative evidence for new office needs in Marsden- it is clearly not a “Big Five” regional office location, and would not be likely to compete with Leeds or Manchester for the type of occupiers that are driving office demand in those locations.

4.42 However:

- The local demographics;
- evidence of existing homeworking;
- higher than average micro business rates, and;
- programmed transport improvements that would make commuting to Huddersfield, Leeds or Manchester for a day or two of office working, with the rest at home or in a flexible / co-working space:

4.43 Does seem to suggest that flexible small business office space is a product that could be commercially attractive, and would also reduce the need for travel outside the village.

Regeneration

4.44 Finally, there is a clear and compelling case to regenerate the mills. This is widely accepted to be a missed opportunity in the village.

4.45 This brings with it a need to identify uses that are likely to work, particularly in the retained spaces which were designed for different industries. This needs to approached creatively to find enough quantum and variety of uses that can both fill the amount of available space, and also work positively with the existing attributes of village.

5. Impact

5.1 NPPF expects consideration of:

a) 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

b) The impact of the proposal on town centre vitality and viability, including local consumer choice and trade in the town centre and the wider retail catchment.

5.2 To assist with this analysis, NPPG sets out a series of tests[21] as follows:

- Establish the state of existing centres and the nature of current shopping patterns (base year)

- Determine the appropriate time frame for assessing impact, focusing on impact in the first five years, as this is when most of the impact will occur

- Examine the 'no development' scenario (which should not necessarily be based on the assumption that all centres are likely to benefit from expenditure growth in convenience and comparison goods and reflect both changes in the market or role of centres, as well as changes in the environment such as new infrastructure);

- Assess the proposal's turnover and trade draw (drawing on information from comparable schemes, the operator's benchmark turnover of convenience and comparison goods, and carefully considering likely catchments and trade draw)

- Consider a range of plausible scenarios in assessing the impact of the proposal on existing centres and facilities (which may require breaking the study area down into a series of zones to gain a finer-grain analysis of anticipated impact)

- Set out the likely impact of the proposal clearly, along with any associated assumptions or reasoning, including in respect of quantitative and qualitative issues

5.3 It also advises that:

"*any conclusions should be proportionate: for example, it may be sufficient to give a broad indication of the proportion of the proposal's trade draw likely to be derived from different centres and facilities in the catchment area and the likely consequences for the vitality and viability of existing town centres*"

5.4 This guidance is focussed more on quantitative impacts, which are particularly relevant to retail uses. This assessment considers the wider range of town centre uses proposed by this application, many of which are difficult to assess in pure quantitative terms. Nonetheless, these matters are considered further below.

[21] Paragraph: 018 Reference ID: 2b-018-20190722

The state of the existing centre and the nature of current shopping patterns

5.5 For a centre of it's size, Marsden has high diversity, good pedestrian footfall and extremely low vacancy rates. People living locally clearly make good use of the services and facilities on offer in the village.

5.6 The analysis presented in Section 4 suggests that people do travel out of the village for certain needs- larger and more formal leisure activities; leisure activities that require specific facilities, or high cost facilities that would not be commercially feasible in a smaller village, and; main food shopping.

5.7 Marsden is considered to be a very healthy centre. This is likely supported in part by the visitor economy.

5.8 However, it also has capacity issues. The extremely low vacancy rates suggest a level of demand which outstrips supply. This is likely to be curtailing business growth, and will limit service provision and employment opportunities over time- particularly across the range of uses considered in this assessment.

The appropriate time frame for assessing impact

5.9 This project is likely to be delivered over an extended time period. Most of the main town centre uses are included in outline format to allow future consideration of the precise use, the precise area and to test the commercial appetite of this level of intervention in the village.

5.10 It is expected that planning permission could be achieved by mid-2026, with demoliton and remediation / repair works during 2026/7, and works to deliver the first phase of development (likely to be light industrial elements, to the east of the site) during 2027.

5.11 Subsequent phases will need reserved matters approval and will likely be delivered over a number of years, 2027 to the early 2030's.

5.12 It is suggested that the development may not be fully completed and operational for 5 to 10 years (say 2030 to 2035).

5.13 On this basis, the main town centre impact is not likely to occur in the first 5 years. That guidance seems to be focussed on a pure out of centre retail proposal (a supermarket or shopping centre type proposal), whereas this is a town centre mill conversion regeneration project. It is expected that the main "impacts" would occur in around 5-10 years, rather than within 5 years.

The 'no development' scenario

5.14 If this project does not happen, the impact on Marsden is likely to be negative.

5.15 The site will continue to fall into disrepair; buildings that would otherwise have been saved would likely need to be demolished; the site would be levelled and likely left as a prominent "wasteland" in the centre of the village. For the purposes of this report, the impact on the town centre would primarily be harm to the perception of the village as a location to visit.

5.16 There would also be an “opportunity cost” as new space for existing business expansion and new occupier diversification would not be delivered.

5.17 The centre would continue to be highly constrained, with existing businesses unable to expand. There would continue to be limited opportunities to expand the range of services and facilities available to existing residents, as there would be no additional space to support a wider diversification of uses (eg some health related uses). There would also be no potential to enhance facilities for home workers, and a failure to address the current village concerns about availability of short stay parking opportunities to support trips to the existing town centre uses.

5.18 Over time, this could combine to have a negative impact on both the attractiveness of the centre to local people, as well as the visitor economy.

5.19 Environmental change and lack of capacity may reduce the number of visitors to Marsden, removing their incidental spending- which probably supports the current health and vibrancy of the centre.

5.20 It is predicted that this baseline projection could include a decline in vibrancy, reduced diversity, ultimately resulting in a less healthy and sustainable centre.

The proposal’s turnover and trade draw

5.21 This project has modest levels of uses that can be analysed in this manner. The main use is non-food retail.

5.22 There is some need for additional non-food retail space in this Zone of the District. This amounts to around 200-400sqm of space by 2030, which is slightly less than the proposed 456sqm of retail and restaurant space. However, making a modest allowance for a restaurant / café space (say 25% of the total) the site would provide around 342sqm of non-food retail- which is within the range of need identified in the Retail Study. However, it is above the lower end of the prediction.

5.23 The retail study assumed sales densities of between £3,000/sqm to £6,000/sqm (giving the range of 200-400sqm in table 5.33 of that study).

5.24 Applying that sales density to the c. 142sqm above the lowest prediction, would suggest a turnover of c.£0.5m to c.£0.9m.

5.25 The retail study projections allow for just under £3m of expenditure growth every 5 years in Zone 5[22] which is about £0.6m a year. Improvements in trading efficiencies of existing committed developments in Zone 5 would account for around £0.5m of this growth[23].

5.26 On this basis, and acknowledging that this is a very rudimentary calculation, it should be expected that there will be clear capacity for this additional non-food retail space by around

[22] See difference between 2031 and 2026 surplus expenditure in Table 5.32 of the retail study
[23] See differences between 2026 and 2031 projected commitment trade in Table 5.33 of the retail study

2032. This is broadly in line with expected delivery schedule for this element of the development (see paragraph 5.10 above).

5.27 Therefore, it is expected that natural growth in expenditure would be likely to support this comparison goods space in Zone 5, broadly by the time it is delivered.

5.28 The food retail provision on site is assumed to be a replacement for the existing co-op. This would simply divert the same expenditure to a different location, within the central area of the village. This would free up a unit which would be unlikely to be a future food retail use, given the limited spending capacity for this category of goods, and the current servicing and range of goods limitations that is well known in the village.

5.29 The other town centre uses do not lend themselves to analysis by quantitative means.

Plausible scenarios

5.30 There are a number of plausible scenarios that could be considered. The guidance is seeking a level of sensitivity testing for the turnover and trade draw analysis. This study has only undertaken a rudimentary analysis to indicate that the passage of time is likely to support any additional trading capacity in Zone 5, given the likely lead times to delivering this element of this wider regeneration project.

5.31 It must be remembered that this is partially Government funded, heritage led, regeneration project. It has a number of challenges to address, one of which is finding enough market attractive occupiers to support the level of muti-storey mill space that is being retained due to heritage and townscape related concerns.

5.32 The aim is to create a vibrant extension to a healthy and well performing district centre; to add capacity and flexibility to the operation of the village, and; to create employment opportunities. These employment outputs are the fundamental outputs which resulted in securing Government funding for this project.

5.33 Scenarios which do not provide uses that can reasonably assist with those aims, on the basis that there could be a theoretical trade draw from an existing distant retail use (potentially one that is not even protected by the town centres first approach), is not considered to be realistic or helpful to achieving the objectives of this proposal.

5.34 Given the location, nature of the project and the indictive findings of this assessment, undertaking a range of scenario analysis on trade draw is not considered to be necessary.

The Impact of the Proposal

5.35 It is considered that the project is not likely to have a materially negative effect on any defined centre. Indeed, it is likely to have a positive impact- regenerating prominent buildings of character in the centre of the village, and; helping to address long running local concerns about job availability and parking issues. This project is likely to have an overwhelmingly positive influence on Marsden.

5.36 The remainder of this section reviews the key considerations in the NPPF tests.

1. Impact on Town Centre Investment

5.37 Marsden centre is clearly a very vibrant and well occupied centre, with very little vacancy- the sequential test undertaken at section 3 found just three units on the market:

- One had just been removed as it had been let,
- One was fully occupied and being sold as an investment rather than space to let, and
- The final unit is a part of the application site.

5.38 There are no vacant units and no vacant land or sites for additional development adjacent to the centre- other than the application site.

5.39 This suggests that, at the time of writing, there is 0% vacancy in Marsden. This is testament to its vitality and attractiveness as a local service destination. It suggests that demand exceeds availability, and that further provision could be supported in the town with no harm to the vitality and viability of the defined centre.

5.40 Indeed, arguably, this level of vacancy suggests that the current lack of space could become a negative factor:

(a) Existing businesses will not be able to expand. Their growth will be impeded, and economic opportunities will be lost.

(b) There are no opportunities for smaller or new businesses to get a “foot hold” in the village

(c) There are no opportunities for new, and potentially necessary, services to locate to Marsden.

5.41 Anecdotally, many of the businesses are extremely busy at key times- existing local businesses are trading extremely well. This suggests that it is necessary to provide expansion space for Marsden centre- to allow it to expand it’s role, and to meet the current and future needs of the local population.

5.42 There are no opportunities for further investment in the centre, other than potential small scale and comprehensive enhancements to shopfronts to make them more cohesive. However, that is not a necessary, or currently planned, intervention that would be undermined by the proposed development.

5.43 The Marsden Masterplan team are currently consulting on various enhancements to the centre. This might include elements of pedestrianisation and other environmental improvements – including to the pedestrian environment and traffic flow.

5.44 The New Mills proposal would not be likely to harm that investment- indeed the teams working on both the New Mills and Master Plan projects are in regular contact and taking into account the measures that each may be proposing though their respective processes.

5.45 It is clear that the New Mills project would not undermine any planned investments in the defined centre. Indeed, it would represent a very positive intervention that could address existing and likely future problems in the village.

2. Impact on Vitality and Viability

5.46 This project proposes up to 1,663 sqm of new town centre uses on the edge of a centre which is understood to currently provide around 2,470sqm of existing space.

5.47 If delivered as envisaged, this would significantly enhance consumer choice, capture more local spending and reduce the need to travel for more retail and leisure opportunities.

5.48 There are existing issues which cause frustration locally, including:

- The lack of parking- which particularly affects those that are less mobile- or those that are stopping at the centre by on the way home from a job in the wider area;
- Access and servicing issues, which result from the generally narrow roads with considerable on street parking – especially in the narrower sections of Peel Street where on street parking and servicing coincide regularly.
- A lack of diversity in local job opportunities.

5.49 The application site is the only real opportunity to provide the space that could address those local concerns.

5.50 At its closest point, New Mills is just 5m from the defined boundary and thus it has huge potential to function as an extension of the defined centre, rather than to compete with it.

5.51 However, the application proposal would represent a considerable expansion of the centre, given the large amount of town centre uses proposed. The offer is split between office and both comparison and convenience retailing, as well as food and drink provision.

5.52 There is no quantitative need for new food retail space. This application is looking to provide a replacement location for the existing co-op, which has issues around access and parking- being located on a prominent corner of Peel Street. Moving this to a location where car parking is available and it can be suitably serviced would address existing local issues and free up a unit for an occupier that does not wish to be located at New Mills. This would present a neutral position for convenience goods provision in Marsden.

5.53 The identified capacity in the retail study for comparison (non-food) goods is for 2031. It is likely that some of the proposed non-food retail space will be delivered after that point in time. As discussed above, in theoretical terms, consumer spending will continue to grow over time. Conventional retail modelling methods would see that available expenditure grow in the years past 2031, so that it eventually matches the space proposed to be provided in New Mills.

5.54 There will also be spending associated with the visitor economy. This will be drawn in, from outside the catchment area, and this is likely to come from a diverse range of locations. The trade drawn by that additional space should have no discernible impact on any one location. That can further support an uplift of this type of use at the New Mills site.

5.55 On this basis, it is considered likely that this project can provide the amount of space proposed, without causing any notable harm to nearby planned investments in any identified centres, and without harming the vitality and viability of either Marsden, or other protected centres.

3. Other Considerations

5.56 It is important to define this application so that it does act as an extension of the centre, rather than a separate economic entity that could be conceived as being in competition with the village- and thus being likely to draw trade from the existing centre. This is particularly important as the combined "town centre offer" at New Mills will considerably expand the size of Marsden District Centre.

5.57 The approach to this application has been to locate all uses with a community and retail aspect to the western side of the site, closest to Peel Street. This means that the current spinning mill (between the River and Derby Terrace) will provide:

- A new courtyard with access to new retail and restaurant space
- A new formal car parking area, with spare capacity (ie above that needed for the uses on site alone) with potential controls for short term parking- allowing for linked trips between the existing centre and New Mills- addressing existing concerns about access to the centre
- Improved pedestrian and cycle route between Peel Street and New Mills, via Derby Terrace- improving access opportunities between the Mills and town centre

5.58 The current centre is very strong: Activity levels are very high, vacancy is non-existent and the centre has positive feel. There is a diversity of uses and a range of occupier types. It is very unlikely that the New Mills project will harm the function of the current centre.

5.59 That said, there is potential for some vacancy to result once the new retail spaces are made available. This is likely to come from businesses that have needed to grow for some time, and have not had the space to do so. These occupiers may decide to move to the new space offered by the development. However, as noted above, Marsden currently has 0% vacancy. This means no turnover of units, and; no opportunity for businesses to evolve to meet customer needs.

5.60 Creating the ability for business growth, new start ups and having some vacancy to encourage competition for rental values would likely be a very positive factor that contributes to the health of Marsden District centre.

6. Conclusions

6.1 This application proposes a range of main town centre uses in an edge of centre location, several meters outside the boundary of Marsden District Centre.

6.2 Marsden is a relatively small centre, with high levels of footfall, a wide range of uses and extremely low vacancy. It is a vibrant local centre, that also attracts spending from the visitor economy- which ensures its continued vitality, at a time when many other centres are struggling with low demand and high vacancy rates.

6.3 This statement has considered:

a) **The Sequential Test**: No suitable, available or viable sites were found which could reasonably provide for the application proposals in a more central location.

b) **Need**: A proportionate assessment has been undertaken, which shows that during the life time of the project, there is likely to be enough expenditure available that would support the retail uses proposed on the site. There is a qualitative need for the restaurant and other uses, based on reducing travel outside Marsden to access food and drink options. There is also a need to find a suitable mix of uses to support the type and scale of space that is being made available in this significant regeneration project. This results from preserving considerable amounts of multi-story mill space on the site, which need a suitable mix and variety of uses to ensure that its regeneration is a success.

c) **Impact**: The project is expected to have a positive effect on the vitality and viability of Marsden. It proposes a significant expansion of the centre. This is in the context of a very healthy centre, that is projected to suffer from a lack of space and business growth potential in the current defined centre. New Mills will offer the space for expansion in a currently tight centre, and offer a greater breadth of occupier and service opportunity.

6.4 This project is a very considerable heritage led regeneration project. It will positively transform the central area of Marsden by removing a significant and increasingly derelict site that currently dominates the central area of the village.

6.5 The development will retain the buildings which have the most heritage and townscape interest. The objective is to create new job opportunities in the village, whilst also providing some new living space, and helping to address some of the issues currently faced by the town centre- including a lack of space, unmet demand and transport related issues, primarily the lack of availability of short stay parking.

6.6 This statement offers a proportionate and primarily qualitative assessment of how this project would relate to the District Centre in line with the relevant policy tests.

6.7 However, this is not a commercially driven out of centre retail proposal. It should not be treated as such, when considering it's potential impact.

6.8 It is a partially Government funded, heritage led, regeneration project, where the challenge to be met is finding a viable mix of uses that can financially support the development, whilst also supporting and extending the commercial offer of the village- in support of reducing the need to travel and making Marsden a more self-sustaining settlement.

6.9 This project has considerable local support; the uses proposed are balanced to help make the project work and support the village; and are considered to be the best options available to help retain the more important heritage assets on this prominent site.

6.10 It is concluded that the development would not harm the vitality or viability of Marsden Centre. Indeed, we would expect this development to support the success of both the Centre and Marsden as a whole.

6.11 It is concluded that the sequential test has been passed, and that there would be no material impact which suggests that this planning application should be refused on grounds of the "town centres first" policy.