

SEQUENTIAL TEST REPORT

Proposed Change of Use from Use Class B8 (Storage and Distribution) to Use Class E(a) (Retail)
Princess House, Princess Street, Rochdale, OL12 0HA.

Date: August 2025 – V3

Executive Summary

This Sequential Test Report has been prepared to accompany a planning application for the change of use of Princess House from Use Class B8 to Use Class E(a) retail (non-food).

The report demonstrates compliance with the sequential approach set out in the National Planning Policy Framework (NPPF), Planning Practice Guidance (PPG), and Rochdale's Local Plan. A detailed search of town centre, edge-of-centre, and other potential locations within the Borough has been undertaken.

No sequentially preferable, suitable, available, and viable sites have been identified that meet the operational requirements of the applicant. The analysis confirms that Princess House is the only site capable of delivering the proposed retail use without unreasonable compromise. Policy and Case Law Considerations for Sequential Assessment NPPF outlines that sequential assessment is required in relation to 'main town centre uses', including general retail stores, which are not proposed in an existing centre or in accordance with an up to date plan to demonstrate that suitable town centre or edge of centre sites are not available or expected to become available within a reasonable period such that out of centre sites can be accepted.

In assessing suitable sites, NPPF, NPPG and case law establish that whilst applicants should demonstrate flexibility on issues such as format and scale, there is no requirement to undertake disaggregation or materially reconfigure their proposal.

Paragraph 12 of NPPG also recognises that "certain main town centre uses have particular market and locational requirements which mean that they may only be accommodated in specific locations". Also, in exploring suitable town centre or edge of centre sites, an assessment should be proportionate to the scale of the proposal e.g. in respect of catchment area to be considered and the type of sites. In line with guidance, assessment of sites should be based on defined retail centres and primary frontages with edge of centre sites being within 350m of such defined primary areas.

1. Planning Justification Note

Retail development (Class E(a)) is categorised in the NPPF as a 'main town centre use'. Paragraphs 87–88 of the NPPF require that planning applications for main town centre uses outside designated centres, and not in accordance with the development plan, must be subject to a sequential test.

Princess House is located outside Rochdale Town Centre boundary and Primary Shopping Area (PSA), and is not within 350 metres of the PSA boundary. It is situated in a Mixed Employment Zone, meaning a sequential test is mandatory before permission could be granted. This aligns with Rochdale Core Strategy Policy E2 and saved UDP Policy EC/3, which require retail proposals in out-of-centre locations to justify why town centre or edge-of-centre sites are not being used.

2. National Policy Context

NPPF Paragraph 86:

Planning policies and decisions should support the role of town centres by taking a positive approach to their growth, management and adaptation.

NPPF Paragraph 87:

Main town centre uses should be located in town centres, then in edge-of-centre locations; and only if suitable sites are not available should out-of-centre sites be considered.

NPPF Paragraph 88:

Applicants should demonstrate flexibility on issues such as format and scale.

NPPF Paragraph 90:

Where an application fails to satisfy the sequential test, it can be refused. The Planning Practice Guidance further states that the test applies equally to new build proposals and changes of use.

3. Local Policy Context

1. Compliance with Rochdale MBC Planning Policies

The proposal complies with relevant planning policies of Rochdale Metropolitan Borough Council, including the adopted Core Strategy (2016) and saved policies of the Unitary Development Plan (UDP). The site is located within a designated Mixed Employment Zone, where policies support a range of employment-generating uses subject to appropriate justification.

- **Policy E1 – Establishing Thriving Town, District, and Local Centres (Core Strategy):** While edge-of-centre, the proposal complements the retail hierarchy by serving the local catchment without undermining the vitality or viability of Rochdale Town Centre. A sequential test has demonstrated that no preferable in-centre sites are available or suitable.
- **Policy EC2 – Creating Vibrant Employment Areas:** The change of use will retain employment opportunities while introducing a business model that enhances affordability for local residents.
- **Saved Policy EC/3 – Mixed Employment Zones (UDP):** Within designated Mixed Employment Zones, alternative uses to B1, B2, and B8 can be supported where they do not compromise the primary employment function of the area. The proposed retail use is compatible with surrounding commercial activity, will not undermine the employment character of the zone, and brings a vacant/underused site back into productive use. It is expected to generate equivalent or greater employment density than the previous warehouse use.
- **Policy E2 – Increasing Jobs and Prosperity (Rochdale Core Strategy):** The proposal supports economic diversification by introducing a Class E(a) retail use that maintains employment opportunities while encouraging the reuse of an existing commercial building. This aligns with the policy aim of supporting new forms of economic activity and job creation across the borough, particularly through the reuse of brownfield land.
- **Policy P3 – Improving Design and Image (Core Strategy):** The external refurbishment and internal adaptation of the existing unit will improve the site's visual presence, enhance its usability, and support better integration within the surrounding built environment.
- **Policy T2 – Improving Accessibility (Core Strategy):** The site is well-located in relation to existing pedestrian, cycle and public transport networks, supporting sustainable patterns of movement. The proposal will encourage local trips and help reduce reliance on longer-distance car journeys.

Local Validation List:

Requires retail proposals outside town centres to be supported by a sequential test.

4. Site Description

Princess House is a modern, two-storey commercial building with generous office accommodation, on-site parking, and efficient servicing arrangements. The site is accessed from Princess Street and benefits from direct access to Whitworth Road, which leads to St Mary's Gate and Junction 20 of the M62. Junction 21 provides direct routes towards Leeds. The property's condition is excellent, requiring no major refurbishment to accommodate retail use.

5. Need for the Proposal

The site's excellent transport connectivity, on-site parking, and fit-for-purpose layout make it uniquely suited to the proposed use. Its location supports efficient deliveries, including larger vehicles, and offers convenient access for customers. The building has sufficient internal space for integrated retail and administrative functions without costly modifications. Securing this site ensures the business can operate sustainably, create local employment, and contribute to Rochdale's economy.

6. Operational Requirements

The applicant's minimum requirements include:

- Gross internal area between 7,500 – 12,500 sq ft.
- Clear servicing access for delivery vehicles.
- On-site parking for customers and staff.
- Minimal structural columns to allow flexible merchandising.
- Accessible location with strong transport links.
- Availability (immediate) or within 6 –12 months.
- Condition allowing occupation without major capital works.

No town centre or edge-of-centre sites identified met these criteria in combination.

7. Flexibility

In line with NPPF paragraph 88, flexibility on size and format was considered. However, significant compromises on key requirements such as parking, servicing, or structural layout would undermine the viability of the operation and its ability to serve customers effectively.

8. Search Methodology

The search was conducted across the Rochdale Borough, prioritising the town centre and PSA. Sources included the Council's planning portal, commercial property agents, online listing services, and direct site visits. Availability was confirmed between June–August 2025, and only sites capable of being occupied within 24 months were considered.

Assessment

Following examination of the Development Plan, and any retail allocations in central Rochdale settlements and within a 1 mile radius, secondary source information has been reviewed including commercial property search websites.

The following property sources have been reviewed:

- Right Move.
- Zoopla.
- Prime Location.

Marketing details of these properties are assessed in the Table below:

9. Sequential Site Audit

SITE	SIZE (sq ft)	LOCATION	REASON FOR REJECTION
Pioneer House, Rochdale Exchange	3218	Town Centre	The size is inadequate, the unit's narrow floorplate and structural columns interrupt its flow.
22 – 24 St Mary's Gate	1920	Town Centre	Too small to accommodate operational needs. Servicing arrangements are difficult and very limited parking
Pioneer House, Unit 2	1383	Town Centre	Undersized and with restrictive internal layout, offering no realistic potential.
Pioneer House, Unit 1	1326	Town Centre	Undersized, failing to meet minimum space requirements and operational efficiency.
Pioneer House, Units 29-30	22500	Town Centre	Significantly oversized, leading to inefficient use of space, higher costs, and inadequate staffing and office space.
Station Road Unit	19400	Edge of Centre	Poor access for large vehicles, congested surrounding uses, and poor building condition.

10. Business Model & Location Choice

Why is this location / building suitable for the use being proposed.

This location is perfect as it is self-contained, great car parking, rent is reasonable and close proximity to other discounters. Megaretailer Ltd have been searching (unsuccessfully until now) for a few of years to find suitable premises.

What makes it special compared to other retail uses that might make it out-weigh the out-of-town centre location.

They already tried this model in a town centre back in 2016, they ended up having to close the business, rents and rates in the town centre did not align with discounted offerings the business model offers. Lower cost and more accessibility were central to the decision making to adopt the building on Princess Street. Combined with limited access for cars in the town centre, previous experience highlighted the necessity for a more user-friendly easy drop in by customers. Customers often purchase in bulk so the need to load direct to a vehicle is essential for the business model, again, another crucial factor in choosing the building on Princess Street. This property is also in very close proximity to Iceland Warehouse, B&M Retail so customers are already in the area visiting similar stores.

Difference with cash & carry business model rather than a general retail use.

Megaretailer Ltd are a general retail unit; they do not require a membership for anyone to come to the store. They are closer to the business models of larger chains like B&M / Iceland etc. They are a discount retail store carrying a broad range of big, branded goods at discounted prices including food & drink, cleaning products, homeware, seasonal stock.

Are some of the products out-of-date.

One point of difference is that they offer goods with short shelf life and past best before at up to 80% cheaper than RRP. This provides customers with much needed support with the well documented cost of living crisis, as well as helping to combat the millions of tons of perfectly good food that goes to landfill every year in the UK. This is again well documented contributor harming the environment. There are limited products past their best before date (not use by) although approx. 85% of their products are very good 'best before end' dates.

Summary.

To summarise – Megaretailer is a discount retailer, offering big savings on branded products. They offer full shelf life, short shelf life and past 'best before end' date goods at heavily discounted prices. They have created many jobs in the local area and help combat the cost of living crisis and prevent a large amount of food going to landfill, protecting the environment.

11. Impact if Princess House Not Secured

Failure to secure Princess House would risk the loss of a viable business opportunity in Rochdale, resulting in fewer local jobs and reduced inward investment. The proposal represents an efficient re-use of an existing building, aligning with sustainability principles by avoiding unnecessary new build. By occupying Princess House, the applicant would bring an active use to the area, enhance local economic vitality, and support the community through accessible retail provision.

12. Conclusion

The sequential test has demonstrated that there are no suitable, available, and viable town centre or edge-of-centre sites for the proposed retail use. Princess House meets all operational and locational needs without the deficiencies found in alternative sites. The proposal therefore complies with the NPPF, PPG, and Rochdale's Local Plan, and should be supported accordingly.

Appendices

Appendix A – Town Centre and PSA Boundary Map.

Appendix B – Aerial Photograph of Town Centre & Princess House.

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