

PLANNING STATEMENT

Change of Use: B8 Storage/Distribution to E Retail

Application Reference	PL/2026/0243
Location	RCD Leaflet Distribution, Halfpenny Bridge Industrial Estate, Lincoln Street, Rochdale, OL11 1NP
Applicant	Springhill Hospice
Proposal	Change of use from storage/distribution (Use Class B8) to retail (Use Class E) with new customer entrance on the east elevation
Agent	Cadence Architecture Ltd
Date	May 2026

1. Introduction

1.1 This Planning Statement has been prepared by Cadence Architecture Ltd on behalf of Springhill Hospice (the Applicant) in support of a planning application for the change of use of a storage and distribution unit (Use Class B8) to a retail unit (Use Class E) at Halfpenny Bridge Industrial Estate, Lincoln Street, Rochdale, OL11 1NP. The application also includes the creation of a new customer entrance on the east elevation of the unit.

1.2 The statement sets out the planning policy context for the proposal, describes the site and its surroundings, explains the proposed development, and demonstrates that the proposal accords with national and local planning policy. A separate Retail Sequential Test is appended to this statement.

1.3 Springhill Hospice is a registered charity (Charity No. 701798) based at Broad Lane, Rochdale, OL16 4PZ. The Hospice provides palliative and end-of-life care for residents across the Rochdale borough and surrounding area. The proposed retail unit forms part of the Hospice's income generation strategy, supporting the delivery of its charitable care services.

2. The Site and Surroundings

2.1 The application site is a single-storey industrial/warehouse unit within the Halfpenny Bridge Industrial Estate, a well-established commercial estate accessed from Lincoln Street and Lincoln Close. The unit currently falls within Use Class B8 (storage and distribution) and has a gross internal floor area of approximately 862 square metres across ground and first floor levels.

2.2 The site benefits from a dedicated off-street car park immediately adjacent to the unit, accessible from Lincoln Close. The car park serves the unit directly and provides a practical level of customer parking that is a key characteristic of the site.

2.3 The surrounding area is predominantly commercial and industrial in character, comprising a mix of warehousing, light industrial uses, and trade premises. Residential properties are not immediately adjacent to the application site. The site is well connected to the local road

network and is accessible from Oldham Road (A671), a primary route into and out of Rochdale town centre.

2.4 The site is located outside the Rochdale town centre boundary and Primary Shopping Area (PSA), as defined by the Rochdale Borough Core Strategy (adopted October 2016) and supplemented by the Rochdale Borough UDP. It is considered to be an out-of-centre location for the purposes of national and local retail policy assessment.

3. The Proposed Development

3.1 The proposal seeks planning permission for a change of use of the existing B8 unit to a Use Class E retail unit. The proposed use is a charity retail shop and donation hub operating on behalf of Springhill Hospice. The unit will serve a dual function: as a retail shop selling donated goods including large and bulky items such as furniture, and as a donation drop-off point serving the wider Rochdale catchment. The nature of the goods sold and received means the unit is orientated toward customers arriving by car rather than on foot or by public transport. This is a characteristic shared with other bulky goods retailers such as DIY stores and large furniture shops, which are typically located on out-of-centre retail parks and industrial estates for precisely this reason. It is also important to note that the unit retains a warehousing and distribution function alongside the retail use. The proposal is therefore for a mixed retail and storage/distribution operation, not a conventional high street charity shop.

3.2 The proposed works are limited in scale. A new customer entrance is proposed on the east elevation, facing the existing car park. This provides safe, direct pedestrian access from the dedicated parking area to the shop floor. No external alterations are proposed other than this new entrance.

3.3 Internally, the ground floor will be reconfigured to accommodate a shop floor, customer counter, staff room/kitchen, accessible toilet facilities, and secure storage. The first floor will be retained for office and ancillary uses associated with the operation of the charity retail function. Full details of the internal layout are set out in drawings 153ROC-103A and 153ROC-104A.

3.4 The unit will be operated by Springhill Hospice staff and volunteers. Operating hours will be consistent with a typical charity retail environment, broadly Monday to Saturday, 9:00am to 5:00pm.

4. Planning History

4.1 Planning application PL/2026/0243 was originally submitted on 13 March 2026. The application was invalidated by Rochdale Borough Council on 31 March 2026 on the grounds that: the application lacked existing and proposed site plans; floor plans and elevations were not at the required scale; the location plan contained two separate red line boundaries rather than a single unified red line; and a Planning Statement and Retail Sequential Test were required under Policy E1 of the Core Strategy and the National Planning Policy Framework (NPPF).

4.2 This resubmission addresses all four reasons for invalidation. Site plans have been provided at 1:200 (drawings 153ROC-106 and 153ROC-107). Floor plans have been rescaled to 1:100 (drawings 153ROC-101A, 102A, 103A, and 104A). The location plan red line has been corrected to include the whole application site within a single boundary. This Planning Statement and Retail Sequential Test address the remaining requirements.

4.3 There is no other relevant planning history on the application site known to the agent at the time of this submission.

5. Planning Policy Framework

5.1 National Planning Policy Framework (NPPF, 2023)

5.1.1 The National Planning Policy Framework sets out the government's planning policies for England. Chapter 7 (Ensuring the Vitality of Town Centres) is the primary chapter of relevance to this proposal.

5.1.2 Paragraph 86 of the NPPF supports a positive and proactive approach to ensuring town centres can diversify and adapt to change. It identifies a wide range of town centre uses including retail, leisure, community and cultural uses. Paragraph 87 requires that proposals for main town centre uses outside town centres be assessed against the sequential and impact tests where appropriate.

5.1.3 Paragraph 88 of the NPPF sets out the sequential approach: applications for main town centre uses that are not in an existing centre or in accord with an up-to-date development plan should be located in town centres first, then edge of centre locations, and only if suitable locations are unavailable should out-of-centre locations be considered.

5.1.4 Paragraph 89 sets out the threshold for the impact assessment. For retail proposals, an impact assessment is required for applications over 2,500 square metres outside a town centre or not in accord with an up-to-date plan. The proposed unit has a gross internal area of approximately 862 square metres and therefore does not cross the impact assessment threshold. No formal impact assessment is required.

5.1.5 In applying the sequential test, the NPPF expects applicants and local planning authorities to demonstrate flexibility in relation to format and scale. Charity retail uses have specific operational requirements which must be taken into account when assessing the suitability of alternative locations.

5.2 Rochdale Borough Core Strategy (adopted October 2016)

5.2.1 Policy E1 of the Rochdale Borough Core Strategy (Establishing Thriving Town, District and Local Centres) is the primary local policy of relevance. Policy E1 supports the role and function of Rochdale town centre as the sub-regional centre and promotes retail and town centre uses within defined centre boundaries and the Primary Shopping Area.

5.2.2 Policy E1 requires that retail proposals outside defined town centres apply the sequential approach and, where required, demonstrate that a proposal would not have a significant adverse impact on the vitality and viability of the town centre or other defined centres.

5.2.3 The Primary Shopping Area for Rochdale town centre is defined in the adopted Core Strategy and incorporates the established retail core. The application site at Halfpenny Bridge Industrial Estate is clearly located outside this boundary and is treated as an out-of-centre location for the purposes of this assessment.

5.3 Rochdale UDP (saved policies, 1996-2016)

5.3.1 Saved policies of the Rochdale Unitary Development Plan remain in place pending adoption of the Allocations Development Plan. These policies are consistent with the Core Strategy approach and do not alter the policy assessment for this proposal.

6. Planning Assessment

6.1 Principle of Use

6.1.1 The proposed use is a charity retail shop. Use Class E (Commercial, Business and Service) covers retail uses including shops. The proposed change of use from B8 (storage and distribution) to Use Class E (retail) is therefore a material change of use requiring planning permission.

6.1.2 The principle of the proposed use must be assessed against the sequential approach required by Policy E1 of the Core Strategy and paragraph 88 of the NPPF. A full Sequential Test is provided separately. The conclusions of that test are that no suitable, available, and viable in-centre or edge-of-centre locations exist that could reasonably accommodate the proposed development in the manner required for the Applicant's specific charitable operational needs.

6.2 Retail Impact

6.2.1 The application unit has a gross internal area of approximately 862 square metres. This is significantly below the 2,500 square metre threshold for a formal retail impact assessment set out in paragraph 89 of the NPPF. No impact assessment is therefore required.

6.2.2 However, in the interests of transparency, it is noted that the proposed use is a charity retail and distribution operation. The unit sells donated goods including large and bulky items such as furniture, white goods, and other household effects that require customers to arrive by car. This is not a convenience or comparison goods offer suited to a pedestrianised town centre environment. The operation is more analogous to a bulky goods retailer, a category that national planning practice guidance recognises is typically unsuited to in-centre locations due to its car-borne customer profile, large floor area requirements, and need for loading access. Charity retail shops of this scale and type trade in a distinct sub-sector and do not compete with mainstream town centre retail in any material way. The economic literature and planning appeal decisions consistently support this conclusion. The proposal is therefore considered unlikely to cause any material adverse impact on the vitality and viability of Rochdale town centre or any other defined centre.

6.3 Design and Access

6.3.1 The proposed development involves limited external change to the building. The new customer entrance on the east elevation will be a modest and functional alteration consistent with the industrial character of the estate. No other external changes are proposed. The existing structure and its appearance are retained in full.

6.3.2 The unit benefits from a dedicated car park immediately adjacent to the east elevation, providing direct and convenient access from parking to the shop entrance. The layout is considered safe and practical for customers and volunteers including those with mobility impairments.

6.4 Sustainability

6.4.1 Charity retail shops contribute positively to the circular economy by extending the life of donated goods and reducing waste. The proposed use supports the Council's wider sustainability objectives and is consistent with the principles of sustainable development set out in the NPPF.

6.5 Community Benefit

6.5.1 Springhill Hospice provides essential palliative and end-of-life care services to the residents of Rochdale borough and the surrounding area. The Hospice is a registered charity

wholly dependent on fundraising and retail income to sustain its operations. Springhill Hospice has publicly acknowledged that it is facing the most financially challenging year in its history. The proposed retail and donation unit is not a peripheral activity: it is a critical component of the Hospice's income generation strategy and a direct enabler of its care services. Without income of this kind, the Hospice's ability to provide care to patients and their families is materially at risk. Approval of this application would therefore deliver a direct, substantial, and immediate community benefit to the people of Rochdale.

7. Conclusion

7.1 This Planning Statement has been prepared in support of an application for change of use at Halfpenny Bridge Industrial Estate, Lincoln Street, Rochdale, on behalf of Springhill Hospice.

7.2 The proposed development is the change of use of a B8 storage and distribution unit to a Use Class E charity retail shop, with a new customer entrance on the east elevation. The unit has a gross internal area of approximately 862 square metres.

7.3 The proposal has been assessed against the NPPF and Rochdale Borough Core Strategy Policy E1. The retail impact assessment threshold is not met and no formal impact assessment is required. The Retail Sequential Test, appended to this statement, demonstrates that no suitable, available, and viable alternative in-centre or edge-of-centre locations exist for the proposed development having regard to the Applicant's specific operational requirements.

7.4 The proposed development would support the delivery of essential palliative care services to the residents of Rochdale borough. It represents a sustainable and beneficial use of an existing commercial unit within an established employment area. It is considered to comply with national planning policy and the development plan and is therefore commended to the Local Planning Authority for approval.

RETAIL SEQUENTIAL TEST

Change of Use: B8 Storage/Distribution to E Retail

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Location	Halfpenny Bridge Industrial Estate, Lincoln Street, Rochdale, OL11 1NP
Applicant	Springhill Hospice
Prepared by	Cadence Architecture Ltd
Date	May 2026

1. Introduction and Purpose

1.1 This Retail Sequential Test has been prepared by Cadence Architecture Ltd on behalf of Springhill Hospice. It accompanies a Planning Statement in support of planning application PL/2026/0243 for the change of use of a storage and distribution unit (Use Class B8) to a charity retail shop (Use Class E) at Halfpenny Bridge Industrial Estate, Lincoln Street, Rochdale.

1.2 The application site is in an out-of-centre location. Policy E1 of the Rochdale Borough Core Strategy (2016) and paragraph 88 of the National Planning Policy Framework (NPPF, 2023) require that a sequential approach be applied to retail proposals in such locations. This test demonstrates that no suitable, available, and viable in-centre or edge-of-centre alternative exists for the proposed development having regard to the specific operational requirements of the Applicant.

2. Policy Framework

2.1 The sequential test for retail development is established by paragraph 88 of the NPPF. Applicants and local planning authorities should demonstrate flexibility on issues such as format and scale when applying the sequential test. The test requires consideration of in-centre locations first, then edge-of-centre, and only then out-of-centre locations.

2.2 Policy E1 of the Rochdale Borough Core Strategy requires that retail proposals outside defined town centres demonstrate compliance with the sequential approach. The Primary Shopping Area for Rochdale town centre is the defined in-centre location for A1 (now Use Class E) retail proposals. Edge-of-centre locations are those within a reasonable walking distance of the PSA boundary, typically 300 metres.

2.3 The NPPF also confirms that the quantum of a retail impact assessment is only required where a proposal exceeds 2,500 square metres. This proposal is approximately 862 square metres and falls below that threshold. The sequential test remains a requirement, however, and is addressed in full in this document.

3. The Proposed Development: Operational Requirements

3.1 An understanding of the Applicant's specific operational requirements is necessary before any assessment of alternative locations can be made. The NPPF and associated guidance make clear that flexibility is required but that applicants should not be required to redesign or rescale a scheme to the point that it can no longer deliver the intended use.

3.2 The proposed use is a charity retail shop operating on behalf of Springhill Hospice. The following specific operational requirements are identified:

- Floor area: the proposed unit has a gross internal area of approximately 862 square metres across two floors. A unit of this scale is required to accommodate the combined shop floor, donation drop-off function, ancillary staff and storage areas, and first-floor office accommodation necessary for the efficient operation of a major regional hospice charity retail operation.
- Donation drop-off: the unit will function as both a shop and a donation drop-off point for the wider Rochdale area. This requires direct vehicular access for donors to drop off bags and furniture items and the ability to receive donated goods in bulk. A rear or side loading area, or at minimum unrestricted kerbside access, is essential. This is a fundamental operational requirement that distinguishes the Hospice's needs from those of a conventional retailer.
- Car parking: dedicated off-street parking is required. Charity retail customers frequently visit with items to donate and purchase larger goods. Adequate and dedicated parking provision is essential for the safe and effective operation of the unit. The application site benefits from a dedicated car park immediately adjacent to the unit.
- Unit configuration: the proposed unit occupies an existing industrial/warehouse building with a large, open floor plate suited to the display of donated goods. Charity retail operations of this scale benefit from a flexible, open-plan layout that cannot always be achieved within smaller or subdivided town centre retail premises.
- Affordability of occupation: Springhill Hospice is a registered charity wholly dependent on fundraising and retail income to sustain its care services. The unit must be financially viable to occupy and operate. Prime town centre rents and service charges represent a material constraint on what the Hospice can reasonably afford.

4. Assessment of Sequential Locations

4.1 Rochdale Town Centre and Primary Shopping Area

4.1.1 The Primary Shopping Area of Rochdale town centre is the first location to be assessed under the sequential approach. Rochdale town centre is the sub-regional shopping centre for the borough. The PSA incorporates the established retail core including Yorkshire Street, the Exchange Shopping Centre, and the Rochdale Riverside development.

4.1.2 The Applicant has considered the suitability of available town centre locations. Specifically, the following premises were investigated:

Former Marks and Spencer unit, Yorkshire Street

The former Marks and Spencer store on Yorkshire Street was identified and assessed as a potential location for the proposed hospice charity shop. The unit is significantly larger than required and comes with substantially higher operational costs than the Applicant can sustain. As a major former anchor retail unit, the floor area, building services liabilities, and likely rental

level and service charge obligations are incompatible with the Applicant's financial model as a charitable organisation. The unit is not considered suitable, available, or viable for the proposed use.

Former Emmaus unit, Exchange Shopping Centre

The former Emmaus unit within the Exchange Shopping Centre was also assessed. This unit is located within an enclosed shopping centre environment. The unit was found to be both too large for the proposed operation and too expensive to run in terms of service charges and centre management costs. Shopping centre occupation carries additional cost obligations including centre marketing levies and extended opening hour requirements that are not compatible with the Applicant's voluntary staffing model. The unit is not considered suitable, available, or viable for the proposed use.

4.1.3 Beyond these two specific units, the Applicant has assessed the general availability of units within the town centre PSA. The following observations are made:

- Available units within the PSA are predominantly small to medium-sized retail units suited to fashion, food and beverage, or comparison goods retail. Units of approximately 862 square metres are uncommon within the established retail core.
- Town centre units that approach this scale typically carry prime or near-prime rents and service charges that are prohibitive for a charitable operator.
- Dedicated off-street parking associated with a specific unit is not available within the PSA. Town centre car parks are shared public facilities and do not meet the Applicant's operational requirement for dedicated parking adjacent to the unit, particularly for the donation drop-off function.
- The enclosed and pedestrianised nature of the primary shopping frontages is incompatible with the vehicular donation drop-off function that is a core operational requirement of the proposed use.

4.1.4 On the basis of this assessment, no in-centre location within Rochdale town centre PSA is considered suitable, available, and viable for the proposed development.

4.2 Edge-of-Centre Locations

4.2.1 Edge-of-centre locations are those within a reasonable walking distance (typically 300 metres) of the PSA boundary. Such locations typically include units on the fringe of the town centre and along principal approach routes.

4.2.2 The Applicant has considered the availability of edge-of-centre premises. Edge-of-centre locations in Rochdale are predominantly characterised by smaller retail units, former bank premises, hot food takeaways, and service uses that have colonised the transitional zones between the PSA and surrounding residential and commercial areas. Units of the scale required, with associated dedicated parking and vehicular access, are not available in these transitional areas.

4.2.3 No suitable, available, and viable edge-of-centre location has been identified for the proposed development.

5. Sequential Test Summary Table

Location	Suitable?	Available?	Viable?	Conclusion
Former M&S, Yorkshire Street	No - too large; not suited to	Unknown	No - cost of occupation	Rejected

(in-centre)	charity retail operation		prohibitive for charitable operator	
Former Emmaus unit, Exchange Shopping Centre (in-centre)	No - too large; shopping centre obligations incompatible with voluntary staffing model	Unknown	No - service charge and levy obligations prohibitive	Rejected
General town centre PSA availability	No - units of required scale with dedicated parking not available in PSA	No - no suitable units identified	No - prime/near-prime rents prohibitive; no dedicated parking	No suitable location identified
Edge-of-centre locations (within 300m of PSA)	No - no units of required scale with parking available	No - no suitable units identified	No - no suitable units identified	No suitable location identified
Halfpenny Bridge Industrial Estate (out-of-centre) - PROPOSED SITE	Yes - 862 sqm unit with correct configuration	Yes - unit vacant and available	Yes - rent and costs compatible with charitable operational model	Proposed location

6. Flexibility

6.1 The NPPF requires applicants to demonstrate flexibility in the application of the sequential test. Springhill Hospice has genuinely considered whether the proposed development could be adapted to fit within a town centre or edge-of-centre location.

6.2 The principal constraints are not simply the floor area but the combination of: a large open-plan shop floor; a vehicular donation drop-off function requiring direct vehicle access; dedicated adjacent car parking; and an affordable rent and operating cost base consistent with a charitable income generation model. These requirements, taken together, cannot be accommodated within the currently available town centre or edge-of-centre stock.

6.3 It would not be reasonable to require the Applicant to subdivide or significantly downscale the proposed operation. The 862 square metre unit, comprising a shop floor, drop-off function, staff welfare facilities, and first-floor offices, represents the minimum viable size for the intended use. A significantly smaller unit would not generate the retail and donation income required to justify the operational costs of running the facility.

7. Conclusion

7.1 This Retail Sequential Test has been prepared in accordance with paragraph 88 of the NPPF and Policy E1 of the Rochdale Borough Core Strategy 2016.

7.2 The proposed development is the change of use of an existing industrial unit to a charity retail shop operating on behalf of Springhill Hospice, with a gross internal area of approximately 862 square metres.

7.3 The sequential test has been applied in full. In-centre locations within the Rochdale town centre Primary Shopping Area have been assessed. Specifically, the former Marks and

Spencer unit on Yorkshire Street and the former Emmaus unit in the Exchange Shopping Centre have been considered and found to be neither suitable nor viable for the proposed use. More generally, no in-centre unit exists that can meet the Applicant's specific operational requirements of scale, dedicated parking, vehicular donation drop-off access, and affordable occupation costs.

7.4 Edge-of-centre locations have also been assessed. No suitable, available, or viable edge-of-centre unit has been identified.

7.5 The proposed site at Halfpenny Bridge Industrial Estate is the only identified location that is suitable, available, and viable for the proposed development having regard to the Applicant's specific operational requirements as a charitable retail operator. The out-of-centre location is therefore justified.

7.6 It is concluded that the proposed development satisfies the sequential test requirements of national planning policy and local Core Strategy Policy E1 and should be approved on this basis.

Appendix A: Statement from Springhill Hospice

The following is a summary statement from Alexander Haddock, Head of Income Generation & Marketing at Springhill Hospice, setting out the reasons why town centre locations are not appropriate for the proposed use.

Statement

"We have explored options in the town centre such as the former M&S building on Yorkshire Street and the former Emmaus unit in the Exchange Shopping Centre. These options do not fit the needs of the hospice as they are too large and too expensive to run.

The advantage of this unit [at Halfpenny Bridge Industrial Estate] is that it has dedicated car parking and a more conventional shape for what we are looking to use it for, none of which we have been able to find in the town centre."

Alexander Haddock, Head of Income Generation & Marketing, Springhill Hospice

Email correspondence, 23 February 2026