



JAMES CAMPBELL ASSOCIATES LTD

CHARTERED ARCHITECTURAL SERVICES



**Campbell House
173 Rochdale Road
Firgrove
Rochdale
OL16 3BN**

Tel: 01706 354888

Mob: 07817 623183

Email: admin@jamescampbellassociates.co.uk

Web: www.jamescampbellassociates.co.uk

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SEQUENTIAL TEST ASSESSMENT

Proposed Change of Use of Existing Industrial Unit (Class B2) to Gymnasium, Health, Fitness and Community Facility

Site: 3a / 3b Stockton Street, Littleborough, Rochdale

Applicant: Life Without Limits / LWL Gym

Local Planning Authority: Rochdale Borough Council

1. Introduction

This Sequential Test Assessment has been prepared in support of the planning application for the change of use of an existing industrial unit on Stockton Street, Littleborough, to a gymnasium falling within Use Class E(d).

The proposal involves the occupation and adaptation of an existing industrial building with a total internal floor area of approximately 1,200 square metres, including an existing internal mezzanine floor.

The proposed gymnasium would be operated by LWL Gym / Life Without Limits, an established local fitness and wellbeing business which is experiencing continued growth in membership and services. The existing premises are becoming unsuitable for the sustained growth of the business, and the proposed Stockton Street unit provides an opportunity to relocate the operation to a significantly larger and more appropriate building whilst remaining within its established local catchment.

The purpose of this assessment is to demonstrate that the application site represents an appropriate and suitable location for the proposed main town centre leisure use and that there are no sequentially preferable sites which are available, suitable and capable of accommodating the particular operational requirements of the proposed gym.

Importantly, the sequential assessment has not been undertaken on the basis that any premises of approximately 1,200 square metres would automatically constitute a suitable alternative. The assessment considers the suitability, availability and deliverability of alternative premises having regard to the actual requirements of the proposed use.

2. Policy Context

2.1 National Planning Policy Framework

The National Planning Policy Framework (NPPF) requires main town centre uses proposed outside existing centres to follow a sequential approach.

NPPF Policy TC3 states that main town centre uses should be located in town centres, followed by edge-of-centre locations, and only where suitable sites are unavailable should out-of-centre locations be considered.

The policy also requires applicants and local planning authorities to demonstrate appropriate flexibility on matters of format and scale when considering alternative sites. The sequential test is therefore not simply a test of whether another building exists. It requires consideration of whether there is a suitable and available site which could reasonably accommodate the proposed development.

The Government's planning practice guidance similarly confirms that the sequential test should consider the suitability and availability of alternative sites, together with appropriate flexibility regarding format and scale.

2.2 Rochdale Borough Local Planning Policy

The Council's emerging Rochdale Borough Local Plan 2025–2039 contains Draft Policy PR5 – Out of Centre Retail and Leisure Uses.

Draft Policy PR5 states that main town centre uses should be located within existing centres, followed by edge-of-centre locations, and only where suitable sites are unavailable, or are not expected to become available within a reasonable period, should out-of-centre locations be considered. The policy expressly states that proposals should take a flexible approach to scale and format when undertaking the assessment.

The emerging policy is particularly relevant to this application because it identifies a local impact assessment threshold of 500 m² gross for Littleborough and District/Local Centres, with the threshold applying to new floorspace including mezzanines, extensions and changes of use.

The application is therefore accompanied by this Sequential Test Assessment in order to demonstrate that the proposed out-of-centre location is justified by the particular requirements of the proposed use.

3. Nature and Requirements of the Proposed Development

The proposed gymnasium would occupy approximately 1,200 m² of internal floorspace, including an existing mezzanine. The building therefore provides a substantial amount of usable internal accommodation within a single established building.

The specific operational requirements of the proposed gym include:

1. Approximately 1,200m² of usable internal accommodation (current gym approx. 750 m²);
2. A sufficiently large and open internal floorplate capable zoning and accommodating gym equipment and exercise areas;
3. Appropriate ceiling height and internal configuration;
4. Safe and convenient customer and staff access;
5. Appropriate servicing arrangements;
6. Sufficient dedicated on-site parking;
7. Sufficient space to accommodate the existing operation while allowing for future growth;
8. A location capable of continuing to serve the established local membership catchment.

The proposal therefore represents a large-format leisure use which has particular spatial and operational requirements. A conventional town-centre retail unit of a similar gross floor area would not necessarily provide an equivalent or suitable alternative because the proposed use requires a combination of internal volume, open floor space, access, parking and ancillary accommodation.

4. Existing Business and Need for the Proposed Premises

LWL Gym / Life Without Limits is an established local business which has experienced continued growth in membership and the range of services offered.

The business currently operates from premises which are becoming increasingly constrained as membership and services expand.

The proposed Stockton Street premises would provide the additional accommodation required to allow the business to continue expanding within Littleborough rather than requiring the operator to relocate away from its established customer base, a key consideration for this assessment.

The objective is not simply to identify a building which could physically accommodate gym equipment; the premises must provide a realistic opportunity for the existing business to relocate and continue operating successfully, whilst accommodating its existing membership base and anticipated future growth.

The proposed building is particularly well suited to this purpose because it is an existing building close to the current premises and provides a substantial internal floor area, existing mezzanine, established access arrangements and 36 on-site parking spaces.

5. Operational Requirements for Alternative Sites

For the purposes of the sequential assessment, alternative premises have been considered against the following criteria.

5.1 Floor area

The proposed premises provide approximately 1,200 m² of total internal accommodation. An alternative premises would therefore need to provide sufficient usable floorspace to accommodate the proposed gym operation without resulting in an unacceptable reduction in the scale or functionality of the facility.

5.2 Internal configuration

Floor area alone is not sufficient, the proposed gym requires a substantial open internal area capable of accommodating exercise and gym equipment, circulation areas and ancillary facilities such as reception and changing rooms.

The existing mezzanine is also an important feature of the application building, providing additional accommodation without requiring an equivalent increase in the overall building footprint.

5.3 Parking

The application site provides 36 dedicated on-site parking spaces. This is a significant operational advantage and is particularly important for a gymnasium, where customer arrival and departure occurs throughout the day and evening rather than being concentrated around a conventional office working period. The current premises provide very little parking for members.

Alternative premises would therefore need to provide an appropriate level of parking.

5.4 Access and servicing

The proposed site benefits from established, substantial vehicular access associated with its existing industrial use. The building is therefore already configured to accommodate vehicle movements associated with a substantial commercial operation.

An alternative site would need to provide safe and practical customer, staff and servicing access appropriate to the scale of the proposed gym.

5.5 Location and catchment

The proposed development is deliberately retained within Littleborough. The majority of the existing LWL membership catchment is understood to be largely concentrated within Littleborough, Wardle and Smithybridge.

Relocating the business significantly further away would therefore risk disconnecting the facility from its established customer base. The application site allows LWL to expand while continuing to serve the community from which its membership has developed.

5.6 Future growth

The premises need to accommodate not only the current operation but also foreseeable future growth. The applicant is seeking premises capable of providing a sustainable long-term base for the business rather than a short-term solution which would quickly become inadequate. This is particularly relevant given the continued growth in membership and services.

6. Evidence of the Availability of Larger Premises

A search of currently marketed commercial premises within Littleborough demonstrates that there are a number of larger industrial-format buildings available. This is acknowledged within the assessment rather than suggesting that no large premises exist.

For example, current commercial listings include:

Property	Approx. area	
Units 4 & 5, Littleborough Industrial Estate, Stockton Street	15,047 sq ft / 1,398 m ²	Large industrial accommodation with yard and loading
Units 6 & 7, Littleborough Industrial Estate, Stockton Street	15,952 sq ft / 1,482 m ²	Large industrial accommodation with yard and parking
Stockton Street warehouse	20,000 sq ft / 1,858 m ²	Large refurbished warehouse with yard and loading
Henderson Street, Littleborough	6,129 sq ft / 569 m ²	Substantially below the required scale

These properties are currently being marketed as industrial/light industrial or warehouse premises rather than established leisure premises. The current listings confirm the existence of larger industrial accommodation within Littleborough but do not, in themselves, establish that those premises represent sequentially preferable locations for the proposed gym.

The sequential test requires an assessment of whether an alternative is suitable and available for the proposed development, rather than whether a building of a broadly comparable size can be found.

7. Assessment of Currently Available Larger Premises

7.1 Units 4 & 5, Littleborough Industrial Estate, Stockton Street

Units 4 & 5 are currently marketed at approximately 15,047 sq ft (1,398 m²).

The property comprises refurbished steel portal-frame industrial accommodation with concrete flooring, WC facilities, office accommodation and loading access. The premises also benefit from external yard space and parking. The premises are therefore of sufficient overall scale to warrant consideration.

However, they are an industrial-format property rather than a purpose-designed leisure facility. Their suitability would depend upon whether the internal configuration, parking provision, access and ancillary accommodation could accommodate the proposed gym operation without unacceptable alteration or reliance on surrounding highway parking.

Again, this property is located within the same established industrial area and therefore does not represent evidence that a town-centre or edge-of-centre alternative is available.

7.2 Units 6 & 7, Littleborough Industrial Estate, Stockton Street

Units 6 & 7 are currently marketed at approximately 15,952 sq ft (1,482 m²).

The premises comprise steel portal-frame accommodation with WC facilities, office accommodation, roller-shutter access and a secure external yard incorporating parking and operational space. The property is therefore sufficiently large to warrant consideration within the sequential assessment.

However, as with the other industrial premises identified, the key issue is whether the accommodation represents a genuinely suitable and deliverable alternative for LWL. The property is marketed as industrial accommodation and would require consideration of its internal configuration, parking capacity, customer access and ability to provide the proposed gym and ancillary facilities.

Its location within the same industrial estate also demonstrates that the proposed use is seeking to remain within an established and accessible commercial area of Littleborough rather than seeking an out-of-centre location remote from the settlement.

7.3 Stockton Street – 20,000 sq ft Warehouse

A further property currently marketed on Stockton Street provides approximately 20,000 sq ft (1,858 m²).

The property is described as a refurbished distribution warehouse with level-access loading, integral offices, a secure yard and a new roof. Although the property provides significantly more floorspace than required, its availability demonstrates that large-format commercial accommodation is available within Littleborough.

However, its significantly larger scale does not make it inherently more suitable. A sequentially preferable site should be capable of accommodating the proposed development in a realistic and proportionate manner. A substantially larger distribution warehouse may introduce unnecessary floorspace, additional operational costs and a building configuration which is less suited to the specific requirements of the proposed gym.

8. Town Centre and Edge-of-Centre Premises

The search has also considered the principle of locating the proposed gym within or closer to Littleborough town centre.

The sequential approach gives priority to town-centre and edge-of-centre locations. However, this does not mean that an applicant must select a town-centre property regardless of whether that property can accommodate the actual development. The application is for a 1,200 m² gymnasium with 36 dedicated parking spaces, together with a substantial open internal floorplate, mezzanine accommodation, ancillary facilities and sufficient access for a growing membership. This is materially different from the requirements of many conventional town-centre occupiers which typically cannot provide the required site specification.

The availability of a smaller shop, office, retail or commercial unit within Littleborough town centre would therefore not constitute a suitable alternative merely because it is geographically closer to the centre.

9. The Importance of Parking to the Sequential Assessment

Parking is a particularly important consideration in this case. The proposed development provides 36 on-site spaces.

The parking provision is incorporated within the existing commercial site and avoids the need for members to rely upon unrestricted on-street parking or third-party town-centre car parks.

A town-centre alternative would need to demonstrate that equivalent parking demand could be accommodated without creating unacceptable pressure on public parking facilities or surrounding streets.

This is not an attempt to impose an inflexible requirement that an alternative must replicate the precise 33-space arrangement; rather, parking forms part of the overall suitability assessment, alongside floorspace, configuration, access and location.

10. Sustainable Location and Local Catchment

The application site is located within an established industrial/commercial area of Littleborough and is approximately 500m from the town centre and Littleborough railway station. The site is therefore not an isolated or remote out-of-centre location.

The proposed development would make productive use of an existing, underused commercial building within the established settlement and would allow an existing local business to expand without relocating its operation away from its established customer base.

The majority of existing members are drawn from Littleborough, Wardle and Smithybridge, meaning that retaining the gym within this area is important to the continued accessibility of the facility to its existing users.

The proposal therefore represents an expansion of an existing local service within the same community rather than the introduction of an entirely new leisure destination intended to draw customers from a much wider area.

11. Flexibility and the Sequential Test

The applicant has approached the sequential assessment with an appropriate degree of flexibility.

The applicant is not seeking a property of precisely 1,200 m² and is not suggesting that only a building identical to the application premises could be suitable. The property search demonstrates that premises somewhat larger than the application building could potentially accommodate the proposed use.

However, flexibility does not require the applicant to disregard the fundamental operational requirements of the development. The sequential test must still identify a site which is genuinely capable of accommodating the proposed business in a practical and commercially realistic manner.

12. Sequential Assessment Summary

The sequential assessment can therefore be summarised as follows:

Sequential consideration	Assessment
Town-centre site	No identified town-centre property has been established as capable of providing the combination of approximately 1,200 m ² accommodation, suitable gym configuration, parking, access and ancillary facilities required by LWL.
Edge-of-centre site	No identified alternative has been demonstrated to provide a superior combination of floorspace, configuration, parking, access and availability.
Large Littleborough premises	Larger industrial premises are available and have been considered. Their existence does not automatically establish them as suitable alternatives.
Floor area	Application site provides approximately 1,200 m ² including mezzanine.
Parking	36 dedicated on-site spaces provide substantial parking capacity.
Access	Existing commercial access and servicing arrangements are appropriate to the scale of the site.
Location	Established commercial area within Littleborough, close to the town centre and railway station.
Catchment	Retains the facility within the established Littleborough/Wardle/Smithybridge customer catchment.
Future growth	Provides a significantly larger and more sustainable long-term base for an expanding local business.
Deliverability	Existing building allows the proposal to be delivered through change of use without requiring a new-build development or significant structural intervention.

13. Proposal Precedent

In considering the suitability of the proposed use within an established industrial/commercial location, regard can also be had to a number of recent planning decisions involving the conversion of industrial or other large-format commercial buildings to gymnasium and indoor leisure uses.

Whilst each planning application must be determined on its individual merits, these decisions demonstrate that Class E(d) indoor sport, recreation and fitness uses can be compatible with industrial estates and large-format commercial premises, subject to appropriate consideration of matters such as the sequential approach, highways, parking, amenity and the effect upon the supply of employment accommodation.

Mitchell Hey Mills, College Road, Rochdale – Application 25/00447/FUL

Of particular relevance is planning application **25/00447/FUL at Mitchell Hey Mills, College Road, Rochdale, OL12 6AE. Planning permission was granted by Rochdale Council on 27 October 2025 for the:

- Change of use of an existing building from Class B2 (General Industrial) to Class E(d) (Indoor Sport and Recreation) to facilitate a padel sports facility comprising nine indoor courts, changing facilities and reception accommodation, together with associated alterations.

The application was approved with conditions. The approved proposal therefore involved the direct loss of an existing Class B2 industrial building and its conversion to an indoor leisure use falling within the same Class E(d) category as the current gym proposal.

This represents a particularly relevant recent decision within the Rochdale Borough. The development involved a substantial indoor recreation facility occupying a building formerly used for general industrial purposes and demonstrates that the Council has recently accepted, in principle, that a large-format Class E(d) leisure facility can represent an appropriate reuse of existing industrial accommodation where the detailed planning considerations are satisfactorily addressed.

The decision is relevant to the current proposal because the Stockton Street application similarly seeks the reuse of an existing B2 industrial building for a Class E(d) indoor sport and fitness use, rather than the construction of a new leisure building on undeveloped land.

Former Pentagon Eagle Technology Park, Queensway, Rochdale – Application 25/00742/FUL

A second particularly relevant Rochdale decision is application 25/00742/FUL at the Former Pentagon Eagle Technology Park, Queensway, Rochdale, OL11 1TQ.

The application sought the:

- Change of use from a car dealership to a gym (Class E(d)), together with associated alterations and reconfiguration of the car park.

The application was subsequently granted planning permission in November 2025.

Although the former use was a car dealership rather than B2 industrial use, the site formed part of a large-format commercial/employment environment and the proposal involved the introduction of a gymnasium use into premises of a form and character more comparable with employment/commercial accommodation than a conventional town-centre leisure unit.

This decision is particularly useful because it relates specifically to a gymnasium falling within Class E(d) on a site that is out of centre and was approved by RMBC.

Taken alongside the Mitchell Hey Mills decision, this application demonstrates that Rochdale Council has recently approved Class E(d) leisure uses within substantial existing commercial and industrial-type buildings where the characteristics of the premises and site make them suitable for such use.

Unit A4, Lyntown Trading Estate, Eccles – Application PA/2025/1417

A further Greater Manchester example is Unit A4, Lyntown Trading Estate, Old Wellington Road, Eccles, where Salford City Council granted permission on 6 March 2026 under application **PA/2025/1417** for the change of use of an industrial unit to a training gym for a cheerleading club, Use Class E(d).

The approval provides another recent example within Greater Manchester of an indoor sporting and fitness operation being considered appropriate within an established trading/industrial estate.

Unit 12, City Court Trading Estate, Manchester – Application 143541/FO/2025

Manchester City Council also approved application 143541/FO/2025 at Unit 12, City Court Trading Estate, Poland Street, Manchester, on 31 October 2025*, for the change of use of the premises to a gym falling within Class E(d).

Again, this approval demonstrates the practical suitability of industrial and trading-estate accommodation for modern gym operations, particularly where large, flexible internal spaces are required.

Unit 1, Hellaby Industrial Estate, Rotherham – Application RB2026/0041

Although located outside Greater Manchester, application RB2026/0041 at Unit 1, Hellaby Industrial Estate, Rotherham provides a further recent and directly comparable decision.

Planning permission was granted conditionally on 24 March 2026 for the change of use of an existing B8 storage/warehouse building to a Class E(d) indoor leisure facility incorporating padel courts, a gym, studio, sauna/steam facilities and associated changing accommodation.

The development demonstrates the compatibility that can exist between substantial indoor recreation uses and established industrial-estate locations, particularly where the building form, accessibility and parking arrangements are appropriate.

Relevance to the Stockton Street Proposal

The above decisions demonstrate a clear pattern of recent approvals for gymnasium and indoor recreation uses occupying existing industrial, warehouse and large-format commercial buildings.

Of greatest relevance are the recent Rochdale Borough decisions at Mitchell Hey Mills and the Former Pentagon Eagle Technology Park.

There are practical reasons why this type of accommodation is particularly suited to modern fitness and leisure operations. Industrial buildings typically provide:

- Large and comparatively open internal floorplates;
- Greater floor-to-ceiling heights;
- Structural layouts capable of accommodating substantial fitness equipment;
- Opportunities for mezzanine accommodation;
- Established vehicular access;
- Dedicated parking and servicing areas; and
- Greater separation from sensitive residential uses than may be achievable within traditional town-centre premises.

These characteristics closely reflect the requirements of LWL. The application premises provide approximately 1,200 m² of internal accommodation including an existing mezzanine, together with 36 dedicated parking spaces, established access arrangements and sufficient capacity to accommodate the continued growth of the business.

The recent approvals identified above should not be interpreted as establishing an automatic entitlement to planning permission, since each proposal must be assessed against its own site-specific circumstances and the relevant development plan. Nevertheless, they provide ****materially relevant examples of local and regional planning authorities accepting the principle of Class E(d) gym and leisure uses withi****

14. Overall Conclusion

The sequential assessment has considered the actual operational requirements of the proposed LWL gym and the availability of alternative premises within Littleborough.

The proposed unit provides approximately 1,200 m² of internal floorspace, including an existing mezzanine, together with suitable access, dedicated parking and sufficient space to accommodate the continued growth of the business. While a number of larger commercial and industrial premises are available locally, no sequentially preferable site has been identified which offers a comparable combination of size, layout, access, parking and suitability for the proposed use.

The Stockton Street premises also allow LWL to remain within its established Littleborough, Wardle and Smithybridge catchment, while occupying an existing commercial building within an accessible employment area close to Littleborough town centre and railway station.

Recent approvals within Rochdale and the wider Greater Manchester area also demonstrate that Class E(d) gym and leisure uses can be acceptable within industrial and large-format commercial buildings where the site characteristics and wider planning considerations support the use. Of particular relevance is the recent approval at Mitchell Hey Mills, Rochdale, for the change of use of an existing Class B2 industrial building to a Class E(d) indoor leisure facility.

Having regard to the property search, the operational requirements of the business and the characteristics of the application site, it is considered that no suitable, available and deliverable sequentially preferable alternative has been identified. The proposed location is therefore considered appropriate for the development and consistent with the sequential approach.