

## Sequential Test Assessment

*In support of: Planning Application for Demolition of Former Whalley Motors Garage and Construction of New Office Building with associated parking and landscaping*

Former Whalley Motors Site, 18 Accrington Road, Whalley  
For Green Improve Ltd.

October 2025

Job Number: 18-188

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## Appendices

## 1.0 Introduction

- 1.1 This Sequential Test Assessment (STA) has been prepared by Maybern Planning and Development ('Maybern') on behalf of Green Improve Ltd (herein referred to as the "applicant") to support a full planning application for the demolition of the former Whalley Motors Garage building, 18 Accrington Road, Whalley, and construction of a new office building with associated parking and landscaping. The proposal is to provide an updated and accessible office and administrative space for the applicant's business, relocating such accommodation from their existing nearby premises at Carr Hall, Whalley Rd, Wilpshire and maintaining the business in the Borough.
- 1.2 A Sequential Assessment is required by the National Planning Policy Framework (NPPF) (2024). Within the NPPF, para 91 sets out the requirement for a sequential test where main town centre uses are proposed outside of a defined existing centre nor in accordance with an up-to-date plan. Where it is demonstrated that town centre locations are not present then edge of centre locations should be considered (and before consideration to out of centre sites).
- 1.3 The development site lies approximately 100m outside of the defined Main Centre Boundary (MCB1) for Whalley, as defined on the adopted Ribble Valley HED Proposals Map. As such the site is determined to be located within an edge of centre location and therefore a sequential assessment of any opportunities within the town centre of Whalley must be undertaken<sup>1</sup>.
- 1.4 This report has been produced in order to identify whether or not there are any sequentially preferable site locations throughout the Main Centre Boundary of Whalley on which development of the required form and size could be accommodated.
- 1.5 As per the assessment below, it is concluded that no in-centre (or immediately adjacent boundary) sites are present.
- 1.6 The report is laid out in the following manner:
- a summary of the proposal site and the development scheme;
  - the statutory and local planning policy context of the site and for the provision of an office use and consideration of relevant case law;
  - key parameters and methodology for this STA and;
  - assessment of potential sites.
- 1.7 A location plan of the proposal site is provided within **Appendix 1**. Further information on the proposal is provided in the Design and Access Statement and other supporting documents to the application.

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<sup>1</sup> RVBC Pre-Application feedback on the scheme with the applicant's architect has also requested such assessment.

## 2.0 The Site and Proposal

- 2.1 The 603.01sq m / 0.060301ha brownfield site is located approximately 100 metres from the Main Centre boundary of Whalley. It is located on Accrington Road, a key arterial road which runs from the A671/A59 to the centre of Whalley and joining main town centre street of King Street to the west.
- 2.2 Surrounding uses are commercial and residential. To the sites immediate west is Alta Live music and event venue and a number of retail and health and beauty units.



Figure 1: Aerial view of the approximate application site (edged red) and its wider setting

- 2.3 The site is located sustainably with regards to its surrounding public transport opportunities, with the site best served by bus stops located adjacent to the site at Sydney Avenue and to the west, and Whalley bus interchange c 220m to the north west. This allows the site to be connected to Clitheroe, Accrington, Billington, and Burnley. Whalley train station is also located c 850m to the west.
- 2.4 The proposal will redevelop the existing outdated building and provide a high-quality office building of approximately 612 sq m (over three floors – lower ground, ground and first), and reconfigure the site external areas for parking, cycle parking and landscaping and allow the applicant to relocate their office and administration functions from the business site at Carr Hall, Whalley Rd, Wilpshire. The proposal also enables scope for future planned growth of the business.

### 3.0 Planning Policy Context and Other Material Considerations

#### *Development Plan Policy*

3.1 Ribble Valley Core Strategy (adopted 2014) (CS) and the RVBC Housing and Economic Development DPD (adopted 2019) (HED) set out the relevant employment and business-related policy for the Borough. These are as follows:

- Key Statement EC1: Business and Employment Development – This statement looks to direct employment generating development toward main settlements of Clitheroe, Whalley and Longridge as the preferred location for employment growth. It is also noted that land will be made available for employment sites to support the health of the local economy and job creation. Business expansion will, ‘where appropriate’, will be considered favourably. Priority to Brownfield land to deliver employment sites and the re-use of exiting employment sites are to be favoured before alternative sites are considered. It is also referenced that proposals which result in the loss of existing employment uses to other forms of development will have to prove that there are no adverse impacts upon the local economy.
- Key Statement EC2: Development of Retail, Shops and Community Facilities and Services – for which the justification references the NPPF inclusion of offices as appropriate centre services. Development that supports the vitality of the retail and service centres of Clitheroe, Longridge and Whalley will be supported in principle.
- Policy DMB1: Supporting Business Growth and the Local Economy – This policy lays out that proposals which “*support business growth and the local economy will be supported in principle*”.

#### *The National Planning Policy Framework (December 2024)*

3.2 The NPPF was updated in 2024 and includes the overarching objectives to achieving sustainable development within economic, social and environmental elements.

- Economic objectives include building a “*strong, responsive and competitive economy*”, ensuring that adequate land of the correct types is available to support growth, productivity and innovation.
- Environmental objectives are to protect and enhance the natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change.
- Social objectives include supporting strong, vibrant and healthy communities by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations.

3.3 Para 85 of the NPPF states that “*Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development*”.

3.4 Paragraph 91 of the NPPF sets out the requirement for sequential test where main town centre uses (including offices as referenced in Annex 2 Glossary) are proposed outside of a defined existing centre. Such development should be first focused within main town centres; then edge of centre locations; and only if suitable sites are not available (or expected to become available within a reasonable period) should out of centre sites be considered.

- 3.5 Paragraph 92 goes on to set out that preference is to be given to sites which are well connected surrounding town centres (particularly if out of centre proposals are to be taken forward).

**Planning Practice Guidance (PPG)**

- 3.6 As well as the NPPF referenced above, the government has published Planning Practice Guidance on Town Centres and Retail, which provides relevant detail on why sequential assessments for town centre uses are required and why they should be applied. Relevant provisions include the following:

- *"What if future development needs cannot be accommodated in the town centre? It may not be possible to accommodate all forecast needs for main town centre uses in a town centre: there may be physical or other constraints which make it inappropriate to do so. In those circumstances, planning authorities should plan positively to identify the most appropriate alternative strategy for meeting the identified need for these main town centre uses, having regard to the sequential and impact tests. This should ensure that any proposed main town centre uses which are not in an existing town centre are in the best locations to support the vitality and vibrancy of town centres, and that no likely significant adverse impacts on existing town centres arise, as set out in paragraph 90 of the National Planning Policy Framework".* Paragraph: 005 Reference ID: 2b-005-20190722
- *"What is the sequential test? The sequential test guides main town centre uses towards town centre locations first, then, if no town centre locations are available, to edge of centre locations, and, if neither town centre locations nor edge of centre locations are available, to out of centre locations (with preference for accessible sites which are well connected to the town centre). It supports the viability and vitality of town centres by placing existing town centres foremost in both plan-making and decision-taking."* 009 Reference ID: 2b-009-20190722
- *"How should the sequential test be used in decision-making? It is for the applicant to demonstrate compliance with the sequential test (and failure to undertake a sequential assessment could in itself constitute a reason for refusing permission). Wherever possible, the local planning authority is expected to support the applicant in undertaking the sequential test, including sharing any relevant information. The application of the test will need to be proportionate and appropriate for the given proposal. Where appropriate, the potential suitability of alternative sites will need to be discussed between the developer and local planning authority at the earliest opportunity. The checklist below sets out the considerations that should be taken into account in determining whether a proposal complies with the sequential test:*
  - *with due regard to the requirement to demonstrate flexibility, has the suitability of more central sites to accommodate the proposal been considered? Where the proposal would be located in an edge of centre or out of centre location, preference should be given to accessible sites that are well connected to the town centre. It is important to set out any associated reasoning clearly.*
  - *is there scope for flexibility in the format and/or scale of the proposal? It is not necessary to demonstrate that a potential town centre or edge of centre site can accommodate precisely the scale and form of development being proposed, but rather to consider what contribution more central sites are able to make individually to accommodate the proposal.*
  - *if there are no suitable sequentially preferable locations, the sequential test is passed.*

*In line with paragraph 86 of the National Planning Policy Framework, only if suitable sites in town centre or edge of centre locations are not available (or expected to become available within a reasonable period) should out of centre sites be considered. When considering what a*

*reasonable period is for this purpose, the scale and complexity of the proposed scheme and of potentially suitable town or edge of centre sites should be taken into account.*

*Compliance with the sequential and impact tests does not guarantee that permission will be granted –all material considerations will need to be considered in reaching a decision”.*  
011 Reference ID: 2b-011-20190722

- *“How should locational requirements be considered in the sequential test? Use of the sequential test should recognise that certain main town centre uses have particular market and locational requirements which mean that they may only be accommodated in specific locations. Robust justification will need to be provided where this is the case, and land ownership does not provide such a justification.”* 012 Reference ID: 2b-012-20190722

### **Relevant Case Law – for Sequential Assessment**

3.7 Relevant case law for sequential tests must also be taken into consideration in the implementation of such a test and how planning policy should be applied. In summary, regard must be given to:

- Tesco Stores Limited (Appellants) v Dundee City Council (Respondents) (Scotland) (2012):
- Although this specific decision relates to a sequential assessment for retail use, it acts as a cornerstone judgement.
- This case specifically considered the meaning of ‘suitable’ and ‘available’ and determined that this should relate to the development proposed by the applicant who should also have due regard to a reasonable level of flexibility and realism in their proposals. This can be seen through para 27 where it states it:

*“...is upon the availability of sites which might accommodate the proposed development and the requirements of the developer...”*

It also states that:

*“... it would be an over-simplification to say that the characteristics of the proposed development, such as its scale, are necessarily definitive for the purposes of the sequential test. That statement has to be qualified to the extent that the applicant is expected to have prepared his proposals in accordance with the recommended approach: he is, for example, expected to have had regard to the circumstances of the particular town centre, to have given consideration to the scope for accommodating the development in a different form, and to have thoroughly assessed sequentially preferable locations on that footing. Provided the applicant has done so, however, the question remains, as Lord Glennie observed in Lidl UK GmbH v Scottish Ministers [2006] CSOH 165, para 14, whether an alternative site is suitable for the proposed development, not whether the proposed development can be altered or reduced so that it can be made to fit an alternative site.”*

- With regards to the above, sites which are considered within the sequential test must be suitable for the proposal yet must take on the consideration of the developer’s flexibility with regards to specific elements of the proposal. These include proposed floorspace and parking arrangements.
- Aldergate v Mansfield District Council & Anor [2016]
- This reconfirms that a sequential test is to assess the development proposal for which planning permission is sought and not; *‘.....other proposal which the planning authority might seek to substitute for it which is something less than sought by the developer’*.
- Rushden Limited v. East Northamptonshire Council (2014):

- With relation to the Tesco Stores Limited v Dundee City Council judgement summarised above, this judgement specified that:

*“In summary it [Dundee] establishes [a] 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 approach; and [b] that 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. These points although related are distinct.”*

## 4.0 Sequential Test Scoping and Methodology

- 4.1 Key variables that are required to be considered in scoping the parameters of the STA include the area of search to identify suitable/sequentially preferable sites as well as the size of sites/existing properties to be considered within the search area which could adequately accommodate the development.

### *Area of Search:*

- 4.2 With the proposal being the relocation of an existing business within the Borough and to remain in proximity to current business arrangements, the proposal site at Whalley has been progressed.
- 4.3 As the proposal site is located within an edge of defined (town) centre location, the scope of the assessment considers sites located within the Main Town Centre area of Whalley. As a further sensitivity and for robustness, any edge of centre sites abutting the immediate outer edge of the Centre Boundary have also been assessed.
- 4.4 As such an extract from the Whalley Policies Map (2019), illustrating the centre boundary and edge of centre zone is provided within **Appendix 2**.

### *Site Size:*

- 4.5 The existing garage size measures 0.061ha, and for an efficient redevelopment of the brownfield site, the whole site area is relevant to utilise.
- 4.6 This site area can also incorporate a high-quality building that incorporates space over a small number of floors for efficiency and design considerations, and to meet the business current and future requirements in terms of business space, facilities and staffing. As such, floorspace to approximately 610 sq m is required. Provision of some on-site parking, cycle parking and associated circulation and landscaping is also required.

### *Site Availability Search:*

- 4.7 To identify and locate potential alternative available sites, consideration has been given to:
- any allocations in the local plan
  - in-depth market search via:
    - o Rightmove; and Rightmove Commercial;
    - o Zoopla; and
    - o Lancashire County Council's property search engine
- 4.8 Review has also been undertaken of the sequential test based on Whalley for the retail elements of the Hybrid Planning Application for employment, retail and residential development ref: 3/2019/0545 (Land between Clitheroe Road and A59/A671 roundabout junction Barrow) undertaken in 2019. This assessment was based on a site size parameter of 0.65ha and considered in centre and edge of centre sites given that proposal was for an out of centre location. It identified 8 sites which have been re-appraised for current availability and suitability for the current proposal.
- 4.9 From this, four sites/units are now either occupied or are sited a significant distance away from the defined Main Centre boundary and in significantly more edge of centre locations and are not therefore

sequentially preferable to the proposal site; it is not therefore necessary to be consider these sites in this assessment. These comprise:

- Bank Chambers – 65-67 King Street – occupied
- Springwood Drive – discounted due to distance from the Main Centre boundary
- LCC Depot, Riddings Lane – discounted due to distance from the Main Centre boundary
- Land south of Accrington Road – discounted due to distance from the Main Centre boundary

4.10 As such, full information for the sites and properties identified and assessed via this current search methodology can be found within proformas and market search information at **Appendix 3**.

## 5.0 Sequential Test Assessment

5.0 The five assessment sites and conclusions are as follows:

### **Swan Hotel and Land between King Street and Accrington Road**

5.1 The site measures 0.15 hectares and comprises a Listed public house/hotel and rear car park area that serves the building and the centre.

5.2 Whilst the building and site is for sale it is not available or suitable for the proposal in cost, use/form or timescale terms and is not therefore a sequentially preferable alternative to the application site.

### **Land between King Street and Accrington Road (south)**

5.3 The site measures 0.16ha and is an operative car park to the Co-Op and centre and is not available to the proposal. It is not therefore a sequentially preferable alternative to the application site.

### **25 King Street, Whalley**

5.4 The site measures 0.02ha and includes a building of 256 sq m. Whilst it is being marketed for sale, it is not suitable or available for the proposal. It is not therefore a sequentially preferable alternative to the application site

### **Land and Units at Back King Street**

5.5 The site is 0.18ha and is an edge of centre site directly abutting the centre boundary. It is occupied by a number of buildings and businesses and is not available or suitable for the proposal. It is not therefore a sequentially preferable alternative to the application site.

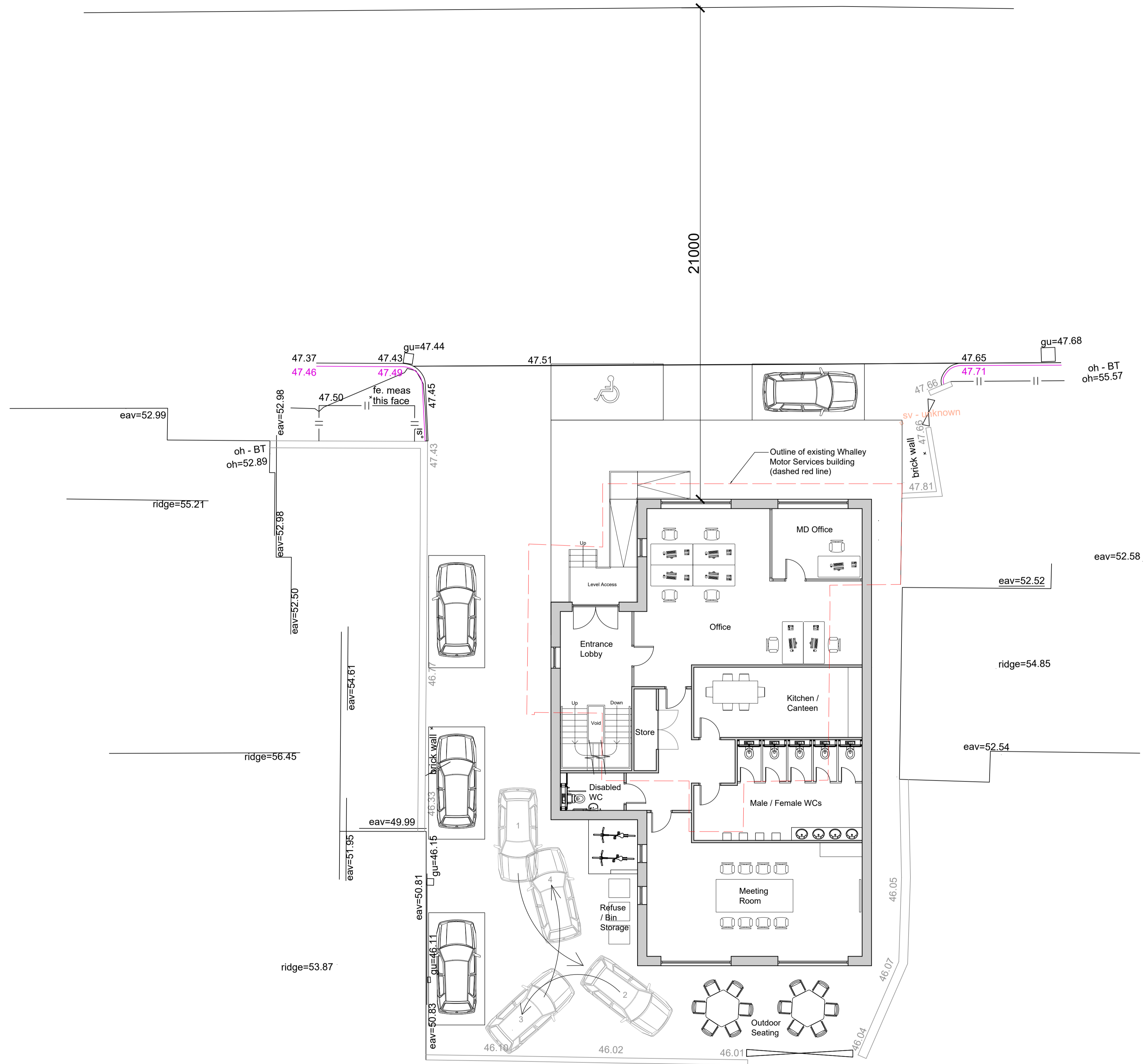
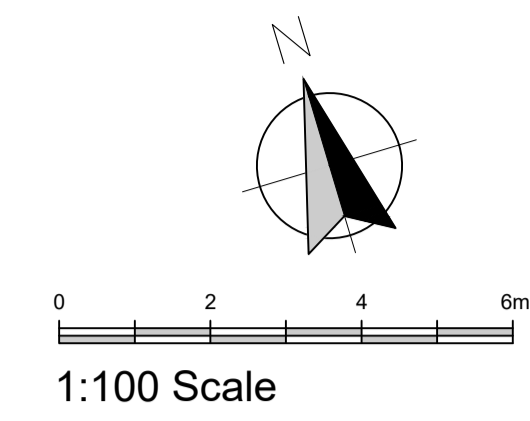
### **1-9a, The Picture House and car park, George Street**

5.6 The site measures 0.45ha and is an edge of centre site directly abutting the centre boundary. It is occupied by a recently refurbished building in mixed uses and its associated car park and is being marketed for an investment opportunity. It would not be available or suitable for the proposal in terms of cost, current use/configuration or timeframe. It is not therefore a sequentially preferable alternative to the application site.

## 6.0 Conclusion

- 6.1 The application proposal for a small office use is proposed in an edge of centre location that is in close proximity to Whalley main centre and accessible by a choice of means.
- 6.2 As a main town centre use, a sequential assessment of the opportunities for more central locations to accommodate the proposal has been undertaken in line with NPPF.
- 6.3 Having regard to relevant parameters for the site search and reviews, and the accepted provisions for assessing sites in relation to availability and suitability, five sites have been considered.
- 6.4 From this, none of the sites are considered sequentially preferable to the proposal site and it should not be resisted on such reason.

## Appendix 1



Proposed Site Plan  
1:100 Scale

Client  
Mr Daniel McGowan

Job Title  
Redevelopment of former Whalley Motor Services site into new offices at:  
18 Accrington Road  
Whalley  
BB7 9TD

Drawing Title  
Proposed Site Plan

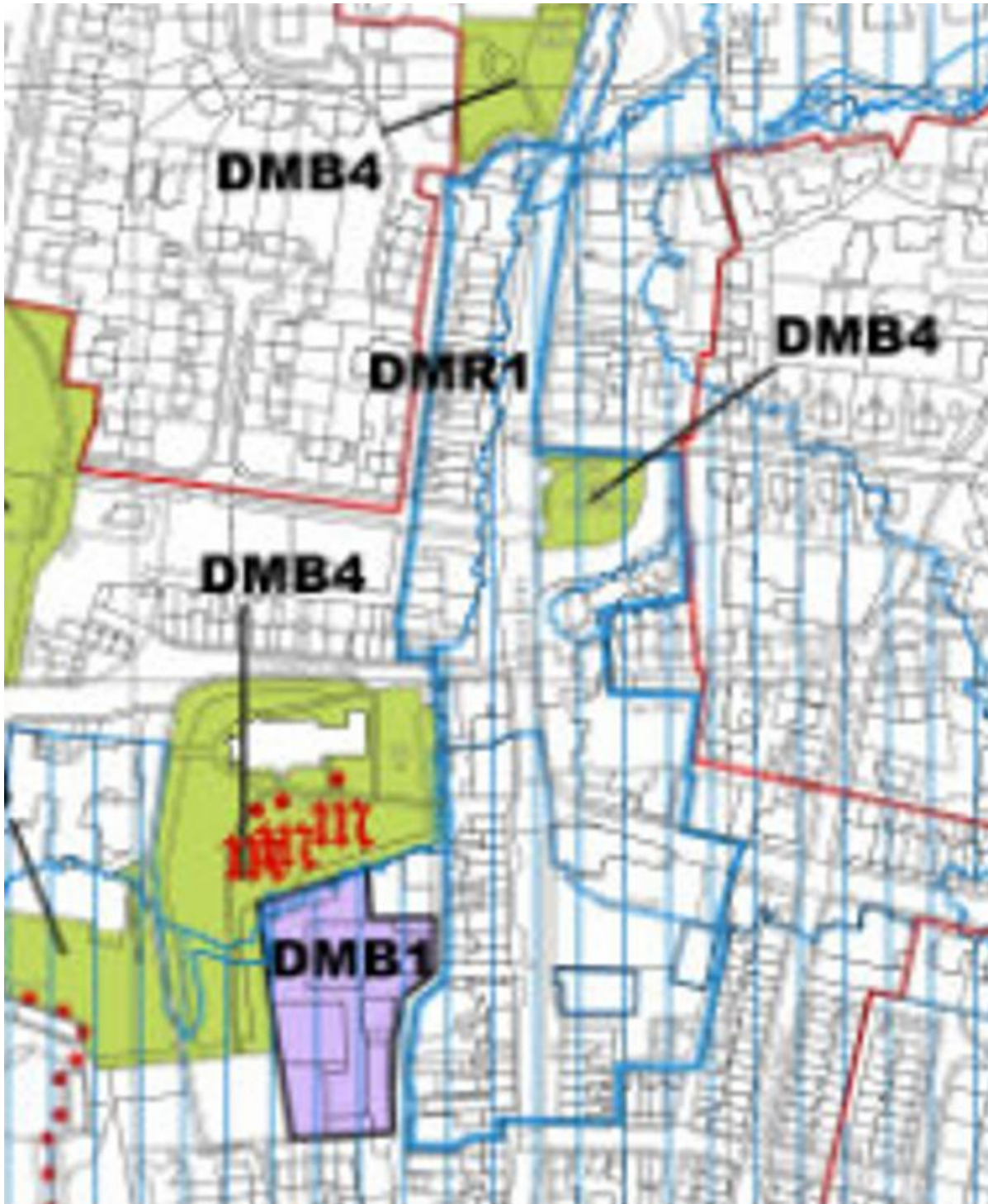
Issued for Pre App

Scale: 1:100 @ A1 Date: June 2025 Drawn: Craig Harrison

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## Appendix 2



Extract From Proposals Map – Sheet 6 Whalley

Main Town Centre Boundary – Thicker Blue line

## Appendix 3

## Swan Hotel and Car Park, King Street and Accrington Road (north)

- Site Size 0.15ha
- Site Location Within Main Centre Boundary

### Planning History

- 3/2008/0282- Development of section of rear car park area to create an outside dining area with smoking solution (Approved with Conditions 22.08.2008)
- 3/2008/0550 - Change of use of unmarked section of car park area to create an outside dining area (Approved with Conditions 22.08.2008) – permissions built out.
- 3/2005/0771 - Alteration of 1st and 2nd floor layouts from five en-suite letting rooms and owners accommodation into six en-suite letting rooms, private office and staff changing facilities, storage cupboards and en-suite owners accommodation (Approved with Conditions 25.10.2005)

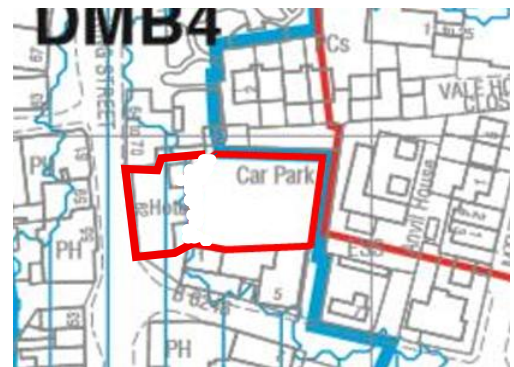
### Current Status and Relevant Considerations

This site/car park is currently being marketed for sale for public house/ hotel purposes with an asking price of £2,000,000 (marketed by Savills with sales brochure dated September 2025).

The building is Grade 2 Listed and within Whalley Conservation Area.

The car park is subject to a narrow access route from Accrington Road.

### Site Position



### Appraisal

#### Availability:

The property is being advertised for sale for public house and hotel use (with associated car parking) via an agent. The asking price is significant and would not be commercially available to the applicant.

In addition, the timeframe for potential future availability for alternative uses (including for office use), would be prohibitive to the current proposal (requirement for marketing for the current use before alternatives may be considered, further period of time to achieve planning permission/ Listed Building/ Conservation Area consents for any conversion and then for conversion/ build times).

This would not therefore meet the timescale requirements of the applicant for the office requirements.

Suitability:

The building is not considered suitable for conversion to office use in light of configuration, age and historic factors.

Also the car park is not considered to be separately suitable for the proposal, as its loss to other purposes would likely commercially undermine the hotel /pub use.

### **Conclusion**

The site is not a sequentially preferable alternative to the application site as it is not available for the proposal use in a relevant timeframe or cost terms and is not suitable to accommodate the use.

## Land between King Street and Accrington Road (south) – Car Park to Co-Op

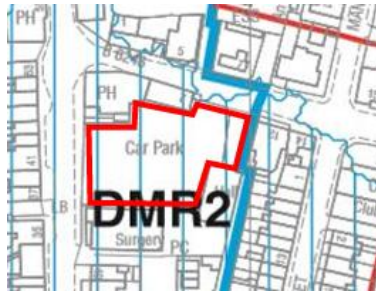
- Site Size 0.16 ha.
- Site Location Within Main Centre Boundary.

### Planning History

- 3/2018/0071 - Co-Op logo and car park signs (Approved with Conditions 08.03.2018).
- 3/2018/0076 - Co-Op logo and car park signs (Approved with Conditions 08.03.2018).
- 3/2016/0522 - Change of use of the former public house from Class A4 to Class A1, internal and external alterations and works to public car park - planning permission granted 23rd March 2017

Current Status - Car Park is currently in active use for the Co-Op and centre.

### Site Position



### Appraisal

Availability: Not available and not being marketed.

Suitability: The site is not suitable as in current occupation and use.

### Conclusion

The Site is not a sequentially preferable alternative to the application site as it is not available for the proposal.

## 25 King Street, Whalley

- Site Size 0.025ha
- Site Location Within Main Centre Boundary

### Planning History

- 3/1999/0059 - Rear Extension to Ground and Part of First Floor (Approved with Conditions 15.07.1999).

### Site Location -



### Current Status and Relevant Considerations

The site is currently in use as a restaurant with ancillary staff accommodation and is being marked for sale with an asking price of £360,000 (Auction Group Limited). The floorspace of the building is 256 sqm.

### Appraisal

#### Availability:

Whilst the site is being marketed it is not currently available for office use and is not of a size available for the proposal.

#### Suitability:

The site is not suitable due to size and configuration.

### Conclusion

The Site is not a sequentially preferable alternative to the application site as it is not suitable for the proposal.

## Land and Units at Back King Street

- Site Size 0.4 ha.
- Site Location Edge of Centre – immediately abutting the Centre boundary

## Planning History

- 3/2023/0771 - Change of use from booking office to taxi office at first floor level. Access to first floor reception/sitting area via entrance hall and staircase on ground floor (Refused 18.12.2023).
- 3/2020/0030 - Confirmation of lawful change of use of first floor office (previously used by Building Contractor) to use as taxi booking office, manager's office, prayer room and drivers' rest room since 16 November 2009 (Approved 04.02.2020).
- 3/2019/0806 - Change of use from metal workshop (use class B2) to barber's shop (use class A1) including alterations to front elevation (Approved with Conditions 08.10.2019).
- 3/2017/0164 - Change of use from Class B1 business use to Class D2 gym including external alterations (Planning permission granted 21.04.2017).
- 3/2015/0794 - Demolition of industrial units and construction of a pay and display car park (Application Withdrawn 08.04.2016).
- 3/2014/0477 - Certificate of lawfulness for an existing use of motorcycle repair, servicing and preparation work (Certificate issued 22.07.2014).

Current Status - In active use by a number of businesses and enterprises. Is a protected employment site.

Site position



## Appraisal

Availability: In use by multiple existing businesses and not available and not being marketed.

Suitability: The site is not suitable as in current occupation and use.

## Conclusion

The Site is not a sequentially preferable alternative to the application site as it is not available for the proposal.

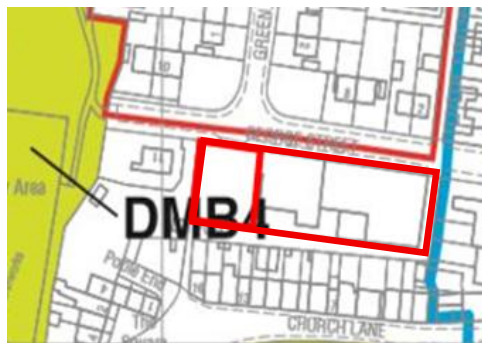
## 1-9a, The Picture House and car park, George Street

- Site Size 0.18ha
- Site Location Edge of centre - immediately abutting the Centre boundary

### Planning History

- 3/2021/1004 - Proposed conversion, extension and alterations to the upper floors to create seven residential apartments. Rear extension to ground floor retail unit. Demolition of loading bay and rebuilding boundary wall at the rear and associated alterations (Application approved with conditions 08.04.2022).

### Site Location



### Current Status and Relevant Considerations

The building has been recently refurbished and converted to mixed residential, retail and restaurant uses with associated car parking. All the ground floor units (food/retail) are currently in use except one which is currently being advertised for (retail) let.

The whole site is also currently being advertised for an Investment Opportunity at £3.75m.

### Appraisal

#### Availability:

In use by existing businesses and for residential purposes and being marketed as an overall investment opportunity at a significant price. One unit which is vacant is not currently available for office use and is not of a size available for the proposal.

#### Suitability:

The site is not suitable as recently converted to residential and retail/ food and drink uses so is not of a configuration suitable for the proposal. Due to the recent nature of the conversion it is not considered the site would be readily altered from the current use/ configuration.

### Conclusion

The Site is not a sequentially preferable alternative to the application site as it is not available or suitable for the proposal.


## Rightmove and Zoopla Market Search for Commercial Units - WHALLEY:

The sites/properties included below have been included with the site search above.

On-Line Search carried out on 06.10.2025 at 3.30pm

15:32  
06/10/2025

### Rightmove:



1/13

**1-9a The Picture House, George Street, Ribbles Valley, Whalley, Lancashire, BB7 9TH**

Mixed Use

High yielding mix use investment. Located in Whalley, an affluent town in Lancashire. Approximate total floor area of 19,809 sq ft and 0.45 acre site. FOR SALE- Upon the instructions of the...

**COMMERCIAL**



Marketed by Landwood Group, Manchester

**£3,750,000**  
Offers in Excess of

INVESTMENT OPPORTUNITY

0161 524 5789  
Local call rate

Contact Save



1/6

**Swan Hotel, 62 King Street, Whalley, Clitheroe, BB7 9SN**

Pub

Traditional Public House with Letting Rooms for sale

**COMMERCIAL**

Marketed by Savills, Manchester - Licensed Leisure

**£2,000,000**  
Offers in Region of  
1,538 sq. m.

0161 524 5965  
Local call rate

Contact Save

### Additional commercial listings



1/21

**King Street, Whalley, BB7**

Restaurant

A SUBSTANTIAL COMMERCIAL PREMISES IN THE HEART OF WHALLEY To be sold via online auction - powered by The Auction Group

**COMMERCIAL**

Marketed by The Auction Group Limited, Auction

**£360,000**  
Guide Price  
256 sq. m.

01254 963355  
Local call rate

Contact Save

**Zoopla:**

No listings found.

**Lancashire Country Council Property Engine:**

No listings found