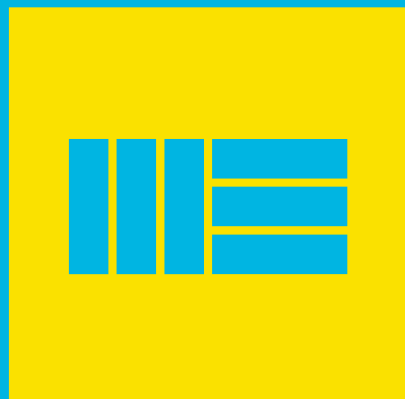


FORBURY RETAIL PARK, READING

RETAIL STATEMENT

FINAL ISSUE FOR SUBMISSION

31 MARCH 2023



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1.0 INTRODUCTION

1.1 This Retail Statement forms part of the application for outline planning permission (“the Application”) submitted on behalf of Abrdn Property Income Trust (“the Applicant / “abrdn”) to Reading Borough Council (“the Council” / “RBC”) for mixed use development comprising of up to 820 residential units and up to 5,500 sqm of commercial floorspace (“the Proposed Development” / “the Scheme”) on part of Forbury Retail Park, Kenavon Drive, Reading, RG1 3HS (“the Site”). King’s Meadow View (“KMV”) is the name that has been given to the project.

The Application

1.2 In summary the proposed development comprises:

- Demolition of the existing buildings and structures on Site;
- Construction of new buildings to provide the following:
 - Up to 820 residential units
 - Up to 5,500 sqm of flexible class E floor space which could accommodate a including a foodstore on the western part of the Site
- Up to 200 parking spaces, all of which are located at basement level.
- Delivery of 860 cycle parking spaces;
- Diversion of the existing sewer running through the Site;
- Ancillary and associated works including public realm creation, landscaping, utilities and surface water drainage, plant and equipment.

1.3 This Application seeks outline planning permission with all matters reserved, save for access. The description of development is as follows:

Outline application for comprehensive redevelopment, including demolition of existing structures, comprising a residential-led mixed use scheme of up to 820 units (Class C3) and up to 5,500 sqm (GEA) of commercial uses (Class E) together with ancillary and associated development including new and enhanced pedestrian routes and vehicle access routes, open spaces, hard and soft landscaping, basement, and basement car parking providing up to 200 car parking spaces, up to 860 cycle parking spaces and servicing facilities, sewer diversion and associated works, with details of layout, scale, external appearance and landscaping reserved.

1.4 The application format allows RBC and other relevant key stakeholders to assess parameters of the scheme against the statutory development plan (and other material considerations), whilst allowing flexibility for the Site to respond to changing market conditions, requirements and demands, with the design codes securing the key principles of design. Subsequent details in relation to appearance, landscaping, layout and scale will be submitted to and determined by RBC through future reserved matters applications and will have to comply with the approved design codes and fall within the limits set by the approved parameters and Development Specification Report.

- 1.5 The outline Application provides a robust framework for RBC to ensure that through detailed design and subsequent reserved matters applications, high quality buildings and spaces will be delivered.

Format of Application

- 1.6 The Application seeks outline planning permission for development of the Site, as detailed above, with all matters reserved except for highways access.
- 1.7 Given the scale of the proposal it was concluded that the proposal has the potential to have significant effects on the environment and that it constitutes Schedule 2 paragraph 10(b) development, falling within the Category 'Urban Development Infrastructure Project'. The development involves more than 1ha of non-residential development, more than 150 dwellings and the overall area of the development exceeds 5 ha therefore it was accepted by the Applicant that an Environmental Impact Assessment was required. As such, a formal screening request to RBC was not considered necessary.
- 1.8 A request under Regulation 15 of the Town and Country Planning (Environmental Impact Assessment) Regulations (2017) for an Environmental Impact Assessment ("EIA") Scoping Opinion, was submitted to RBC on 24 February 2023.
- 1.9 On 18th April 2023 RBC concluded that, with the addition of a scheme to the combined and cumulative effects assessment, providing guidance on the scope of the assessment which has been taken into account when assessing the scheme. A copy of RBC's EIA Scoping Opinion (ref: 230243) can be found at **Appendix 1**. As a result, this Application is supported by an Environmental Statement ("ES") the scope and content of which has been considered and agreed with SCC.

Planning Policy Context

- 1.10 The proposed retail development has been guided by national and local planning policy, planning guidance and other material considerations, including relevant retail planning case law. The proposal has been developed with consideration to relevant national and local policies and this Retail Statement will focus on the acceptability of the retail element in policy terms.
- 1.11 Policies relevant to the development proposal derive from the Reading Borough Local Plan (adopted November 2019), and the National Planning Policy Framework (NPPF) (2021). This Statement will also have regard to Planning Practice Guidance (PPG). The relevant retail policies for the Site are set out in Section 4.

Report and Purpose Structure

- 1.12 This Retail Statement assesses the development proposals against the relevant retail policies in the adopted Development Plan, relevant guidance and planning case law, specifically in relation to the relevant retail tests of Sequential and Retail Impact. It will demonstrate how the proposed development adheres to the relevant policy and guidance in retail terms.
- 1.13 Further, this Statement seeks to highlight the wider social, environmental and economic benefits of the proposal and ultimately demonstrate why the development proposals are considered appropriate for the Site and surrounding area, adhere to national and local planning policy and are therefore acceptable in planning terms.
- 1.14 The remainder of this Retail Statement is structured as follows:

- **Section 2 Site Location and Context** introduces the existing Site, its location and surroundings, including the Site's planning history and relevant planning history from the wider area;
- **Section 3 Proposed Development** outlines the details of the proposed development, including the use and amount of retail floorspace;
- **Section 4 Planning Policy Overview and Assessment** - provides an overview of relevant retail and town centre use planning policy, including national and local policies as well as supplementary planning guidance. Here we conclude that the proposed retail floorspace fully accords with local planning policy and will support sustainable economic development;
- **Section 5 Summary and Conclusion** provides a summary and overview of this Statement and concludes that the proposal complies with the relevant policies and should be granted permission.

2.0 THE APPLICATION SITE AND PLANNING HISTORY

THE SITE AND SURROUNDINGS

- 2.1 The Site is located in Reading, to the east of the town centre. The Site is bound to north by the railway lines that serve Reading Station, beyond which lie a small number of 2/3 storey office buildings, beyond which is Kings Meadow.
- 2.2 To the north east, approximately 200m from the site is a residential development comprising six buildings between 9-4 storey buildings, located between Kings Meadow and the railway lines. Beyond this site to the east is a large Tesco 'Extra' store, that is served by a large area of surface level car parking.
- 2.3 The east the Site is abutted by the remaining part of Forbury Retail Park, comprising a large area of surface car parking, a standalone McDonalds unit, and a number of large retail units, with occupiers including Decathlon. This is under separate ownership.
- 2.4 Along the River Kennet, approximately 350m to the south east, is an area of residential land uses comprising a number of 3-5 storey buildings located between the River Kennet and the railway lines to the north.
- 2.5 The Site is bound by Forbury Road and Kenavon Drive to the south. Across Kenavon Drive to the south east is the Huntley Wharf Site, which is subject to approved planning permission for 765 residential units, which is currently under construction. To the south west beyond Forbury Road is Reading Gaol; a grade II listed building. Further west along Forbury Road is Abbey Ruins, and Forbury Gardens, forming a cluster of historically significant heritage assets. These are considered in the Heritage Assessment.
- 2.6 Abutting the Site to the west are large floor plate, office buildings accommodating 41,209 sqm across 8 storeys.
- 2.7 The Site itself currently comprises part of the Forbury Retail Park and extends to 2.62 ha. This part of the retail park comprises a parade of big box retail units. The occupiers include; Home Sense, DFS and SCS. There is also a standalone KFC drive through unit on the south part of the Site. The remainder of the Site comprises a large area of surface level car parking facing Forbury Road and Kenavon Drive. The part of the retail park to which this application relates currently accommodates 9,025 sqm of floorspace.
- 2.8 The Site is located within the Reading Central Area, and just outside the Central Core Area - the boundary of which is located adjacent around Forbury Gardens to the south west. The Primary Shopping Area is located approximately 280m from the Site. Therefore the site constitutes an edge-of-centre location given that it is well connected, and within 300m of the Primary Shopping Area.

ACCESSIBILITY

- 2.9 The main access to the site is on the south boundary to the west, from Forbury Road. This provides pedestrian access and ingress and egress for customer vehicles and egress for service vehicles. To the east of the south boundary there is a secondary access from Kenavon Drive. This provides ingress only for both customer vehicles and service vehicles. The existing service area is behind the retail units running along the north boundary of the Site.

- 2.10 Forbury Retail Park is served by the number 42 bus, which provides access to Reading Town Centre and the Reading station, as well as serving the residential land uses to the east of the Site. In relation to pedestrian and cycle routes, the Site is served by the existing routes along Forbury Road providing access to Reading Town Centre, with Reading Station being a 7-minute walk from the Site.

RELEVANT PLANNING HISTORY

- 2.11 The Forbury Retail Park was constructed initially under permission referenced outline permission ref. 930772 and subsequent reserved matters ref. 940008, approved in 1995, for 5,727 sqm of non-food retail warehousing with associated parking and landscaping. The standalone KFC unit was approved separately in 2015 under permission reference 150085.
- 2.12 Reserved matters permission ref. 940008 included a number of conditions relating the use and nature of the approved units, which restricted the use of the floorspace to non-food retail warehousing only. The sale of food and flexibility to other uses within Class E were therefore restricted.
- 2.13 Since the park's construction there have also been a number of planning applications relating to alterations at the park, these include applications for mezzanine areas, minor external alterations, and advertisement consents, these largely relate to new occupier requirements. However, none of these have materially affected the use of the units, which remain in a non-food Class E retail use.

3.0 THE PROPOSED DEVELOPMENT

- 3.1 This section provides an overview of the proposed developments quantum, layout, design, use and access arrangements as well as the description of development.

Description of Development

- 3.2 The scheme is proposed on land at Forbury Retail Park, Kenavon Drive, Reading, RG1 3HS for a mixed-use development comprising residential and commercial floor space.
- 3.3 This application seeks outline planning permission for the demolition of the existing buildings and the construction of up to 820 residential units, up to 5,500 sqm of commercial floorspace which is to include a foodstore of approximately 3,000 sqm, basement car parking, the diversion of the existing sewer and associated public realm, landscaping and other works, with all matters reserved save for access.
- 3.4 The description of development can be summarised as follows:

Outline application for comprehensive redevelopment, including demolition of existing structures, comprising a residential-led mixed use scheme of up to 820 units (Class C3) and up to 5,500 sqm (GEA) of commercial uses (Class E) together with ancillary and associated development including new and enhanced pedestrian routes and vehicle access routes, open spaces, hard and soft landscaping, basement, and basement car parking providing up to 200 car parking spaces, up to 860 cycle parking spaces and servicing facilities, sewer diversion and associated works, with details of layout, scale, external appearance and landscaping reserved

Application Structure

- 3.5 The exact nature of the development proposal is set out below.
- 3.6 The Application seeks to establish the principle of use, amount and scale, appearance, layout and landscaping of the development. All matters, except for access, are reserved for future conservation.
- 3.7 In summary the proposed development comprises:
- Demolition of the existing buildings on Site;
 - Construction of new buildings to provide the following:
 - Up to 820 residential units
 - Up to 5,500 sqm of flexible class E floor space which could accommodate a foodstore on the western part of the Site
 - Up to 200 parking spaces, all of which are located at basement level.
 - Delivery of 860 cycle parking spaces;

- Diversion of the existing sewer running through the Site;
- Ancillary and associated works including public realm creation, landscaping, utilities and surface water drainage, plant and equipment.

3.8 A set of Parameter Plans and Design Codes have been submitted for approval which define the: development zones and plot boundaries; land uses; site levels; amenity play space and publicly accessible open space; vehicular access and circulation, and maximum building heights for the future development of the Site.

3.9 The **Proposed Land Use Ground Floor Parameter Plans** outlines the proposed land uses within each development plot. Specifying the location and nature of the uses. This is supported by the Design Codes which are also submitted for approval. The Design Codes that a retail store could be accommodated under the West Block (as identified under Section 6.5. This is located on the western part of the Site at ground level with residential uses above at podium level (Plots WB1-4). The store would reprovide some of retail floorspace currently at the Site, but more importantly will play an important role in serving the residents of the proposed development as well as serving the other residents that will live in the area as it develops in accordance with the local plan and surrounding Site allocations.

3.10 The precise split between floorspace across the Site is not fixed as the Application is submitted in outline. However assuming that a store would be provided in the Western Block the remaining commercial floorspace which could amount to 2,500 sqm of Class E uses will be distributed across the Site in smaller kiosk type units that can accommodate a variety of uses such as small scale convenience retail, cafes, restaurants, and community uses. This will provide ground floor activation.

4.0 PLANNING POLICY OVERVIEW AND ASSESSMENT

- 4.1 This Application has been informed by adopted and emerging development plan policies and other relevant guidance. This section of the Statement provides a summary of the relevant planning context from which such policy is drawn, focusing on retail, town centre uses and economic policies.
- 4.2 It does not provide a verbatim account of all relevant policy as this is dealt with in more detail within the accompanying Planning Statement.

STATUTORY FRAMEWORK

- 4.3 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that *“if regard is to be had to the development plan for the purpose of any determination to be made under the planning acts the determination must be made in accordance with the plan unless material considerations indicate otherwise”*
- 4.4 Section 70(2) of the Town and Country Planning Act 1990 and Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that planning applications must be determined in accordance with the Statutory Development Plan unless material considerations indicate otherwise.

NATIONAL PLANNING POLICY

- 4.1 The National Planning Policy Framework (NPPF) states that the purpose of the planning system is to contribute to the achievement of sustainable development - performing economic, social and environmental roles. The three roles are interdependent and need to be mutually supported.
- 4.2 Paragraphs 7-11 confirm that at the heart of the NPPF is a presumption in favour of sustainable development. The planning system should therefore promote sustainable development solutions.

ECONOMIC GROWTH

- 4.3 Paragraphs 81-83 state that planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. 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. Planning decisions should also recognise the specific locational requirement of different sectors.

TOWN CENTRES

- 4.4 Paragraphs 86-91 of the NPPF seek to ensure the vitality of town centres and requires that planning policy should provide a framework to assess proposals for main town centre uses, such as retail, which cannot be accommodated in or adjacent to town centres. Paragraph 86 requires proposals to demonstrate compliance with the sequential test,

and paragraph 89 to demonstrate that the proposals will not have a significantly adverse impact on any designated local centres.

- 4.5 LPA's should apply a sequential test to planning applications for main town centre uses that are not in an existing centre and are not in accordance with an up-to-date Local Plan. That is to say that main town centre uses should be located in town centres, then in 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. Applicants and local planning authorities should demonstrate flexibility on issues such as format and scale, and the sequential test should be considered in light of the latest NPPF policy, which confirms that when considering availability, it is necessary to consider sites which may become available within a reasonable period.
- 4.6 Details of how this policy should be applied are contained in the NPPF Planning Practice Guidance 2019 as well as relevant Secretary of State decisions, which are explored in more detail later in this Statement.
- 4.7 The application of the sequential test should be proportionate and appropriate for the given proposal. The following considerations should be taken into account in determining whether a proposal complies with the sequential test (Paragraph 011 of Planning Practice Guidance):

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.

- 4.8 Paragraph 012 of the PPG guidance further states that the implementation of the sequential test should reflect the specific characteristics of the development proposals:

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

- 4.9 With regards to retail impact, the PPG confirms:

The impact test only applies to proposals exceeding 2,500 square metres gross of floorspace unless a different locally appropriate threshold is set by the local planning authority. In setting a locally appropriate threshold it will be important to consider:

- *the scale of proposals relative to town centres*
- *the existing viability and vitality of town centres*
- *cumulative effects of recent developments*
- *whether local town centres are vulnerable*
- *likely effects of development on any town centre strategy*
- *impact on any other planned investment*

As a guiding principle impact should be assessed on a like-for-like basis in respect of that particular sector (e.g. it may not be appropriate to compare the impact of an out of centre DIY store with small scale town-centre stores as

they would normally not compete directly). Retail uses tend to compete with their most comparable competitive facilities. Conditions may be attached to appropriately control the impact of a particular use.

LOCAL PLANNING POLICY

- 4.5 Section 70(2) of the Town and Country Planning Act 1990 and Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that planning applications must be determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 4.6 The statutory development plan for Reading Borough Council comprises the Reading Borough Local Plan adopted in November 2019.

EMERGING PLANNING POLICY

- 4.7 Since the adoption of the Local Plan in 2019 Reading Borough Council have not yet publicly begun preparing a New Local Plan, therefore there are no Local emerging planning policies for consideration.

PLANNING DESIGNATIONS

- 4.8 According to the Council's online policy mapping system the Site currently falls within the following designations:
- Allocated Development Site CR13b – Forbury Retail Park
 - Borough of Reading Central Area – Policy CR1-10
 - Air Quality Management Area – Policy EN15
 - Major Opportunity Area – Policies CR11-13 and SR1
 - Area of Archaeological Potential – Policy EN2
- 4.9 As well as the above policy designations, an assortment of other policies from the development plan are relevant to the proposal. These are discussed in detail in the planning statement, in terms of retail considerations the following policies are of relevance;
- 4.10 **Policy CC1** (Presumption in favour of Sustainable Development) confirms that the council will adopt a positive approach to considering development proposals that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework (NPPF).
- 4.11 The Policy also confirms that in accordance with Section 70(2) of the Town and Country Planning Act 1990 and Section 38(6) of the Planning and Compulsory Purchase Act 2004, planning applications that accord with the policies in the development plan (including, where relevant, with policies in neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise.
- 4.12 **Policy CR1** (Definition of Central Reading) The Central Area boundary as shown on the Proposals Map will mark the edge of the town centre other than where specified. However, for the purposes of application of the sequential test for main town centre uses, the following definitions as defined on the Proposals Map are used:

- Retail development will take place in the Primary Shopping Area;
- Major office development of over 1,000 sq. m will take place in the Office Core; and
- Other main town centre uses will take place in the Central Core.

4.13 **Policy RL2** (Scale and Location of Retail, Leisure and Culture Development) states that retail and main town centre leisure and culture development, where it would mean a net gain of over 2,500 sq. m, will take place in, or as an extension to, the centre of Reading, unless it is on a site allocated for such development. Where a need for additional development has been identified, and no sites are available in or adjoining the centre of Reading, or other defined centres, a sequential approach should be adopted to identifying alternative sites.

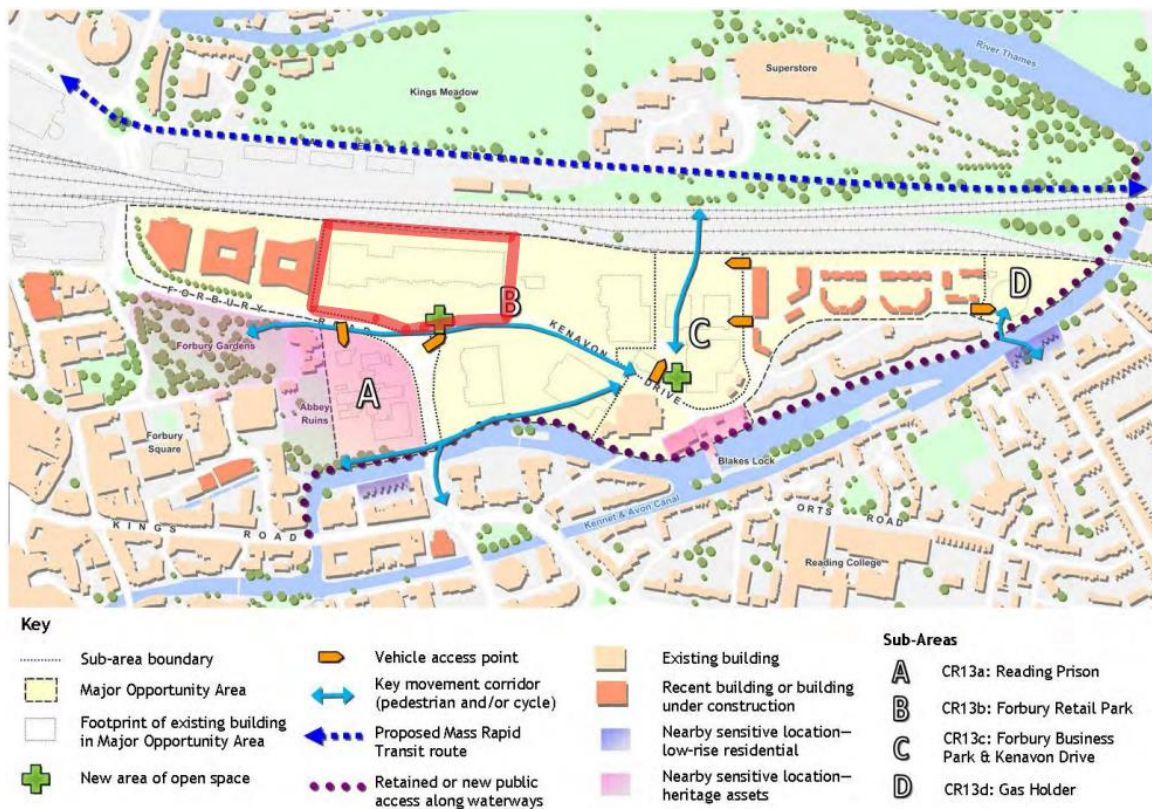
4.14 All development will be required to comply with the relevant tests for retail, leisure and culture development set out in national policy.

4.10 **Policy RL5** (Impact of Main Town Centre Uses) requires proposals that include more than 1,000 sq m (gross) of new or additional floorspace for main town centre uses in an edge-of-centre or out-of-centre location to demonstrate that there will be no significant adverse impact on existing centres. Ensuring that centres within areas of deprivation are not adversely affected is of particular local importance.

4.15 **Policy CR13** (East Side Major Opportunity Area) sets out the principles for development in the East Side Major Opportunity Area, which requires development to:

- Provide a more defined urban environment than currently exists, of a medium to high density;
- Contribute towards the provision of a new residential community at the eastern fringes of the central area;
- Help facilitate greater pedestrian and cycle permeability, in particular east-west links through the area and links between development areas and the station, including improved crossings of the IDR and railway;
- Safeguard land which is needed for mass rapid transit routes and stops;
- Conserve and enhance the listed buildings, scheduled ancient monument and historic garden in the area and their setting where possible;
- Give careful consideration to the archaeological potential of the area and be supported by appropriate archaeological assessment which should inform the development;
- Demonstrate that it is part of a comprehensive approach to its sub-area, which does not prevent neighbouring sites from fulfilling the aspirations of this policy, and which contributes towards the provision of policy requirements that benefit the whole area, such as open space;
- Provide additional areas of open space where possible, particularly in the centre of the new community;
- Maintain, improve and create new access along the north side of the River Kennet to the Kennet Mouth; and
- Give early consideration to the potential impact on water and wastewater infrastructure in conjunction with Thames Water, and make provision for upgrades where required.

4.16 The Site itself forms the east part of Site Specific Allocation CR13b as shown by the extract below from the Local Plan with the Site highlighted in Red.



- 4.11 **Allocation CR13b** allocates the site for the focus of the new residential community, alongside residential, additional retail, leisure and community uses at a scale to serve the Kenavon Drive area would be appropriate. It should include a new area of open space and enhance the frontage to the canal, including a buffer zone to the top of the canal bank to reflect its wildlife significance. Implementing this policy may involve complete redevelopment or using new additional development to improve the existing urban form of the area. Some parts of the site are likely to be implemented in the long term.
- 4.12 The indicative potential of the 6.99 ha Area b is for 1,230 – 1,840 dwellings and the allocation allows for retail development on the Site, provided there is no net gain of retail floorspace. Although the Site currently comprises non-food retail, the allocation does not specify the type of retail floorspace to be provided going forward, simply that there should be no net gain. It therefore follows that the policy supports retail uses which would complement the proposed redevelopment, including the new residential community at the Site and the Kenavon Drive area.
- 4.13 An Impact assessment is only required by Policy RL5 for development proposals for additional floorspace exceeding 1,000 sq. m. However the proposed development results in a net loss of retail floorspace of over 4,000 sqm. Furthermore, Allocation CR13b supports the provision of retail floorspace at the Site, providing there is no net-gain. The proposed reduction in floorspace therefore fully accords with Policy CR13b, and will complement the proposed residential uses both within the application Site and the wider allocation, as advocated by the policy.
- 4.14 Taking this into account, there is no policy requirement to undertake an impact assessment in support of the application.
- 4.15 Paragraph 87 of the NPPF requires that LPA's apply the sequential test to planning applications for main town centre uses which are neither in an existing centre nor in accordance with an up-to-date plan.

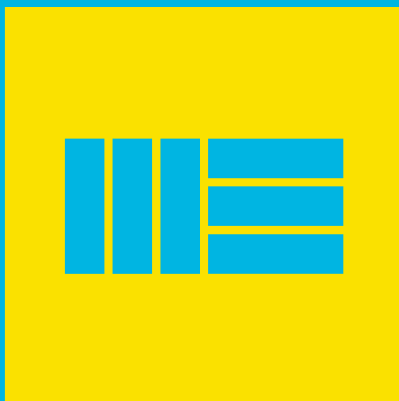
- 4.16 The Site currently provides over 9,000 sqm of retail floorspace, while the proposed development results in a net loss of over 4,000 sqm. As noted above, Site Allocation CR13b, supports retail development at the Site provided that there is no net gain. Crucially, the policy does not specify the type of retail floorspace to be provided at the Site (i.e. food / non-food), and it is clear from that any retail provision should be of a scale to support and complement main residential use and the wider Kevanon Drive area.
- 4.17 Given that RBC's Local Plan was adopted in 2019, the policies are considered up to date. Given that the proposed development accords with an up to date development plan, as stipulated by Paragraph 87 of the NPPF, does not require the development proposals to be supported by a sequential assessment.
- 4.18 The main role of the foodstore that could be accommodated on the western part of the site and complementary Class E floorspace is to meet the needs of the local residents, not only those who will be living with the development, but also those current and future residents of the wider Kenavon Drive area, in line with the Local Plan allocation. We therefore conclude that the replacement Class E floorspace will have a positive impact on the wider area, helping to meet the objectives of Local Plan policy.
- 4.19 The precise split between floorspace across the Site is not fixed as the Application is submitted in outline. However assuming that a store would be provided in the Western Block the remaining commercial floorspace which could amount to 2,500 sqm of Class E uses will be distributed across the Site in smaller kiosk type units that can accommodate a variety of uses such as small scale convenience retail, cafes, restaurants, and community uses. This will provide ground floor activation.
- 4.20 Furthermore, the replacement retail floorspace will have a positive socio-economic impact, through the retention of jobs at the Site, the majority of which will be available for local residents.

7.0 SUMMARY AND CONCLUSIONS

- 7.1 In summary this application seeks outline planning permission for the demolition of the existing buildings and the construction of up to 820 residential units, up to 5,500 sqm of commercial floorspace which could include a foodstore of approximately 3,000 sqm, basement car parking, the diversion of the existing sewer and associated public realm, landscaping and other works, with all matters reserved save for access.
- 7.2 The commercial element of the proposed development accords with the relevant national and local planning policies Paragraph 97 of the NPPF requires the sequential test to be applied to planning applications for main town centre uses which are neither in an existing centre nor in accordance with an up-to-date plan. Local Plan Policy RL2 seeks to direct town centre uses which would result in a net gain of 2,500 sqm to the defined town centre or specifically allocated sites. The proposed development therefore accords with these policies and does not require a sequential assessment to be carried out on the basis that:
- The Reading Local Plan was adopted in November 2019 and covers the plan period to 2036 therefore constitutes an up to date local plan.
 - Site allocation CR13B supports retail development at the Site provided there is not net gain of retail floorspace from the existing approximately 9,000 sqm of retail – The allocation does not specifically exclude food retail.
 - The proposed development accords with the site allocation of the up to date Local Plan, and the proposed development results in a net loss of retail floorspace of approximately 4,000 sqm, therefore no sequential assessment is required to support the application.
- 7.3 In relation to the Impact assessment Local Plan policy RL5 stipulates a local variation to the national 2,500sqm threshold for impact assessments, requiring an assessment to be carried out where development proposals result in a net gain of retail floorspace exceeding 1,000 sqm. As set out above the proposed development results in a net loss of approximately 4,000 sqm, therefore an impact assessment is not required to support the proposed development.
- 7.4 Furthermore the proposed commercial floorspace is intended to be a complimentary land use to the proposed 820 residential units. As well as serving the dwellings proposed by this application the retail floorspace will also serve and support the high number of new residents in the area including residents of the under construction Huntley Wharf scheme opposite the Site across Kenavon drive. The commercial element will provide new residents with high quality convenience retail floorspace in very close proximity, reducing the need for additional trips that would often be undertaken by car therefore representing a sustainable and complimentary land use.

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