



HYPERION TRADE PARK PLANNING STATEMENT

Legal & General Property Partners (Industrial
Fund) Limited

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1 INTRODUCTION AND BACKGROUND

- 1.1 This Planning Statement has been completed by Rapleys LLP on behalf of Legal & General Property Partners (Industrial Fund) Limited ('the applicant'), in support of a full planning application for a new standalone pod unit (Use Class E), which is intended to be occupied by Greggs, at Hyperion Trade Park, Reading.
- 1.2 The proposed pod unit, which measures 112 sqm (GIA), will provide an ancillary café providing a food and drink facility to serve the local workers and visitors to Hyperion Trade Park, together with the other surrounding commercial uses and activities located within the wider employment area.
- 1.3 The formal description of development being applied for is as follows:
- "Proposed freestanding pod unit (Use Class E) and outdoor seating area, together with new landscaping, parking and associated works"* (the 'Proposed Development').
- 1.4 Greggs has identified Hyperion Trade Park as an ideal opportunity to expand its offer within Reading. Due to its size and nature, it is considered the proposed pod will complement the surrounding employment uses and will not adversely affect the role and vitality of Hyperion Trade Park. Indeed, the proposed pod will make efficient use of an under-utilised parcel of land and, in the process, will generate 13 jobs (3 full-time and 10 part-time), which will serve to strengthen the estate as a whole.
- 1.5 The proposal will serve as an ancillary operation to the wider employment area and, as a consequence of its intended customer base, it is not suited to a town centre location. It is important to note that the existing Greggs within Reading, including those in Reading City Centre and other designated centres, will remain trading as Greggs considers that the Proposed Development and its existing town centre operations perform different roles within discreet markets which do not impact upon one another.
- 1.6 The planning application submission is accompanied by a comprehensive package of supporting documents. In this Planning Statement, reference will be made, where appropriate, to the details and conclusions contained within these supporting documents.
- 1.7 The following are submitted:
- Full Set of Detailed Drawings, prepared by Harris Partnership;
 - Site Location Plan
 - Existing and Proposed Site Plans
 - Proposed Floor Plans
 - Proposed Roof Plan
 - Proposed Elevations
 - Material Details
 - Planning Statement (this document)
 - Transport Statement and Parking Analysis, prepared by Connect Consultants
 - Tree Survey and Arboricultural Implications Assessment, prepared by SEED
 - Air Quality Statement, prepared by Phlorum
 - Sustainability Statement, prepared by SCS

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- Landscaping Scheme, prepared by Vector
 - Preliminary Ecological Appraisal and Biodiversity Net Gain metrics, prepared by Phlorum

Scope of Planning Statement

1.8 This Statement is structured as follows:

- **Section 2** provides a summary of the site and surroundings of Hyperion Trade Park and also details the relevant planning history affecting the Site.
- **Section 3** sets out the pre-application advice received by Reading Borough Council (RBC).
- **Section 4** provides a detailed description of the Proposed Development.
- **Section 5** identifies the national and local planning policy framework of relevance to the planning application.
- **Sections 6 & 7** sets out the approach to the Sequential Test and the Site Assessments.
- **Section 8** provides an assessment of the acceptability of the Proposed Development against relevant planning policy framework.
- **Section 9** provides a summary of the key points raised by this Statement and the case for granting planning permission.

2 SITE DESCRIPTION, BACKGROUND AND PLANNING HISTORY

- 2.1 This section sets out a description of the Site and surrounding area and provides a summary of the planning history for the application Site at Hyperion Trade Park.

Site Description

- 2.2 The Site measures 0.04 hectares and forms part of Hyperion Trade Park. It comprises an underutilised area of land consisting of hardstanding, 11 car parking spaces and an overgrown hedge of Leyland cypress along its eastern boundary.
- 2.3 Hyperion Trade Park itself is located to the north of Rose Kiln Lane and comprises 9 warehouse units arranged around Hyperion Way (whose activities are understood to be within Classes E(g)(iii) and B8). Occupiers of note include Screwfix, City Plumbing, Formula One Autocentres and 1 Touch Repair.
- 2.4 Hyperion Trade Park contains 143 car parking spaces, which are shared among the 9 properties in an informal arrangement. Each unit comprises a loading and servicing area to the front, which are accessed via the estate road.
- 2.5 According to the Environment Agency, the majority of the Site falls within Flood Zone 1. The Site is not in a Conservation Area. There are no listed buildings or structures on or adjacent to the Site. The Site is located within the Air Quality Management Area (AQMA).

Surrounding Area

- 2.6 Hyperion Trade Park is prominently situated on Rose Kiln Lane in a mixed commercial and industrial area.
- 2.7 It is bound by Rose Kiln Lane to the south beyond which lies a large Morrisons supermarket together with its car park and petrol filling station.
- 2.8 Adjoining this to the west is Brunel Retail Park, which comprises 13 no. retail units extending to approximately 14,475 sqm of floorspace. Occupiers of note include Halfords, Next, B&M, Pets at Home and Shoe Zone. A planning application seeking the partial redevelopment of Brunel Retail Park to provide 2 no. employment warehouses (within Classes E(g)(iii), B2 and/or B8) was approved on 15 July 2021 (Ref: 201853).
- 2.9 To the east of Hyperion Trade Park is a row of residential properties that front onto Basingstoke Road (B3031) whose gardens adjoin the estate boundary. The residential properties are set back approximately 40m.
- 2.10 As described above, Hyperion Trade Park forms part of a large swathe of employment land comprising numerous commercial and industrial warehouses, which are predominantly arranged to the east of the A33 and west of Basingstoke Road and extend as far south as the M4 (which is around 2.35 km away from the Site).
- 2.11 The closest designated centre is Reading Town Centre, which is located approximately 1.9 km to the north of the Site.

Accessibility

- 2.12 Hyperion Trade Park is prominently situated on Rose Kiln Lane. This provides a direct link into Reading Town Centre (via the A33 which is 500m to the west) as well as linking up with the M4 (via the same road) which is approximately 2.35 km to the south.
- 2.13 The Site is located within 500m of four bus stops (served by Nos. 5, 6, 6a and 7) which provide regular services to Central Reading, Reading Town Centre, Whitley Wood and Riseley.
- 2.14 In consideration of the above, the site is considered a sustainable and accessible location.

Planning History

- 2.15 A detailed planning history search of the Site has been undertaken, utilising the Council's online Statutory Register. There are no relevant planning history records for the Site.

3 PRE-APPLICATION CONSULTATION

- 3.1 Pre-application advice has been sought from RBC in connection with the proposed pod at Hyperion Trade Park. The Council provided its formal response on 23 April 2021.
- 3.2 The response - provided by James Overall - confirms the principle of the proposed pod to be acceptable as it is considered to comply with Policy EM2 of the Local Plan (2019). From a design perspective, the response considers the proposal to be high quality and notes that the proposed materials would fit in with the contemporary design of the wider trade park. Owing to this the proposal is considered to be acceptable from a design perspective.
- 3.3 The response notes the proposed removal of trees and landscaping on the eastern boundary to facilitate the proposed pod. It notes that significant replanting would need to be provided to offset that being lost. An Arboricultural Implications Assessment (AIA) has been prepared by SEED and a Landscape Plan has been prepared by Vector. The latter - which is informed by the former - details what is considered to be sufficient provision for replacement planting and how this will continue to perform the function of that which is proposed to be removed.
- 3.4 Furthermore, in line with the recommendations of the pre-application response, a transport statement together with parking analysis has been prepared by Connect Consultants to justify the Proposed Development from a highway perspective.

4 PROPOSED DEVELOPMENT

- 4.1 The Proposed Development relates to a standalone pod unit (within Class E) which is intended to be occupied by Greggs at Hyperion Trade Park.
- 4.2 The proposed pod, which measures 112 sqm (GIA), is an ancillary café which will provide a food and drink facility to serve the local workers and visitors to Hyperion Trade Park and the surrounding commercial uses within the wider employment area.
- 4.3 An outdoor seating area is also proposed to the south of the pod. The Proposed Development proposes to provide 8 no. car parking spaces including 2 no. disabled parking spaces.
- 4.4 The proposed pod utilises high quality materials which are designed to correspond with the modern appearance of the wider estate, including contemporary dark grey cladding and galvanised steel roof sheeting. The use of glazing on the southern and western elevations of the proposed pod creates active frontages onto the wider trade park.
- 4.5 As well as providing a number of new trees along the eastern boundary of the Site, the Proposed Development includes mixed instant native hedge planting which extends to around 21 metres in length and is proposed to be 2.4 m high. It is considered this will integrate into the existing landscaping to the north and south and will provide sufficient screening for the residential to the east thereby continuing to perform the function of the Leyland Cypresses which are set to be removed.
- 4.6 Further to the above, the existing signage board and brick boundary wall on the southern boundary of the Site are also proposed to be removed.

Rationale for the Proposed Development

- 4.7 Hyperion Trade Park has been identified by Greggs as a feasible and viable location, as it is located within an established employment location, which is well served by a mix of trade counter uses, warehouses and commercial businesses.
- 4.8 Greggs has identified a strong requirement for its services among workers and customers of trade locations like Hyperion Trade Park and its surrounding employment areas and has identified a key opportunity to expand its successful operations within the borough of Reading to meet this unmet demand.
- 4.9 Additionally, the proposed pod unit will adjoin Rose Kiln Lane, building on an area of high visibility to provide the necessary prominence. As well as serving the existing workers and visitors to the surrounding employment areas, the pod unit will also serve passing vehicular traffic on Rose Kiln Lane, albeit to a much lesser extent. Due to the scale and ancillary nature of the proposed café, it is unlikely to become a trip generating use in its own right with most of its trade occurring through linked trips with the nearby trade counter uses, warehouses and commercial businesses, and through some pass-by trips on Rose Kiln Lane.
- 4.10 It should be stressed that all existing Greggs within Reading, including those in Reading City Centre and other designated centres, will remain trading. Greggs considers that the Proposed Development and its existing town centre operations perform different roles within discreet markets which do not impact upon one another.
- 4.11 It is considered the above rationale justifies the site-specific requirements for the proposed pod - which is intended to be occupied by Greggs - to be situated in this location.

5 PLANNING POLICY FRAMEWORK

5.1 This section sets out the planning policy framework of relevance to the application proposal.

5.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004 stipulates that in making any determination under the Planning Acts, regard is to be had to the Development Plan, and the determination must be made in accordance with that Plan, unless material considerations indicate otherwise. The statutory Development Plan is as follows:

- Reading Borough Local Plan (2019)

5.3 In addition, the following are material considerations in this assessment:

- National Planning Policy Framework (2021);
- National Planning Guidance (2016, last updated June 2021); and
- Local Supplementary Planning Documents and Guidance.

Reading Borough Local Plan Policies Map

5.4 The location of the Site is detailed on the below extract of RBC's Interactive Policies Map.

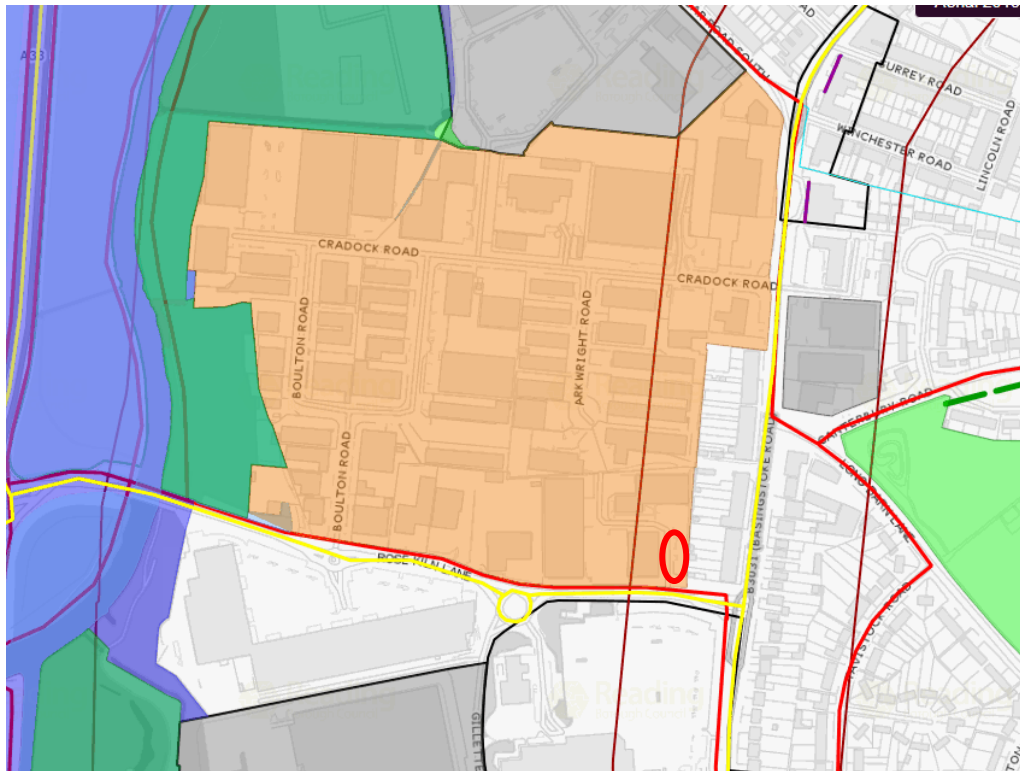


Figure 1 Interactive Policies Map

5.5 In broad terms, the Site is identified as being within the 'North of Basingstoke Road' Core Employment Area (Ref: EM2e) under Policy EM2 of the Local Plan and is identified as being within a 'Air Quality Management Area' under Policy EN15 of the Local Plan.

Reading Borough Local Plan (2019)

5.6 Policy CC1 confirms that a positive approach to considering development proposals will be taken that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework (NPPF). Policy CC1 states that "where appropriate, the

Council will work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible.”

- 5.7 Policy CC2 confirms that Proposals for new development, including the construction of new buildings and the redevelopment and refurbishment of existing building stock, will be acceptable where the design of buildings and site layouts use energy, water, minerals, materials and other natural resources appropriately, efficiently and with care and take account of the effects of climate change.
- 5.8 Policy CC2 states that in order to meet these requirements, inter alia:
- *All minor non-residential developments or conversions to residential are required to meet the most up-to-date BREEAM ‘Very Good’ standard as a minimum.*
- 5.9 Policy CC3 (Adaptation to Climate Change) states that the following measures shall be incorporated into development:
- *All development shall minimise the impact of surface water runoff from the development in the design of the drainage system, and where possible incorporate mitigation and resilience measures for any increases in river flooding levels as a result of climate change.*
- 5.10 Policy CC6 confirms the scale and density of development will be related to its level of accessibility by walking, cycling and public transport to a range of services and facilities, with the densest and largest scale development taking place in the most accessible locations.
- 5.11 Policy CC7 (Design and Public Realm) confirms that all development must be of high design quality that maintains and enhances the character and appearance of the area of Reading in which it is located. Policy CC7 requires all development to be assessed to ensure that they:
- *Respond positively to their local context and create or reinforce local character and distinctiveness, including protecting and enhancing the historic environment of the Borough and providing value to the public realm;*
 - *Create safe and accessible environments where crime and disorder or fear of crime does not undermine quality of life or community cohesion;*
 - *Address the needs of all in society and are accessible, usable and easy to understand by them, including providing suitable access to, into and within, its facilities, for all potential users, including disabled people, so that they can use them safely and easily;*
 - *Are visually attractive as a result of good high quality built forms and spaces, the inclusion of public art and appropriate materials and landscaping.*
- 5.12 Policy CC8 seeks to ensure that development does not cause a detrimental impact on the living environment of existing residential properties in terms of, inter alia, noise, disturbance, artificial lighting, harm to outlook, and smell.
- 5.13 Part (b) of Policy EN12 (Biodiversity and the Green Network) states that on all sites, development should provide a net gain in biodiversity wherever possible.
- 5.14 Policy EN14 (Trees, Hedges and Woodlands) states that *“new development shall make provision for tree retention and planting within the application site, particularly on the street frontage, or off-site in appropriate situations, to improve the level of tree coverage within the Borough, to maintain and enhance the character and appearance of the area in which a site is located, to provide for biodiversity and to contribute to measures to reduce carbon and adapt to climate change. Measures must be in place to ensure that these trees are adequately maintained.”*

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- 5.15 Policy EN15 states that development should have regard to the need to improve air quality and reduce the effects of poor air quality. The Site is located within a designated Air Quality Management Area (AQMA).
- 5.16 Policy EM2 identifies the Site as falling within the North of Basingstoke Road Core Employment Area (Ref: EM2e). Policy EM2 explicitly states that, *“Non-employment uses that would support the area’s economic function may be located in the Core Employment Areas where they do not result in a loss of employment land.”*
- 5.17 Paragraph 4.3.10 states that there is some scope for intensification of employment sites within Core Employment Areas, such as development on surplus parking or servicing space, which will be acceptable subject to other material considerations.
- 5.18 Policy TR1 confirms that all development should make appropriate provision for works and contributions to ensure an adequate level of accessibility and safety by all modes of transport from all parts of a development, particularly by public transport, walking and cycling, in accordance with any agreed transport assessment submitted as part of the application.
- 5.19 Policy TR3 states that in determining proposals involving a new or altered access onto the transport network, improvement works to the transport network, the creation of new transport infrastructure or the generation of additional trips on the transport network, consideration will be given to the effect on safety, congestion and the environment.
- 5.20 Policy TR5 states that development should provide car parking and cycle parking that is appropriate to the accessibility of locations within the Borough to sustainable transport facilities, particularly public transport.
- 5.21 Policy RL2 applies to main town centre uses proposed in out-of-centre locations and sets out the requirement for a sequential assessment to be provided in such circumstances.

MATERIAL CONSIDERATIONS

National Planning Policy Framework (NPPF) (July 2021)

- 5.22 The NPPF sets out the Government’s presumption in favour of sustainable development (paragraph 10). For decision taking, this means approving development proposals that accord with the Development Plan without delay.
- 5.23 Section 6 of the NPPF focuses on building a strong, competitive economy. Paragraph 80 seeks to create the conditions in which businesses can invest, expand and adapt, and 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.”*
- 5.24 Paragraph 87 confirms that local planning authorities should apply a 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. Paragraph 87 states 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.”*
- 5.25 Paragraph 90 of the NPPF states that when assessing applications for retail and leisure development outside town centres, which are not in accordance with an up-to-date plan, local planning authorities should require an impact assessment if the development is over a proportionate, locally set floorspace threshold. Paragraph 90 goes on to state that, *“If there is no locally set threshold, the default threshold in 2,500 sqm of gross floorspace.”*

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- 5.26 Paragraph 119 prioritises the effective use of land in meeting the need for development, making *“as much use as possible of previously-developed or ‘brownfield’ land”*. Furthermore, the same paragraph states that planning policies and decisions should, *“promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment”*.
- 5.27 Paragraph 126 emphasises the importance of good quality design in making better places for people, stating that it is a key part of sustainable development and indivisible from good planning.
- 5.28 Paragraph 130 states that decisions should aim to ensure that developments, inter alia, *“will function well and add to the overall quality of the area”* and *“establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit.”*
- 5.29 Paragraph 110 states that the following should be considered when assessing applications for development:
- a. *appropriate opportunities to promote sustainable transport modes can be - or have been - taken up, given the type of development and its location;*
 - b. *safe and suitable access to the site can be achieved for all users; and*
 - c. *any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.*
- 5.30 Paragraph 111 states that *“development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.”*

6 APPROACH TO SEQUENTIAL TEST

- 6.1 The Site lies in an out-of-centre location in retail planning terms. Therefore, in accordance with Paragraph 87 of the National Planning Policy Framework and Policy RL2 of the Local Plan, a sequential test has been completed.
- 6.2 The NPPG states that 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 town 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” (Reference ID: 2b-008-20140306).*
- 6.3 In setting out the approach to the sequential test, it is stressed that the application is for a freestanding pod (within Class E), which is to be occupied by Greggs and measures 112 sqm (GIA). In this respect, reference should be given to Paragraph 10 of the NPPG ‘Ensuring the vitality of town centres’ (Reference ID: 2b-010-20140306). This paragraph states that the application of the sequential test *“should be proportionate and appropriate for the given proposal”*. In this spirit, a sequential site assessment has been completed in accordance with paragraph 87 of the NPPF and the guidance contained within the NPPG.
- 6.4 The sequential site assessment has been undertaken in the context of the Tesco Store Limited v Dundee City Council Supreme Court Judgement (21 March 2012), the appeal decision for Land at Vulcan Road, Sheffield (Appeal Ref: APP/J4423/A/13/2189893) dated 3 July 2013, and the more recent Aldergate Properties Ltd v Mansfield District Council High Court Judgement (Case No. CO/6256/2015).
- 6.5 The Dundee Judgment provides advice on the issue of flexibility, stating that the key consideration is 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”* (Para. 29). This decision put the emphasis on considering the proposed development as a whole, rather than breaking it down into the constituent parts.
- 6.6 Furthermore, it is implicit that the business model of the operator and the specific proposals are a key factor in determining the suitability of the site. This approach is supported by the successful appeal by Next at Vulcan Road in Sheffield (Appeal reference APP/J4423/A/13/2189893). In considering the issue of suitability, the Planning Inspector had regard to the ruling of the Supreme Court and reinforced this approach.
- 6.7 In consideration of Next’s business model, the Inspector rejected a redevelopment option at Moorfoot and stated that *“to insist on Next operating from the Moorfoot site would be to push it towards what it clearly sees as an inappropriate business decision”* (paragraph 39). The Inspector went on to conclude that:
- “it is my view that the extent to which Next would have to compromise its business model to operate a H&G (Home and Gardens) store from Moorfoot would be both excessive and unreasonable” (Paragraph 53).*
- 6.8 In consideration of a site’s availability, the Inspector highlighted that the question needs to be asked whether the site is available now, or is likely to become available for development *“within a reasonable period of time, determined on the merits of the particular case and having regard, amongst other matters, to the urgency of the Site Criteria/Area of Search”*. In this instance, a reasonable period of time was considered as 12 months by the Planning Inspector. In that case, the Inspector afforded significant weight to the business case progressed by Next and their desire to locate at Moorfoot in the immediate term.

6.9 The NPPG provides guidance on how the sequential test should be used in decision-taking (Reference ID: 2b-010-20140306). It is against these criteria that the parameters of the sequential test have been applied. Paragraph 10 of the sub section 'Ensuring the vitality of town centres' includes a checklist which states, inter alia:

- 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.
- Is there scope for flexibility in the format and/or scale of the proposal?
- If there are no suitable sequentially preferable locations, the sequential test is passed.

6.10 In view of the above, the sequential test is predicated on the following specific operational requirements that will determine whether a site or premises is suitable or viable for the operations of a proposed pod unit:

- site measuring 0.04 hectares, which can accommodate a freestanding pod unit.
- A site located within close proximity to a sufficient number of trade counter uses, warehouses and commercial businesses, to serve the existing staff working in the locale together with the customers who visit such trade locations.
- A site that can accommodate an outdoor seating area sufficient enough for Greggs' operations.
- A site adjoining a road which provides the necessary prominence to passing vehicular traffic.
- A site that can provide a dedicated service with adequate provision to accommodate delivery and servicing vehicles.

6.11 In applying this guidance, it is considered the following items are relevant to the Proposed Development:

1. Catchment Area / Area of Search - The area of search includes Reading Town Centre;
2. Flexibility - In demonstrating flexibility, sites are assessed against the capability to accommodate a pod unit that meets the specific requirements of a typical operator.
3. Suitability and Availability - In consideration of suitability, the timescale for the availability of the site is important as well as considering the proposed operator's business requirements.

6.12 Paragraph 10 of the NPPG states that the application of the test should be proportionate and appropriate for the given proposal. Whilst viability is a notable absence from the checklist of the sequential test, it is an important factor when considering suitability.

6.13 Paragraph 11 of the NPPG considers how locational requirements should be met in the sequential test and states, *"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 must be provided where this is the case, and land ownership does not provide such a justification."*

Catchment Area / Area of Search

6.14 Greggs has a particular market and locational requirement to expand its operations and locate to Hyperion Trade Park. The application site is ideal in meeting Greggs' business model requirements, being located immediately adjacent to a range of employment uses, which will

allow it to serve the existing staff working in the locale together with the customers who visit these areas.

6.15 It is important to note that as a result of the pod's intended customer base, locating it at a location other than Hyperion Trade Park (i.e. within a designated centre or edge-of-centre site) would mean that the proposed use would not be capable of meeting the same requirements as the application is intended to meet. Notwithstanding this, however, and in the interests of completeness, the sequential assessment has considered town centre and edge-of-centre sites located within Reading Town Centre.

6.16 Due to the ancillary nature, size, and intended function of the proposed pod unit, it has a tight catchment, which is focussed on the immediate employment areas. The intended catchment area of the pod does not extend to any nearby designated centres, including Reading Town Centre, however, in the interests of completeness, the area of search for the sequential assessment has considered alternative sites within this designated centre, nonetheless.

Flexibility

6.17 The NPPG requires developers and operators to demonstrate flexibility in considering the suitability of more central sites to accommodate the proposal being considered. The NPPG also sets out that proposals should consider whether there is scope for flexibility in the format and/or scale of the proposal. However, in this assessment, the NPPG is clear that:

“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” (Reference ID: 2b-010-20140306).

6.18 In demonstrating flexibility, sites are assessed against the capability to accommodate a pod unit (within Class E) that meets the specific requirements of a typical operator.

Suitability and Availability

6.19 In setting the parameters for the sequential site assessment, key elements which we have considered to appraise the suitability of the potential sites include:

- An appropriate size of site for the type of development proposed;
- Physical and ownership considerations including ease of site assembly;
- Existing land use;
- Allocation within the Development Plan;
- Accessibility (foot/bus/cycle) including suitability of vehicular access; and
- Proximity to car parking.

6.20 In regard to assessing the availability of sites, we will consider whether sites are available now or are likely to become available within a reasonable period of time. Any existing legal or ownership issues which may affect the site and will also impact upon its availability, will be taken into account.

6.21 Known operator requirements are for immediate occupation with the desire to have occupied the site and be trading by Spring 2023. It is against this methodology that Section 7 undertakes an assessment of the sites that form the sequential assessment.

7 SEQUENTIAL SITE ASSESSMENT

- 7.1 In accordance with the NPPG and section 6.0 of this Planning Statement, Rapleys LLP has identified the following sequential sites in Reading Town Centre:
1. Vacant unit within Reading Town Centre; and
 2. Opportunity Areas (Policies CR11, CR12, CR13) and Other Sites for Development in Central Reading (Policy CR14) identified in the Local Plan (2019).
- 7.2 It is acknowledged that some of the opportunity areas and identified sites for development and some of the vacant units identified in Rapleys LLP's survey of Reading Town Centre, could accommodate a proposed pod within Class E. However, it must be recognised that neither the opportunity areas/sites for development nor the vacant units, are capable of meeting the same market locational requirements as the intended use, in this instance.
- 7.3 Paragraph 011 of the NPPG explicitly states that the sequential test should recognise that certain main town centre uses have particular market locational requirements, which means that they may only be accommodated in specific locations. In this regard, and as stressed throughout this Planning Statement, Greggs has identified a strong requirement for its services among workers and customers of trade locations like Hyperion Trade Park and its surrounding employment uses and has identified a key opportunity to serve this unmet demand. As a result of the proposal's intended customer base, the proposed pod must be located within immediate proximity of a critical mass of trade counter and warehouse uses, whose presence is fundamental to ensure it is commercially feasible.
- 7.4 The intended catchment of the proposed pod is Hyperion Trade Park together with the remainder of the surrounding employment uses, and does not extend to Reading Town Centre. Indeed, Greggs already trade from locations within Reading, including those in Reading City Centre, which will remain operational as Greggs considers that the Proposed Development and its existing town centre operations perform different roles within discreet markets which do not impact upon one another.
- 7.5 Locating the proposed pod at a location other than Hyperion Trade Park (i.e. at the opportunity areas/sites for development or vacant units within Reading Town Centre), would mean it would not be capable of meeting the same requirements as the application is intended to meet. For these reasons, the sequential sites identified above, are considered to be **unsuitable** for the proposed pod, in this specific instance.
- 7.6 On the basis of the above, it is concluded that the Proposed Development satisfies the sequential approach to site selection, in accordance with paragraph 87 of the NPPF and Policy RL2 of the Local Plan (2019).

8 PLANNING POLICY COMPLIANCE

Land Use

- 8.1 The Proposed Development includes the erection of a standalone pod unit (within Class E), which measures 112 sqm (GIA) and is proposed to be occupied by Greggs. The site is located within Hyperion Trade Park which is identified as falling within a wider 'Core Employment Area' (Ref: EM2e: 'North of Basingstoke Road'), where B1c, B2 and B8 uses are supported and safeguarded. In respect of non-employment uses, (like those falling within Class E), Policy EM2 of the Local Plan (2019) states that these will be encouraged providing they support the area's economic function and do not result in the loss of employment land.
- 8.2 In the first instance, it should be stressed that the proposed pod unit will not result in the direct loss of employment floorspace and will be located within an area of under-utilised car parking in the south-eastern section of Hyperion Trade Park.
- 8.3 Due to its size and nature, the proposed pod will provide an ancillary service to the existing employment uses which is unlikely to harm the character or function of Hyperion Trade Park.
- 8.4 Indeed, the proposed pod will make efficient use of an under-utilised parcel of land and, in the process will generate 13 jobs (3 full-time and 10 part-time), which will serve to strengthen the estate as a whole. In view of this, it is concluded that the proposal complies with Policy EM2 of the Local Plan (2019). This approach also aligns with Paragraph 119 of the NPPF which seeks to prioritise the effective use of land in meeting the need for development.
- 8.5 As set out in Section 7, and in accordance with Policy RL2 of the Local Plan and Paragraph 87 of the NPPF, it has been demonstrated that there are no suitable alternative sites to accommodate the Proposed Development. Furthermore, as the proposed pod is substantially less than the 1,000 sqm local threshold established by Policy RL5 of the Local Plan (2019), an impact assessment is not required in this instance.
- 8.6 On the basis of the above, the Proposed Development is considered to be acceptable in land use terms.

Design

- 8.7 The design of the proposed pod corresponds to the wider trade park through the use of similar modern materials and colour palettes which will include dark grey cladding and grey galvanised steel roof sheeting. The glazing on the western and southern elevation allows for an active frontage onto the wider trade park and Rose Kiln Lane, respectively.
- 8.8 A small section of the existing brick wall and fencing on the southern boundary will be removed to allow for a new outdoor seating area together with the provision of 2 no. DDA parking spaces. It should also be stressed that the removal of the wall, together with the large signage board, will provide pedestrian access into the site.
- 8.9 To the north of the pod is a bin store area, which will be sufficiently screened utilising treated softwood. On the basis of the above, it is considered that the scheme proposes a high quality design and a suitable use of materials, which integrates with the setting and character of the surrounding employment area. It is considered the proposal complies with Policy CC7 of the Local Plan (2019) and is, therefore, acceptable in terms of design

Trees and Landscaping

- 8.10 An Arboricultural Implications Assessment (AIA) has been prepared by SEED and a Landscape Plan has been prepared by Vector in support of the planning application. Both documents should be read in conjunction with one another.

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- 8.11 The AIA demonstrates that the trees that are proposed for removal are low quality. The existing trees along the eastern boundary have been retained where possible.
- 8.12 The Landscape Plan sets out the significant replacement planting measures to off-set the loss of the Leyland cypresses. 3 no. trees are proposed along the eastern boundary (Standard Extra Heavy) including 2 no. *Betula pendula* and 1 no. *Sorbus aucuparia*.
- 8.13 Also included on the eastern boundary of the Site is mixed instant native hedge planting which extends to around 21 metres in length and is proposed to be 2.4 m high. It is considered this will integrate into the existing landscaping to the north and south and will provide sufficient screening for the residential to the east thereby continuing to perform the function of the Leyland Cypresses which are set to be removed.
- 8.14 In addition to the above, the replacement planting also enables the Proposed Development to achieve a net gain in biodiversity across the Site (as detailed in the below sub-section).

Ecology / Biodiversity

- 8.15 An Ecological Scoping Survey has been undertaken by Phlorum. The concludes that, overall, the Site is considered to have low ecological value. It notes there is little vegetation at the Site - with the only vegetation being non-native species - and also confirms that no particular features of ecological value were noted at the Site either.
- 8.16 The Ecological Scoping Survey formed the basis for the calculation of Biodiversity Net Gain (BNG) - also undertaken by Phlorum - using 'The Biodiversity Metric 3.1' published by Natural England (2022). Overall net gains of 738.87% in habitat units and 148.83% in hedgerow units from the existing baseline have been calculated. This reflects the removal of the existing introduced shrubs and a length of the line of trees, and planting of an area of wildflower grassland, three new native trees, and a new species rich native hedgerow.
- 8.17 On the basis of the above, it has been demonstrated that the Proposed Development will provide a net gain in biodiversity in line with Part (b) of Policy EN12.

Parking, Transport & Highways

- 8.18 Connect Consultants has prepared a Transport Statement (TS) and Travel Plan (TP) in support of the planning application.
- 8.19 In the first instance, the TS confirms the Site is accessible by a choice of travel modes and will reduce reliance on the private consistent with national and local policy. It also confirms that the proposed car parking accords with local standards.
- 8.20 Furthermore, a car park accumulation analysis has been undertaken as part of the TS which shows the provision of 8 no. car parking spaces to serve the pod will provide sufficient capacity during peak times, and given the availability of spaces within the wider Trade Park, overflow parking onto Rise Kiln Way is unlikely to occur.
- 8.21 The traffic assessment included within the TS demonstrates that the traffic effects generated by the Proposed Development will be negligible. In conclusion, the Proposed Development is considered to be acceptable from a transport perspective, in accordance with Policy TR3 of the Local Plan (2019).

Sustainability Statement

- 8.22 In accordance with Policy CC2 of the Local Plan, a Sustainability Statement has been prepared by SCS in support of this planning application, which demonstrates that the Proposed Development can achieve BREEAM 'Very Good' standard as a minimum.

Air Quality

- 8.23 Owing to the Site's location within an Air Quality Management Area (AQMA), an Air Quality Statement has been prepared by Phlorum as part of the planning application. This confirms that the Proposed Development will comply with all relevant policy and that air quality should not, therefore, pose any significant obstacles to the planning process.

9 SUMMARY AND CONCLUSIONS

- 9.1 This Planning Statement has been completed by Rapleys LLP on behalf of Legal & General Property Partners (Industrial Fund) Limited ('the applicant'), in support of a full planning application for a new standalone pod unit (Use Class E), which is intended to be occupied by Greggs, at Hyperion Trade Park, Reading.
- 9.2 The proposed pod unit, which measures 112 sqm (GIA), will provide an ancillary café providing a food and drink facility to serve the local workers and visitors to Hyperion Trade Park, together with the other surrounding commercial uses and activities located within the wider employment area.
- 9.3 The formal description of development being applied for is as follows:
"Proposed freestanding pod unit (Use Class E) and outdoor seating area, together with new landscaping, parking and associated works" (the 'Proposed Development').
- 9.4 Greggs has identified Hyperion Trade Park as an ideal opportunity to expand its offer within Reading. Due to its size and nature, it is considered the proposed pod will complement the surrounding employment uses and will not adversely affect the role and vitality of Hyperion Trade Park. Indeed, the proposed pod will make efficient use of an under-utilised parcel of land and, in the process, will generate 13 jobs (3 full-time and 10 part-time), which will serve to strengthen the estate as a whole.
- 9.5 The proposal will serve as an ancillary operation to the wider employment area and, as a consequence of its intended customer base, it is not suited to a town centre location. It is important to note that the existing Greggs within Reading, including those in Reading City Centre and other designated centres, will remain trading as Greggs considers that the Proposed Development and its existing town centre operations perform different roles within discreet markets which do not impact upon one another.
- 9.6 As demonstrated in Sections 6 and 7, and in accordance with Policy RL2 of the Local Plan and Paragraph 87 of the NPPF, it has been demonstrated there are no suitable alternative sites to accommodate the Proposed Development
- 9.7 Section 8 demonstrates that the Proposed Development is acceptable from a land use perspective as well as from a design, highways, tree & landscape and ecological perspective.
- 9.8 In conclusion, it is our considered view that the Proposed Development should be supported by the Council and the additional investment welcomed.