

Barclays Nominees
(George Yard) Ltd c/o
Abrdn

Unit 6 (Unit C), Reading
Gateway, Imperial Way,
Reading

Planning Statement

November 2022



Document control

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Contents

1.0	Introduction.....	1
1.1	Background	1
1.2	Structure	1
2.0	The Proposed Development.....	2
2.1	The Application Site	2
2.2	Relevant Planning History	2
2.3	The Proposed Development.....	3
2.4	Pre-Application Consultation	4
3.0	Planning Policy Context	5
3.1	Introduction	5
3.2	Reading Borough Local Plan (adopted Nov 219).....	5
3.3	Supplementary Planning Guidance	7
3.4	National Planning Policy Framework	7
3.5	Summary.....	8
4.0	The Sequential Approach to Site Selection.....	9
4.1	Introduction	9
4.2	Sequential Approach Requirements	9
4.3	Sequential Approach Guidance	9
4.4	Application of the Sequential Approach	10
4.5	Site Search Parameters	12
4.6	Shinfield Road District Centre.....	14
4.7	Whitley Wood Local Centre	15
4.8	Three Mile Cross Local Centre	16
4.9	Spencers Wood Local Centre	17
4.10	Whitley District Centre	18
4.11	Shinfield Local Centre.....	19
4.12	Summary.....	20
5.0	Other Material Planning Considerations	21
5.1	Introduction	21
5.2	Design, Layout and appearance	21



5.3	Transport.....	22
5.4	Air Quality	23
5.5	Sustainability	23
5.6	Economic Benefits	23
6.0	Summary and Conclusion	24



List of Appendices

Appendix A – Site Layout Plan

Appendix B – Catchment Plan



1.0 Introduction

1.1 Background

- 1.1.1 This Statement has been prepared by CarneySweeney on behalf of our client, Abrdn. The Statement provides the planning policy justification in support of the submission of a full planning application for use of the Unit 6 (Unit C) for the sale of food and external alterations, installation of electric vehicle charging bays and associated alterations to the car park and landscaping at Reading Gateway Shopping Park, Imperial Way, Reading.

1.2 Structure

- 1.2.1 The following report assesses the requirements of local and national planning policy relevant to this location and the development proposed, including (but not limited to) town centre use policy. The report is structured as follows:
- Section 2: describes the proposed development, the site and the relevant planning history for the park, where relevant;
 - Section 3: sets out the local and national planning policy context;
 - Section 4: considers the application of the sequential approach and the search for a sequentially preferable site;
 - Section 5: addresses other material planning considerations to the proposed development; and
 - Section 6: provides a summary of conclusions.
- 1.2.2 The applications follow a pre-application enquiry submitted to Reading Council Planning Department in January 2022 and the Council's subsequent response in March 2022 confirming application requirements.



2.0 The Proposed Development

2.1 The Application Site

- 2.1.1 The site is Unit 6 (aka Unit C) and associated parking area at Reading Gateway. Reading Gateway is a mixed retail/ leisure development accessed from Imperial Way, via the A33 Basingstoke Road, to the south of Reading. Reading Gateway lies directly north of Junction 11 of the M4. The application specifically relates to Unit 6 and its associated parking as shown on the Site Location Plan accompanying the full planning application and enclosed at **Appendix A**.
- 2.1.2 The surrounding area is characterised by a mix of commercial and residential land uses. To the east is the residential suburb of Whitley. To the south is Reading International Business Park. Directly west of the site is Tesco's Reading Distribution Warehouse on Basingstoke Road, beyond which is the Madejski Stadium.
- 2.1.3 Access to the site is from Perkins Way via Imperial Way.
- 2.1.4 The site lies within an Air Quality Management Area (AQMA) but is otherwise undesignated. The site lies within South Reading Strategic Development Site (SA2a – Worton Grange). The site lies in Flood Zone 1 and is at low risk of flooding.

2.2 Relevant Planning History

- 2.2.1 The following relevant historic planning permissions associated with Reading Gateway are noted.
- Pp ref: 151944 - Full planning permission for the development of 12 commercial units; two car showrooms (Sui Generis); three retail warehouse units (Class A1); hotel (Class C1); pub/restaurant (Class A4); coffee shop (Class A1); restaurant (Class A3); and bank (Class A2). Creation of new vehicular access arrangements and all other ancillary development. Granted April 2016.
 - Pp ref: 161672 - Non-material amendment following a grant of planning permission ref: 151944. Agreed October 2016.
 - PP ref: 162257 - Erection of a 557sqm building for use within Class A1 (retail) / A2 (financial & professional services) / A3 (restaurants and cafes) or A5 (hot-food takeaway) and associated works. Granted March 2017.
 - PP ref: 190339 - Change of use and subdivision to provide 1no. class A3 unit & 1no. class A2/A3 unit. Provision of mezzanine to class A3 unit. Alteration to elevations, external seating area and parking layout. Granted June 2019.
 - PP ref: 190890 – Change of use of Unit 6 from retail (Class A1) to gym (Class D2) and insertion of a 1,105sqm GIA mezzanine floor. Granted December 2019.



2.3 The Proposed Development

2.3.1 Unit 6 (Unit C) has lain vacant since Toys R Us ceased trading in early 2018. Since then, efforts to bring the unit back into active use have been unsuccessful. As outlined above this has included securing planning permission for a change of use of the unit for Class D2 (gym) purposes (pp ref: 190890) (unimplemented).

2.3.2 Planning permission ref: 151944 is the principal governing consent at Reading Gateway. Condition 42 of the pp ref: 151944 restricts Unit 6's (Unit C) trading operation. It is worded as follows:

"42. The retail premise (Units A, B and C) hereby permitted shall not be used for the sale of goods other than: DIY goods and services; garden stock and equipment; furniture (pre-assembled, fitted and self-assembly), fixtures and fittings; floor coverings; household textiles, soft and hard furnishings and homewares; automotive parts and accessories; bicycles, bicycle parts and accessories; electrical goods (including personal mobile communication equipment and accessories); gas appliances; pets, pet goods (including pet food) and pet services; office furniture and equipment; toys and indoor/outdoor play equipment/products; arts and crafts, entertainment and educational goods; sports good/equipment and sportswear and goods sold ancillary to the above ranges (such goods to account for no more than 5% of the net sales area of each unit) and for no other purpose within Class A1."(now Class E)

2.3.3 In order to meet market interest and facilitate the beneficial reoccupation of the unit by Aldi, a Limited Assortment Discounter (food), a full planning application is submitted for the allowance of the sale food at Unit 6 and physical alterations to the existing unit and car park.

2.3.4 Aldi is already represented across Reading with four stores at: Basingstoke Road; London Road; Vastern Court, Caverhsham Road; and Bath Road. It is important to note, should permission be granted, **Aldi do not intend to close/ relocate from any of its existing stores in Reading**. On the contrary, owing to their popularity a new store is required to principally serve shoppers based in South Reading. Increased local representation is needed to better meet demand and serve local shopping needs, locally.

2.3.5 To facilitate reoccupation of Unit 6 by Aldi, the following physical works are proposed, as outlined on the application drawings:

- Construction of a new delivery pod and canopied entrance/exit lobby (+62sqm GIA in total);
- Minor elevational alterations;
- Provision of a trolley bay;
- Alterations to the existing servicing yard and the following changes to parking provision:



Existing	Proposed
61no. standard spaces	48no. spaces
2no. disabled spaces	4no. EVCP spaces
	6no. Disabled spaces
	6no. Parent & Child spaces
	2no. Click & Collect spaces
63no. total spaces	66no. total spaces (64 exc. click and collect)

- 2.3.6 The car park is proposed to be altered to accommodate electric vehicle charging bays and 'click and collect' bays, and Aldi's altered servicing requirements, in accordance with sustainable travel objectives. The accompanying Transport Assessment, Travel Plan and Parking Technical Note address the transport related matters in detail.

2.4 Pre-Application Consultation

- 2.4.1 This application follows a pre-application enquiry with Reading Borough Council initiated in January 2022, with officers' response provided in March 2022. In summary, it is considered that the principle of widening the range of goods that condition 42 stipulates can be sold from Unit C (Unit 6) is dependent on demonstration of compliance with the sequential approach as set out in the NPPF, with officers confirming a list of surrounding centres to be assessed.
- 2.4.2 Since pre-application consultation, at which point the submission of a s.73 application to vary condition 42 was considered, for procedural reasons a full planning application is submitted seeking consent for the allowance of the sale of food and the now necessary physical alterations to the unit to accommodate the food retail operator.
- 2.4.3 In terms of impact, pre-application advice notes guidance provided at paragraph 90 of the NPPF which states an impact assessment is required for applications for retail and leisure development outside town centres, which are not in accordance with an up-to-date plan, with a default threshold of 2,500sqm gross floorspace unless there is a locally set threshold. Based on existing floorspace, officers accept the proposal falls below the national threshold. Policy RL5 of the Local Plan sets a lower threshold of 1,000sqm, but only for "new or additional floorspace for main town centre uses in an edge-of-centre or out-of-centre location". Given the proposal does not involve new or additional floorspace, officers confirmed that an impact assessment is not required.
- 2.4.4 Officers confirmed the submission of a Transport Assessment and Framework Travel Plan is required to demonstrate that significant impacts on the transport network will be avoided. A Transport Assessment and Travel Plan accompany the application, the scope of which has been agreed with officers at pre-application stage.



3.0 Planning Policy Context

3.1 Introduction

3.1.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that:

“If regard is to be had to the Development Plan for any 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”.

3.1.2 The statutory development plan for Reading is the Reading Local Plan (2019).

3.1.3 Local policies and guidance contained within the relevant Supplementary Planning Guidance/Documents and National Planning Policy Framework (NPPF) and National Planning Practice Guidance (NPPG) are also material considerations in the determination of the planning application and are considered further below.

3.2 Reading Borough Local Plan (adopted Nov 219)

3.2.1 The adopted development plan proposals map indicates the subject site is situated within the urban extent of southern Reading but is not allocated for a specific use, and therefore constitutes ‘white land’. The following policies of the adopted Local Plan are relevant to the proposed development:

3.2.2 **Policy CC1 Presumption in Favour of Sustainable Development** - indicates a positive approach to considering development proposals will be taken reflecting the NPPF’s presumption in favour of sustainable development.

3.2.3 **Policy CC2 Sustainable Design and Construction** - proposals for new development, including 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.

3.2.4 **Policy CC3 Adaption to Climate Change** - all developments will demonstrate how they have been designed to incorporate measures to adapt to climate change.

3.2.5 **Policy CC7 Design and the Public Realm** - 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.

3.2.6 **Policy CC8 Safeguarding Amenity** - development will not cause a detrimental impact on the living environment of existing residential properties or unacceptable living conditions for new residential properties.

3.2.7 **Policy CC9 Securing Infrastructure** - development will not be permitted unless infrastructure, services, resources, amenities or other assets lost or impacted upon as a result of the



development or made necessary by the development will be provided through direct provision or financial contributions at the appropriate time.

- 3.2.8 **Policy EN15 Air Quality** - indicates development should have regard to the need to improve air quality and reduce the effects of poor air quality. Development that would detrimentally affect air quality will not be permitted unless the effect is to be mitigated. The site lies within an AQMA.
- 3.2.9 **Policy EN16 Pollution and Water Resources** - development will only be permitted where it would not be damaging to the environment and sensitive receptors through land, noise or light pollution.
- 3.2.10 **Policy EN17 Noise Generating Equipment** - where noise generating equipment is proposed, the noise source specific level (plant noise level) should be at least 10dBA below the existing background level as measured at the nearest noise sensitive receptor.
- 3.2.11 **Policy TR1 Achieving the Transport Strategy** - Planning permission will not be granted for major development proposals unless there is a commitment to implement measures to promote and improve sustainable transport facilities.
- 3.2.12 **Policy TR3 Access, Traffic and Highway Related Matters** - states in determining proposals involving, inter alia, the generation of additional trips, consideration will be given to the effect on safety, congestion and the environment.
- 3.2.13 **Policy TR5 Car and Cycle Parking and Electric Vehicle Charging** - indicates 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.
- 3.2.14 **Policy RL1 Network and Hierarchy of Centres** - sets out a network of centres, identified on the Proposals Map including regional centres, district centres, major local centres and local centres. The vitality and viability of these centres should be maintained and enhanced.
- 3.2.15 **Policy RL2 Scale and Location of Retail, Leisure and Cultural Development** - provision will be made for up to 34,900sqm of retail and related facilities in Reading to 2036, together with new leisure facilities.
- 3.2.16 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. All development will comply with the relevant tests for retail, leisure and cultural development set out in national policy.
- 3.2.17 **Policy RL5 Impact of Main Town Centre Uses** - proposals that include more than 1,000sqm (gross) of new or additional floorspace for main town centre uses in an edge-of-centre or out-of-centre location should 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.

3.2.18 The proposal does not involve new or additional retail floorspace.

3.3 Supplementary Planning Guidance

3.3.1 Relevant local supplementary guidance is provided in the following SPDs:

- **Revised Parking Standards and Design SPD (2011)** – This document outlines standards based on a zonal approach. The standards set, except for those relating to residential (C3), are to be imposed as maximums. The application site lies in Zone 3. Areas within this zone feature a variety of land uses and densities and include some local centres for day-to-day needs. Typically, these areas are within 400m of a Reading Buses high frequency 'Premier Route', which provides high quality bus routes.
- **Planning Obligations under Section 106 SPD (2015)** - This sets out the Council's approach towards seeking planning obligations, alongside CIL. Development proposals will be assessed on a site-by-site basis with the individual circumstances of each site being taken into consideration.

3.4 National Planning Policy Framework

3.4.1 The NPPF indicates the purpose of the planning system is to contribute to the achievement of sustainable development.

3.4.2 In regard to building a strong, competitive economy, paragraph 81 indicates 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. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future.

3.4.3 In respect of the location of development, paragraph 87 states *"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. 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"*.

3.4.4 The Framework also indicates that when considering edge of centre and out of centre proposals, preference should be given to accessible sites which are well connected to the town centre. Applicants and local planning authorities should demonstrate flexibility on issues such as format



and scale, so that opportunities to utilise suitable town centre or edge of centre sites are fully explored (paragraph 88).

- 3.4.5 The Development Plan and the NPPF advises that where an application fails to satisfy the sequential test, it should be refused. Notwithstanding this however, it is important to recall the case of *Zurich Assurance Limited v North Lincolnshire Council* judgment [2012] EWHC 3708 (Admin), where the High Court confirmed that the failure of the sequential approach (or retail impact tests) and the consequent presumption of refusal, is just one consideration which the Local Planning Authority (LPA) must balance against other considerations to see whether or not it is outweighed by other such considerations. The sequential test addressed is just one consideration. All material planning considerations need to be considered in reaching a decision.

3.5 Summary

- 3.5.1 The statutory development plan is found to be in accordance with the requirements of the NPPF in so far as retail policy matters are concerned.
- 3.5.2 The application site lies beyond an allocated retail centre as defined under Policy RL1 of the local plan, in an 'out-of-centre' location in retail planning terms. Where there are no available sites within or adjoining the centre of Reading, a sequential approach should be applied to identify alternative sites, in accordance with the retail tests for retail development set out in the NPPF.
- 3.5.3 Proposals for new development, including refurbishment of existing building stock, will be acceptable where the design of buildings and site layouts use natural resources appropriately and take account of the effects of climate change. Development must be of high design quality that maintains and enhances the character and appearance of the area.
- 3.5.4 Parking and cycle parking should be provided that is appropriate to the accessibility of locations.
- 3.5.5 No additional floorspace is proposed. An impact assessment is not required. A CIL charge is inapplicable.
- 3.5.6 From a policy perspective, the beneficial reuse of a longstanding vacant retail unit for retail purposes is not considered to raise any in principle land use policy conflict, subject to the application of the sequential test.



4.0 The Sequential Approach to Site Selection

4.1 Introduction

- 4.1.1 The NPPF sets out that a sequential assessment needs to accompany planning applications for main town centre uses that are not in a centre and not in accordance with an up-to-date development plan.
- 4.1.2 Since the application site is located in an out-of-centre location and not allocated for retail development this section provides supporting evidence addressing this NPPF policy requirement.

4.2 Sequential Approach Requirements

- 4.2.1 The NPPF (paragraph 86) identifies that main town centres 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.
- 4.2.2 Paragraph 87 identifies that when considering edge-of-centre and out-of-centre proposals, preference should be given to accessible sites which are well connected to the town centre. The NPPF requires applicants and local planning authorities to demonstrate flexibility on issues such as format and scale so that opportunities to utilise suitable town centre or edge of centre sites are fully explored.

4.3 Sequential Approach Guidance

- 4.3.1 The National Planning Policy Guidance (NPPG) provides confirmation of how the sequential test should be applied in decision taking; this is set out in NPPG's Town Centres and Retail section.
- 4.3.2 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).
- 4.3.3 A checklist is provided which 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.
 - 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 precisely accommodate 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.

4.3.4 The NPPG makes clear the application of the test needs to be proportionate and appropriate for the given proposal¹. Indeed, paragraph 012 notes that the 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.

4.3.5 The sequential test supports the Government's 'town centre first' policy. Importantly however the NPPG recognises at paragraph 013, that *"promoting new development on town centre locations can be more expensive and complicated than building elsewhere, and local planning authorities need to be realistic and flexible in applying the test."*

4.4 Application of the Sequential Approach

4.4.1 The approach adopted in this assessment is consistent with the recommendations and guidance set out in the NPPF and NPPG and prevailing judicial authority regarding the application of the sequential test.

4.4.2 It is important that the sequential approach is applied in a policy and legally compliant manner. Several appeal and Court cases have helped shape the application of the sequential test. The following section provides a summary of the key matters regarding the application of the sequential test including applying flexibility, "suitability" and the need to "disaggregate."

- The NPPF and NPPG indicate that when looking at the suitability of potential sequential sites, flexibility should be demonstrated on issues such as format and scale. The definition of suitability is pertinent to the consideration of flexibility of format and scale. The definition was clarified in February 2012 by the Supreme Court in *Tesco Stores v Dundee City Council*². Since this time the Judgment has been recognised and applied by the High Court, Secretary of State and Inspectors as being applicable to the NPPF. The Dundee Judgment identifies that provided the applicant has demonstrated flexibility with regard to format and scale, the question is *"whether an 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 an alternative site."* (Dundee, paragraph 29).
- For a sequentially preferable site to be suitable, it must be "suitable for the development proposed by the applicant." The "whole exercise is directed to what the developer is proposing, not some other proposal which the planning authority might seek to substitute

¹ Paragraph: 011 Reference ID: 2b-011-20190722

² *Tesco Stores Limited v Dundee City Council (Tesco Stores Ltd v. Dundee City Council [2012] UKSC13)*



for it which is for something less than that sought by the developer.” (Dundee³, paras 24 and 38);

- “to refuse an out-of-centre planning consent on the ground that an admittedly smaller site is available within the town centre may be to take an entirely inappropriate business decision on behalf of the developer.” (Dundee, para 28). Accordingly, the application of the sequential test is “for use in the real world in which developers wish to operate, not some artificial world in which they have no interest doing so.” (Dundee, para 38);
- “The policy concerning the sequential approach as set out in the NPPF ... must be applied in a manner which complies with the legally binding case law on the meaning of the sequential approach. Plainly the case in question (Dundee) is of seminal importance” (Rushden Lakes⁴, para 8.44);
- “There is no longer any such [disaggregation] requirement stated in the NPPF... [The NPPF] cannot be read so as to imply that a major, and extremely controversial, part of previously stated national policy lives on by implication in the NPPF. Had the Government intended to retain disaggregation as a requirement it would and should have explicitly stated this in the NPPF.” (Rushden Lakes, para 8.47). It is clear, then, that “there is no requirement to disaggregate” (as confirmed in the Secretary of State decision letter for Rushden Lakes, para 16);
- Furthermore, the appellant’s own commercial objectives are relevant to the question of suitability, even where these are site specific (Telford Forge⁵ appeal, para 16).
- For a site to be suitable, it would have to be a genuine “real world” alternative for the development. If the appeal were dismissed, would the developer build the development on the sequentially preferable site is the relevant question (Telford Forge appeal, para 19).
- The Rushden Lakes appeal concluded that for a site to be available for the development proposed, it had to be ‘currently’ available and not available over a period of time – at some point in the future (para. 8.55). Subsequent appeals have provided alternative interpretations of the term, and later revisions to the NPPF have sought to provide further clarity by stating: “or expected to become available within a reasonable period”. Notwithstanding this, the 2016 Exeter⁶ Secretary of State decision makes it clear that the *“NPPF test should not be used to prevent development unless a sequentially preferable*

³ Ibid

⁴ Land adjacent Skew Bridge Ski Slope, Northampton Road, Rushden (“Rushden Lakes”) (Appeal ref: APP/G2815/V/12/2190175)

⁵ Telford Forge Retail Park (Appeal Ref. APP/C3240/A/12/2172756)

⁶ APP/Y1110/W/15/3005333



site could actually deliver the proposal". In other words, there has to be certainty about a site's availability.

- There is no requirement to demonstrate 'disaggregation' in either the NPPF or NPPG. This was confirmed in the Warners Retail Court of Appeal judgement and by the Secretary of State in his decisions on Rushden Lakes, Northamptonshire; Scotch Corner, North Yorkshire and Honiton Road, Exeter. The more recent Mall⁷, Cribbs Causeway appeal decision further supports that there is no requirement to disaggregate a proposed development finding *"There is no longer any requirement for disaggregation in current national policy or guidance as was made clear in the Rushden Lakes decision. BCC's approach of splitting the proposed retail and food and beverage floorspace over a number of unspecified sites or vacant premises is wrong in principle and inconsistent with case law."*

4.4.3 The Rushden Lakes Secretary of State decision and the Mall decision confirms that the sequential test relates entirely to the application proposal as a whole; it is not a question of whether a materially reduced or otherwise different scheme can in theory be pursued on other sites. Provided that an element of flexibility is exercised on issues such as format and scale, any potential sequential sites should be considered only in terms of whether they could accommodate a broadly similar development proposal.

4.5 Site Search Parameters

4.5.1 As confirmed at the pre-application stage the catchment for the proposed development is outlined at **Appendix B**. This is the area of south Reading the proposed development is primarily intended to serve. Indeed, as outlined above, Aldi the proposed operator is already represented elsewhere in Reading.

4.5.2 As confirmed in pre-application consultation with officers the following nearby centres, which lie within the proposed development's catchment area, provide the main focus of the sequential search:

- Whitley District Centre;
- Whitley Wood Local Centre;
- Three Mile Cross Local Centre (Wokingham Borough);
- Spencers Wood Local Centre (Wokingham Borough);

4.5.3 In addition to the above officers request that the assessment also cover Shinfield Road Centre, which officers acknowledge lies at the very edge of the catchment area, and also Shinfield Local

⁷ APP/P0119/V/17/3170627



Centre in Wokingham Borough; this centre lies beyond the development's intended primary catchment area to the south-east.

4.5.4 CarneySweeney has conducted a sequential site search of the above centres to ascertain whether there are any suitable, available and viable sites which could accommodate the proposed development.

4.5.5 Bearing in mind the need for flexibility, the physical requirement to meet the needs of the proposed development have been taken to be:

- A site that can accommodate a store in excess of 1,700sqm gross to allow for provision of a discount food retail format based on a full product range offer. There is no prospect for disaggregation to separate, smaller sites in this instance;
- A site that can allow for the safe manoeuvring of customer vehicles and delivery vehicles on site;
- A prominent site with the ability to attract passing trade, or else there is no commercial rationale for the occupation;
- A site that is easily accessible by a choice of means of transport;
- Given the bulky nature of food shopping, a site that is able to offer ample, dedicated surface level car parking, so that customers can easily transfer goods to their vehicles, as they can from all similar foodstores. To have otherwise would severely impact the appeal and viability of the store; and
- Provision of a dedicated servicing including the ability to accommodate HGVs.

4.5.6 All of the above are key operational and locational requirements that any sequentially preferable site will need to provide, albeit allowing for some flexibility on format and scale.

4.5.7 The approach that has been adopted in this sequential site analysis includes two elements; to firstly examine whether any sites or units are allocated in the adopted Local Plan, and secondly to undertake a detailed review of the nearby defined retail centres.

4.5.8 Adopting a degree of flexibility, as required by both the NPPF and NPPG, in this instance we have adopted a floor area flexibility parameter margin of c.10% to establish whether other site opportunities are available or suitable to support the applicant's development. Any site smaller than this would not meet operator requirements. It is considered anything smaller than this would not accommodate a broadly similar development proposal.

4.5.9 As noted earlier, the NPPG (paragraph 11) notes that the 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. It should be recognised by their nature, space and access not all operations are suited to town centre locations. For

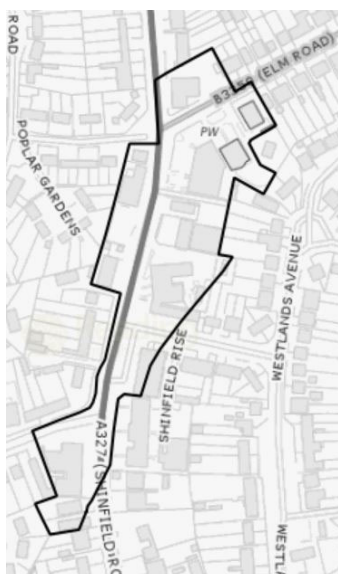


example, proposals for stores selling bulky goods are typically better located outside of town centres where loading/servicing can be more easily catered for, they are less likely to cause traffic problems and where customers will realistically expect to use private vehicles to collect goods directly from these types of shops.

Definition of Availability

- 4.5.10 In accordance with the NPPF, any sequential site needs to be available or expected to be available within a reasonable period. Paragraph 11 of the Town Centres and Retail Planning Practice Guidance indicates that 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.
- 4.5.11 If there is any uncertainty on a site coming forward for development, for example, there are practical/feasibility/viability issues to resolve or investment/occupier interest or funding is still to be secured, then a site cannot reasonably be considered to be available. If a potential alternative site does not satisfy the availability test it is not sequentially preferable.
- 4.5.12 Subject to securing permission the proposed development and discharge of planning conditions could be implemented within 3-6months. Accordingly, for a potential alternative site being considered available in the context of the subject proposals it must be available in a timeframe that could allow a scheme to be implemented immediately. In this instance, anything beyond 3-6 months is not considered to be a “reasonable period”.
- 4.5.13 A review of the Reading local plan has revealed there are no retail allocations within the store’s catchment area which may accommodate the proposed development.

4.6 Shinfield Road District Centre



Source: Reading BC LP proposals map



- 4.6.1 Shinfield Road DC lies approximately 2.5km to the north-east of the application site. It should be noted it lies beyond the PCA to the north-east, albeit in close proximity. The centre lies within a tightly-knit, densely developed, predominantly residential area.
- 4.6.2 It is a largely linear centre comprising mostly small, terraced units fronting Shinfield Road. The centre is served by, amongst other uses, fast food takeaways, petrol filling station, small convenience stores, an optician, pub and a church. The centre is buoyant but physically constrained, with a low vacancy rate and little opportunity for additional inward investment through e.g. site redevelopment.
- 4.6.3 Based on our visits and a desk-based review of the centre, we have not identified any potentially sequentially preferable sites. During our visit a small unit (formerly in residential use) was observed as being marketed for rent. However, at c.32sqm the unit is wholly unsuitable for the development proposed, even allowing for flexibility.
- 4.6.4 There are no other similarly sized (to the application unit), vacant and available sites/ units within or on the edge of the centre.
- 4.6.5 Moreover, lying outside the PCA to the north-east the centre is considered to be in a compromised location and unsuitable for the proposed development.
- 4.6.6 Accordingly, the centre has been discounted from the sequential search.

4.7 Whitley Wood Local Centre



Source: Reading BC LP proposals map

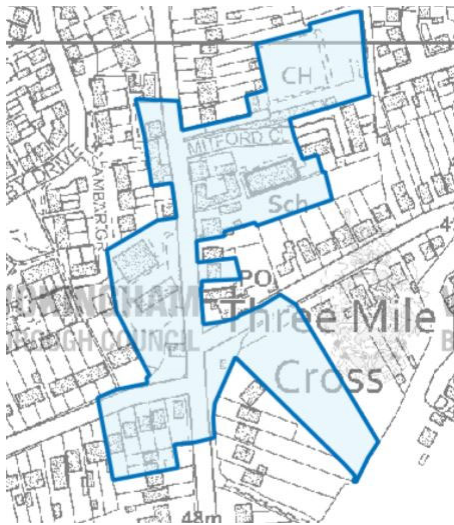
- 4.7.1 Whitley Wood LC is located approximately 850m to the east of the application site. It comprises a small precinct of shops located at the junction of Whitley Wood Road and Northumberland Avenue. The centre is anchored by a Coop foodstore unit. Other operators include a café and Pharmacy. The centre lies within a dense residential setting.
- 4.7.2 Geoffrey Field Junior and Infant school, and Christ the King RS Primary school and grounds lie to the north.



Vacant unit, Northumberland Avenue

- 4.7.3 At the time of survey there was one vacant unit at the centre measuring c.60sqm, which is wholly unsuitable to accommodate the proposed development.
- 4.7.4 There are no suitable, available or viable potentially sequentially preferable sites at the centre. The identified vacant unit at the centre is too small to accommodate the proposed development, even allowing for flexibility. The centre has been discounted from the sequential search.

4.8 Three Mile Cross Local Centre



Source: Wokingham BC LP proposals map

- 4.8.1 Three Mile Cross LC lies approximately 1.4km to the south of the application site, within Wokingham Borough authority area. It comprises a mix of small commercial units mostly fronting Basingstoke Road. The centre is anchored by a Budgens and BP service station. Other operators include a florist, Bargain booze, a Bowling Club and a chapel off Grazeley Road.
- 4.8.2 There are two vacant units at the local centre. The vacant units are a former pub building (formerly The Swan) and a former garage (formerly David Hearn Motor Engineers).

The Swan pub site, Basingstoke Road

- 4.8.3 The former pub site measures c.0.2ha. The former pub building is Grade II listed building with an approximate size of 200sqm. The site also accommodates a c.70 vehicle space car park. We understand the Swan has been permanently closed since March 2020.
- 4.8.4 At c.0.2ha the site is physically too small and narrow to accommodate the proposed development with ample parking. Moreover, the site is too constrained to accommodate the proposed retail store format, even allowing for flexibility. Any redevelopment of the site would require demolition of the Grade II pub building which is a heritage asset; its demolition is not considered justified or appropriate. The site considered unsuitable and has been discounted.



Former garage site, Basingstoke Road

- 4.8.5 The former garage site is located on Basingstoke Road, opposite Special Occasions Florists. The site measures c.01ha and is vacant. The site has been marketed for lease. We understand the site has been the subject of a recent application for its renovation for use as a garage which was approved in July 2021 (pp ref: 211358). The site is not considered available for the proposed development. Notwithstanding this, the site's size renders it unsuitable for the proposed development, even allowing for flexibility. The site has been discounted from the sequential search.

4.9 Spencers Wood Local Centre



Source: Wokingham BC LP proposals map

- 4.9.1 Spencers Wood Local Centre is located approximately 2.5km to the south of the application site, within Wokingham Borough authority area. It is a linear centre that is largely residential in nature but comprises a number of commercial units mostly fronting Basingstoke Road, including a One Stop, pharmacy, Miahs restaurant, the Barriers Arms pub and a petrol station. Wellington Industrial Estate is also located at the south of the centre.
- 4.9.2 From our on-site investigations no potentially sequentially suitable, available and viable sites were identified within or on the edge of the centre, allowing for flexibility. As such the centre has been discounted.



4.10 Whitley District Centre



Source: Reading BC LP proposals map

- 4.10.1 Whitley DC lies approximately 1.8km to the north of the application site. The centre is laid out over two separate locations, with the west of the centre fronting Basingstoke Road and the remainder of the centre found approximately 400m to the east fronting Northumberland Avenue. Whitley 'west' district centre is anchored by a large Morrisons and an Aldi foodstore and BJ's Bingo Hall. Whitley 'east' is a more traditional, linear-type centre comprising mostly units occupied by e.g., Reading Community Hub, Whitley Children's Centre, a convenience store and a bookmaker.
- 4.10.2 It should be noted that this centre lies just beyond the PCA to the north and as such is not considered suitable in serving the chosen catchment. It should also be noted from the outset Aldi is already represented at the centre with its existing store at Basingstoke Road. Moreover, it should be noted there is no intention to close/relocate the existing Aldi store should permission be granted for the proposed development. The fact Aldi is already represented at the centre renders it wholly unsuitable for the proposed development, which is principally intended to serve south Reading.
- 4.10.3 Notwithstanding the above, at the time of our site visit there were no vacant units within the Whitley District centre west. One vacant unit at Whitley district centre east was identified i.e. a former off license unit adjacent to the Golden Dragon takeaway restaurant. However, the unit has a site area of just c.90sqm and is wholly unsuitable.



Brunel Retail Park

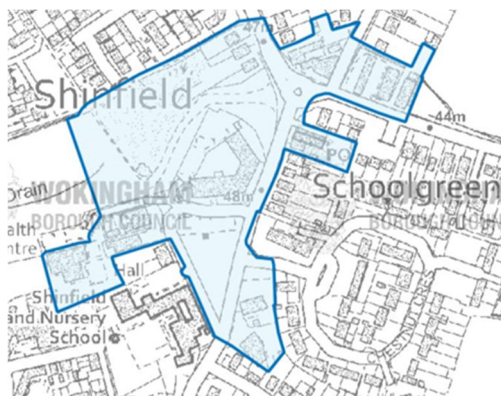
- 4.10.4 Brunel Retail Park lies within 300m of Whitley District Centre at an edge of centre location. At the time of site visit there were six vacant units at the retail park.

Table 1. Vacant units at Brunel Retail Park

Unit Number	Ground Floor Area (GIA) (sqm)
3a	1,202
3b	1,212
4	1,868
5	931
7	938
9	460

- 4.10.5 We understand Brunel Retail Park benefits from planning consent for comprehensive redevelopment of the park⁸. Planning permission was granted at the Retail Park in July 2021 for demolition of existing buildings and erection of 2no. buildings for use within Classes E(g)(iii) (Industrial), B2 (General Industrial) and B8 (Storage and Distribution), along with access and servicing arrangements, car parking, landscaping and associated works. It is clear a comprehensive non-retail led redevelopment of the retail park is being pursued. The site is not considered suitable and/or available (within a reasonable period of time) for the proposed development.
- 4.10.6 Based on a review of Whitley centre, and Aldi's existing representation at the centre, it is not considered suitable, available or viable for the proposed development and has been discounted.

4.11 Shinfield Local Centre



Source: Wokingham BC LP proposals map

⁸ Pp refs: 201853 & 201842



- 4.11.1 Shinfield Centre lies approximately 3.5km to south-east of the application site. It is anchored by a Coop store. Other operators include a pub (Bell & Bottle), Shinfield View Care Home, a coffee shop, Medical Centre and Pharmacy. The centre lies **beyond** the proposed development's intended primary catchment area.
- 4.11.2 A site visit and desk-based review provides no indication of any potentially available, suitable sites of a similar scale (allowing for flexibility) that may accommodate the proposed development.
- 4.11.3 We note the redevelopment on land at Shinfield West North of Beke Avenue. This site is being redeveloped for residential-led mixed use purposes pursuant to RM permission granted in May 2021⁹. The permission includes provision of a foodstore. A reserved matters application¹⁰ for the foodstore element was submitted in August 2022 by Lidl, who is the committed operator to the site. The site is not available for the proposed development and has been discounted.

4.12 Summary

- 4.12.1 As outlined the preceding section NPPG recognises that promoting new development on town centre locations can be more expensive and complicated than building elsewhere, and local planning authorities need to be realistic and flexible in applying the test. In addition, for a site to be suitable, it would have to be a genuine “real world” alternative for the development. If permission were to be withheld, would the applicant build the development on the sequentially preferable site is the relevant question (Telford Forge appeal, para 19).
- 4.12.2 The sequential search has identified no sites which can be considered available, suitable, and viable sequentially preferable alternatives in respect of the proposed development, allowing for flexibility. The proposed development is considered, therefore, to fully accord with local and national policy and guidance as well judicial and appeal authority with respect to the sequential approach.

⁹ outline pp ref: VAR/2014/0624 and RM pp ref: 211530

¹⁰ App ref: 222656



5.0 Other Material Planning Considerations

5.1 Introduction

5.1.1 This section addresses other design related planning policy matters relating to the proposed development, namely:

- Design, Layout and Appearance; and
- Highways considerations; and
- Economic benefits

5.2 Design, Layout and appearance

5.2.1 Policy CC2 relates to sustainable design and construction. Proposals for new development, including 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.

5.2.2 Policy CC7 states 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.

5.2.3 Reading Gateway's built character is similar to that of many retail parks, providing large scale retail units and car parking facilities. The proposal in terms of layout and design have been developed to provide a high standard of amenity to its visitors, created by the use of modern architectural design and detailing. In accordance with Policy CC2 changes are being minimised wherever practicable.

5.2.4 The external appearance of the unit is proposed to be altered and renewed with a contemporary modern shopfront to reflect Aldi's well established brand fascia.

5.2.5 The elevational treatment of the frontage will be formed in anthracite grey cladding, with glazed shop front windows and entrances.

5.2.6 The minimal changes will ensure the continuity of high-quality design throughout the shopping park and will enhance the overall visual amenity.

5.2.7 The overall appearance and visual amenity of the shopping park and its surrounds will be enhanced as a result of the proposals. Accordingly, the changes are considered to comply with policy CC7 of the local plan. The proposed development will not cause a detrimental impact on



the living environment of existing residential properties or unacceptable living conditions for new residential properties in accordance with Policy CC8.

5.3 Transport

- 5.3.1 The application is supported by at Transport Statement (TS), Travel Plan (TP) and Technical Note (TN) prepared by Tetra Tech.
- 5.3.2 In summary, the TS contains a highways safety audit which shows that within the study area there are not any existing undue highway safety problem that need to be addressed.
- 5.3.3 An accessibility assessment shows the site is well located to integrate into the local pedestrian, cycle, and public transport networks. In addition, the technical audit completed of the site access demonstrates that policy compliant visibility is provided.
- 5.3.4 In respect of parking, the existing car park at Reading Gateway accommodates 329 parking spaces, with these spaces not being allocated for each use / unit specifically, but, rather, across the park as a whole. The change of use proposals would be accompanied by an increase in car parking provision of just +1 space, and that parking provision is ample. A parking accumulation assessment finds car park capacity is forecast to operate at 55% in the weekday PM peak, and 47% during the Saturday PM. Parking impacts of the proposed development are therefore acceptable and will also not frustrate the operation of the wider car park or adjacent facilities.
- 5.3.5 The approved cycle parking provision at the park provides 52 spaces, in the form of 26 Sheffield Stands. Similarly, the approved spaces are not allocated for each use / unit specifically, but, rather, across the park. The TS finds the change of use proposals would not give rise to a material difference in the demand for cycle parking.
- 5.3.6 Swept path assessments have been undertaken which indicate that safe and suitable access can be achieved for a max-legal length UK articulated vehicle to deliver to the proposed store's service yard.
- 5.3.7 An assessment of trip generation finds the proposal will provide an ancillary service within the retail park; it will reduce the movement of vehicles travelling off site to access this type of facility. The development proposal is therefore suitable for this part of Reading, given its location within the retail park and for this reason, it will not have a material impact on the operation of the road network.
- 5.3.8 In light of the accompanying assessments the proposals will not give rise to any undue adverse impact on the wider park and/or local highways network, in accordance with policies TR1, TR3 and TR5 of the local plan.
- 5.3.9 Further details can be found in the accompanying Transport assessments prepared by Tetra Tech.



5.4 Air Quality

- 5.4.1 We note the site lies within an Air Quality Management Area (AQMA). Policy EN15 relates to Air Quality. It indicates development should have regard to the need to improve air quality and reduce the effects of poor air quality. Development that would detrimentally affect air quality will not be permitted unless the effect is to be mitigated.
- 5.4.2 In respect of air quality, as outlined above the proposals will reduce the movement of vehicles travelling off site to access food retailing and for this reason, it will not have a material impact on the operation of the road network. Furthermore, in respect of parking the change of use would be accompanied by an increase in car parking provision of just +1 space, which is not considered material. The proposed development is not considered likely to give rise to an adverse impact on local air quality in accordance with policy EN15.

5.5 Sustainability

- 5.5.1 It is considered the application site occupies an inherently sustainable location. It is a well-established retail and leisure location, with excellent links to surrounding settlements, established services and facilities and sustainable transport routes. As highlighted in the Transport Statement, the site is located within close proximity of a wide range of services and facilities. The beneficial reoccupation of an existing retail unit is considered to be an inherently sustainable form of development in accordance with Policy CC2.

5.6 Economic Benefits

- 5.6.1 The proposed development will result in a beneficial re-occupation of an existing unit and will create a range of new jobs for local people at both the construction/fit out phase of the development and its operation. New job opportunities will assist in the overall economic attractiveness of Reading within the national retail market, thereby helping to improve the economic well-being of all its residents.
- 5.6.2 The proposed investment at Reading Gateway represents an active commitment to ensure that the retail park and its current tenants can continue to support the local labour market into the future. The reoccupation of the store will provide employment for c.40 FTE workers.
- 5.6.3 The retail sector employs a broad cross section of people from a variety of socio-economic groups, and offers starter positions and grounding in transferable skills, facilitating career development. Retail jobs have significant value in improving inter-personal skills and employability by providing social contact with colleagues and the general public. Equally, such roles provide opportunities for teamwork, increasing overall self-confidence.



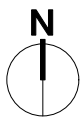
6.0 Summary and Conclusion

- 6.1.1 This Statement is submitted in support of a full planning application for the allowance of the sale of food and external alterations to Unit 6 (Unit C), installation of electric vehicle charging bays and associated alterations to the car park and landscaping at Reading Gateway Shopping Park, Imperial Way.
- 6.1.2 Unit 6 is a longstanding vacant unit. The application seeks its beneficial reuse at a well-established retail location. The principle of the development is considered acceptable, subject to the sequential approach to site selection.
- 6.1.3 Whilst both national and local planning policy require that a sequential test be applied, this must be done in a way which is compliant with established judicial authority and policy. The sequential search has identified no other sites considered available, suitable, and viable sequentially preferable alternatives. The proposed development is considered to fully accord with local and national policy and guidance as well as judicial and appeal authority with respect to the sequential approach.
- 6.1.4 The overall appearance and visual amenity of the shopping park and its surrounds will be enhanced as a result of the proposals. Changes are considered to comply with policy CC7 of the local plan. The proposed development will not cause a detrimental impact on the living environment of existing residential properties or unacceptable living conditions for new residential properties in accordance with Policy CC8.
- 6.1.5 The proposed parking provision is ample. A parking accumulation assessment finds parking impacts of the proposed development will not frustrate the operation of the wider car park or adjacent facilities.
- 6.1.6 The approved cycle parking provision at the park provides spaces not allocated for each use / unit specifically, but, rather, across the park. The TS finds the change of use proposals would not give rise to a material difference in the demand for cycle parking. Swept path assessments indicate that safe and suitable access can be achieved. The development proposal will not have a material impact on the operation of the road network, in accordance with policies TR1, TR3 and TR5 of the local plan.
- 6.1.7 The proposed development is not considered likely to give rise to a material adverse impact on local air quality in accordance with policy EN15.
- 6.1.8 New job opportunities will assist in the overall economic attractiveness of Reading and help to improve the economic well-being of residents. The reoccupation of the unit will provide employment for c.40 FTE workers.
- 6.1.9 The proposed development's accordance with planning policy at all levels provides an overall balance of consideration which weighs firmly in favour of permitting the proposals.



Appendix A – Site Layout Plan





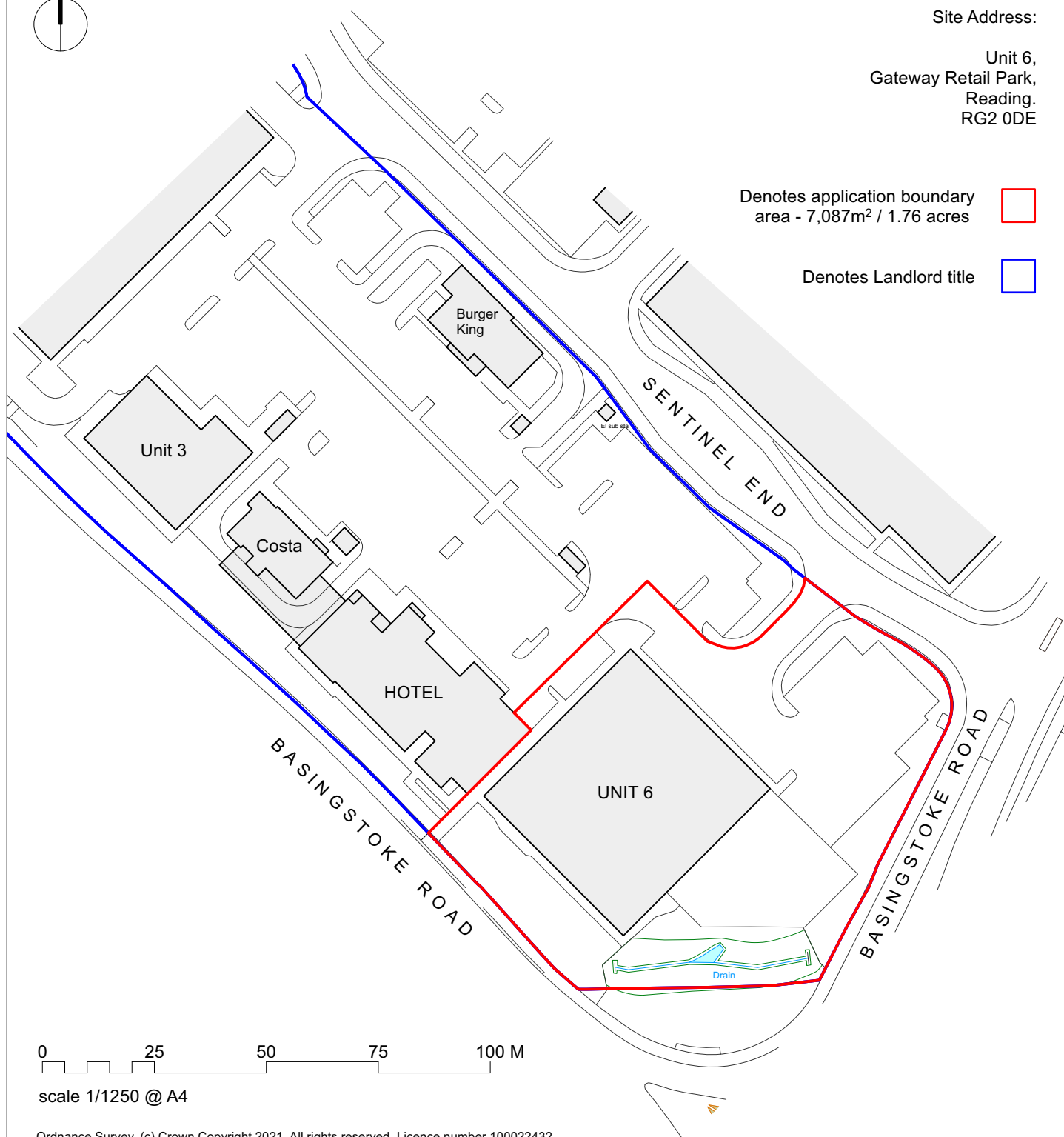
Site Address:

Unit 6,
Gateway Retail Park,
Reading.
RG2 0DE

Denotes application boundary
area - 7,087m² / 1.76 acres



Denotes Landlord title



0 25 50 75 100 M

scale 1/1250 @ A4

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Project
**Unit 6, Reading Gateway,
Sentinel End**
Client
Aldi Stores Ltd

Scale Paper Size Filename
1:1250 A4
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P3 17/11/2022 MS MW Boundary adjusted at site entrance

P2 14/11/2022 MS MW Application area amended
Rev Date By Ap Note

Drawing Title
Site Location Plan

Project Number Drawing Number Revision
220534 1000 P3

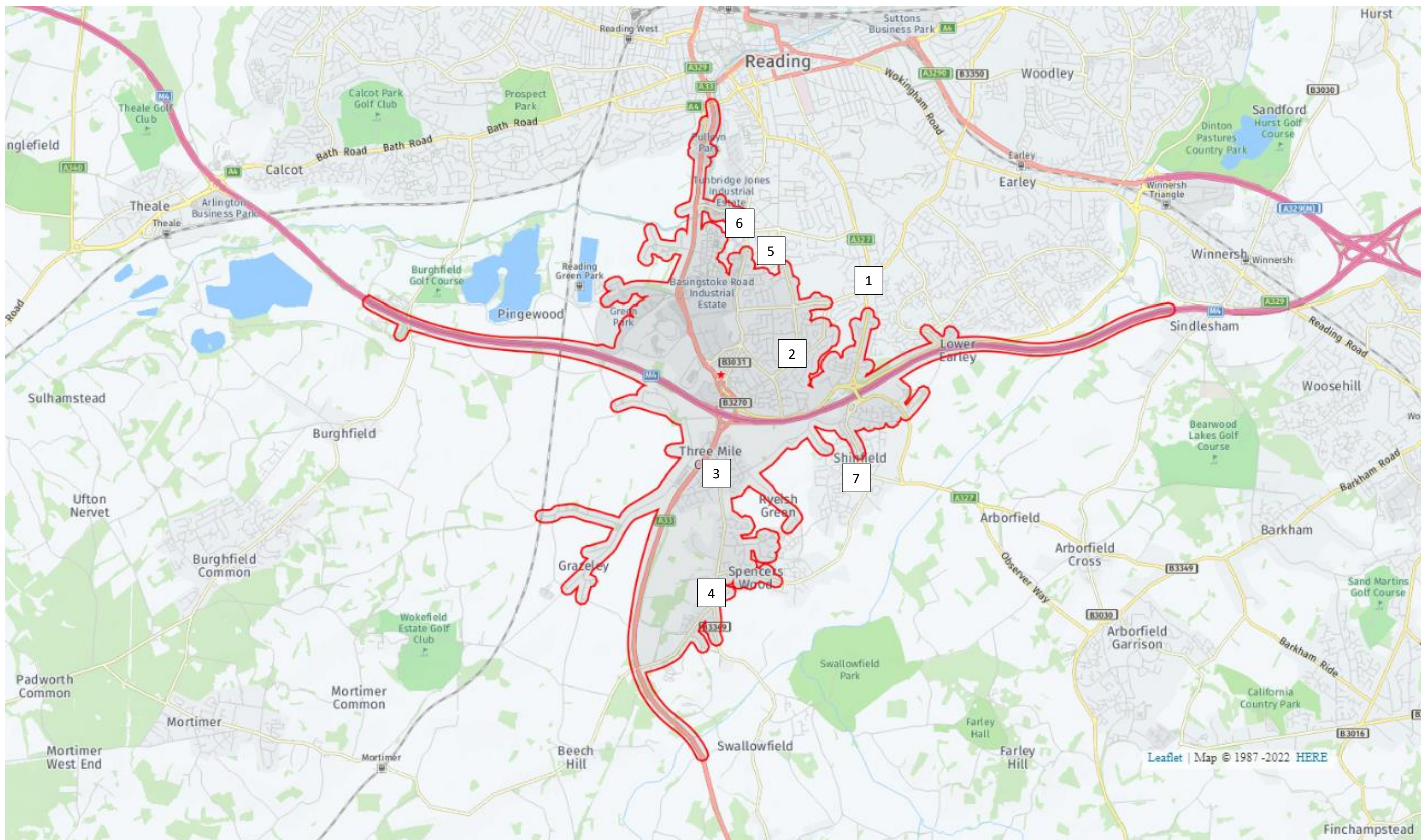
Date Drawn Checked Status
Oct 2022 MS MW PLANNING

Check all dimensions and levels on site

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Appendix B – Catchment Plan





Legend

 Reading Gateway, Drive Time 5 Mins Off Peak

1. Shinfield Road District Centre
2. Whitley Wood Local Centre
3. Three Mile Cross Local Centre
4. Spencers Wood Local Centre
5. Whitley District Centre East
6. Whitley District Centre West
7. Shinfield Local Centre