

READING LINK RETAIL PARK, ROSE KILN LANE, READING, RG2 0SN

SEQUENTIAL TEST

ON BEHALF OF SORBON ESTATES

Prepared by: Andy Meader BSC (Hons) Dip TP MRTPI

Pegasus Group

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1. INTRODUCTION

- 1.1 This Sequential Test is submitted in support of a planning application, made on behalf of the Applicant, Sorbon Estates. This follows the refusal by the Council and dismissal at appeal of a previous similar scheme under application reference 181860.
- 1.2 Application 181860 was an outline application for a drive-thru coffee shop of 189sqm, associated parking and a new access at Reading Link Retail Park, Rose Kiln Lane, Reading.
- 1.3 The previous application was submitted to the Council on 25th October 2018 and determined under delegated powers on 15th March 2019. It was refused for 7 reasons, one of which related to the fact that a Sequential Test was not submitted to accompany the application.
- 1.4 Whilst the request for a Sequential Test did not appear consistent with the approach of the Council when assessing similar applications, one was prepared on behalf of Sorbon Estates to accompany the Appeal submission.
- 1.5 Having had sight of the Sequential Test during the appeal process, the Council confirmed that the reason for refusal relating to the Sequential Test had been satisfactorily addressed by the Appellant. This is confirmed at paragraph 4 of the Appeal Inspector's decision letter.
- 1.6 The Appeal Inspector dismissed the appeal due to concern about impact upon the free flow of traffic and pedestrian safety. No concern was raised by the Inspector with regards to Sequential Test matters.
- 1.7 Given the non-contentious nature of the previous Sequential Test (once prepared), the findings are now re-submitted with the current application. Elements of the current application have been amended from the previous scheme in order to address the concerns raised by the Appeal Inspector. Such amendments are not however relevant to the type and scale of the proposal and as a result the parameters applied to the previous Sequential Test are still appropriate.
- 1.8 Before describing such parameters, further context is provided by reference to the relevant planning policy that relates to the provision of such Sequential Tests.

The remaining sections of this statement will then turn to the results and analysis of sites that were identified from the area wide search.

2. PLANNING POLICY

- 2.1 The Council's Local Plan was adopted in November 2019 and includes Policy RL2 which refers to the scale and location of retail, leisure and culture development. The policy makes specific reference to schemes greater than 2,500 sq m taking place within, or as an extension of, Reading Town Centre. Specific guidance isn't provided for schemes of less than 2,500 sq m, as is the case with the current application, but it does refer to all developments complying with the relevant tests set out in national policy.
- 2.2 Explanatory text at paragraph 4.6.12 of the Local Plan adds that retail, leisure and culture development outside designated centres will only be allowed when national policy is met, and it will need to be shown that a sequential approach has been adopted to site selection.
- 2.3 Paragraph 86 of the National Planning Policy Framework does refer to LPAs needing to apply a sequential test for main town centre uses that are not in an existing town centre or allocated for such a use in the Local Plan. The definition of main town centre uses provided within the NPPF does include reference to 'drive through restaurants'.
- 2.4 It is therefore considered that whilst not specifically required through Local Plan policy, cross reference to the NPPF does mean that a sequential test is justified for the proposed development in this instance.

3. SEQUENTIAL TEST PARAMETERS

- 3.1 The previous Decision Notice stated that possible sites should be identified from 'town centre' or 'edge of centre' locations. The 'town centre' area has been taken as the 'Reading Centre' area as defined in the Reading Borough Local Plan Proposals Map (2019). The 'edge of centre' area has been extended by approximately 500m from the 'town centre' to reflect the distance of the proposed site from the 'town centre' area. The depth of this buffer has been continued around the Reading Centre Area, to ensure all those sites as close to, or closer than, the appeal site to the town centre are considered. A map showing the area of search for the Sequential Test is available in Appendix 1. The boundary lines for the 'town centre' and the 'edge of centre' areas are marked in black and red respectively.
- 3.2 In order to identify and assess alternative sites, it is important to firstly understand the site characteristics of this proposed drive-thru coffee shop. The appeal site is 0.23 hectares, and fronts directly onto Rose Kiln Lane, which directly feeds into the A33, a major road link between Reading Town Centre to the north and the M4 to the south. The proposed site will consist of a 189sqm drive-thru coffee shop, drive-thru access surrounding this building, a seating area, cycle parking, disabled parking spaces and electric car charging points. The wider retail park also has approximately 300 parking spaces, which can accommodate an overspill.
- 3.3 Consequently, in order to provide a degree of flexibility, an alternative site would need to accommodate a single storey unit of between 150 and 250 sq m and 20 - 40 parking spaces. The parking spaces would need to be positioned at a surface level rather than in a multi-storey building, as the associated costs for multi-storey would be unviable. Sites have been selected in the catchment area that are up to 40% more and 40% less than the appeal site area (0.23ha), i.e. between 0.13ha to 0.33ha. It is noted that sites above 0.35ha could potentially accommodate a drive-thru coffee shop, however, they are considered to be unsuitable for such a use, as it would not make the most efficient use of developable land. Additionally, given the nature of the use, and a requirement for passing traffic, it will also be necessary for the site to be clearly seen and accessible from an A or B road.

3.4 In summary alternative sites have been identified that are:

- within the defined search area (Appendix 1)
- between 0.13ha to 0.33ha in area
- clearly seen and accessible from an A or B road.

3.5 The sites in the search area were identified by a variety of means. This included writing letters (attached to emails sent on 12th April 2019) to several local commercial letting agents (Haslams, Sharps Commercial and Hicks Baker), enquiring whether they were aware of any suitable sites that adhered with the parameters. Email responses were received from Haslams (15th April 2019) and Sharps Commercial (25th April 2019), both stating that they were not aware of any suitable sites. No response was received from Hicks Baker, despite follow-up emails being sent on the 25th April 2019 and 7th May 2019. Evidence of the correspondence with the commercial agents is available in Appendices 2-7.

3.6 Additionally, a survey on the ground (by foot and by car) was also carried out within the search area on 10th April 2019. Web-based searches were also made on various websites, including Estates Gazette, Zoopla and Prime Location. Consequently, it was considered that sites that are 'suitable,' 'available' and 'viable' were robustly identified within the defined search area.

4. ASSESSMENT OF SUITABLE ALTERNATIVE SITES

4.1 Table 1 below contains the sites that were identified from the area wide searches. Comments have been made against the suitability of each site. The sites that met the stated criteria and merited further consideration are highlighted in yellow.

Site Name	Site area (ha)	Comments
Sardar Palace, 149 London Road	0.04	Not suitable; site area lower than required threshold
Land adjacent to Richer Sounds, Oxford Rd	0.03	Not suitable; site area lower than required threshold
Former Central Swimming Pool, Battle Street	0.2	Potentially suitable, as within size threshold and visible from the A329
Land at Abattoirs Road	0.19	Potentially suitable, as within size threshold and visible from the A329
2-4 Cremyll Road,	0.1	Not suitable; site is within area threshold, although not visible from an A or B road
Land opposite the former Red Cow pub, Southampton Street	0.07	Not suitable; site area lower than required threshold
Former Iceland Foods site, Weldale St	1.16	Not suitable; site area greater than required threshold.
Hardstanding opposite the Bell & Dragon, Kenavon Drive, Forbury Business Park	0.6	Not suitable; site area greater than required threshold.
187 / 189 Cardiff Road, Reading	0.02	Not suitable; site area lower than required threshold
Talbot House, 2 Ross Road, Reading, RG1 8EL	0.1	Not suitable; site is within area threshold, although not visible from an A or B road.
Former Royal Mail sorting centre	1.6	Not suitable; site area larger than required threshold
Dukesbridge Chambers, Kings Road,	0.3	Potentially suitable, as within size threshold and visible from the A329.
71-73 Caversham Road and 1 Northfield Road	0.15	Potentially suitable, as within size threshold and visible from the A329
Units 4-6, Meadow Road, Reading, RG1 8LB	0.25	Not suitable; site is within area threshold, although not visible from an A or B road
Alexander House, 205-207 Kings Road	0.16	Potentially suitable, as within size threshold and visible from the A329

Table 1: Sites identified in the various searches

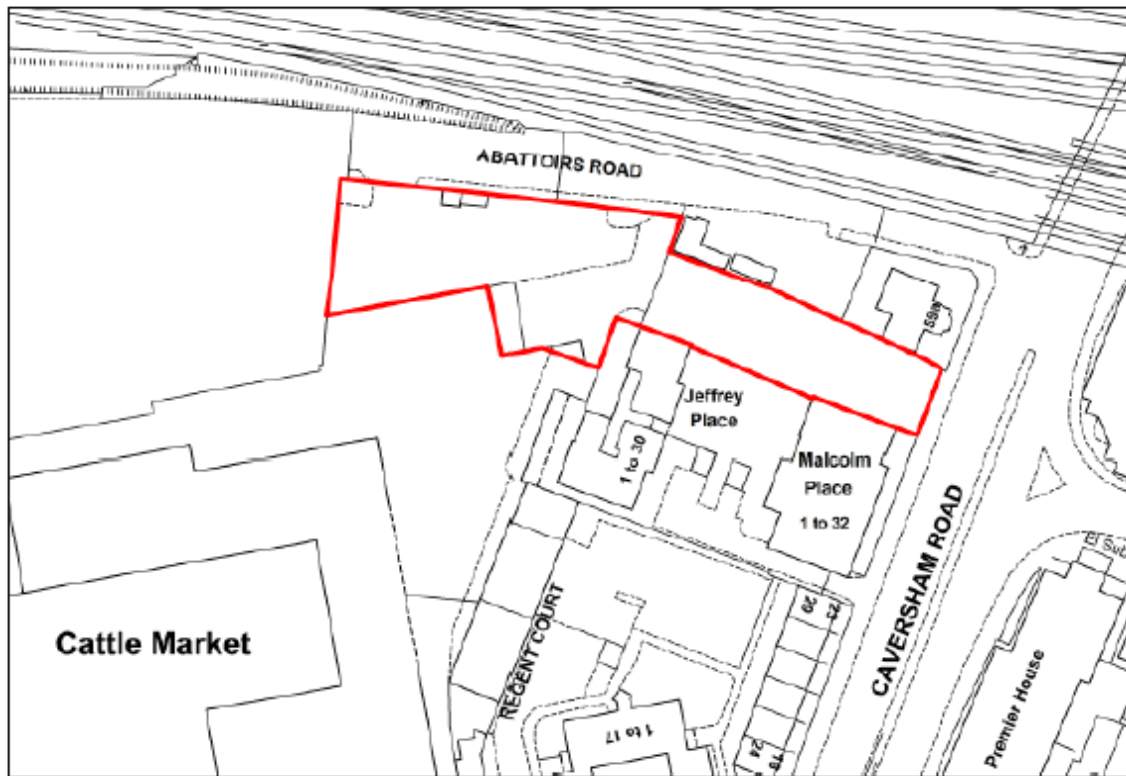
Former Central Swimming Pool, Battle Street

4.2 The site has been allocated for residential development in the Local Plan. Permission was granted in October 2018 for the demolition of the swimming pool (181606). The surrounding area is also predominately residential. It is most

likely, therefore, that the site is most appropriate for residential development and as such incorporation of a drive-thru coffee shop would not be acceptable in residential amenity and highways terms.

Land at Abattoirs Road

- 4.3 As shown on the location plan below, the Eastern boundary of the site fronts onto Caversham Road (A329), with vehicular access secured to the rear from Abattoir Road. The site is also in a very sustainable location, as it is approximately 300m from Reading's train station. In order to ensure that a coffee shop drive-thru operation is visible and accessible from the A329, a new access point would need to be created between the existing residential units of Malcolm Place and 59A Caversham Road. The drive-thru coffee shop building itself would need to be positioned to the rear of the site, as the entrance from Caversham Road would not be wide enough to accommodate a building and an access.
- 4.4 Firstly, in order to assess whether a new private access onto the A329 would be acceptable from a highway's perspective, Pegasus' Transport Team has been consulted. The Transport Team consider that it is very likely that Reading Borough Council's Highways Department would resist such a proposal onto one of Reading's main arterial roads. In the surrounding area, most of the junctions from private land are provided from quieter publicly maintained side streets. Additionally, it would need to be established whether a bell-mouth entrance and associated junction radii could accommodate delivery vehicles without encroaching onto the opposite side of the carriageway. Furthermore, it is unclear whether appropriate levels of visibility could be achieved in both directions.
- 4.5 Secondly, creating an entrance would take up approximately half the developable area of the site. It would not be an efficient use of land in such a sustainable location, and an arrangement that results in the unit itself being screened from public view would not be commercially attractive. Residential would appear to be better suited to this site, with a scheme continuing the pattern of development that fronts onto Caversham Road. There could also be the option to extend a residential use towards the western boundary of the site. It is therefore considered unrealistic that the site could or should be developed with a drive-thru coffee shop.



Map 2: Land at Abattoirs Road Location Plan

Dukesbridge Chambers, Kings Road

- 4.6 Since the initial survey in 2019 planning permission has been granted at the site for 25 dwellings and a change of use on the ground floor. The more recent discharge of conditions indicates that development is imminent, and as a result it is no longer an available alternative site.

71-73 Caversham Road and 1 Northfield Road

- 3.5 Following its identification in the 2019 survey, a planning application was submitted in November 2019 for a mixed-use building at the site, including 44 dwellings. Whilst not yet determined, it is apparent that the landowner clearly has other intentions for the site and would not be willing to consider a drive thru use.



Map 3: 71-73 Caversham Road and 1 Northfield Road Location Plan

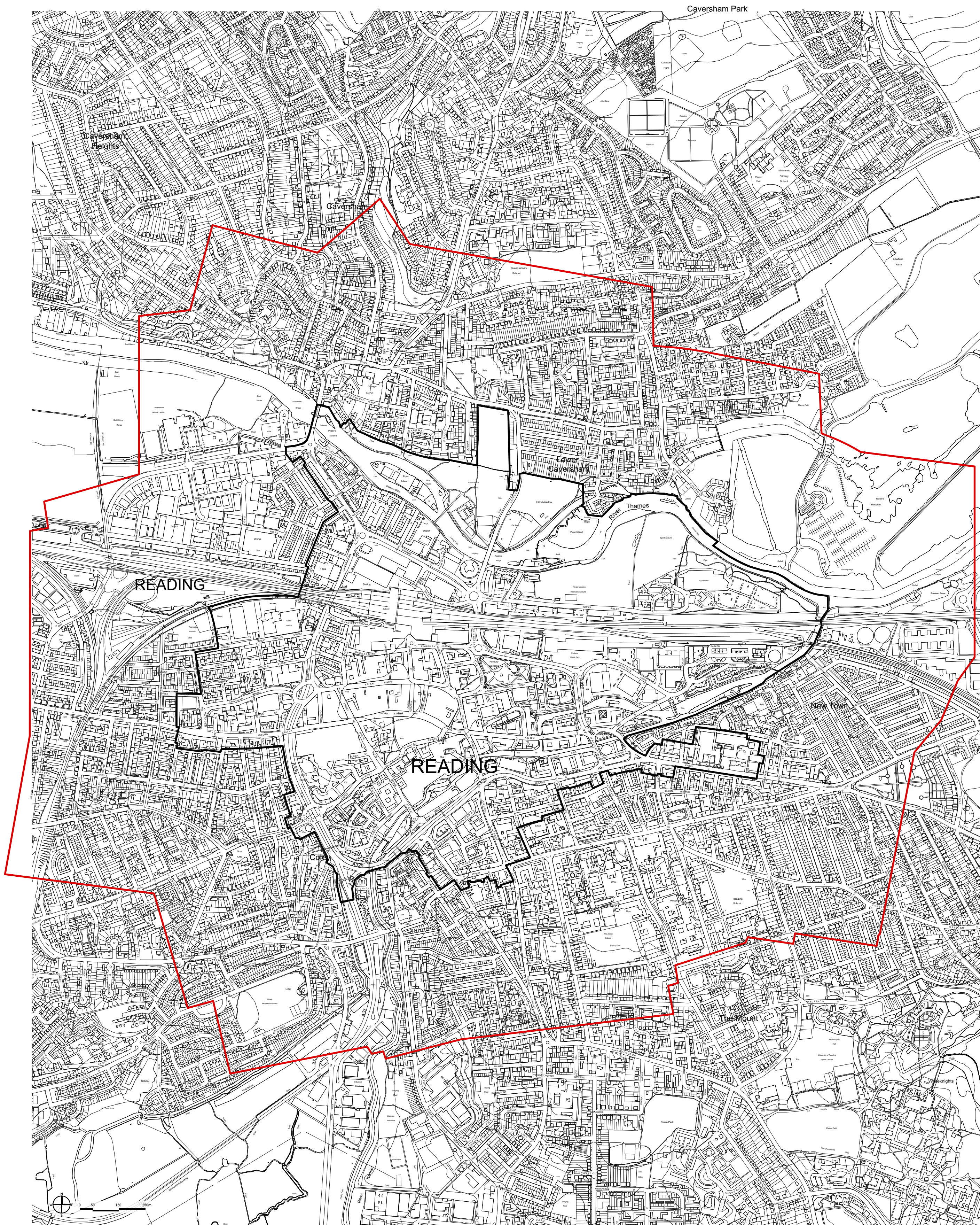
Alexander House, 205-207 Kings Road

- 4.7 A full planning application was submitted in February 2019 for the demolition of the existing office building and construction of a new building incorporating 182 student beds. The application was refused and an appeal has subsequently been made against the Council's decision. Alexander House is situated in a prominent position to the East of Reading town centre fronting Kings Road. The building is within walking distance of both Reading railway station and Reading town centre. It is a site with potential for high density development, offering a much greater return than a drive thru unit, as indicated by the recent planning application, and is therefore not considered to be realistically available for accommodating a coffee shop drive-thru.

5. CONCLUSION

- 5.1 This sequential test has assessed potential alternative drive-thru coffee shop sites that are between 0.13ha to 0.33ha in area, are located within the defined search area (Appendix 1) and that are clearly seen and accessible from an A or B road. The sites in the search area were identified by a variety of means, this included writing to local commercial agents, undertaking a foot and vehicle survey and conducting various web-based searches.
- 5.2 Overall, it is concluded from the assessment that there are no alternative sites in sequentially preferable locations which are suitable, available and capable of viable occupation. As a result, the proposed use of the appeal site for a coffee shop drive-thru satisfies the sequential test.

APPENDIX 1: SEARCH AREA



KEY



TOWN CENTRE



EDGE OF CENTRE

APPENDIX 2: LETTER TO HASLAMs

Ref P18-1172

April 12, 2019

Haslams Chartered Surveyors
County House
17 Friar Street
Reading
RG1 1DB

Dear Sir / Madam,

Re: Potential alternative Coffee Shop Drive-Thru sites/premises on the market, either in or close to Reading town centre.

We are instructed by Sorbon Estates in connection with a planning application for a Coffee Shop Drive-Thru at Reading Link Retail Park. The application has recently been refused by Reading Borough Council, and one of the reasons for refusal was because the Council considered a Sequential Test should be undertaken to explore whether there are any alternative sites for the proposed use that are closer to, or within the Town Centre.

We are now in the process of undertaking this Sequential Test, and as part of the process we are enquiring whether local agents are aware of potential alternative sites / premises that are on the market – hence this letter to yourselves.

Our area of search relates to that outlined in red on the attached plan. Given the nature of the use, and requirement for passing traffic, it will also be necessary for the site to be clearly seen from an A or B road. The site would need to accommodate a single storey unit of between 150 and 250 sq m, plus in the region of 20 - 40 parking spaces.

If you are aware of any available sites that would satisfy the above criteria then it would be helpful to receive further details of them. Alternatively if you're not aware on any such sites your confirmation of this by response would be appreciated. If you have any queries please do not hesitate to contact myself or Tom Kilvert at the office on the below details.

Yours Sincerely,



Andy Meader
Regional Director
Andy.Meader@PegasusGroup.co.uk

Pegasus Group

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APPENDIX 3: HASLAM'S EMAIL AND RESPONSE

Reply Reply All Forward

Fri 12-Apr-19 2:05 PM

Thomas Kilvert

Drive-thru potential sites in Reading

To [REDACTED]

Cc Andy Meader

You forwarded this message on 12-Apr-19 2:08 PM.

P18-1172_01B Search Area Plan.pdf 1 MB

Drive-thru potential sites- Haslams.pdf 77 KB

Dear [REDACTED]

Please see the attached letter, which requests whether you are aware of any potential coffee shop drive-thru sites in or close to Reading Town Centre? The site would need to accommodate a single storey unit of between 150 and 250 sq m, plus in the region of 20 - 40 parking spaces, and be within the red line search area of the attached map. Please read the attached letter for further details on this enquiry.

Kind Regards,

Thomas Kilvert
Planner

Pegasus Group

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Reply Reply All Forward

Mon 15-Apr-19 12:35 PM

Harry Bevens <harrybevins@haslams.co.uk>

RE: Drive-thru potential sites in Reading

To Thomas Kilvert

Cc Andy Meader; [REDACTED]

Follow up. Start by Monday, April 15, 2019. Due by Monday, April 15, 2019.

You replied to this message on 16-Apr-19 8:20 AM.

Click here to download pictures. To help protect your privacy, Outlook prevented automatic download of some pictures in this message.

Thomas,

Further to your email below, in Steve's absence, I can confirm that we're not aware of any suitable site.

Kind regards,
Harry

[REDACTED]

D: [REDACTED]
M: [REDACTED]
PA: [REDACTED]

A: [REDACTED]
T: [REDACTED]
W: www.haslams.co.uk



APPENDIX 4: LETTER TO SHARPS COMMERCIAL

Ref P18-1172

April 12, 2019

Sharps Commercial
26-28 Southampton Street
Reading
Berkshire
RG1 2QL

Dear Sir / Madam,

Re: Potential alternative Coffee Shop Drive-Thru sites/premises on the market, either in or close to Reading town centre.

We are instructed by Sorbon Estates in connection with a planning application for a Coffee Shop Drive-Thru at Reading Link Retail Park. The application has recently been refused by Reading Borough Council, and one of the reasons for refusal was because the Council considered a Sequential Test should be undertaken to explore whether there are any alternative sites for the proposed use that are closer to, or within the Town Centre.

We are now in the process of undertaking this Sequential Test, and as part of the process we are enquiring whether local agents are aware of potential alternative sites / premises that are on the market – hence this letter to yourselves.

Our area of search relates to that outlined in red on the attached plan. Given the nature of the use, and requirement for passing traffic, it will also be necessary for the site to be clearly seen from an A or B road. The site would need to accommodate a single storey unit of between 150 and 250 sq m, plus in the region of 20 - 40 parking spaces.

If you are aware of any available sites that would satisfy the above criteria then it would be helpful to receive further details of them. Alternatively if you're not aware on any such sites your confirmation of this by response would be appreciated. If you have any queries please do not hesitate to contact myself or Tom Kilvert at the office on the below details.

Yours Sincerely,



Andy Meader
Regional Director
Andy.Meader@PegasusGroup.co.uk

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APPENDIX 5: SHARPS COMMERCIAL EMAIL AND RESPONSE

Reply Reply All Forward

TK
Fri 12-Apr-19 2:08 PM
Thomas Kilvert
Drive-thru potential sites in Reading

To [REDACTED]
Cc Andy Meader

You replied to this message on 25-Apr-19 8:56 AM.

P18-1172_01B Search Area Plan.pdf 1 MB
Drive-thru potential sites- Sharps Commercial.pdf 77 KB

Dear [REDACTED]

Please see the attached letter, which requests whether you are aware of any potential coffee shop drive-thru sites in or close to Reading Town Centre? The site would need to accommodate a single storey unit of between 150 and 250 sq m, plus in the region of 20 - 40 parking spaces, and be within the red line search area of the attached map. Please see the attached letter for further details on this enquiry.

Kind Regards,

Thomas Kilvert
Planner
Pegasus Group
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The Columbia Centre | Station Road | Bracknell | RG12 1LP
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Reply Reply All Forward
TK
Thu 25-Apr-19 9:01 AM
Thomas Kilvert
RE: RE: Drive-thru potential sites in Reading
To [REDACTED]
Cc Andy Meader

From [REDACTED]
Sent: Thursday, April 25, 2019 8:57 AM
To: Thomas Kilvert <Thomas.Kilvert@pegasusgroup.co.uk>
Cc: Andy Meader <andy.meader@pegasusgroup.co.uk>
Subject: RE: RE: Drive-thru potential sites in Reading

Dear Thomas

Sorry, for delay in replying but I've been away on holiday and only got back yesterday.

I'm not aware of any sites.

Kind regards

[REDACTED]

[REDACTED] e
Director
Sharps Commercial
Main: [REDACTED]
Mob: [REDACTED]
Email: [s\[REDACTED\]@sharpscommercial.co.uk](mailto:s[REDACTED]@sharpscommercial.co.uk)

Please visit our website at www.sharpscommercial.co.uk

APPENDIX 6: LETTER TO HICKS BAKER

Ref P18-1172

April 12, 2019

Hicks Baker
John Adams House,
29 Castle Street,
Reading,
RG1 7SB

Dear Sir / Madam,

Re: Potential alternative Coffee Shop Drive-Thru sites/premises on the market, either in or close to Reading town centre.

We are instructed by Sorbon Estates in connection with a planning application for a Coffee Shop Drive-Thru at Reading Link Retail Park. The application has recently been refused by Reading Borough Council, and one of the reasons for refusal was because the Council considered a Sequential Test should be undertaken to explore whether there are any alternative sites for the proposed use that are closer to, or within the Town Centre.

We are now in the process of undertaking this Sequential Test, and as part of the process we are enquiring whether local agents are aware of potential alternative sites / premises that are on the market – hence this letter to yourselves.

Our area of search relates to that outlined in red on the attached plan. Given the nature of the use, and requirement for passing traffic, it will also be necessary for the site to be clearly seen from an A or B road. The site would need to accommodate a single storey unit of between 150 and 250 sq m, plus in the region of 20 - 40 parking spaces.

If you are aware of any available sites that would satisfy the above criteria then it would be helpful to receive further details of them. Alternatively if you're not aware on any such sites your confirmation of this by response would be appreciated. If you have any queries please do not hesitate to contact myself or Tom Kilvert at the office on the below details.

Yours Sincerely,



Andy Meader
Regional Director
Andy.Meader@PegasusGroup.co.uk

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APPENDIX 7: EMAILS TO HICKS BAKER

Reply Reply All Forward



Fri 12-Apr-19 2:12 PM

Thomas Kilvert

Drive-thru potential sites in Reading

To [Redacted]

Cc Andy Meader

You replied to this message on 25-Apr-19 8:57 AM.



P18-1172_01B Search Area Plan.pdf
1 MB



Drive-thru potential sites- Hicks Baker .pdf
77 KB

Dear [Redacted]

Please see the attached letter, which requests whether you are aware of any potential coffee shop drive-thru sites in or close to Reading Town Centre? The site would need to accommodate a single storey unit of between 150 and 250 sq m, plus in the region of 20 - 40 parking spaces, and be within the red line search area of the attached map. Please see the attached letter for further details on this enquiry.

Kind Regards,

Thomas Kilvert

Planner

Pegasus Group

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The Columbia Centre | Station Road | Bracknell | RG12 1LP

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Thu 25-Apr-19 8:58 AM

Thomas Kilvert

RE: Drive-thru potential sites in Reading

To [Redacted]

Cc Andy Meader

You replied to this message on 07-May-19 12:02 PM.



Drive-thru potential sites- Sharps Commercial.pdf
77 KB



P18-1172_01B Search Area Plan.pdf
1 MB

Dear [Redacted]

Further to my previous email, I was wondering if you are aware of any potential coffee shop drive-thru sites in or close to Reading Town Centre? The site would need to accommodate a single storey unit of between 150 and 250 sq m, plus in the region of 20 - 40 parking spaces.

Additional information is provided in the two attachments.

Kind Regards,

Thomas Kilvert

Planner

Pegasus Group

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Tue 07-May-19 12:03 PM

Thomas Kilvert

RE: Drive-thru potential sites in Reading

To

[Redacted]

Cc Andy Meader

Dear [Redacted]

Further to my previous emails, are you aware of any potential coffee-ship drive-thru sites in or close to Reading Town Centre? As we are required to submit the sequential test document shortly.

Kind Regards,

Thomas Kilvert
Planner

Pegasus Group

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