



**Unit 6,
Reading Gateway,
Imperial Way,
Reading**

Planning Statement

May 2019





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Appendix Contents

Appendix A – Site Location Plan



1.0 Introduction

1.1 Background

- 1.1.1 This Statement has been prepared by WYG on behalf of our client, Aberdeen Standard Investments. The Statement provides the planning policy justification in support of a full planning application for a change of use from Class A1 (retail) to Class D2 (gym) and insertion of a 1,105sqm GIA mezzanine at Unit 6, Reading Gateway, 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 retail/leisure park, where relevant;
 - Section 3: sets out the local and national planning policy context;
 - Section 4: considers the existing retail provision in surrounding centres;
 - Section 5: considers the application of the sequential approach and the search for a sequentially preferable site;
 - Section 6: addresses the specific impact tests set out in the National Planning Policy Framework (NPPF);
 - Section 7: addresses other considerations material to the consideration of the proposed development; and
 - Section 8: provides a summary of conclusions.



2.0 The Proposed Development

2.1 The Site

- 2.1.1 The site is Reading Gateway, which 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 applications specifically relate to Unit 6 of the retail/leisure park as shown on the Site Location Plan 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 (inc. Verizon UK offices). 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 South Reading Strategic Development Site (SA2a – Worton Grange).
- 2.1.5 The site lies in Flood Zone 1 and is at low risk of flooding. Both the existing and proposed uses are classified as 'Less Vulnerable'.

2.2 Relevant Planning History

- 2.2.1 We outline the site's relevant planning history below:
- 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.



- 2.2.2 Condition 42 of planning permission ref: 151944 (wording as amended by NMA ref: 161672¹) restricts the use of Units 1 (unit B), 2 (unit A) and 6 (unit C) to specified retail goods. Condition 43 prohibits the extension/ enlargement of Units 1, 2 and 6 (including installation of mezzanine floors) without planning permission. A planning application is therefore required for changes of use and the insertion of a mezzanine to Unit 6.
- 2.2.3 Planning permission ref: 162257 granted consent for an alternative building to the originally permitted bank (Unit D, Class A2) (pursuant to pp ref: 151944) to allow flexibility (i.e. Class A1, A2, A3 and A5) in terms of use for the proposed building.
- 2.2.4 We understand, and it is material for officers to recall, that the original planning application for Reading Gateway development included mezzanine floors to Units A, B and C; Unit C (now referred to as Unit 6) is subject to the present application. These mezzanine floors were assessed as part of the original planning application and considered by officers to be acceptable in principle. Notwithstanding this, in February 2016 the mezzanines were subsequently removed from the development, for commercial reasons, prior to the granting of consent and were not implemented. The present proposal for the insertion of a mezzanine at Unit 6 (Unit C) effectively seeks to deliver a quantum of the previously assessed mezzanine floorspace. It should, therefore, be considered in this context.
- 2.2.5 The above planning history and assessment of each application in turn, particularly in respect of the matters of retail impact and highways, has informed the content of this Planning and Retail Statement.

2.3 Proposed Development

- 2.3.1 The application proposes the following development:
- Change of use to Class D2 (gym);
 - insertion of a 1,105sqm GIA mezzanine.
- 2.3.2 No external alterations to the unit are proposed as part of this application. Any signage will be subject to its own advertisement consent applications as required.

¹ Allowing baby goods to be sold from Unit A, B and C



- 2.3.3 The previous tenant of Unit 6 (Unit C), Toys R Us, has gone into administration. The unit is vacant. Marketing of the unit has been difficult. Accordingly, to meet market interest, prospective tenant requirements and deliver the beneficial occupation of the unit the above redevelopment is sought.
- 2.3.4 The unit is intended to be occupied by UFC gyms (Class D2) which is not currently represented in Reading. The operator is seeking to increase its UK presence with representation/investment at Reading Gateway i.e. the proposed occupancy of Unit 6 will not lead to the closure or/relocation of existing operators in the borough.
- 2.3.5 A 1,105sqm mezzanine is required in order to deliver UFC's particular gym format and facilitate its occupation of the unit.

2.4 UFC Gym

- 2.4.1 The proposed occupant is UFC gym. UFC gym is **not** currently represented in Reading borough.
- 2.4.2 UFC gym creates training programs to suit all ages and fitness levels and the UFC gym programming has been developed through exclusive access to the training regimens of internationally acclaimed UFC athletes; providing members with everything they need for the entire family to move, get fit and live a healthy life.
- 2.4.3 Membership includes access to UFC's world-famous Octagon and signature classes such as Daily Ultimate Training (DUT), TRX, Muay Thai, Brazilian Jiu-Jitsu ("BJJ"), kick boxing, boxing, mixed martial arts conditioning, women's self-defence, as well as popular group fitness classes.
- 2.4.4 Members benefit from a full-range of functional fitness classes, group and private training, group fitness, personal and group dynamic performance-based training. A fitness membership offering regular gym facilities is available (to those not looking for MMA style training) or to utilise the premium fitness classes. The gyms offer personal training sessions with highly-skilled coaches.
- 2.4.5 UFC gym offers state of the art facilities, with the very best cardio, weight and functional fitness areas with trained staff delivering a first-class service. An extensive timetable of classes is available, including traditional MMA classes, as well as traditional fitness classes, such as Spin or Yoga.
- 2.4.6 UFC gym offer designated crèche areas and separate children's classes. Amenities include a café, recovery zones, saunas, changing facilities and cryotherapy chambers. It is estimated the gym will



create up to 55 jobs including: managerial, personal training/physiotherapy/instructor, administrative, catering, creche, and cleaning roles.



3.0 Planning Policy Context

3.1 Local Development Plan

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 Core Strategy and Sites and Detailed Policies.

3.1.3 Policies and guidance contained within the National Planning Policy Framework (NPPF) and National Planning Practice Guidance (NPPG) are also material considerations in the determination of this planning application and are considered further below.

3.2 Reading LDF Core Strategy (2008, revised 2015)

3.2.1 Policy CS1 Sustainable Construction and Design stipulates that proposals including the construction the refurbishment of existing buildings will be acceptable where the design of buildings and site layouts use resources appropriately take account of the effects of climate change. Policy CS2 (Waste Minimisation) requires development to demonstrate measures to minimise the generation of waste.

3.2.2 All members of the population should be provided with access to good quality health, education and other social facilities (Policy CS3 - Social Inclusion and diversity).

3.2.3 Policy CS4 stipulates that the scale and density of development should be related to its level of accessibility by walking, cycling and public transport to a range of services and facilities.

3.2.4 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 CS7 - Design and the Public Realm)

3.2.5 Policy CS9 (Infrastructure, Services, Resources and Amenities) states that development will not be permitted unless the LPA is satisfied that 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 at the appropriate time.

- 3.2.6 Development must contribute appropriately to the provision of a balanced transport network. (Policy CS20 Implementation of the Reading Transport Strategy). Development proposals must make appropriate provisions to ensure an adequate level of accessibility and safety by all modes of transport, particularly by public transport, walking and cycling (Policy CS22 Transport Assessments). Policy CS24 (Car/Cycle Parking) states maximum car parking standards and cycle parking requirements will be applied.
- 3.2.7 Policy CS25 Scale and Location of Retail, Leisure and Culture Development stipulates that major retail and main town centre leisure and culture development will take place in, or as an extension to, the centre of Reading. Where a need for additional development has been identified, and no sites are available in or adjoining the centre of Reading, a sequential approach should be adopted to identifying alternative sites. All development will comply with the relevant tests for retail, leisure and culture development set out in government guidance.
- 3.2.8 Policy CS34 Pollution and Water Resources states development will only be permitted where it would not be damaging to the environment through air, land, noise or light pollution.

3.3 Sites and Detailed Policies Document (SDPD) (2012, revised 2015)

- 3.3.1 The application site(s) lie within the Policy SA2a South Reading Strategic Development Sites – Worton Grange designation where redevelopment will incorporate a mix of uses including housing (between 175 – 275 units), community uses, additional small retail and leisure uses at a scale commensurate to the needs of the housing proposal (and, subject to improved pedestrian links, the identified underserved area²), open space and a public transport interchange. There is also potential for some office floorspace (ranging from small-scale up to the equivalent of the previous levels of floorspace on site).
- 3.3.2 Policy SA3 Retail, leisure and culture uses in south Reading: development proposals within South Reading will maintain and enhance the identified network of District and Local Centres. Proposals will not detract from the vitality and viability of these centres.

² In line with Policy SA3: see paragraph 13.8.5 of the Local Plan



- 3.3.3 The SDPD states the main focus for additional retail, leisure and culture uses in South Reading will be in or as an extension to the Whitley District Centre. We understand this development plan aspiration has now partly been delivered through the opening of a new Aldi foodstore, Pure Gym and public house on former employment land.
- 3.3.4 Policy SA3 states "On strategic sites which cannot be effectively served by existing or extended identified centres, retail, leisure and culture uses of a scale to serve the residential development and identified under-served residential areas will be appropriate."
- 3.3.5 Paragraph 13.8.5 states that states on large developments which are outside existing residential areas, provision of small-scale retail, leisure and culture uses of a scale to serve the residential elements of the development may be appropriate, as long as it would not be possible for the development to be served by an existing centre, or an extended existing centre.
- 3.3.6 The policy therefore refers to 'strategic sites', which are sites that cannot be effectively served by identified centres, and which fulfil the following criteria:
- Sites of over 1,000 dwellings;
 - Sites of less than 1,000 dwellings which would also serve identified underserved areas. Only one existing residential area is considered to currently be underserved, and that is the western part of Whitley Wood, west of Whitley Wood Lane; (underlining added) or
 - Sites of less than 1,000 dwellings which are completely isolated from existing residential areas.
- 3.3.7 Policy SD1 (Presumption in Favour of Sustainable Development) requires a positive approach to considering development proposals and reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework.
- 3.3.8 Policy DM1 requires all development to demonstrate it has been designed to incorporate measures to adapt to climate change. Policy DM3 Infrastructure Planning requires all development to make appropriate provision for the following infrastructure, services, resources and amenities.
- 3.3.9 Policy DM12 Access, Traffic and Highway-Related Matters stipulates 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. Development will only be permitted where:



- Accesses and works to the highway comply with the adopted standards of the Transport Authority;
- The development would not have a material detrimental impact on the functioning of the transport network;
- The proposals would not be detrimental to the safety of users of the transport network, including pedestrians and cyclists;
- The proposal would not generate regular movement of heavy goods vehicles (HGVs) on unsuitable roads, or on roads without easy access to the Classified Highway Network; and
- For non-residential uses, or new dwellings on classified roads, off-street servicing would be provided.

3.3.10 Proposals involving either the construction of a new site access, or a material increase in the use of an existing site access, will not be acceptable if they would be likely to result in the encouragement of the use of the network for short local trips or compromise the safe movement and free flow of traffic on the network or the safe use of the road.

3.3.11 Policy DM14 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.

3.3.12 New development shall make provision for tree planting within the application site, or off-site in appropriate situations (Policy DM18 Tree Planting).

3.3.13 Under Policy DM19 Air Quality development should have regard to the need to improve air quality and reduce the effects of poor air quality.

3.4 Other relevant local planning documents:

3.4.1 Other supplementary local planning documents that have been considered in respect of the proposed development include:

- Employment Skills and Training SPD (April 2013);



- Revised Parking Standards and Design SPD (Oct 2011); and
- Sustainable Design and Construction SPD (July 2011).

3.5 Western Berkshire Retail and Leisure Study 2017 (WBRLS)

- 3.5.1 The WBRLS notes changing retail requirements and finds the growth of the internet means that many retailers are focusing their development programmes on the provision of large flagship stores in strategic locations (para 4.4). Reading is an example of a centre which continues to represent an attractive comparison-goods shopping destination for many retailers (para 4.5).
- 3.5.2 Another trend is the evolution of traditional retail 'box' warehouse developments into retail parks, sub-dividing units, expanding the product offer, and developing beyond just retail to introduce food and beverage, encouraging longer dwell times. Retail parks are increasingly being refurbished to enhance the visitor experience (para 4.22).
- 3.5.3 The most popular destination for comparison goods spending in the survey area is Reading town centre (para 5.3). Reading also has a number of district centres which serve a more localised catchment (para 5.11).
- 3.5.4 Reading town centre is doing a good job at retaining comparison goods expenditure from local residents. Reading town centre accounts for £7 in every £10 spent on comparison goods shopping for residents in zone 2 (para 7.5). Comparison goods floorspace in Reading town centre is performing particularly strongly (para 7.11).
- 3.5.5 In respect to leisure trends the Study finds that (para 11.5):
- The most popular leisure activity undertaken is visiting restaurants, attracting an aggregate response of over 75% from each of the individual sub-zones in the survey area. Visiting cafes was the second-most popular leisure activity.
 - Apart from cinema visits the only other commercial leisure activity which over 50% of respondents participate in is visiting arts/ cultural venues such as theatres, museums, art galleries;
 - 37.4% of respondents visit health and fitness facilities.



- 3.5.6 In the Reading urban area and its surrounding hinterland, as would be expected the majority of residents look towards Reading town centre for café and restaurant visits (para 11.8).
- 3.5.7 In zone A³, Reading town centre attracts a 40% market share for health and fitness facilities which is considered a reasonably strong performance. The town centre includes representation from PureGym (on Caversham Road, near the railway station), Anytime Fitness, and Advance Gym. There are facilities located across the rest of the Reading urban area, such as the David Lloyd facility on Thames Valley Park Drive, plus a network of Council-operated leisure centre facilities. Lower Earley attracts a market share of 21% from zone A, which is mostly attributed to the Loddon Valley Leisure Centre on Rushey Way (para 11.33).
- 3.5.8 The WBRLS demonstrates that a significant growth in commercial leisure expenditure can be expected to come forward in the survey area over the period to 2036 (para 12.14). It shows that there is scope for further restaurant and gym uses to be accommodated.

3.6 Emerging Reading Local Plan – Submission Draft (March 2018)

- 3.6.1 The Council is in the process of producing a new Local Plan, to guide development up to 2036. The examination of the local plan took place in September and October 2018. Following the examination, we understand additional information is currently in production.
- 3.6.2 Some of the key principles for **South Reading** include (para 6.2.1):
- South Reading will be the location for a significant amount of new residential and employment development over the plan period;
 - Development will contribute to revitalising and regenerating the wider South Reading area, by integrating with established residential areas, and by providing new employment opportunities;
 - The environs of the A33 and the Basingstoke Road will be enhanced to provide an attractive entrance into Reading;
 - The isolation of some existing and new housing areas in South Reading will be reduced, thereby enhancing it as an attractive and pleasant place to live;
 - Whitley district centre will be expanded to serve as the main district centre for South Reading;

³ Retail survey zones 1, 2 ,3 and 21



- Opportunities to undertake renewal and regeneration of some of South Reading's suburban areas will be investigated.

3.6.3 We note policies CC1 to CC7 of the emerging local plan are broadly reflective of adopted policy CS1 to CS7. Emerging policy EN15 (Air Quality) reflects adopted policy DM19.

3.6.4 Emerging Policy TR3 (Access, Traffic, and Highway related matters) reflects adopted policy DM12. Emerging Policy TR5 states development should provide car parking and cycle parking that is appropriate to the accessibility of locations.

3.6.5 Emerging Policy RL1 (Network and Hierarchy of Centres) sets out the local retail hierarchy and requires the vitality and viability of these centres to be maintained and enhanced. The emerging local plan recognises Reading has a very strong town centre which is by far the dominant centre within the Borough and for much of the surrounding area (paras 4.6.1 & 4.6.2).

3.6.6 Policy RL2 makes provision for up to 34,900sqm of retail and related facilities in Reading to 2036, together with new leisure facilities. 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.

3.6.7 Retail, leisure and culture development outside designated centres will only be allowed in those exceptional circumstances where the provisions of national policy are met. That is, demonstrating a sequential approach to site selection has been adopted, and that there will be no adverse impact on existing centres. 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 (Policy RL5). Ensuring that centres within areas of deprivation⁴ are not adversely affected is of particular local importance.

3.6.8 Matters to be considered in an impact assessment are set out in national guidance, but the following impacts are particularly significant for Reading:

- Impacts on trade levels;
- Impacts on the prospect of investment in existing centres;

⁴ Coronation Square, Dee Park, Whitley and Whitley Wood



- Impacts on centres in areas of deprivation; and
- Cumulative impacts with other developments and proposals within the preceding five years.

3.7 National Planning Policy

National Planning Policy Framework (July 2018)

- 3.7.1 The National Planning Policy Framework (NPPF), published in July 2018 sets out the Government planning policies for England and how these should be applied. The current revision makes a number of minor changes to the policies comprised in the preceding March 2012 Framework. In particular, the new Framework provides further clarification on the application of the presumption in favour of sustainable development. National policy relating to the application of the sequential and impact tests however remain largely unchanged.
- 3.7.2 The Framework notes that the purpose of the planning system is to contribute to the achievement of sustainable development (paragraph 7). Paragraph 8 indicates that achieving sustainable development means that the planning system has three overarching objectives: a) an economic objective, b) a social objective and c) an environmental objective which are interdependent and need to be pursued in mutually supportive ways. The economic objective is to *'help build a strong, responsive and competitive economy....'*
- 3.7.3 The Framework at Paragraph 11 states that for decision taking, the 'presumption in favour' means:
- "c) Approving development proposals that accord with the development plan without delay; or*
- d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:*
- i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*
- ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole."*
- 3.7.4 The Framework states that planning policies and decisions should help create 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 (paragraph 80). The Framework makes clear that policies and decisions should **recognise and address the specific locational requirements of different sectors** (paragraph 82) (emphasis added).

- 3.7.5 The key considerations in the NPPF are the main town centre use policy tests of impact and the sequential approach to site location Paragraph 86 advises 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. 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."

- 3.7.6 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 87).

- 3.7.7 Paragraph 89 sets out the impact test in respect of town centre uses. It states:

"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 (if there is no locally set threshold, the default threshold is 2,500 m² of gross floorspace). This should include assessment of:

a) the impact of the proposal on existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposal; and

b) the impact of the proposal on town centre vitality and viability, including local consumer choice and trade in the town centre and the wider retail catchment (as applicable to the scale and nature of the scheme)."

- 3.7.8 The Framework makes clear at paragraph 90 that where an application fails to satisfy the sequential test or is likely to have significant adverse impact on one or more of the considerations in paragraph 89, it should be refused.



National Planning Practice Guidance (NPPG)

3.7.9 NPPG guidance is split into a number of topics, including "Ensuring the vitality of town centres". Of particular relevance are the following extracts:

What does the National Planning Policy Framework say about planning for town centres? - *"The sequential test should be considered first as this may identify that there are preferable sites in town centres for accommodating main town centre uses (and therefore avoid the need to undertake the impact test). The sequential test will identify development that cannot be located in town centres, and which would then be subject to the impact test. The impact test determines whether there would be likely significant adverse impacts of locating main town centre development outside of existing town centres (and therefore whether the proposal should be refused in line with policy). It applies only above a floorspace threshold as set out in paragraph 89 of the National Planning Policy Framework⁵."*(underlining added)

How should the sequential test be used in decision-taking? – *"...The application of the test should be proportionate and appropriate for the given proposal... The checklist below sets out the considerations that should be taken into account in determining whether a proposal complies with the sequential test:*

- *with due regard to the requirement to demonstrate flexibility, has the suitability of more central sites to accommodate the proposal been considered? Where the proposal would be located in an edge of centre or out of centre location, preference should be given to accessible sites that are well connected to the town centre. Any associated reasoning should be set out clearly.*
- *is there scope for flexibility in the format and/or scale of the proposal? It is not necessary to demonstrate that a potential town centre or edge of centre site can accommodate precisely the scale and form of development being proposed, but rather to consider what contribution more central sites are able to make individually to accommodate the proposal.*
- *if there are no suitable sequentially preferable locations, the sequential test is passed."*
(underlining added)

⁵ Paragraph: 001 Reference ID: 2b-001-20140306



3.7.10 Other relevant extracts from the adopted NPPG include:

How should viability be promoted? – *"The sequential test seeks to deliver the Government's "town centre first" policy. However as promoting new development on town centre locations can be more expensive and complicated than building elsewhere local planning authorities need to be realistic and flexible in terms of their expectations."*⁶

When should the impact test be used – *"The impact test only applies to proposals exceeding 2,500 square metres gross of floorspace unless a different locally appropriate threshold is set by the local planning authority... As a guiding principle impact should be assessed on a like-for-like basis in respect of that particular sector (e.g. it may not be appropriate to compare the impact of an out of centre DIY store with small scale town-centre stores as they would normally not compete directly)."*⁷

Planning Appeal & Legal Decisions

3.7.11 The Court and Appeal decisions have provided clarification of the interpretation of the NPPF and NPPG on the matter of the application of the sequential and impacts tests in recent years. Such decisions form a material consideration when determining planning applications of this type. These are discussed in detail at Sections 5 and 6.

3.8 Summary

3.8.1 The application site(s) lie within the Policy SA2a South Reading Strategic Development Sites – Worton Grange designation leisure uses (at a commensurate scale) are acceptable in principle.

3.8.2 South Reading will be the location for a significant amount of new residential and employment development over the emerging plan period.

3.8.3 Development proposals within South Reading will maintain and enhance the identified network of District and Local Centres in accordance with Policy SA3. Additional retail, leisure and culture uses in South Reading will be in or as an extension to the Whitley District Centre. We understand this provision has been delivered through the opening of a new Aldi foodstore, gym and public house.

⁶ Paragraph: 012 Reference ID: 2b-012-20140306

⁷ Paragraph: 016 Reference ID: 2b-016-20140306



- 3.8.4 Retail, leisure and culture uses of a scale to serve residential development and identified underserved residential areas will be appropriate. Only one existing residential area is considered to currently be underserved and that is the western part of Whitley Wood, west of Whitley Wood Lane.
- 3.8.5 The WBRLS demonstrates that a significant growth in commercial leisure expenditure (including health and fitness) can be expected to come forward in the survey area over the period to 2036 (para 12.14). It shows that there is scope for further gym uses to be accommodated.
- 3.8.6 A sequential approach to site selection should be applied for town centre uses outside of designated centres. 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.



4.0 Vitality and viability of defined centres

4.1 Introduction

4.1.1 This section of the assessment presents a health check of surrounding centres. We have carried out a healthcheck assessment of the following surrounding catchment area-based centres:

- Whitley District Centre;
- Shinfield Road District Centre;
- Whitley Wood Local Centre; and
- Lower Earley Centre (Wokingham Borough).

4.1.2 In carrying out centre healthchecks due regard has been given to national policy provided in the NPPF and NPPG on accepted vitality and viability indicators of designated centres. The following analysis draws upon established sources of retail data which are supplemented by our own centre visits/ observations.

4.2 Shinfield Road District Centre

4.2.1 Shinfield Road is defined district centre. The centre is relatively small, comprising 29 units and is located approximately 3km south of Reading town centre. It is located close to the border of Wokingham Borough.

Composition of centre

4.2.2 WYG has investigated the composition of the centre based on the centre extent outlined within the emerging local plan⁸. A breakdown of units is set out in the table below:

⁸ Submission draft, March 2018


Table 1.1 Shinfield district centre composition

Type of Unit	December 2018		UK Average July 2018 %
	No. units	% Total	
Convenience	4	14	9
Comparison	8	28	30
Retail Services	4	14	15
Leisure Services	12	41	24
Financial & Business Services	0	0	10
Vacant	0	0	11
Total	29	100	100

Source: WYG site visits. UK average at July 2018

- 4.2.3 The convenience retail sector represents 14% of the centre which is well above the national average. Comparison retail, at 28%, broadly reflects the national average.
- 4.2.4 There is a notably high proportion of leisure uses at the centre, which accounts for 41% of the centre, almost double the national average (24%). There is however financial service representation which indicates an imbalance of provision. There are no vacant units.

Retailer and Leisure Representation

- 4.2.5 The centre benefits from a mixture of national multiples and independent operators. National multiples present in the centre include; Carphone Warehouse, Tesco Express, Sainsbury's Local, KFC, Londis, Ladbroke's, Subway, Papa John's and Pizza Hut Takeaway. The range of national multiple retailers is complemented by independent operators including; Choice Home Improvements, Firezza, Blissful Beauty, Shinfield Local, China Garden, Woody's Grill, Vantage Pharmacy, Forrester's Hair, Mr Cod, Ableworld Mobility Store and Shinfield Tandoori.

Vacancies

- 4.2.6 No vacant units were identified during the WYG survey which is considered a positive indication of a buoyant centre; however this may also indicate a somewhat constrained centre, with a lack of premises to attract new operators.



Accessibility

- 4.2.7 The centre is adequately accessible given its suburban, residential setting. By private car the centre is approximately 2.8km north east of junction 11 of the M4. The centre benefits from 3 bus stops on Shinfield Road and Elm Road and is served by the 3, 3b, 10 and 10a buses. Considering the relatively small size of the centre, levels of car parking provision are very good with three dedicated car parks and on street parking bays.

Pedestrian Flows

- 4.2.8 At the time of survey, higher levels of pedestrian activity were observed at the northern end of the district centre which can be attributed to the presence of national multiple convenience stores such as Tesco Express and Sainsburys Local. Lower levels of pedestrian activity were observed in the south of the district centre, near Whitley Wood Road.

Environmental Quality

- 4.2.9 At the time of survey, the centre demonstrated good levels of environmental quality. Shop fronts and building facades are well maintained throughout and areas of public realm were in a good condition. The high levels of environmental quality add to the shopping experience.

Summary

- 4.2.10 In conclusion, Shinfield Road district centre is well used and viable, as demonstrated by the lack of vacancies and high levels of footfall. The centre comprises a very strong range of leisure services that complement the convenience and comparison retail uses. The centre is considered vital and viable in serving a local predominantly top-up retail and leisure function.

4.3 Whitley District Centre

- 4.3.1 Whitley is a defined district centre. The centre is split into two areas which includes Morrisons supermarket and the nearby frontage along Basingstoke Road and Buckland Road. The second area is linear in form and follows Northumberland Avenue.
- 4.3.2 The SDPD states the main focus for additional retail, leisure and culture uses in South Reading will be in or as an extension to the Whitley District Centre. We understand this policy aspiration has now partly been delivered through the opening of a new Aldi foodstore, Pure Gym and public house on former employment land.



Composition of centre

4.3.3 WYG has investigated the composition of the centre based on the centre extent outlined within the emerging local plan⁹. A breakdown of units is set out in the table below:

Table 1.2 Whitley centre composition

Type of Unit	December 2018		UK Average July 2018 %
	No. units	% Total	
Convenience	4	15	9
Comparison	4	15	30
Retail Services	5	19	15
Leisure Services	6	23	24
Financial & Business Services	1	4	10
Vacant	3	12	11
Total	26	100	100

Source: WYG site visits. UK average at July 2018

Retailer and Leisure Representation

- 4.3.4 The centre benefits from a mixture of national multiples and independent operators. National multiples include; Morrisons, Cotswold, Ladbroke's, Lloyds Pharmacy, Betfred and Premier Stores. Independent operators in the centre include; Choi Hung Gardens, Turkish Mangal, Golden Dragon, Brinsdens, Laundrette, Ken's, Allsorts of Pets, Top Cut, Relate, White Knights and Puccinos Pizza.
- 4.3.5 The convenience sector is well represented, above the national average of 9%. Strength in the convenience sector can likely be attributed to the centre's mainly suburban setting, serving the day to day needs of the surrounding residential population.
- 4.3.6 The comparison sector accounts for 15% of the centre, representing 4 units. This level of provision operates 15% below the national average of 30%. However, a significant comparison offer is found in close proximity to Morrisons supermarket, outside of the designated centre.
- 4.3.7 Retail services account for 5 units, representing 19 of the centre. This level of provision operates 4% above the national average of 15%.

⁹ Submission draft, March 2018



- 4.3.8 Financial and business services account for a single unit, equivalent to 4% of the centre. The sector operates 6% below the national average of 10%. Leisure services represent 23% of the centre, numbering 6 units which operates on a par with national averages.

Vacancies

- 4.3.9 3 vacant units were found within the centre, representing 12% of the centre. This level of vacancy is a single percentage above the national average of 11%. Vacancies are generally well dispersed throughout the centre.

Accessibility

- 4.3.10 The centre is highly accessible via public transport and private car. Basingstoke Road provides links south towards the M4 and north towards Reading town centre. In addition to this, bus stops are found on Basingstoke Road and Northumberland Avenue served by the number 5, 6, 6a, 7, 9, 66 and 154 buses. Car parking provision is good, with a large dedicated car park at Morrisons and a smaller car park off Basingstoke Road. Parking at Northumberland avenue is on street.

Pedestrian Flows

- 4.3.11 At the time of survey high levels of pedestrian activity were observed at Morrisons supermarket, with pedestrians moving north, south and east of the supermarket to access further retail units located outside of the centre to the north and south. Movements east towards Basingstoke Road were also observed. Lower levels of pedestrian activity were observed at Northumberland Avenue.

Environmental Quality

- 4.3.12 At the time of survey, the centre demonstrated good levels of environmental quality. Shop fronts and building facades are well maintained throughout and areas of public realm were in a good condition. The high levels of environmental quality add to the shopping experience.

Summary

- 4.3.13 Whitley District Centre is a well-used and viable centre, which shows strength in the convenience and leisure services sectors, which serve the surrounding residential population. Vacancies mirror national averages, whilst comparison and financial and business services provision are below national averages. The centre is highly accessible with good levels of car parking and is environmentally attractive. High levels of footfall confirm the centres viability and viability.



4.4 Whitley Wood Local Centre

- 4.4.1 Whitley Wood is a defined local centre. The centre is located approximately 3.5km south of Reading town centre, and approximately 1km north east of junction 11 of the M4 motorway. It is small, comprising only 7 units that front Whitley Wood Road and Northumberland Avenue and services a limited local function. The surrounding area is identified in the local plan as being underserved however it is also recognised that here "opportunity for new development within the existing residential areas are more limited" (para 6.2.3, submission draft Reading Local Plan)

Composition of centre

- 4.4.2 WYG has investigated the composition of the centre. A breakdown of units is set out in the table below:

Table 1.3 Whitley Wood local centre composition

Type of Unit	December 2018		UK Average
	No. units	% Total	July 2018 %
Convenience	2	29	9
Comparison	2	29	30
Retail Services	1	14	15
Leisure Services	1	14	24
Financial & Business Services	0	0	10
Vacant	1	14	11
Total	7	100	100

Source: WYG site visits. UK average at July 2018

- 4.4.3 Although the centre is small, overall there is a well-balanced composition of uses available, with only financial and business services not represented; this does not cause undue concern considering the size and nature of the centre. Convenience and comparison retail uses are most strongly represented.

Retailer and Leisure Representation

- 4.4.4 Despite being a small centre, two national multiple stores are represented at Whitley Wood: Betfred and Co-op. Independent retailers that operate in the centre include: Newlook Barbers, PMK Supermarket, Whitley Wood Pharmacy and Christian Community Action.



Vacancies

- 4.4.5 At the time of survey there was a single vacant unit at the centre.

Accessibility

- 4.4.6 The centre is highly accessible via sustainable modes of public transport and private car. Two bus stops on Northumberland Avenue adjoin the centre, providing access to the number 5 and 9 buses. By car, the centre is approximately 1km north east of junction 11 of the M4 motorway. Car parking provision is good, with on street bays provided at Northumberland Avenue and a car park found off Cooper Close.

Pedestrian Flows

- 4.4.7 At the time of survey pedestrian activity focused around the retail frontages at Northumberland Avenue and Whitley Wood Road.

Environmental Quality

- 4.4.8 Shop facades appeared in good condition at the time of survey. Areas of public realm were similarly well kept and clean.

Summary

- 4.4.9 Whitley Wood Local Centre is a small centre serving a limited, primarily, top-up function which is reflective of its local centre status. While the area is relatively underserved the existing centre, although small, provides good retail provision, is accessible to its surrounding local population and is generally well maintained. The centre was busy at the time of survey. It is considered vital and viable.

4.5 Lower Earley District Centre

- 4.5.1 Lower Earley is located within Wokingham Borough and is a defined district centre¹⁰ The centre is approximately 4km south east of Reading town centre and approximately 3.5km east of junction 11 of the M4 motorway. The centre comprises two main areas; The Square – to the west of Chalfont Way, and a shopping and community complex east of Chalfont Way, anchored by Asda.

¹⁰ Wokingham Borough Core Strategy



Composition of centre

- 4.5.2 WYG has investigated the composition of the centre. A breakdown of units is set out in the table below:

Table 1.4 Lower Earley district centre composition

Type of Unit	December 2018		UK Average July 2018 %
	No. units	% Total	
Convenience	4	25	9
Comparison	2	12.5	30
Retail Services	2	12.5	15
Leisure Services	4	25	24
Financial & Business Services	3	19	10
Vacant	1	6	11
Total	16	100	100

Source: WYG site visits. UK average at July 2018

- 4.5.3 The centre is small but provides a diverse range of uses. The centre benefits from a strong convenience sector, with representation well above the national average. The comparison sector is more modest, below the national average but which is not untypical for a small locally focussed service orientated centre.

Retail and Leisure Representation

The convenience retail sector includes three large convenience stores, Asda, Marks and Spencer and Iceland. Leisure uses are well represented in line with the national average. The financial and business services sector is also well represented.

Vacancies

- 4.5.4 The centre has one vacant unit at the time of survey which suggests good buoyancy/demand.

Accessibility

- 4.5.5 The centre is highly accessible via public transport and private vehicle. Numerous bus stops are located around the centre, at Rushey Way and Chalfont Way. By car, the B3270 provides a



convenient link to the M4 motorway. Car parking provision is plentiful with two large car parks serving The Square and Asda.

Pedestrian Flows

- 4.5.6 At the time of survey high levels of pedestrian activity were observed in both The Square and Asda complex. Quieter areas were observed in the north of the Asda complex, where community facilities are located.

Environmental Quality

- 4.5.7 Shop facades appeared in good condition at the time of survey. Areas of public realm were similarly well kept and clean.

Summary

- 4.5.8 Lower Eardley District Centre is considered to be performing well against key indicators. It offers a very strong convenience retail element; it is well served by three large convenience stores, Asda, Marks and Spencer and Iceland. Strength is also seen in the leisure and financial and business services sector. The centre's viability and vitality is further demonstrated by low levels of vacancy. The centre is easily accessible and was busy at the time of survey. Additionally high environmental quality adds to the shopping experience. The centre is considered vital and viable.

4.6 Summary of existing defined centres

- 4.6.1 Surrounding centres, on the whole, meet the demands of their typically limited role and function, which is generally focussed towards top-up retail needs and everyday services. Whitley Wood Local Centre is small, and the surrounding area is identified in the local plan as being underserved in town centre use terms.
- 4.6.2 The lower order centres generally display a good mix of national multiples and independent retailers. The centres are accessible, have good levels of footfall and typically display low or average levels of vacancy. It is recognised there is little opportunity for new development within existing residential areas where many lower order centres are located, nevertheless these centres are considered vital and viable having regard to their role and function.



5.0 The Sequential Approach to Site Selection

5.1 Introduction

5.1.1 Paragraph 86 of the NPPF states that local planning authorities (LPAs) 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. Paragraph 87 states that applicants and LPAs should demonstrate flexibility on issues such as format and scale.

5.1.2 National Planning Practice Guidance (NPPG) advises the application of the test should be proportionate and appropriate for the given proposal¹¹. It sets out key considerations that should be taken into account in determining whether a proposal complies with the sequential test:

- Has the suitability of more central sites 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/scale of the proposal?
- If there are no suitable sequentially preferable locations, the sequential test is passed.

5.2 How should locational requirements be considered in the sequential test?

5.2.1 NPPG advises 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 (WYG emphasis). Robust justification must be provided where this is the case, and land ownership does not provide such a justification.¹²

5.2.2 The primary catchment area (PCA) is the area the proposed development is primarily intended to serve. This is the area where a significant proportion of the residential population will seek to primarily focus this leisure activity, having regard to, inter alia, Reading Gateway's geographical

¹¹ NPPG Paragraph: 010 Reference ID: 2b-010-20140306

¹² NPPG Paragraph: 011 Reference ID: 2b-011-20140306



location, its relative accessibility/proximity to residential population, and the proximity of other centres/facilities. The primary catchment area and the locational requirement of the future tenant is south Reading. It to be located in south Reading; the development is, inter alia, intended to meet the needs of the underserved residents of this area of the borough e.g. residents in and around Whitley Wood (as recognised in the local plan and outlined in preceding chapters).

- 5.2.3 Reading town centre lies beyond the primary catchment area of the proposed development. Indeed, the town centre is already well catered for – there are already four gyms/health and fitness centres represented in the town centre including: The Gym (Reading Central), 9 Round (Friar Street), Anytime Fitness (Chatham Place) and Studio 42 (Chatham Place). An additional town-centre based facility would fail to suitably serve the south Reading catchment area.
- 5.2.4 Notwithstanding the site lies at an out-of-centre location, it forms part of the Policy SA2a South Reading Strategic Development Site - Worton Grange designation. The site is subject to redevelopment for a mix of uses in accordance within its strategic allocation including housing, community uses and leisure uses at a scale commensurate to the needs of the housing proposal. It lies in close proximity to the main road network, and is easily accessed by public transport. The site is well connected to the surrounding pedestrian and cycle network, with a substantial residential population within walking distance. Pre-application advice from officers acknowledges *"that a mix of retail and leisure uses has already been accepted within the overall site. The principle of A3 and D2 (gym) uses is therefore considered acceptable."*¹³
- 5.2.5 The provision of the proposed use increases prospects of nearby residents using local facilities which is considered to accord with national guidance with respect to ensuring minimising travel, subject to there being are no in-centre sequentially preferable alternative sites being available, suitable and viable.
- 5.2.6 A sequential site search has been carried out of surrounding centres outlined in the preceding chapter.

¹³ Dated 21st September 2018



5.3 Correct Application of the Sequential Approach

5.3.1 It is important that the sequential approach is applied in a policy and legally compliant manner. Given the relative brevity of the sequential test as set out in the NPPF, it is helpful to give consideration to how the policy has been applied in practice by the Courts and by the Secretary of State. The following bullet points below provide a summary of the key matters regarding the application of the sequential test including suitability and the need to disaggregate:

- 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 for it which is for something less than that sought by the developer." (Dundee, paras 24 and 38¹⁴);
- "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). 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);
- "Had the Government intended to retain disaggregation as a requirement it would and should have explicitly stated this in the NPPF." (Rushden Lakes¹⁵, 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);
- The appellant's own commercial objectives are relevant to the question of suitability, even where these are site specific (Telford Forge appeal ref: APP/C3240/A/12/2172756, 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 ref: APP/C3240/A/12/2172756, para 19).
- "... "suitable" and "available" generally mean "suitable" and "available" for the broad type of development which is proposed in the application by approximate size, type, and range of

¹⁴ Tesco Stores Limited (Appellants) v Dundee City Council (Respondents) (Scotland) [2012] UKSC

¹⁵ APP/G2815/V/12/2190175 - LXB RP (Rushden) Limited v East Northamptonshire Council, June 2014



goods. This incorporates the requirement for flexibility in NPPF, and excludes, generally, the identity and personal or corporate attitudes of an individual retailer. The area and sites covered by the sequential test search should not vary from applicant to applicant according to their identity, but from application to application based on their content.” (paragraph 35, Aldergate v Mansfield District Council & Anor [2016] EWHC 1670 (Admin)).

- “In carrying out the sequential test it is acknowledged that whilst Framework paragraph 24 [now paragraph 86] indicates that applicants should demonstrate flexibility on issues such as format and scale, it does not require the applicant to disaggregate the scheme. The sequential test seeks to see if the application, i.e. what is proposed, can be accommodated on a town centre site or on sequentially preferable sites. There is nothing in the evidence before me to suggest that the applicant has pitched the scale of the scheme so that would be impossible to identify a town centre site” (para 11.7 of Inspector’s Report, Scotch Corner called-in application). The SoS specifically agreed with the Inspector at IR11.7 (para 11 of his decision letter).

5.3.2 Having regard to the prevailing legal and policy context WYG has conducted a sequential site search in order to ascertain whether there are any suitable, available or viable sites which could accommodate the proposed development.

5.3.3 Applying a reasonable degree of flexibility the physical requirement to meet the needs of the proposed development have been taken to be:

- Unit measuring c. 2,900sqm GIA (broadly reflecting the proposed quantum of floorspace required);
- Parking in the vicinity;
- Level pedestrian access or Equality Act compliant ramps (or the ability to install these);
- Servicing space and access, preferably separate to the customer access;
- Room to accommodate plant/air handling unit(s).

5.3.4 Cognisant of the foregoing legal and policy context, WYG has conducted a sequential site of: the South Reading Opportunity Areas as outlined in the Submission Draft of the emerging Reading Borough Local Plan (March 2018); and PCA based centres.



5.3.5 We have also considered the sites with existing planning permission outlined in the Submission Draft Local Plan (March 2018)¹⁶. These sites vary in size and committed land uses, but all of these sites lie outside of the nearest defined district or local centres and are therefore not sequentially preferable. Accordingly, these sites are discounted from further assessment.

Table 1.5: Opportunity Areas

Area		Location	Indicative Potential Uses	Assessment
SR1	A	Former Landfill, Island Road	95,000sqm to 116,000sqm industrial warehouse use	This area measures 32.13ha and lies at the north-west of the catchment area. This area is not available in a reasonable timeframe and is designated for non-leisure uses. It is unavailable and unsuitable for the proposed development.
	B	North of Island Road	7-9,000sqm industrial warehouse use	This area measures 3.1ha lies at the north-west of the catchment area. This area is not available in a reasonable timeframe and is designated for non-leisure uses. It is unavailable and unsuitable for the proposed development.
	C	Island Road, A33 Frontage	27k to 32k sqm	This area measures 9.7ha. It is designated for industrial/warehouse or other commercial development. This area is unavailable in a reasonable timeframe and unsuitable for the development proposed.
SR2		North of Manor Farm Road	Up to 1,000 dwellings, retail and leisure	Land to the south of Whitley DC has recently been developed for a foodstore (Aldi), gym (Pure Gym) and pub/restaurant. Policy stipulates this area is not to be brought forward in a piecemeal nature. The area is considered unsuitable for the development proposed.
SR3		South of Elgar Road	330-500 dwellings	The site (5.38ha) is allocated for housing and is unavailable in a reasonable timeframe. It is unsuitable for the proposed development.
SR4	a	Pulleyn Park, Rose Kiln Lane	70-100 dwellings	The site (1.29ha) is allocated for housing and is unavailable in a reasonable timeframe. It is unsuitable for the proposed development.
	b	Rear of 3-29 Newcastle Road	18-27 dwellings	The site (0.47ha) is allocated for housing and is unavailable in a reasonable timeframe. It is unsuitable for the proposed development.
	c	169-173 Basingstoke Road	5-80 dwellings	The site (0.8ha) is allocated for housing and is unavailable in a reasonable timeframe. It is unsuitable for the proposed development.
	d	16-18 Bennet Road	2,200sqm-2,700sqm industrial/	The site (0.74ha) is allocated for industrial/warehousing uses and unavailable in a reasonable timeframe. It is unsuitable for the proposed development.

¹⁶ Paragraph 6.3.18



			warehousing	
	e	Former Berkshire Brewery site	11,000-13,000sqm industrial/warehousing	The site (3.7ha) is allocated for industrial/warehousing uses. While related commercial uses (as part of a mix) may be appropriate the site is unavailable in a reasonable timeframe. It is considered unsuitable for the proposed development.
	f	South-west of Junction 11 of the M4	No designated uses	The site (3.84ha) is considered to be unavailable in a reasonable timeframe. It is considered unsuitable for the modest quantum of development proposed development.

Source: Submission Draft Reading Local Plan March 2018

Shinfield District Centre

5.3.6 We have not identified any in-centre vacant, available sites/ premises at Shinfield District Centre.

Whitley District Centre

5.3.7 Our healthcheck identified three vacant units:

- Unit 273 Junction of Buckland Road and Basingstoke Road – we understand this vacant unit was formerly in use as a local bank branch. It is being marketed and is understood to be available. The site measures c.500sqm and the existing unit measures c.200sqm. It is too small and unsuitable to accommodate the proposed development and has been discounted.
- 269 Basingstoke Road – the availability of this vacant unit is unknown. It measures c.200sqm and is too small and unsuitable for the proposed development.
- 242 Northumberland Avenue - the availability of this vacant unit is unknown. It measures c.200sqm and is too small and unsuitable for the proposed development.

Whitley Street

5.3.8 Our healthcheck identified two vacant units:

- 81 Whitley Street – This vacant unit is being marketed and appears available. At c.65sqm the unit is too small to accommodate the development proposed. The unit is **unsuitable** and has been discounted.



- Whitley Street – This vacant office unit measures c.200sqm. The unit is too small to accommodate the development, even allowing a reasonable degree of flexibility. The unit is **unsuitable** and has been discounted.

Whitley Wood Local Centre

- 5.3.9 Our healthcheck identifies one vacant unit at the centre which is too small to accommodate the development proposed. The unit is **unsuitable** and has been discounted.

Lower Earley District Centre

- 5.3.10 Our healthcheck identifies one vacant unit at the centre which is too small to accommodate the development proposed. The unit is **unsuitable** and has been discounted.

5.4 Concluding Comments

- 5.4.1 While the NPPF requires that a sequential test be applied, this must be done in a way which is compliant with recent judicial authority, Ministerial and appeal decisions. It is clear that the suitability of a site depends upon it being suitable to accommodate the development proposed by the applicant. While flexibility must be applied, it is not for LPAs to require applicants to radically alter their proposals. Decisions of the sequential test must be applied in a 'real-world' context and case law reaffirms the salient question whether, if the application were refused, would the applicant/developer develop the floorspace on a sequentially preferable site.
- 5.4.2 It is the locational and commercial requirements of the tenant to be located in **South Reading** - to meet the needs of the underserved residents of South Reading e.g. residents in and around Whitley Wood (as recognised in the local plan and outlined in preceding chapters). It is recognised that at Whitley Wood "opportunity for new development within the existing residential areas are more limited" (para 6.2.3, submission draft Reading Local Plan).
- 5.4.3 Notwithstanding the site lies at an out-of-centre location, it forms part of the Policy SA2a South Reading Strategic Development Site - Worton Grange designation, where it is recognised that "that a mix of retail and leisure uses has already been accepted within the overall site and that the principle D2 (gym) use is considered acceptable.
- 5.4.4 A thorough sequential site search has identified that no site can be considered available, suitable and viable sequentially preferable alternative in respect of the proposals. The proposal 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.



6.0 Assessment of Impact

6.1 Introduction

- 6.1.1 Reading Borough Council's Sites and Detailed Policies document (SDPD) (Policy DM14 and RL5) specifies that 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.
- 6.1.2 The application proposes the insertion of a mezzanine to provide an additional c.1,105sqm GIA floorspace. Accordingly, this additional floorspace provides the focus of this chapter of the statement.
- 6.1.3 The NPPG advises the impact test should be undertaken in a proportionate and locally appropriate way, drawing on existing information where possible.

6.2 Impacts on trade levels

- 6.2.1 As set out at the time of the original consent for Reading Gateway, unlike retail trade, an accurate quantitative assessment of the impact of the proposed Class D2 gym facilities on trade levels is very difficult due to establish with confidence due to the discretionary nature of leisure expenditure. Unlike with retail floorspace, there is not an established process for assessing spending on D2 leisure floorspace.
- 6.2.2 Notwithstanding this, it is material to note that in respect to trade levels, Unit 6 currently measures 1,858 GIA which, based on an average bulky retail goods sales density¹⁷, would be anticipated to turnover c.£5.4m¹⁸ - if a new retail tenant occupied the unit operating under the existing planning permission.
- 6.2.3 It is also material to note that the original planning application for Reading Gateway development included mezzanine floors for Units 2 (unit A), 1 (Unit B) and 6 (Unit C) totalling 3,380sqm GIA which was considered to be acceptable when the application was being considered, but these were

¹⁷ £3,906sqm Mintel Retail Ranking 18, 2018 prices

¹⁸ Assumed 75% net sales area (1,393sqm net)



ultimately removed for commercial reasons. Similarly, based on an average bulky retail goods sales density¹⁹ this unimplemented retail floorspace could be anticipated to turnover c.£5.9m²⁰.

- 6.2.4 With the unit instead trading as a Class D2 unit the 'trading overlap' with surrounding centres is likely to be far lower than the previously assessed trading position outlined above (given retail is the predominant offer found at surrounding centres) and therefore the potential impact on trading levels at surrounding centres as a result of the proposed development is likely to significantly reduce given a) the change of use to Class D2 non-retail use and b) the significantly smaller mezzanine proposed.
- 6.2.5 As noted in the WBRLS, Experian advise that spending on commercial leisure services will increase in the survey area by 1.3% per annum over the period 2016-36. By applying the average zonal per capita spend on the different types of commercial leisure activity to Experian's population projections for the survey area the WBRLS assesses the total of available commercial leisure expenditure available, including for recreational and sporting services (of which health facilities form part).

Table 1.6 Growth in commercial leisure spending in study area, 2016-2036

	2016 (£m)	2021 (£m)	2026 (£m)	2031 (£m)	2036 (£m)	Change 2016- 2036 (£m)
Recreation and Sporting services	351.5	389.3	428.9	469.8	513.5	+162.0

Source: WBRLS, 2017 Table 11.1

- 6.2.6 The above table shows that expenditure (including D2 leisure) is expected to grow significantly over the next ten years and beyond. This is due to a combination of local population increases and the projected increase in discretionary leisure spend. It is clear therefore that, as outlined in the WBRLS that *"there is scope for further uses of this nature to be accommodated"* (para 11.41). The above analysis demonstrates there is demand (and there is likely to be additional latent demand) for additional provision, which is set to increase.

¹⁹ Based on assumed s/d of £1,953sqm (50% of £3,906sqm Mintel Retail Ranking 18, 2018 prices)

²⁰ assumed mezzanine 90% of GIA net sales area (3,042sqm net)



- 6.2.7 It should also be noted that existing gym provision in South Reading is somewhat limited. The sequential analysis has demonstrated it is not feasible to improve this at existing centres, which it is acknowledged, are typically physically restricted with little scope for expansion. The proposed floorspace at Unit 6 is necessary to secure a reoccupation of the vacant unit for the intended gym tenant; this will generate local economic prosperity through, inter alia, job creation – as set out in Section 2.0 the operator is anticipated to generate up to 55 skilled jobs - and enhance local provision in a deprived area of the Borough at a strategic retail/leisure site, where it is recognised that D2 use is acceptable. It will create local economic opportunity directly and in-directly and bring back a vacant, economically in-active site into beneficial occupation. T
- 6.2.8 Whilst the proposed use may affect usage of existing facilities to some modest degree, in impact terms this is considered to likely lead to a neutral/ positive impact on existing centres, when considered in the context of the reduction in trade and potential retail competition between unit 6 and, more widely Reading Gateway, and existing nearby centres, as outlined above.

6.3 Impact on investment in existing centres and areas of local deprivation

- 6.3.1 We are not aware of any committed in-centre leisure proposals in the South Reading PCA which may be affected by the proposed additional floorspace at Unit 6.
- 6.3.2 Existing out of centre gym facilities are not protected in policy terms and their trading position need not be considered as part of this assessment. However, ensuring that centres within areas of deprivation are not adversely affected is of particular local importance. As outlined in preceding chapters leisure investment has already taken place at Whitley district centre through its extension on former employment land to deliver, inter alia, a gym operator. While the proposed development may have some effect on local leisure patterns local trade to the established existing provision is not anticipated to be eroded significantly; the existing provision has an established customer base and will still benefit from its regular (typically contracted) visitors seeking the particular format on offer at that destination.
- 6.3.3 The proposed tenant, UFC Gym, is not currently represented in Reading. As such, no existing operator intends to close/relocate from an existing premises (be it in centre of out of centre) to occupy Unit 6. The new operator represents new investment to Reading. We understand that the UFC gym will create an estimated 55 jobs at Unit 6, at what is a sequentially preferable location.
- 6.3.4 The occupation of Unit 6 will increase local choice; introduce a new operator and a materially different offer to the borough, to the benefit of the surrounding locally deprived areas/consumers.



Some modest localised usage effects are considered to be largely unavoidable if qualitative provision of facilities at this region of the Borough is to be improved and latent and future demand for additional provision is to be met. Indeed, it is anticipated that improvement of local provision may lead to a counteracting of unsustainable travel patterns to existing facilities further afield as visiting a local gym will be more convenient/viable.

- 6.3.5 It should also be recognised that the existing gym provision does not fundamentally underpin the surrounding defined centres' vitality and viability. Crucially, there is no evidence to suggest local effects are likely to be significant adverse, having regard to: the diversity of surrounding defined centres' typically retail/service focussed offer; their overall vitality and viability; and the identified growth in population and leisure spend and the future need for additional leisure provision to meet future demand.

6.4 Summary

- 6.4.1 An impact assessment has been carried out for the proposed floorspace at Unit 6 in a proportionate and transparent way, based upon existing information where appropriate, including the Council's own evidence base. Existing surrounding centres are considered to be vital and viable. The anticipated impact of the proposed development is in quantitative terms anticipated to be neutral/positive when considered in the context of existing retail benchmark trade levels. The development will reduce retail trading overlap with existing centres. The proposed operator represents new investment to Reading at a locally deprived area. No existing facilities will close/relocate as a result of the proposals. The proposed development will help meet identified need for additional leisure provision identified in the Council's evidence base having regard to increases in population and discretionary leisure spending – the proposals will materially improve local choice. The assessment demonstrates that the proposed development would not result in any significant adverse impact on nearby centres, in accordance with NPPF and NPPG guidance.



7.0 Other Principal Planning Considerations

7.1 Introduction

7.1.1 This section addresses other related planning policy matters relating to the proposed development:

- Transport/Parking matters;
- Drainage; and
- Air Quality

7.2 Transport

7.2.1 The proposed development is supported by a Transport Statement, the main findings of which are outlined below:

- The location of the site is accessible and there are a variety of sustainable transport options including walking, cycling and public transport services available;
- The proposed gym use and Unit 6 results in a non-material impact during the weekday evening peak period, there would be a significant reduction in the Saturday peak period;
- In accordance with Policy DM12, it is considered that the minimal changes in vehicle trip generation would result in no material changes to the effect on safety, congestion or the environment.
- There is no net change in car parking numbers proposed. The overall parking provision is considered appropriate, with provision adhering to the principles of local maximum parking policy standards whilst ensuring that an appropriate level of parking provided to accommodate potential demand.
- Existing cycle parking provision is considered appropriate and acceptable having regard to the particular characteristics of the park and anticipated usage requirements.



7.3 Flood Risk/Drainage

- 7.3.1 Flood risk is one of the issues to be considered by planning authorities when determining change of use applications.
- 7.3.2 The impermeable area within the site will not increase and no changes to the existing drainage system will be required as a result of the proposed development.
- 7.3.3 The site is in Flood Zone 1 and both the existing and proposed uses are classified as 'Less Vulnerable' according to Table 2 of the PPG (Flood Risk & Coastal Change). Therefore, as the site is at very low risk of fluvial flooding and it is not proposed to increase the flood risk vulnerability of the existing units nor the drained impermeable area, it is considered that the proposed development is acceptable from a flood risk and drainage perspective and no flood risk & drainage assessment is required in support of the planning application. This has been agreed following pre-application discussions with Reading Council as Lead Local Flood Authority.

7.4 Air Quality

- 7.4.1 The site lies within an AQMA. Accordingly, WYG has undertaken an Air Quality Screening Assessment for the proposed development which accompanies the application.
- 7.4.2 The potential effects during the construction phase are anticipated to include fugitive dust emissions from site activities, such as construction and trackout. The impacts during the operational phase take into account of exhaust emissions from additional road traffic generated due to the proposed development.
- 7.4.3 The air quality background concentrations in the vicinity of the proposed development site are below the Air Quality Objective (AQO) of 40µg/m³ for NO₂ and PM₁₀.
- 7.4.4 The Design Manual for Roads and Bridges (DMRB) screening assessment concluded that during the operational phase, there will be no significant effects on local air quality from the additional development traffic on the local road network. Therefore, further detailed operational air quality assessment is not required.
- 7.4.5 Mitigation during the construction phase of the development and adherence to good practice measures will be implemented.



- 7.4.6 Based on the assessment undertaken it is concluded that the site is suitable for the proposed development and no further air quality assessment is required.



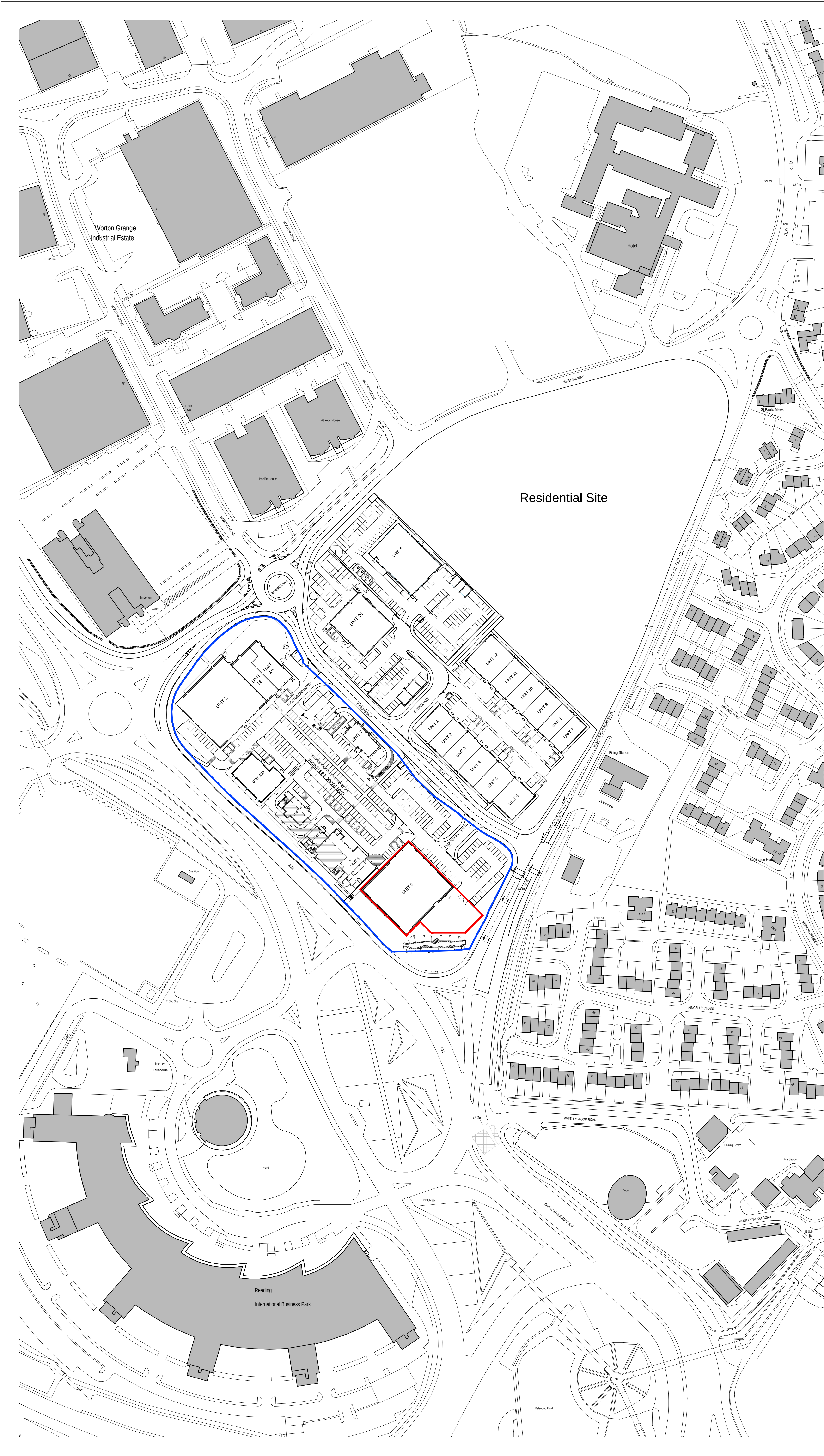
8.0 Conclusions

- 8.1.1 In light of the above, the following summary and conclusions are made in respect of the proposal:
- 8.1.2 Marketing of Unit 6 for Class A1 purposes has not resulted in a letting. Interest has been confirmed by UFC gyms to occupy the unit subject to its change of use and insertion of a mezzanine (to meet operational requirements). Both changes are the subject of this application.
- 8.1.3 The proposed tenant is not currently represented in the borough. No existing facilities will close/relocate to Unit 6 as a result of the proposals.
- 8.1.4 The proposed development will bring a vacant unit back into economic use a vacant unit. It will create skilled jobs directly and improve leisure provision in South Reading, an area of the Borough identified as being under-served.
- 8.1.5 Having carried out a proportional sequential search, no sequentially preferable sites have been identified. The additional floorspace has been assessed from an impact assessment in a proportionate way and the floorspace is not likely to give rise to a significant adverse impact on existing local centres.
- 8.1.6 The proposal will have no unacceptable effect on transportation matters and maintains the number of parking spaces currently at the site. Air quality and flood risk/drainage are not significant considerations for the size and type of development sought.
- 8.1.7 The NPPF contains a 'presumption in favour' of sustainable development. Paragraph 11 states that for decision taking, the 'presumption in favour' means:

"Approving development proposals that accord with the development plan without delay;"
- 8.1.8 The proposal is considered to accord with both national and local policies which weights firmly in favour of permitting the proposals.

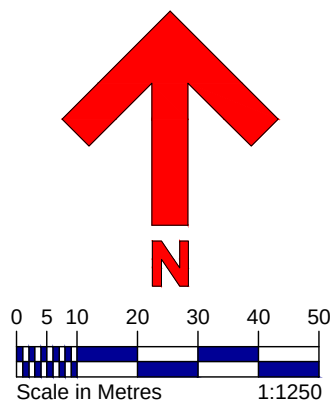


Appendix A – Site Location Plan



NOTES

- 1 © Saunders Architects LLP
- 2 Figured dimensions must be taken in preference to scaled dimensions and site dimensions are to be checked before work is put in hand
- 3 This drawing has been compiled from Ordnance Survey data © Crown Copyright; information from Peter Brett Associates LLP, Reading
Drawing No.'s 28791/001/002, dated 08.01.14 & 326818-001-003, dated 18.08.15;
Topographical Survey data provided by Greenhatch Group, Derby
Drawing No. 21122OGL Rev. 0, dated 06-14.11.14
Site as Existing based on Saunders Architects LLP
Drawing No.'s 1894-P-22 Rev. U, dated 05.09.18; 1894-P-46 Rev. D, dated 11.10.18; 1894-P-271 Rev. B, dated 02.11.17.



- B Drawing revised to show works within the scope of Unit 1 application ref. 190339/FUL 07.05.19
- A Red Line extended. 18.04.19
- First Issue. 18.04.19

AMENDMENTS

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SITE LOCATION PLAN

Reading Gateway
Imperial Way
READING
for Aberdeen Standard

SCALE 1:1250 @ A1	
Drawn RC	Date April 2019
DRAWING No 1949 - 30	REVISION B