

RETAIL, LEISURE AND CULTURE

Reading Borough Council response to Issue 9:

Are the policies for Retail, Leisure and Culture justified, deliverable and consistent with national policy?



Q1. Is Policy RL1 consistent with national policy? Are the boundaries of the Centres identified on the submission Proposals Map justified?

Policy RL1 is consistent with national policy as set out in the 2012 NPPF. It forms one of the strategic policies necessary to deliver the “provision of retail, leisure and other commercial development” (paragraph 156). It sets out “policies for the management and growth of centres over the plan period”, defines a “network and hierarchy of centres that is resilient to anticipated future economic changes” and recognises “town centres as the heart of their communities and pursue policies to support their viability and vitality” (all paragraph 23). There is nothing within RL1 that is inconsistent with national policy.

The justification for policy RL1 is set out in section 4.51 (pages 153-155) of the Local Plan Background Paper (EV002). In general, the boundaries of the district and local centres are drawn to include the main shopping and commercial areas, any nearby facilities that help to broaden the range of facilities available, as well as any sites that offer a clear opportunity for expansion of the centre. Wholly residential areas are generally excluded unless they fall between commercial or community elements of the centre, in which case there could be some potential for ground floor changes of use to help consolidate the centre, subject to compliance with other policies. In the majority of cases, it is relatively clear cut where the boundaries should fall, and there are no outstanding objections to these boundaries.

Q2. Is the requirement in Policy RL2 to undertaking a sequential approach for net floorspace gains of 2,500 sq m justified? Is the intention to limit this Policy to the Centre of Reading justified?

Under paragraph 24 of the 2012 NPPF, the sequential approach will apply to all proposals for main town centre uses that are not in an existing centre or allocated in the Local Plan, regardless of size, and this is confirmed by the last paragraph of policy RL2. RL2 states that the preferred location for retail, leisure and culture development of 2,500 sq m or more (unless subject to a plan allocation) will be central Reading. The reference to the sequential approach in this second paragraph is merely to make clear that where development cannot be accommodated in existing centres, the sequential approach will apply (as set out in national policy), and this is not specific to developments of 2,500 sq m or above, or to development in the centre of Reading.

Q3. Are the percentages for Key Frontages as set out in Policy RL3 justified and consistent with national policy?

The justification for the percentages for key frontages in policy RL3 is set out in section 4.53 (pages 159-162) of the Local Plan Background Paper (EV002). Each centre has its own character, and, within centres that are small in any case, the exact units covered within the key frontages can have a significant difference on the proportion which will fall in A1/A2 use. The approach taken in the Local Plan

is to set the appropriate proportion a level just below existing levels, unless there are reasons for particular concern, in particular the low level of A1, with a maximum proportion of 60%, to allow some scope for flexibility within centres. There were two centres where the target proportion is higher than the actual proportion, specifically Shinfield Road, where the proportion is fractionally below the 50% target, and Whitley Street, where there is a significant amount of non-retail frontage such as restaurants and takeaways, tanning and beauty salons, and some residential. The actual proportion in A1/A2 use (as set out in table 4.29, page 160 of the Local Plan Background Paper) is compared to the target proportion in table 9.1 below.

Table 9.1: Actual and target proportion of key frontage in A1/A2 use

Centre	Actual % of frontage A1/A2	Target % of frontage A1/A2	Difference
Basingstoke Road North	51.4	50	-1.4
Caversham	65.0	60	-5.0
Cemetery Junction	65.8	60	-5.8
Christchurch Road	72.0	60	-12.0
Coronation Square	63.2	60	-3.2
Emmer Green	50.7	50	-0.7
Erleigh Road	58.6	50	-8.6
The Meadway	57.4	50	-7.4
Northumberland Avenue North	69.1	50	-19.1
Oxford Road West	63.4	50	-3.4
Shinfield Road	49.9	50	+0.1
Tilehurst Triangle	75.3	60	-15.3
Wensley Road	80.7	60	-20.7
Whitley	73.6	60	-13.6
Whitley Street	38.7	40	+1.3
Whitley Wood	67.3	60	-7.3
Wokingham Road	59.5	50	-9.5

In terms of compliance with national policy, paragraph 23 of the 2012 NPPF states that Local Plans should “define the extent of town centres and primary shopping areas, based on a clear definition of primary and secondary frontages in designated centres, and set policies that make clear which uses will be permitted in such locations”.

A point has been made in representations from Planware Ltd that it is inconsistent with national policy to seek to apply a maximum proportion of A5 frontage, based on general requirements in the NPPF to support sustainable growth and not over-burden investment in business. The Council has responded to this within the Statement of Consultation on the Pre-Submission Draft Local Plan (LP006, see page 230-231), but in general, considers that the NPPF allows local authorities to set policies that manage uses within key frontages of local centres, in line with the reference to paragraph 23 above, and since no centre currently exceeds the 30% policy ceiling, this does not represent an unreasonable block on sustainable growth.

Q4. Is Policy RL4 justified and based on robust evidence? What is the justification for the 150m radius?

Policy RL4 is justified and based on robust evidence. The evidence to support the policy is set out in section 4.54 (pages 162-163) of the Local Plan Background Paper (EV002). Whilst all buffers and thresholds are arbitrary to some extent, the 150m radius emerged from mapping of the existing location of betting shops and payday loan companies, and is set at a level which highlights existing areas of concern (for instance the area around Friar Street) whilst at the same time avoiding blanket restrictions that would affect most of the existing centres and present an unreasonable block on future developments. An option for a 50m radius formed part of the Sustainability Appraisal, and has been rejected as it would allow for a substantial proliferation of such uses within a single centre.

Q5. What is the justification for the floorspace of 1,000 m as the basis for considering whether a significant adverse impact on existing town centre uses exists as set out in Policy RL5?

The evidence to support the threshold of 1,000 sq m is set out in section 4.55 (pages 163-164) of the Local Plan Background Paper (EV002). This cross-refers to Table 4.26 (p154), and notes that the majority of the smaller local centres have approximately 1,000 to 1,500 sq m of 'A'-class floorspace. Therefore, an out-of-centre development of this scale has potential to have a significant adverse impact on the smaller existing designated centres. Both lower and higher thresholds are tested through the Sustainability Appraisal, and have been rejected.