

50075/APP/2023/1543 - Unit 3 Victoria Retail Park, South Ruislip

## Impact and Sequential Tests – Addendum Note

### *Introduction*

This note has been prepared to respond to planning policy comments received in respect of planning application ref. 50075/APP/2023/1543 which relates to the introduction of an alternative Class E use at Unit 3 Victoria Retail Park, South Ruislip. It should be read alongside the submitted Planning Statement. Planning permission is required in this case due to a restrictive condition that limits the use of the application site to retail purposes only and permission is now sought for use as a gym within Class E(d). The flexibility intended to be afforded by the introduction of Class E in 2020 and the fact that the existing planning condition did not specifically seek to restrict non-retail uses are both important material considerations in this case.

The consultation response from planning policy has requested additional information in respect of both the impact and sequential tests. In terms of the sequential assessment, we have been asked to consider two additional centres, in addition to the five already considered within the Planning Statement. In terms of impact assessment, reference has been made to the methodology for completing a retail impact assessment that is set out within Planning Practice Guidance (PPG). We have raised concerns that this methodology is not appropriate to non-retail uses and that its application in this case is unnecessary and disproportionate. Notwithstanding these concerns and the limited applicability of the suggested approach, we have sought to respond to all requests for additional information within this note.

### *Extant Position*

Under the terms of the existing planning permission at the application site, it could be re-occupied at any time by an alternative retailer provided that this retailer did not sell food goods. This could include a retailer seeking to relocate from existing premises within a defined centre. The application site currently provides floorspace of 1,566 sq.m and if it is assumed that any new occupier operates on the basis of a 70:30 gross:net floorspace split then Unit 3 would provide retail sales floorspace of 1,096 sq. m. If a conservative sales density of £5,000 per sq. m is assumed, then the site could potentially achieve a retail turnover of £5.48 million. Some of this turnover would be diverted from nearby centres, especially if any new retail occupier sold household goods, chemist or beauty products that are important components of the comparison retail offer of nearby centres.

### *Health of Centres*

We provide here an overview of the health of nearby centres, against which the significance of potential trade impacts can be considered. The Council does not appear to have an up-to-date evidence base in respect of the health of the Borough's centres but we refer here to its 'Retail Revival Evaluation Report' prepared in June 2023 which contains vacancy rates for some centres.

- South Ruislip – this is a local centre that includes a large Sainsbury's supermarket and a number of much smaller commercial units on Station Approach and Victoria Road. This includes two small convenience stores, newsagents and service uses including takeaways, bookmakers, hairdressers etc. There are no existing health and fitness facilities within this centre. The vacancy rate within the centre is very low with all units currently appearing to be occupied. The local centre at South Ruislip is therefore considered to be in good health.
- Ruislip Manor – classified as a minor centre, Ruislip Manor contains around 136 ground floor commercial units. Its offer is anchored by Budgens and Tesco Express with a good range of comparison retail facilities including chemists, hardware, household goods, furniture and appliance stores. This is complemented by service facilities including hairdressers, beauty

salons, estate agents, travel agents and a variety of food and drink uses. There is a large gym within the centre (Anytime Fitness) and three small, independent gyms/fitness studios providing a more niche offer. The environmental quality of centre is good with wide pedestrian walkways, street planting and good quality street furniture. The vacancy rate at March 2022 was 2% which is considerably below the national average of 14.1% (Source: British Retail Consortium – Q1 2022). Ruislip Manor is therefore a very healthy centre that provides excellent facilities for a centre of its size and status.

- Ruislip – the town centre at Ruislip contains 140 ground floor commercial units. The centre is underpinned by its convenience retail offer which includes Waitrose, Iceland, Tesco Express and Sainsbury's Local, as well as independent outlets including butchers and bakers. There is a very good range of comparison retail facilities for a centre of its size with some national retailers and complementary service facilities including a notable number of banks. The centre currently contains no health and fitness facilities. Its vacancy rate at March 2022 was 8% which is well below the equivalent national average of 14.1%. As such, Ruislip Town Centre is considered to be a vital and viable centre that is in good health.
- Eastcote – also defined as a town centre, Eastcote contains 143 ground floor commercial units. Its convenience retail offer includes Aldi, Tesco Express and Sainsbury's, with a reasonable comparison retail offer including chemists, household goods, stationers, sportswear and interiors/furnishings. There is a good range of services including restaurants and cafes. The only existing health and fitness facility is a personal training studio. The environmental quality of the centre is excellent, having benefitted from recent public realm improvements to Field End Road. Its vacancy rate at March 2022 was 6%, well below the national average. We conclude that Eastcote is a healthy town centre that is performing well.
- Northolt – located with Ealing, Northcote is a relatively small neighbourhood centre that serves the day-to-day needs of the local community. Its convenience retail offer is very good, being anchored by a Co-op and Sainsbury's Local, with four smaller independent foodstores. However, there is only a limited range of other facilities including a pharmacy, bookmakers, funeral directors and takeaways. There are no existing health and fitness facilities. We estimate the vacancy rate within the centre to be less than 10%. This small neighbourhood centre is therefore considered to be in reasonably good health.

In summary, the nearest defined centres to the application site are considered to be healthy and to perform well on indicators of vitality and viability including low vacancy rates, good diversity of uses and generally good accessibility and environmental quality.

### ***Trade Impacts of Proposed Use***

We have been asked to provide a retail impact assessment in accordance with the methodology set out within PPG. There are a number of limitations when applying such a methodology to a non-retail use as the use of such facilities is not captured in shopping pattern data and there is a lack of published data sources to calculate the 'turnover' of leisure uses. In particular, for health and fitness facilities there is significant variance in terms of offer, price points and floorspace.

We have therefore used our best endeavours to apply this methodology to the proposed gym use. As such, we have sought to estimate trade impacts on the basis of member numbers, applying assumptions regarding likely membership or user figures. These assumptions assume that large, multi-functional public leisure facilities will have around 8,000 members/users, a large format gymnasium or health club will have around 4,000 members, smaller, independent gyms will have approximately 300 members and small personal training or class-based facilities around 100 members. These figures are considered to be robust, particularly with regard to smaller facilities.

For the proposed gym, we have assumed that 66% of members are diverted from existing health and fitness facilities and 33% are not currently members of a gym. The use of base and design years are not directly relevant to this assessment as they are intended to capture the effects of retail

expenditure growth. We do not anticipate any significant changes to the membership capacity of existing or proposed health and fitness facilities in the short to medium term. For this assessment we calculate trade impacts at 2025 when we anticipate that the trade of the proposed gym will have matured. This is within the timescales recommended by PPG.

Trade diversion from existing facilities to the application scheme has been estimated in accordance with the principles highlighted by PPG; that is geographical proximity and like-with-like. As such, we anticipate that the proposed, large-format gymnasium will compete most with other large-format, all-purpose gyms and that the greatest trade diversion will be from those facilities that are closest to the application site. The proposed use will compete less with health and fitness facilities that are further from the site and that provide an alternative offer (be that smaller and more specialised or larger and providing a range of sports facilities, swimming pools, cafes etc).

Table 1 below sets out estimated trade diversion and trade impacts at 2025. It is assumed that the highest levels of trade diversion will be from The Gym at The Old Diary (which provides a similar offer in close proximity) and the existing PureGym at Northolt (for whose members the application site might provide a more convenient alternative). It is expected that 30% of the proposed gym's trade will be diverted from these facilities, with a further 10% from Queensmead Sports Centre and 10% from Anytime Fitness at Ruislip Manor. The remaining 20% of trade will be diverted from a range of other facilities, including some outside of the immediate area (where, for example, commuters switch from a gym close to their place of work to a gym close to their place of residence).

**Table 1 – Estimated Trade Impacts at 2025**

Existing Health & Fitness Facility	Assumed Membership Pre-Development	Trade Draw to Application Scheme (%)	Trade Diversion to Application Scheme (Persons)	Assumed Membership Post-Development	Trade Impact (%)
<i>In-centre</i>					
Anytime Fitness, Ruislip Manor	4000	10	264	3736	6.6%
PureGym, Northolt	300	0	0	300	0.0%
Gymphobics, Ruislip Manor	100	0	0	100	0.0%
Next Level, Ruislip Manor	100	0	0	100	0.0%
Bodystreet, Eastcote	100	0	0	100	0.0%
<i>Out-of-centre</i>					
The Gym Group, South Ruislip	4000	30	792	3208	19.8%
PureGym, Northolt	4000	30	792	3208	19.8%
Queensmead Sports Centre	8000	10	264	7736	3.3%
The Tardis, South Ruislip	300	1	26	274	8.7%
BaseBox, South Ruislip	100	0	0	100	0.0%
Evolve Gym, South Ruislip	300	1	26	274	8.7%
Northolt Leisure Centre	8000	5	132	7868	1.6%
David Lloyd, Sudbury Hill	4000	3	79	3921	2.0%
<i>Other</i>	N/A	10	264	N/A	N/A
		100	2639		

Consequently, the highest levels of impact are expected to be experienced by The Gym at South Ruislip and PureGym, Northolt. This is followed by small, independent gyms within the South Ruislip area. All these facilities are outside defined centres and not afforded any policy protection. The highest level of trade impact on an in-centre facility relates to Anytime Fitness at Ruislip Manor which we estimate will see impact of -6.6%.

In terms of alternative scenarios, it is proposed that the use will be restricted to Class E(d) and there is therefore no need to consider alternative uses.

### ***Significance of Impacts***

Our overview of the health of nearby centres has confirmed that all are underpinned by retail activity and meeting local, day-to-day shopping needs. This supports our previous suggestion that the extant retail use of the application site has greater potential to impact the vitality and viability of nearby centres than the proposed Class E(d) use. Indeed, we are not aware of any existing health and fitness facilities within the centres at South Ruislip, Ruislip and Northolt, meaning the proposed use will have no impacts on these centres.

The town centre at Eascote has a small gym/studio focussed on personal training. Given the nature of this use and its distance from the application site, there will be no material impacts on this facility and the overall vitality and viability of Eastcote. Ruislip Manor has the greatest concentration of in-centre health and fitness facilities, albeit that they clearly serve a complementary role to the main retail and service uses within the centre. Only one of the four existing facilities provides a similar offer to the application scheme, and we estimate it will experience trade impact of around 6.6%.

This level of impact will be within usual trading variations for such a gym and will be readily ameliorated by further growth in the health and fitness market (as set out within the Planning Statement). It will have no fundamental impacts on the viability of this existing facility. Paragraph 91 of the NPPF states that planning permission should be refused if a proposal is likely to have significant adverse impacts on a town centre. These might be characterised as a significant fall in overall trade and footfall, notable increase in the centre's vacancy rate or significant reduction in the diversity of uses or retailer representation. It is evident that Ruislip Manor, which is currently a very healthy and therefore resilient centre, will not experience any of these significant impacts as a result of the proposed development.

### ***Conclusions in respect of the Impact Test***

Given the additional analysis set out above, we confirm that the proposed use will not have any significant adverse impacts on defined centres and that the proposal therefore accord with paragraph 90 of the NPPF and Polices E5 and DMTC 1 of the Local Plan.

### ***Sequential Assessment***

We have been asked to consider two additional centres as part of the sequential assessment prepared to support the planning application. These are the centre at Rayners Lane and at South Harrow in the London Borough of Harrow. We note that both these centres are beyond a 10-minute drive-time from the application site and will serve a materially different catchment area.

Rayners Lane is a traditional district centre and the largest premises currently being marketed as available are offices at Carmine Court on Imperial Drive. These premises are available on a freehold basis and provide floorspace of just 231 sq. m. They are therefore unsuitable for the proposed development. The Site Allocations Local Plan for LB Harrow allocates two sites within and on the edges of Rayners Lane for retail-led development. Units to the south of Rayners Lane are allocated for 500 sq. m of retail floorspace and 15 residential units. Furthermore, the site is not being marketed and the existing retail units appear to be fully occupied. As such, this site is unsuitable and unavailable for the proposed development. The second allocated site is Harrow West Conservative Association and Hallmark Cars on Village Way. The sites are allocated for retail floorspace of 1,000 sq. m with the supporting text stating the site is suitable for multiple small retail units or a single convenience goods retailer. Both parts of the site appear to still be in active use. This site is therefore considered to be unsuitable and unavailable for the proposed development.

South Harrow is also a district centre and the largest unit currently available is at 254-256 Northolt Road. This is a former Lloyds Bank and provides total floorspace of only 188 sq. m. As such it is unsuitable for the proposed development. The Site Allocations Local Plan allocates one site at South Harrow for retail-led development. This is the Roxeth Library and Clinic on Northolt Road that is allocated for 1,000 sq. m of retail floorspace, 34 residential units and replacement community uses. The supporting text states that the site is suitable for multiple small retail units, a single larger



convenience goods unit or an extension to the adjacent Sainsbury's supermarket (now Aldi). Redevelopment should make provision for a replacement library and health care facility. Both public facilities appear to be an active use and that site is not currently being marketed. This site is therefore unsuitable and unavailable for the proposed development.

***Conclusions in respect of the Sequential Test***

The applicant has considered alternative sites within and on the edges of seven defined centres in three London boroughs. There are no suitable alternatives to the application site that will be available within a reasonable period of time. We therefore re-confirm that the proposal satisfies the sequential test and that it accords with paragraphs 87 and 88 of the NPPF, and Policies E5 and DMTC 1 of the Local Plan.

**Urban Agile Limited**

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