



**Retail and main town centre uses:  
technical guidance on the  
implementation of sequential tests and  
impact assessments**

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## Introduction

- 1.1 This technical guidance is intended for use by applicants, the public and by Bracknell Forest Council (BFC) in the assessment and delivery of planning proposals for retail and other main town centre uses outside designated centres within the borough. It is in line with national policy, the Bracknell Forest Local Plan (BFLP), and specifically Policy LP 23 'Development of main town centre uses outside of designated centres', which seek to protect and sustain the vitality and viability of the borough's designated centres. This helps them reach their maximum potential in meeting the needs of residents and visitors and contributing to the economy of Bracknell Forest.
- 1.2 To aid the effective implementation of BFLP Policy LP 23, BFC has produced this technical guidance. It aims to provide further clarity to applicants and the public in respect of the requirements of the policy. It will also serve as a reference point for officers and Councillors at BFC. It does not introduce new policy but seeks to ensure that existing policy is implemented and applied consistently and effectively through the development management process.
- 1.3 This technical guidance note has been prepared drawing together the guidance set out within the National Planning Policy Framework (NPPF), the Planning Practice Guidance (PPG) 'Town Centres & Retail' as well as the policy contained in the BFLP. It is recommended that this technical guidance is read in full.

## Aims and objectives of this technical guidance

- 2.1 The purpose of this technical guidance note is to set out what we expect proposals for retail and other 'main town centre uses' (see definition below) outside designated centres to consider. It aims to ensure that proposals for main town centre uses outside designated centres are accompanied by robust sequential tests and, where required, impact assessments to enable well-informed and sustainable decision-making.
- 2.2 It pulls together:
  - the requirements in BFLP Policy LP 23 'Development of main town centre uses outside designated centres',
  - circumstances when BFLP Policy LP 23 applies and when we expect sequential tests and/or impact assessments to be provided,
  - the information applicants should supply when submitting a sequential test and/or impact assessment,
  - where information can be found to support the production of sequential tests and/or impact assessments, and
  - the process we will use to consider sequential tests and impact assessments.

## Key definitions used in this technical guidance

3.1 The key definitions below are based on Annex 2 of the NPPF but adapted to reflect local circumstances within Bracknell Forest.

Term	Definition
<b>Town centre</b>	Areas defined on the policies map (and in Appendix 3) of the BFLP, that are predominantly occupied by 'main town centre uses' within or adjacent to the 'primary shopping area' (as defined below). References to town centres or centres apply to town centres, district centres and local centres. It does not cover small parades of shops of purely neighbourhood significance. Existing out of centre developments (not identified in BFLP Policy LP 21 or on the policies map), comprising or including main town centre uses, do not constitute 'town centres'.
<b>Main town centre uses</b>	<p>Main town centre uses are:</p> <ul style="list-style-type: none"> <li>• retail development (including warehouse clubs and factory outlet centres)</li> <li>• leisure, entertainment and more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres and bingo halls)</li> <li>• offices, and</li> <li>• arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).</li> </ul> <p>BFC considers the following uses fall under the use of leisure, entertainment and recreation meaning they are, in our view, classified as a 'main town centre use' (the list below is not exhaustive):</p> <ul style="list-style-type: none"> <li>• health and fitness centres (including gyms, leisure centres, swimming pools)</li> <li>• cafés/ coffee shops</li> <li>• soft play/ play cafés/ inflatable centres</li> <li>• trampoline parks</li> <li>• indoor laser-based activities</li> <li>• ice rinks</li> <li>• indoor skateparks</li> <li>• escape rooms</li> <li>• family/ gaming arcades (differentiated from betting shops)</li> <li>• all types of competitive socialising (e.g. darts, snooker, go karting, mini golf/ crazy golf etc.)</li> <li>• other family leisure entertainment.</li> </ul>
<b>Primary shopping area</b>	The defined area on the policies map (and in Appendix 3) of the BFLP where retail development is concentrated.
<b>Edge of centre</b>	<p>For retail purposes, a location that is well connected to, and up to 300 metres<sup>1</sup> from, the primary shopping area.</p> <p>For all other main town centre uses, as listed above, a location within 300 metres of the designated centre boundary.</p>

<sup>1</sup> BFC uses straight-line distance on a map to determine locations of 300m or more.

	<p>For office development, this includes locations outside the town centre but within 500 metres of a public transport interchange.</p> <p>In determining whether a site falls within the definition of edge of centre, account should be taken of local circumstances.</p>
<b>Out of centre</b>	<p>A location which is not in, or on the edge of, a centre, e.g. over 300m from either the primary shopping area (for retail) or over 300m from the designated centre boundary (for other non-retail main town centre uses). This is not necessarily outside the urban area. See paragraph 6.11 of this technical guidance for information on offices in designated Employment Areas.</p>

## Relevant planning policy, guidance and information

### National Planning Policy Framework (NPPF)

- 4.1 The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how these are expected to be applied. The NPPF has a chapter 'Ensuring the vitality of town centres' dedicated to ensuring the vitality and viability of town centres. It states that decisions should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation.
- 4.2 Applications for development outside defined town centres are required to demonstrate compliance with the sequential test, and, for retail and leisure proposals, undertake an impact assessment if the development is over a locally set floorspace threshold.

#### The sequential test

- 4.3 The NPPF requires local planning authorities to apply a 'sequential test' to planning applications for 'main town centre uses' (please refer to definition in paragraph 3.1) which are not located within 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.
- 4.4 It states 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. It also expects applicants and local planning authorities to demonstrate flexibility on issues such as format and scale, so that suitable town centre or edge of centre sites are fully explored.

#### Impact assessments

- 4.5 National policy is clear that an impact assessment is required for retail and leisure development outside town centres in accordance with the locally set threshold where there is one. The impact assessment should include assessment of:
  - the impact of the proposal on existing, committed and planned public and private investment in a centre, or centres in the catchment area, and

- 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).

4.6 The national threshold of 2,500m<sup>2</sup> gross floorspace set out in the NPPF was subject to debate during the BFLP Local Plan examination and it was concluded that a lower threshold for Bracknell Forest is justified. Details of this lower threshold is set out in this document in paragraph 7.6.

#### **Failure to comply with the sequential test or impact assessment**

4.7 National policy is clear that a planning application can be refused planning permission if it fails to satisfy the sequential test, or if a significant adverse impact is found through the impact assessment.

#### **Planning Practice Guidance (PPG) ‘Town Centres and Retail’**

4.8 The PPG provides extensive guidance on a range of matters including ‘town centres and retail’. This offers some useful guidance on the preparation and application of sequential tests and impact assessments. It is recommended that applicants carefully consider this guidance when preparing planning applications<sup>2</sup>.

#### **The sequential test**

4.9 The PPG sets out the sequential approach that should be used in plan-making (paragraph 010), and the approach that should be followed in decision-making (paragraph 011). The PPG is clear that compliance with the sequential and impact tests does not guarantee that permission will be granted – all material considerations need to be considered in reaching a decision.

4.10 The PPG acknowledges that certain main town centres uses have particular market and locational requirements which mean they may only be accommodated in specific locations. It states that landownership does not provide justification (paragraph 012).

4.11 The PPG states that promoting new development in town centre locations can be more expensive and complicated. Therefore, local planning authorities need to be realistic and flexible in applying the sequential test (paragraph 013).

#### **Impact assessments**

4.12 The impact assessment considers the impact of a development proposal on town centre vitality, viability and investment. It relates specifically to applications for retail and/or leisure developments, rather than all ‘main town centre uses’ as is required by the sequential test. All town centres that may be affected need to be considered, including those which may fall within neighbouring authority areas (paragraph 014).

4.13 The PPG sets out guidance for setting ‘locally appropriate’ thresholds for impact assessments and provides a seven-point checklist for applying the impact assessment. It sets out that impact should be assessed on a ‘like-for-like’ basis in respect of a particular sector, as retail uses tend to compete with their most comparable competitive facilities. It sets out that where wider town centre developments or investments are in progress, it will be appropriate to assess the impact of relevant applications on that investment. It lists key considerations which should be assessed in respect of this (paragraph 015).

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<sup>2</sup> PPG ‘Town Centres and Retail’: <https://www.gov.uk/guidance/ensuring-the-vitality-of-town-centres>

## Context to Bracknell Forest

5.1 Bracknell Forest has a well-established network of 'town centres' (see paragraph 3.1 for definitions), ranging in size and function from local centres meeting day-to-day needs to larger district and primary town centres that provide a broader range of goods and services and serve a wider area. The hierarchy for Bracknell Forest is set out in BFLP Policy LP 21 (see [Appendix 1](#)).

5.2 **Bracknell Town Centre** is the primary centre for shopping for the borough. It's the main shopping and leisure destination for residents of the borough. Following the redevelopment of the town centre in the mid-2010s, a new retail and leisure development, the Lexicon, opened in September 2017. Bracknell Town Centre rose in the retail rankings to 25th in 2022 (Trevor Wood Associates) from 255th before the redevelopment. In addition to its retail and leisure offer, the Lexicon hosts events throughout the calendar year. Evidence shows that the Lexicon attracts a significant volume of visits from beyond its primary catchment, including from outside the Borough, despite competition from Reading and Windsor. It has a total catchment population of approximately 709,000.<sup>3</sup> It is a focus for leisure and business activity in a highly accessible location at the centre of the local public transport network.

5.3 The **district centres of Crowthorne and Sandhurst** are vibrant centres with a focus on smaller retail units, restaurants and coffee shops. They provide a varied retail and leisure range that helps meet local convenience and day-to-day shopping needs. Their comparison goods offer is limited so they serve a more local catchment.

5.4 The borough's **local centres** play an essential role in serving the everyday retail needs of the local community, providing such uses as convenience stores and pharmacies. Particularly important to residents with limited mobility, they reduce the need to travel by car to shop and are important in creating a sense of community and identity. Such is their importance in creating sustainable communities, local centres will continue to be provided as part of new residential development.

5.5 It is important that the borough's centres remain competitive and that planning policies support their continued viability and vitality. The continued vitality and viability of centres in the hierarchy identified under Policy LP 21 'Hierarchy and extent of centres' (see [Appendix 1](#)) should not be compromised by new edge and out of centre development that could have significant adverse impact on existing and planned investment, or their vitality and viability.

### Local policy

5.6 The BFLP contains the following relevant strategic retail and main town centre uses policies<sup>4</sup>:

Policy	What the policy does
LP 21 'Hierarchy and extent of centres'	This policy establishes the hierarchy and designated centres in the borough. It also designates the extent of the primary shopping area for each centre.
LP 22 'Development in Bracknell Town Centre'	This policy sets out criteria to help ensure that Bracknell Town Centre acts as the primary town centre for the borough. It will

<sup>3</sup> Source: The Lexicon (CACI)

<sup>4</sup> Extracts of these policies can be found in [Appendix 1](#).

Policy	What the policy does
	be the focus for new development to support the continued regeneration of the Town Centre and enable it to thrive as a destination for retail, leisure and cultural activities.
<b>LP 23 'Development of main town centre uses outside of designated centres'</b>	This policy sets out the requirements for the sequential test and impact assessment. It also sets a local impact assessment threshold.

## Evidence documents

5.7 The BFLP was supported by an extensive evidence base. The evidence documents that are particularly relevant to proposals for main town centre uses are set out in the table below:

Document	Summary
<b>Western Berkshire Retail and Commercial Leisure Assessment (WBRCLA, 2017) and Appendices</b>	The WBRCLA included an assessment of retail and commercial leisure needs (which includes entertainment venues such as ice skating) up to 2036. In terms of identifying commercial leisure needs, it concluded that Bracknell Forest had additional floorspace requirements for cafes/ restaurants, but that there was no additional qualitative need for other types of commercial leisure floorspace on account of Bracknell Forest already being well served by provision of this nature.
<b>Employment Land Needs Study (ELNS, 2020)</b>	The ELNS study has identified a need for office floorspace of 17,744m <sup>2</sup> to 2036. Offices are a main town centre use, so appropriate for designated centres.
<b>Town Centre Retail Needs Technical Review (2020)</b>	This project involved a technical review of assumptions made in the WBRCLA to determine if they were still appropriate. It concluded that there had been significant changes in circumstances since the 2017 report. The Technical Review undertook sensitivity testing of scenarios, including 'increased retention' and 'updated baseline'. No residual need for new retail floorspace was identified when taking account of 'the Deck'.
<b>Bracknell Forest Retail Advice Note (2022)</b>	The Retail Advice Note provides guidance on the current 'state of play' in respect of retail and town centre planning in light of a number of changes which have affected the sector since the publication of the Council's evidence base in respect of retail and commercial leisure needs (the WBRCLA).
<b>Position Statement for employment uses (annually updated)</b>	The Position Statement provides details of the monitoring of employment floorspace since the base date of the BFLP (1st April 2020) and the implications. It sets out how permissions and completions in floorspace affect the remaining need for the Plan period for Business, Industry, Distribution and Storage. This includes offices which are a main town centre use.

## Boundaries of town, district and local centres

5.8 The borough's centres are designated in BFLP Policy LP 21 'Hierarchy and extent of centres' and maps showing the boundary of each centre and their primary shopping area can be found in Appendix 3 or on the [Bracknell Forest policies map](#).

5.9 The distinction between the centre boundary and the primary shopping area is important in terms of how retail and main town centre uses are considered in the sequential test:

- The **red** primary shopping area boundary should be used for retail proposals (Class E(a)). This means that an 'edge of centre' retail development may actually fall within the defined town centre boundary.
- The **blue** town centre boundary should be used for main town centre uses (that are not retail Class E(a)).

## Sequential test

### The purpose of the sequential test

6.1 The purpose of the sequential test is to support the viability and vitality of town centres by placing defined town centres foremost in plan-making and decision-taking. It requires, for planning applications for main town centre uses, the consideration of town centre locations first, then edge of centres, and only then out of centre locations. The sequential test is a long-established part of national planning policy in relation to town centres.

6.2 In accordance with BFLP Policy LP 23, a sequential test is needed to demonstrate that there is no sequentially preferable location in an appropriate town, district or local centre(s) that could accommodate the proposed use. Only then should edge of centre and then out of centre locations be considered.

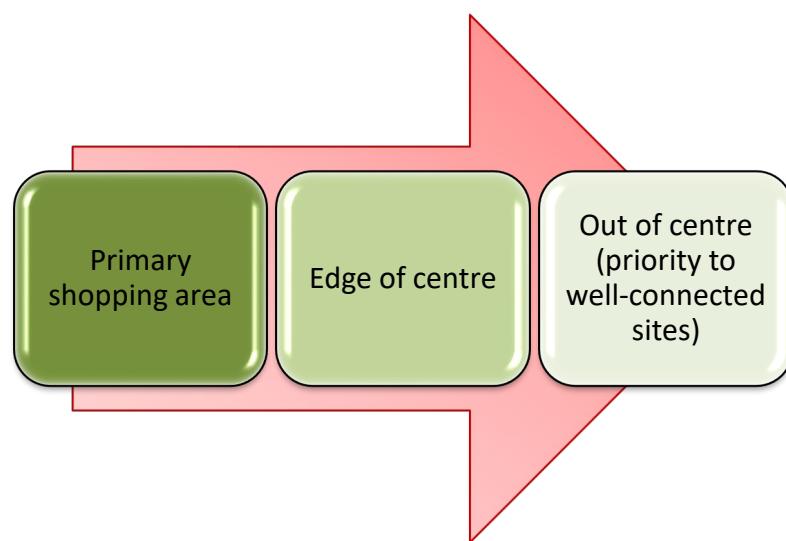
6.3 For the purposes of the sequential test, 'edge of centre' is defined as:

- within 300m from either the primary shopping area for retail proposals; or
- within 300m of the designated centre boundary for other main town centre uses.

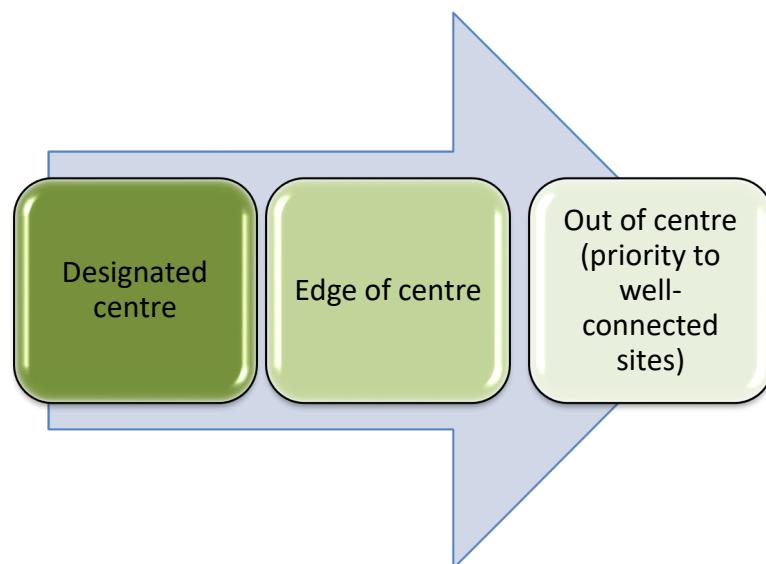
6.4 Only when designated centre locations or edge of centre locations are thoroughly examined and ruled out, should consideration be given to an out of centre location. The NPPF is clear that when a proposal would be in an out of centre location, preference should be given to accessible sites that are well connected to the town centre.

6.5 The sequential test for site selection for retail and other main town centre uses will require applicants to consider sites in the order of preference set out in **Figure 1 or Figure 2**. Accordingly, if an application site for retail lies within the primary shopping area, or for a main town centre use is within a designated 'town centre' (as defined in paragraph 3.1), then there is no requirement to undertake a sequential test.

**Figure 1:** Sequential order for retail site selection



**Figure 2:** Sequential order for site selection of main town centre uses (excluding retail)



- 6.6 The PPG 'Town Centres and Retail' (paragraph 011) is clear that it is for the applicant to demonstrate compliance with the sequential test, and failure to undertake a sequential test can be a reason for refusing permission.
- 6.7 The sequential test should be proportionate and appropriate for the given proposal. The checklist in the PPG 'Town Centres and Retail' paragraph 011 should be used as the basis for undertaking the assessment.
- 6.8 The PPG 'Town Centres and Retail' acknowledges that locational requirements may mean that certain uses can only be accommodated in specific locations. It also states that robust justification will need to be provided where this is the case, and land ownership does not provide such a justification.

## **When is a sequential test required?**

6.9 A proportionate sequential test must be submitted as part of any application for planning permission incorporating proposals for main town centre uses, including in the following circumstances:

- When a new facility/ premises is proposed (irrespective of size)
- A change of use of floorspace or land is proposed (including from one main town centre use to another where planning permission is required)
- An extension to an existing facility is proposed (including the installation of mezzanine floorspace within an existing facility, in circumstances where planning permission is required)
- A variation of a planning condition is proposed (for example, to allow food sales from a unit where the sale of this type of goods is restricted).

6.10 This includes mixed-use proposals that have a main town use as part of the scheme (see paragraphs 6.14 to 6.16).

6.11 In Bracknell Forest, there are two exceptions granted by BFLP Policy LP 18 'Definition and protection of designated Employment Areas' (see [Appendix 1](#)). In designated Employment Areas:

- ancillary services<sup>5</sup> of less than 100m<sup>2</sup> are exempt from the sequential test by Policy LP 18, criterion 5, and
- proposals for offices are exempt from the sequential test by Policy LP 18, criterion 3.

6.12 National policy is clear that small scale rural developments do not need to demonstrate compliance with the sequential test.

## **What is the size threshold for a sequential test?**

6.13 There is no size threshold for triggering a sequential test. A sequential test is needed for any retail or main town centre use proposed outside designated centres that requires planning permission. See paragraph 6.11 for two exceptions in designated Employment Areas.

## **How should mixed-use sites be approached?**

6.14 There may be situations where a proposal includes one or more main town centre uses as part of a wider mixed-use scheme. In such circumstances, the Council will still require applicants to undertake a sequential test. Unless otherwise agreed, this should be for the quantum of main town centre floorspace proposed, and applicants will be expected to demonstrate flexibility in respect of this in line with the requirements of the NPPF.

6.15 Applicants should be clear in their submission whether the proposed main town centre uses are related to other operations on the site. In instances where this is the case, applicants should explain the nature of the development being proposed, and the functional / inter-linked relationship between the different elements of the scheme. An inter-linked scheme will still be required to demonstrate compliance with the sequential test.

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<sup>5</sup> Defined in paragraph 7.17 of the BFLP. See supporting text of [Policy LP 18 'Definition and protection of designated Employment Areas'](#) in [Appendix 1](#).

6.16 It will be assumed that speculative mixed-use proposals have the potential to separate the main town centre use from the proposal unless clear justification can be provided. This will be considered on a case-by-case basis. In the case of mixed-use sites, it is strongly recommended that applicants undertake pre-application discussions with the Council to agree the scope of the sequential test.

### **Where can information on available alternative sites be found?**

6.17 In order to undertake a sequential test, it will be necessary for applicants to undertake a robust search of alternative potential development sites. Applicants should identify the sources of information they have researched in respect of the identification of alternative sites for the purposes of the sequential test. These sources of information<sup>6</sup> may include, but are not limited to:

- The Bracknell Forest development plan, including the BFLP and supplementary planning documents, evidence base and monitoring documents.
- Identification of vacant sites and development opportunities through site visits and/or desktop research.
- Experian Goad, CoStar or similar retail property intelligence systems.
- Letting or commercial property agents.
- National commercial property websites such as Estates Gazette, LoopNet, Completely Retail, Rightmove and Zoopla can be helpful in looking for available sites, as can more locally-based websites.
- The outcome of BFC's annual survey of all retail centres, which includes vacant units. This information can be supplied on request.

6.18 The Council can check the applicant's suggested list of sites that should be considered for the relevant centre as part of [pre-application advice](#) (N.B. There is a charge for this service).

### **How should a sequential test be undertaken?**

6.19 The sequential test should consider alternative sites or premises in designated centres that could accommodate the proposed development. A sequential test should assess the '**suitability**' and '**availability**' of any alternative sites identified through the above search exercise.

Availability	<p>This refers to sites that are available now or are likely to become available for development within a reasonable period. When considering what a reasonable period is for this purpose, the scale and complexity of the proposed scheme and of potentially suitable town or edge of centre sites should be taken into account.</p> <p>It is not acceptable to limit the search to only units/premises that are for sale. Land ownership does not provide justification.</p>
Suitability	<p>Sites should be assessed to ascertain if they are 'suitable' for the proposed development. Suitability may be affected by factors including:</p> <ul style="list-style-type: none"><li>• policy designations</li><li>• ecological or environmental designations</li><li>• heritage or built environment designations</li><li>• shape and/or topography of site*</li></ul>

<sup>6</sup> Please note that the listing of these companies should not be taken in any way to imply a recommendation of them on behalf of BFC.

	<ul style="list-style-type: none"> <li>existing structures on site.</li> </ul> <p>The sequential test is not about individual operator's preferences, or which sites are available to a particular occupier.</p> <p>*In line with the requirements of the NPPF, it will be necessary for applicants to comprehensively and robustly demonstrate that a flexible approach has been taken to the consideration of alternative sites. As part of such an approach the scope for accommodating the proposed development in a different built form, such as splitting uses over different floors, and exploring the possibility of whether a more centrally-located site may be able to individually accommodate the proposal should be undertaken. It is not sufficient to simply conclude that a site is not suitable as it is too small for the applicant's standard trading model, without fully demonstrating consideration of alternative formats, designs, or scales of the proposal.</p>
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### **What is the position if an alternative, suitable, available and sequentially preferable site is identified?**

6.20 If a sequentially preferable site is identified which can be considered suitable and available (or expected to become available in a reasonable period), the application does not pass the sequential test. National policy is clear that where an application fails to satisfy the sequential test, it should be refused.

6.21 The sequential test is a consideration in the determination of a planning application, but other matters will also need to be taken into consideration. It will be for the decision maker to determine whether the benefits of the proposal outweigh non-compliance with the sequential test and justify the grant of planning permission.

### **How will the Council assess the sequential test?**

6.22 We will robustly consider the sequential test provided by the applicant, taking each point of the PPG 'Town Centres and Retail' considerations (paragraph 011) in turn:

- 1. "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. It is important to set out any associated reasoning clearly."***

6.23 For this we assess:

- The size threshold for the alternative premise(s) search the applicant has chosen and whether this is reasonable.
- If any other parameters set by the applicant are reasonable.
- The alternative sites the applicant has considered and the justification for why they are not available or suitable (see the requirements set out in paragraph 6.26 below).
- Any other sites that should have been considered (where pre-application advice was not sought).

- The reasons the applicant has given as to why the proposal needs to be in a non-centre location.
- The applicants' consideration of the accessibility of the proposed site, and its connections to a designated centre.

## **2. “is there scope for flexibility in the format and/or scale of the proposal?”**

6.24 For this we assess:

- The case put forward by the applicants showing how the flexibility of the proposal has been considered. For example, through use of alternative potential design approaches, including multi-level schemes, or smaller more efficient trading floors / alternative servicing arrangements.
- The contribution that more central sites are able to make individually to accommodate the proposal.

## **3. *Locational requirements***

6.25 For this we assess:

- The justification provided if any locational requirements mean the proposal can only be accommodated in a specific location. Please note, land ownership or rental agreements do not provide justification.

### **What we expect the sequential test to include (check list)**

6.26 We expect applicants to include the following in their sequential test accompanying a planning application:

- Description of the proposed use
- Size of the site (ha) or unit (m<sup>2</sup>) - whether existing or proposed - and the breakdown of floorspace for each use (this includes the extension if relevant)
- Identification of an appropriate area of search for alternative sites
- The parameters of the search for alternative premises/ sites (i.e. size threshold, any other considerations – excluding ownership)
- Justification for any limitations applied to the types of units/ sites considered, noting the requirement to demonstrate flexibility
- A list of the alternative, available, sequentially preferable units /sites identified to include:
  - address,
  - size of unit/ site,
  - suitability of the premises/ site,
  - details of how the alternative site was identified,
  - a full justification and evidence of why, if unsuitable,
  - a conclusion about whether the sequential test is met, considering both the availability and suitability of more central sites.
- Where an out of centre location is considered justified:
  - why it needs to be in this location,
  - details of the accessibility of the proposed site and its connection to the designated centre.

## Impact Assessments

### The purpose of the impact assessment

- 7.1 The impact assessment applies to proposals for retail and/or leisure floorspace proposed on edge of centre or out of centre sites that meet the locally set thresholds. It is required to assess the potential impacts of such proposals on the vitality and viability of existing centres i.e. the designated centres listed in the retail hierarchy in BFLP Policy LP 21, or other centres that may be outside the borough boundary (where appropriate<sup>7</sup>).
- 7.2 In accordance with the requirements of the NPPF and BFLP Policy LP 23 criterion 6, an impact assessment should include an assessment of:
  - 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
  - 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).
- 7.3 An impact assessment is likely to require both quantitative and qualitative assessments of impact. Matters which may be covered by a qualitative assessment include whether the proposed development would help to address any existing deficiencies or 'gaps' in the market, and/or offer any beneficial broadening of choice and competition.
- 7.4 A quantitative assessment identifies the financial / trading impact of a development proposal on the turnover of existing town centres and other retail / leisure locations.
- 7.5 National policy is clear that it "is for the applicant to demonstrate compliance with the impact test in support of relevant applications. Failure to undertake an impact test could in itself constitute a reason for refusing permission" (PPG paragraph 017).

### What is the threshold for impact assessments?

- 7.6 The BFLP establishes a local threshold for impact assessments in the borough. BFLP Policy LP 23, criterion 6 sets the threshold for retail and/or leisure uses as:
  - 1,000m<sup>2</sup> or more gross external floorspace outside Bracknell Town Centre, and
  - 500m<sup>2</sup> or more gross external floorspace outside designated district and local centres.
- 7.7 The threshold applied will be determined by the closest centre to the proposal in geographical terms. Where proposals are considered close to more than one centre, then the lower threshold should be used to ensure the potential impacts on all levels of centres are assessed.

### When is an impact assessment required?

- 7.8 An impact assessment is required to be submitted as part of a planning application for proposals for retail and/or leisure floorspace (as defined in paragraph 3.1<sup>8</sup>) that meet the local thresholds and proposes:

<sup>7</sup> This would usually be if the proposal is likely to draw in visitors from outside the local area, such as being the only provision within a large radius.

<sup>8</sup> The list of leisure uses in paragraph 3.1 is not an exhaustive list.

- a new facility/ premises
- a change in the use of floorspace (including from one main town centre use to another, where planning permission is required)
- an extension to an existing facility (including the installation of mezzanines where planning permission is required)
- a variation of condition to allow a particular category of goods to be traded from a unit which may have existing planning restrictions in place.

7.9 If you are unsure if your proposal will require an impact assessment, please use the Council's [pre-application advice service](#) (N.B. there is a charge for this service).

### **How should mixed-use sites be considered?**

7.10 Proposals that reach or exceed the local threshold for retail and/or leisure floorspace (cumulatively or combined) as part of a mixed-use development, will need to provide an impact assessment.

7.11 In circumstances where the proposed floorspace is sought for flexible / speculative use but includes a quantum of retail and/or leisure floorspace over the local threshold set out in Policy LP 23, an impact assessment will still be required. In these circumstances, robust justification will need to be supplied, which tests a range of potential development scenarios. The Council may seek independent expert advice before concluding whether the justification given is acceptable. As set out in BFLP paragraph 7.61, where expert advice is needed, it will be necessary for the applicant to cover the cost.

### **How should an impact assessment be undertaken?**

7.12 As set out above, an impact assessment should include an assessment of:

- **Test 1** - 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
- **Test 2** - 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).

#### ***Test 1 – 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***

7.13 In assessing the impact of the proposal on existing, committed and planned public and private investment, consideration should be given to a range of factors including:

- the stage that has been reached e.g. is there any contractual commitment, and
- the policy 'weight' attached to the investment (for example, whether a site is allocated in the development plan).

7.14 Progress on the development of BFLP and Site Allocations Local Plan allocations can be found in the Authority Monitoring Reports (AMRs) on the Council's website: <https://www.bracknell-forest.gov.uk/planning-and-building-control/planning/planning-policy/monitoring/authority-monitoring-reports>

7.15 Further information on investment and regeneration schemes may be found on the regeneration and economy pages of the Council's website: <https://www.bracknell-forest.gov.uk/business-information/bracknell-forests-thriving-and-connected-economy/bracknell-forest-economic-strategy-2024-2034>

***Test 2 - 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)***

7.16 Whilst we acknowledge that there are several different methodologies for carrying out a retail and/or leisure impact assessment, our preferred method is a step-by-step approach. The starting point will be to identify the appropriate catchment area for the proposal, and the centres (as defined in policy) that fall within the catchment. Depending on the scale / nature of the proposal, this may include centres outside the borough boundary.

***Town centre health checks***

7.17 Applicants should then undertake a town centre health check of the centres in the catchment. This is an important strand of this part of the impact assessment because it determines how well a centre is performing. Proportionate health checks should be undertaken of all designated centres which fall within the identified catchment area. The health check is critical in helping to understand the ability of a centre to withstand any potential impacts of the proposed development.

7.18 The town centre health check should be proportionate for the type / scale of development proposed. Larger proposals should ensure that all criteria in the checklist in the PPG 'Town Centres and Retail' (paragraph 006) are considered. However, the Council expects all town centre health checks, as a minimum, to consider an assessment of:

- the current diversity of uses,
- levels of vacancy,
- environmental quality, and
- any broad performance issues affecting the centre.

7.19 The Council can supply its latest retail survey for the relevant centre(s) on request.

***Quantitative impact assessment***

7.20 In order to inform judgements about the likely impact of proposals on designated centres, it is necessary to consider the likely diversion of expenditure that may occur when the proposed development has been implemented, and trading patterns have been established. An applicant will not be expected to provide a full, detailed quantitative impact assessment for a small proposal, but proportionate consideration of the likely turnover and potential impacts on existing designated centres will be required for all proposals where an impact assessment is required.

7.21 Up-to-date evidence on current patterns of usage of existing retail / leisure facilities should provide a starting point to inform any quantitative impact assessment. However, applicants should consider whether updates are appropriate based on the length of time that has passed since the evidence was produced, or its most recent update was published. Depending on the scale of the proposed development, the Council may request up-to-date primary evidence e.g. a household telephone survey of shopping patterns.

7.22 A financial impact assessment will require the identification of an 'impact assessment year' which will, in most cases, be up to five years from the date of the application submission. A clear understanding of the level of population and expenditure growth within the identified catchment area will need to be provided, including making an allowance for online shopping. Following this, it will be necessary to understand the turnover of existing designated centres (and other retail / leisure facilities) based on appropriate evidence (as discussed above). Applicants will need to undertake an assessment of where the proposed development will

divert trade from the designated centre. It will also need to identify the resultant financial impact on the designated centre which can be expected to arise as a consequence.

7.23 For the quantitative impact assessment, the most up-to-date data sources should always be used to update figures for the matters below. It is recommended that these are sourced from established data providers, e.g. Experian, GlobalData, and should include:

- per capita spend per head
- per capita expenditure growth rates
- special forms of trading e.g. online shopping
- sales density growth rates
- sales density (turnover per sq.m) of existing retail operators, where applicable.

7.24 A common data source should be used where possible when quoting figures such as turnover etc.

### **What happens if a significant adverse impact is shown?**

7.25 If the impact assessment shows a significant adverse impact on one or more designated centres, then the application will not pass the impact assessment. National policy is clear that where an application fails to satisfy the impact assessment, it should be refused.

7.26 The impact assessment is a consideration in the determination of a planning application, but other matters will also need to be taken into consideration. It will be for the decision maker to determine whether the benefits of the proposal outweigh non-compliance with the impact assessment and justify the grant of planning permission.

### **How will the Council assess the impact assessment?**

7.27 An impact assessment requires specialist knowledge. In most cases, the Council will require it to be reviewed by an independent specialist to ensure that the assumptions and outputs are reasonable, and that the impact of the proposal is demonstrated as being unlikely to have a significant adverse impact on the considerations in the NPPF or criterion 6 of BFLP Policy LP 23.

7.28 The supporting text to BFLP Policy LP 23, states in paragraph 7.61 that “A judgement as to whether the likely adverse impacts are significant will be reached in light of local circumstances. Where this requires the impact assessment to be reviewed by an independent specialist, as part of the planning application process, the applicant will need to cover the cost.”

### **What we expect a retail impact assessment to cover (check list):**

7.29 In accordance with PPG ‘Town Centres and Retail’ (paragraph 017), the retail impact assessment can be proportionate in nature. As a guide, we recommend that it should be based on the following steps:

1. Identify all centres (as defined in policy) within the catchment area that the applicant defines (as per paragraph 7.59 of the BFLP – see **Appendix 1**). We may seek

advice from an external consultant to consider the robustness of the extent of the catchment area as part of any assessment of the planning application.<sup>9</sup>

2. Undertake town centre health checks on the identified centres (see requirements above).
3. Determine the appropriate time frame for assessing potential impacts, focusing on the first five years when most impact will occur.
4. Examine the 'no development' scenario.
5. Consider both strands of the impact tests set out in national policy and BFLP Policy LP 23 criterion 6, ensuring the key considerations set out above have been addressed. All proposals for new retail floorspace above the identified BFLP thresholds should include an assessment of financial / trading impact as part of the overall retail impact assessment, including a forecast of the proposed development's turnover and trade draw.
6. Applications for new **food store** development should consider the financial impact on existing food stores on a store-by-store basis to enable the Council to understand where the impacts of the proposed development are likely to fall. In addition, the combined financial impact on centres (as defined in policy) needs to be identified.
7. Examine any 'fall-back' scenario if relevant, and
8. Draw together the outputs of 1-7 to present conclusions against the impact tests of the NPPF and BFLP Policy LP 23, criterion 6.

### **What we expect a leisure impact assessment to cover (check list):**

7.30 In accordance with the PPG 'Town Centres and Retail' (paragraph 017), the leisure impact assessment can be proportionate in nature. As a guide, we recommend it should be based on the following steps:

1. Identify all centres (as defined in policy) within the catchment area that the applicant defines (as per paragraph 7.59 of the BFLP). We may seek advice from an external consultant to consider the robustness of the extent of the catchment area as part of any assessment of the planning application.<sup>10</sup>
2. Undertake town centre health checks on the identified centres (see requirements above).
3. Once the catchment area has been established, a desktop audit of existing leisure provision (of a similar type) within the identified catchment should be undertaken.
4. The audit should identify which facilities are in defined town centres and the contribution these facilities make to the overall 'offer' of the town centre. Facilities outside designated centres do not need to be considered.
5. Determine the appropriate time frame for assessing potential impacts, focusing on the first five years when the greatest impact will occur.
6. Examine the 'no development' scenario.
7. Undertake quantitative analysis proportionate in scale to the nature and type of development proposed on amounts of leisure spending available to the identified catchment to identify whether there is likely to be expenditure growth in the leisure sector to support the delivery of new facilities which may mitigate any impact against existing facilities. This should assess the proposal's turnover and trade draw.
8. Examine any 'fall-back' scenarios if relevant, and
9. Draw together the outputs of 1-8 to present conclusions against the impact tests of the NPPF and BFLP Policy LP 23 criterion 6.

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<sup>9</sup> Please note, it will not be possible to provide this guidance at pre-application stage due to their confidential nature.

<sup>10</sup> Please note, it will not be possible to provide this guidance at pre-application stage due to their confidential nature.

## Pre-application advice

- 8.1 Applicants are encouraged to use the Council's pre-application advice service to agree the scope of a sequential test and/or an impact assessment where one is required.
- 8.2 Please note that the onus is on the applicant to provide the proposed scope of the sequential test or the framework for an impact assessment listing the points / information to be covered for comment.

## Appendix 1

### 9.1 Extracts of Bracknell Forest Local Plan policies and any relevant supporting text.

#### **Policy LP 21 'Hierarchy and extent of centres'**

##### **Hierarchy and extent of centres**

Development proposals within a centre, which are defined on the Policies Map and Inset Maps<sup>(46)</sup>, will be supported where they are consistent with the role and function of that centre, having regard to its place in the following hierarchy:

###### Primary Town Centre

- Bracknell (Inset Map 1)

###### District Centres

- Crowthorne (Inset Map 2)
- Sandhurst (Inset Map 3)

###### Local Centres

- Bagshot Road (Inset Map 4)
- Binfield (Inset Map 5)
- Birch Hill (Inset Map 6)
- Bullbrook (Inset Map 7)
- College Town (Inset Map 8)
- Crown Wood (Inset Map 9)
- Crowthorne (Station Parade) (Inset Map 10)
- Easthampstead (Inset Map 11)
- Forest Park (Inset Map 12)
- Great Hollands (Inset Map 13)
- Hanworth (Inset Map 14)
- Harmans Water (Inset Map 15)
- Martins Heron (Inset Map 16)
- North Ascot (Fernbank Road) (Inset Map 17)
- North Ascot (Warren Row) (Inset Map 18)
- Owlsmoor (Inset Map 19)
- Priestwood (Inset Map 20)
- Sandhurst (East of Swan Lane) (Inset Map 21)
- Sandhurst (Old Mill) (Inset Map 22)
- Whitegrove (Inset Map 23)
- Wildridings (Inset Map 24)

<sup>46</sup> Inset maps show the extent of centres in Appendix 3: 'Inset maps of Defined Centres'. These include Primary Shopping Areas.

7.41 There are a number of retail facilities that, whilst planned for, have not yet been delivered and therefore have not been included in the policy. Any new retail facilities (such as those within new strategic housing developments) should be considered in the context of

this hierarchy and Policy LP 23 'Development of main town centre uses outside of designated centres' which sets out how they will be assessed.

7.42 The planned new local centres are:

- Land at TRL, Crowthorne
- Amen Corner South, Binfield
- Priory Field, Warfield

### **Policy LP 22 'Development in Bracknell Town Centre'**

#### **Development in Bracknell Town Centre**

1. Bracknell Town Centre is designated as a primary town centre and includes a defined Primary Shopping Area as shown on the Policies Map. Development in Bracknell Town Centre will be supported which:

- i. contributes to the Town Centre's diversity, vitality, viability and environmental quality;
- ii. provides a mix of uses which may include retail, residential, employment, recreational, leisure, civic, cultural and health facilities;
- iii. helps meet the local convenience, comparison and specialist shopping needs of the Borough;
- iv. contributes to its role as a transport hub for the Borough;
- v. creates a high quality, distinctive and well-designed environment and public realm that helps reduce crime and the fear of crime;
- vi. conserves and enhances the settings of buildings of special architectural or historic importance;
- vii. provides necessary infrastructure including public transport services, pedestrian and cycle facilities, green spaces, and affordable housing;
- viii. improves existing access and connectivity within and to Bracknell Town Centre; and,
- ix. does not harm the vitality and viability or role of the town centre.

### **Policy LP 23 'Development of main town centre uses outside of designated centres'**

#### **Development of main town centre uses outside of designated centres**

1. Retail applications outside of the primary shopping area, and main town centre use applications outside of the defined centre boundary, will be required to demonstrate compliance with the sequential test. They should also comply with the locally set retail impact threshold identified in this policy.

#### **Sequential test**

2. Development proposals for retail uses (with the exception of ancillary services) should be located within the primary shopping areas of defined town, district and local centres, as defined on the Policies Map. Any development proposals for retail

uses outside of primary shopping areas, including extensions to existing facilities, should demonstrate compliance with the sequential test.

3. Development proposals for other main town centre uses (with the exception of offices and ancillary services) should be located within the boundaries of defined town, district and local centres, as defined on the Policies Map. Any development proposals for these uses outside of defined centres, including extensions to existing facilities, should demonstrate compliance with the sequential test.
4. For each of the above considerations, development proposals should only be located in out of centre locations, if having demonstrated appropriate flexibility in form and scale, they cannot be accommodated within a suitable and available centre, or failing that, edge of centre location. When considering edge of centre and out of centre proposals, preference will be given to accessible sites that are well connected to centres.
5. Where development includes offices, it should be located in Bracknell Town Centre, district and local centres or on the designated Employment Areas prior to other areas of the Borough. Applications for ancillary services<sup>(47)</sup> in designated Employment Areas will be exempt from the sequential test.

### **Impact assessment**

6. Development for retail or leisure uses of 1,000m<sup>2</sup> or more of gross external floorspace outside Bracknell Town Centre and 500m<sup>2</sup> or more of gross external floorspace outside designated district and local centres will only be permitted if it is demonstrated that it will not:
  - i. impact upon existing, committed and planned investment in designated centres within the catchment area of the proposal; and
  - ii. cause a significant adverse impact on the vitality and viability of existing designated town, district and local centres in the Borough's hierarchy of centres and the wider catchment area.
7. New local centres should be reflective of their role and function in the hierarchy of centres. If the total amount of retail or leisure floorspace exceeds:
  - i. the amount specified in the relevant policy and,
  - ii. 500m<sup>2</sup> of gross external floorspace,

evidence will need to be submitted that demonstrates that the proposed neighbourhood centre would not affect the hierarchy of centres, including the centres' vitality and viability. This evidence will comprise a retail and/or leisure impact assessment, and robust evidence that there are not more sequentially preferable locations which could accommodate the floorspace.

<sup>47</sup> Ancillary Services are defined in paragraph 7.17 [It is accepted that employees working in premises on designated Employment Areas need access to a range of small scale 'ancillary services'. For the purposes of this policy, these are defined as small shops, food and drink establishments, gymnasia and crèches of less than 100m<sup>2</sup>...]

7.55 In order to promote the vitality and viability of centres, the NPPF sets out a 'centres first' policy, through a sequential test that directs main town centre uses to existing centres. This is supported by an impact test for retail and leisure developments which requires development that might harm a centre to be assessed against a range of factors. These are set out in the NPPF as follows:

- i. The impact of the proposal on existing, committed and planned investment (both public and private) in the centre or designated centres within the catchment of the proposal
- ii. The impact of the proposals on centre vitality and viability, including consumer choice and trade
- iii. Where the proposal is likely to have a significant adverse impact on one or more of the factors in i and ii above, it should be refused.

7.56 The established hierarchy of centres in Bracknell Forest (Policy LP 21 'Hierarchy and extent of centres') serves a valuable local and Borough-wide function. It is an important part of the Council's strategy that Bracknell Town Centre should continue to act as a primary location for main town centre uses as it is the Borough's most accessible and sustainable location. The designated district and local centres in the Borough act as focal points for communities and help meet everyday needs. They are fairly robust having reasonably high levels of occupancy and few long-term vacant premises. However, many have a limited offer and could suffer significantly from the loss of relatively few existing uses. Such centres might be vulnerable, particularly to impacts from new retail or leisure proposals within their catchments of a significantly smaller scale than the NPPF default threshold for requiring an impact assessment of 2,500m<sup>2</sup>. They have the potential to cause harm either individually or cumulatively, by diverting trade away from the centres. Many of these local centres individually contain a combined floorspace of less than, or little more than 1,000m<sup>2</sup>.

7.57 Any impact assessments for retail or leisure proposals located outside of defined centres will need to ensure that the proposed developments do not undermine or frustrate further regeneration opportunities in Bracknell Town Centre or prejudice the vitality and viability of centres, including local consumer choice and trade. Some of the larger new planned developments will have their own neighbourhood centres/shopping parades. In accordance with Policy LP 21 'Hierarchy and extent of centres' these should be reflective of their role and function in the hierarchy of centres. It is important that these are designed to serve the day to day needs of local residents and do not have any significant adverse impacts on existing centres.

7.58 It is clear that within Bracknell Forest, schemes of less than 2,500m<sup>2</sup> (the NPPF default threshold for assessing impact), have the potential to cause harm either individually or cumulatively, by diverting trade away from centres. The Plan sets a locally specific floorspace threshold of 1,000m<sup>2</sup> (gross external floorspace) or more outside Bracknell Town Centre and 500m<sup>2</sup> or more of gross external floorspace outside designated district and local centres above which an impact assessment will be required to accompany retail and leisure proposals. This reflects the modest size of centres across the Borough. If a proposed development outside a centre is unlikely to have an adverse impact, such developments should also be accessible to the community by foot, car, public transport and cycling. In addition, sufficient car parking should be provided on site and developments should not add significantly to traffic generation on the surrounding roads. Sites proposed for such development should not be required for other uses.

7.59 The purpose of assessing proposals outside centres involving retail and/or leisure uses is to ensure that they do not have significant adverse impacts over time (up to 5 years [or 10 for major schemes]) on existing centres. It is important that the impact is assessed in relation to all centres that may be affected, which are not necessarily just those closest to the proposal and may be in neighbouring local authority areas.

7.60 Where an impact test is required the following steps should be taken in accordance with the PPG 'Town Centres and Retail':

- establish the state of existing centres and the nature of current shopping patterns (base year);
- determine the appropriate time frame for assessing impact, focusing on impact in the first five years, as this is when most of the impact will occur;
- examine the 'no development' scenario (which should not necessarily be based on the assumption that all centres are likely to benefit from expenditure growth in convenience and comparison goods and reflect both changes in the market or role of centres, as well as changes in the environment such as new infrastructure);
- assess the proposal's turnover and trade draw (drawing on information from comparable schemes, the operator's benchmark turnover of convenience and comparison goods, and carefully considering likely catchments and trade draw);
- consider a range of plausible scenarios in assessing the impact of the proposal on existing centres and facilities (which may require breaking the study area down into a series of zones to gain a finer-grain analysis of anticipated impact);
- set out the likely impact of that proposal clearly, along with any associated assumptions or reasoning, including in respect of quantitative and qualitative issues;
- any conclusions should be proportionate: for example, it may be sufficient to give a broad indication of the proportion of the proposal's trade draw likely to be derived from different centres and facilities in the catchment area and the likely consequences to the viability and vitality of existing centres.

## **Policy LP 18 'Definition and protection of designated Employment Areas'**

### **Definition and protection of designated Employment Areas**

1. Designated Employment Areas as defined on the Policies Map are as follows:

- Western Employment Area, Western Road, Bracknell
- Eastern Employment Area, Eastern Road, Bracknell
- Southern Employment Area, Doncastle Way, Bracknell
- Wellington Business Park, Dukes Ride, Crowthorne
- Vulcan Way, Swan Lane, Sandhurst.

2. Within the designated Employment Areas the following will be supported:

- i. development for business, industry, distribution and storage uses (BIDS);
- ii. development that will enable existing businesses to expand and/or adapt to changing circumstances; and
- iii. proposals that meet an evidenced need for a particular type of BIDS development.

3. The sequential test will not be required where new office floorspace is proposed in designated Employment Areas.

4. Development within designated Employment Areas for non-BIDS uses (with the exception of 'ancillary services') will be resisted and will be permitted where there is a justification for a departure from this policy following submission of information on, and consideration of, the following matters:

- i. impact on the supply (amount, type, quality and use) of BIDS land and premises;
- ii. evidence of need for the proposed use and the need for it to be located within a designated Employment Area;

- iii. evidence that the site has been effectively and continuously marketed for BIDS uses through a variety of media for a period of at least 12 months;
- iv. the relative suitability of the site for BIDS and for the alternative use; and,
- v. the location of the site and its relationship to other uses.

5. Ancillary services<sup>(42)</sup> will be permitted in appropriate locations within designated Employment Areas and other areas provided that they:

- vi. are small in scale (100m<sup>2</sup> or less GEA);
- vii. support the primary business function of the designated Employment Area; and,
- viii. cumulatively do not compromise the integrity of the prime business functions of the designated Employment Area.

6. The sequential test will not be required where ancillary services are proposed within designated Employment Areas.

<sup>42</sup> Ancillary services are defined in paragraph 7.17

7.12 A challenge to the integrity of these areas has resulted from The Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020 that came into force on 1st September 2020. This resulted in the revocation of Use Classes A, B1 and D and the creation of a new Class E (commercial, business, and service). The changes brought together former A1 (shops), A2 (financial and professional services), A3 (restaurants and cafes) and B1 (business) as well as parts of Classes D1 (non-residential institutions) and D2 (assembly and leisure) into one single new E Use Class. Changes of use between the different types of uses listed in Class E do not constitute development and so do not require planning permission. They cannot be restricted through the use of Article 4 Directions. Whilst this weakens the Council's ability to protect the integrity of the designated Employment Areas, it is considered appropriate to retain references to uses that fall within Use Class E to cover circumstances when planning permission is required.

7.13 It is possible that buildings used for business purposes could change to uses such as retail and leisure. Protecting the supply of floorspace is important to meet the needs of new and expanding businesses that may not be able to compete with alternative higher value uses. Some alternative uses may not be compatible with the established surrounding uses and could adversely affect the role and continuing viability of designated Employment Areas. The Council will monitor the position and may use conditions and/or planning obligations to restrict new floor-space to business uses within Class E, in order to achieve policy objectives.

7.14 The NPPF promotes a sequential approach to 'main town centre uses', which includes offices. This means that they should in the first instance be directed to Bracknell Town Centre and other centres. This is in order to promote and support particularly Bracknell Town Centre as a focus of economic and cultural activity due to its sustainable location and the need to support its vitality and continuing renewal. However, some office occupiers may have specific market and locational requirements that mean they are better located in the designated Employment Areas. Office development within the designated Employment Areas may facilitate clusters or networks of knowledge and data-driven, creative or high technology businesses. As such, new office development within the designated Employment Areas will be exempt from the sequential test.

7.17 It is accepted that employees working in premises on designated Employment Areas need access to a range of small scale 'ancillary services'. For the purposes of this policy, these are defined as small shops, food and drink establishments, gymnasia and crèches of

less than 100m<sup>2</sup>. The absence of such facilities can increase travel demand and make areas less attractive to employers and staff. However, it is important that 'ancillary services' are subordinate to, and do not form an integral part of, the main employment uses in the designated Employment Area. Furthermore, they must not undermine the availability or suitability of land for core uses or compete with operators of comparable main town centre uses in sequentially preferable locations. Where new employment areas are proposed, the need for 'ancillary services' should be considered as part of the overall development scheme.

7.18 As 'ancillary services' fall within the definition of main town centre uses, they would normally be directed to Bracknell Town Centre and other centres in the first instance. Due to their role in complementing the main employment uses in the designated Employment Area, the sequential approach will not be applied to applications for 'ancillary services'.