

Town Centre Use

Sequential Test Assessment

Our reference no: 240207A

Date of statement: February 2024

Local Planning Authority: Plymouth City Council

Site address: Former Training Centre, Harbour Avenue, Plymouth

Proposed development: Change of use to self and commercial storage, external vehicle storage, associated office and ancillary business space, boxing gym and beauty salon (part retrospective)

Client: SAS Harbour Avenue Limited

Table of Contents

| | |
|--------------------------------------|----|
| Introduction..... | 3 |
| The Site and Context | 4 |
| Application Site..... | 4 |
| The Proposal..... | 5 |
| Description of Development | 5 |
| Planning Policy Considerations | 6 |
| Sequential Test | 6 |
| Sequential Test Assessment..... | 13 |
| Findings..... | 16 |
| Conclusion | 17 |

Introduction

1. This Retail Sequential Test Assessment (the 'Sequential Test' or 'Assessment') has been prepared by MA Planning Consultancy on behalf of the applicant, SAS Harbour Avenue Limited, to inform a planning application for a proposed change of use to self and commercial storage, external vehicle storage, associated office and ancillary business space, boxing gym and beauty salon (part retrospective) ('the proposed development' or 'proposal'). The proposal is located at Former Training Centre, Harbour Avenue, Plymouth ('the site'). The planning application is to be determined by Plymouth City Council ('the Council').
2. This document provides an assessment of potential sequentially preferable sites in and at the edge of the defined centres within the 'catchment area'. The methodology used observes the local and national planning policy requirements and guidance.
3. This document should be read in conjunction with all documents and drawings submitted alongside the planning application.

The Site and Context

Application Site

4. The application site comprises an approx. 0.2 hectare rectangular parcel of land which currently comprises a number of light industrial buildings, including a two storey front gable roofed light industrial building, open sided covered vehicle parking structure, and two single storey buildings. The courtyard comprises a number of car parking spaces and two other smaller structures, with a number of trees to the north west of the site.
5. The site is accessed off Harbour Avenue via a double gate to the north east of the site which is surrounded by palisade fencing. The site boundaries are defined by a watercourse to the south, woodland and the Cornish Main railway line to the west, an unnamed lane to the north, and a neighbouring property comprising car parking to the east.
6. The surrounding area is mostly described by a car dealership and petrol station to the east, HMNB Devonport to the south, woodland to the east and residential properties to the north. The wider area is described by residential properties to the south, east, north and north west, and HMNB Devonport to the south west.
7. The site is located approximately 3.5 km to the north west of Plymouth city centre. The site is off Wolseley Road, a major throughfare in the area connecting Plymouth's north western areas of St Budeaux and Barne Barton to the rest of the city.



Figure 1: Location of the application site (edged in red) within the wider context.

The Proposal

Description of Development

8. In summary, the proposed development, which consists of four units, comprises the change of use to self and commercial storage, external vehicle storage, associated office and ancillary business space, boxing gym and beauty salon comprising 1238 sqm of net internal area (GIA).
9. Specifically, Unit A will consist of 144 sqm of self-storage, 207 sqm of business storage and 393 sqm of recreational sports across its two floors. Additionally, at ground floor, the building will comprise 134 sqm of indoor vehicle storage and 42 sqm of office.
10. Unit B will comprise covered vehicular parking. Unit C and Unit D will cumulatively comprise 228 sqm of business storage.



Figure 2: Proposed floorplan.

Planning Policy Considerations

11. This section sets out the planning policy background of the proposal in relation to town centre use related national and local planning policy guidance. The following are considered key material considerations in assessing the proposed development from a town centre planning perspective:

- National Planning Policy Framework 2023 (NPPF)
- Planning Policy Guidance (PPG)
- Plymouth and South West Devon Joint Local Plan (2019) (JLP)
- Policies Map: Plymouth Policy Area (2019)
- Plymouth City Council Retail and Centres Study (2012)
- Plymouth District and Local Centres Study (2010)

Sequential Test

Requirement

12. As shown in the Policies Map, the site is located some 420 m to the south from the nearest defined district centre of St Budeaux. Annex 2 (Glossary) the NPPF defines 'out of centre' locations as not in, or on the edge of a defined centre. For main town centre uses (except retail and offices), an 'edge of centre' location is described as "*a location within 300 metres of a town centre boundary*". Therefore, for planning purposes, **the site is considered as in an 'out of centre' location.**
13. Within the NPPF, the Glossary confirms that main town centre uses includes leisure, entertainment, more intense sport and recreation uses (such as health and fitness centres) as well as offices, as 'main town centre uses'.
14. NPPF Paragraph 91 confirms that local planning authorities should apply a sequential approach to planning applications proposing main town centre uses that are not located within an existing centre, or not in accordance with an up-to-date development plan. The paragraph continues that main town centre uses should be located in 'town centres', then in 'edge of centre' locations; if suitable sites are not available in these locations, only then should 'out of centre' sites be considered.
15. Paragraph 92 provides clarification on the consideration of 'edge of centre' and 'out of centres' sites and states that preference should be given to accessible sites that are well connected to the town centre. To enable such sites to be considered, both the applicant and the local planning authority must demonstrate flexibility on format and scale.
16. In line with the NPPF, JLP Policy SPT6 expects provision of new main town centre uses to have regard to the sequential hierarchy of centres set out by the Policy which

includes 6 tiers. JLP Policy DEV16 goes further seeks to protect and enhance the vitality and viability. Specifically, at point (2), the Policy expects for main town centre proposals to be supported by a sequential test. Therefore, the national and local planning policy consider the site's location as in a less sequential preferable location for main town centre uses, with locations within, or at the edge of centres being considered more preferable.

17. On this basis, it is considered that it is necessary to demonstrate that the proposed development complies with the sequential approach outlined within the NPPF and the JLP.

Application

18. Paragraph 005 of the PPG states that in circumstances where main town centre uses cannot be accommodated within defined centres, Local Planning Authorities should *“ensure that any proposed main town centre uses which are not in an existing town centre are in the best locations to support the vitality and vibrancy of town centres, and that no likely significant adverse impacts on existing town centres arise”*.
19. This exercise is undertaken by a sequential test assessment. Paragraph 009 of the PPG explains that a *“sequential test guides main town centre uses towards town centre locations first, then, if no town centre locations are available, to edge of centre locations, and, if neither town centre locations nor edge of centre locations are available, to out of centre locations (with preference for accessible sites which are well connected to the town centre). It supports the viability and vitality of town centres by placing existing town centres foremost in both plan-making and decision-taking.”*
20. PPG ‘Ensuring the vitality of town centres’ (Paragraph: 011 Reference ID: 2b-011-0190722) confirms that it is for the applicant to demonstrate compliance with the sequential test and that, where possible, the local planning authority should support the applicant in undertaking the sequential test. The application of the test will need to be proportionate and appropriate for the given proposal.
21. Applications for main town centre uses should firstly be directed to town centres, then edge of centre locations and, only if suitable sites are not available (within a reasonable period), should out of centre sites be considered. In considering edge of centre and out of centre proposals, preference should be given to accessible sites that are well connected to the town centre.
22. PPG Paragraph 011 confirms that the following considerations should be taken into account when determining whether a proposal complies with the sequential test:

- with due regard to the requirement to demonstrate flexibility, has the suitability of more central sites to accommodate the proposal been considered?
- is there scope for flexibility in the format and/or scale of the proposal?
- if there are no suitable sequentially preferable locations, the sequential test is, then, passed.

23. PPG paragraph 011 also states that:

“In line with [former] paragraph 86 [now 91] of the NPPF, only if suitable sites in town centre or edge of centre locations are not available (or expected to become available within a reasonable period) should out of centre sites be considered. 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.

Compliance with the sequential and impact tests does not guarantee that permission will be granted – all material considerations will need to be considered in reaching a decision.”

24. PPG’s paragraph 012 confirms that locational requirements are a material consideration within the sequential test assessment. However, robust justification will need to be provided where this is the case, and land ownership does not provide such a justification.

Area of Assessment

25. The relevant main town centre use elements of the proposed development includes office, boxing gym and ancillary beauty salon which cumulatively comprise a total net floorspace of 435 sqm.
26. As the PPG suggests, the sequential test should be proportionate and appropriate for the given proposal, including by reason of the scale of the proposed floorspace and site area.
27. Boutique gyms, such as the one proposed, are standard health and fitness club facilities that do not attract customers from a wide area. They have arisen as a direct response to meet a market requirement for increasing gym membership to provide health and fitness facilities that are immediately accessible, either to a resident or working population, and can be utilised by a surrounding residential population or visitors travelling to and from a destination (e.g. from home to work or vice versa).
28. This operational requirement is well-established in terms of health and fitness club operations and has been a core part of the decisions taken to help both public and

private health and fitness club facilities – i.e. developing accessible health and fitness facilities that serve the immediate area they are located in.

29. On that basis, and given the scale of the leisure operation proposed, we consider the catchment area to be a five-minute drive time area. The five-minute drive time broadly encapsulates the areas of Barne Barton, St Budeaux, Kings Tamerton, North Prospect, Keysham, and partly, Ford and Morice Town. The application site in this instance enjoys access to a large resident population within a five-minute drive time area.

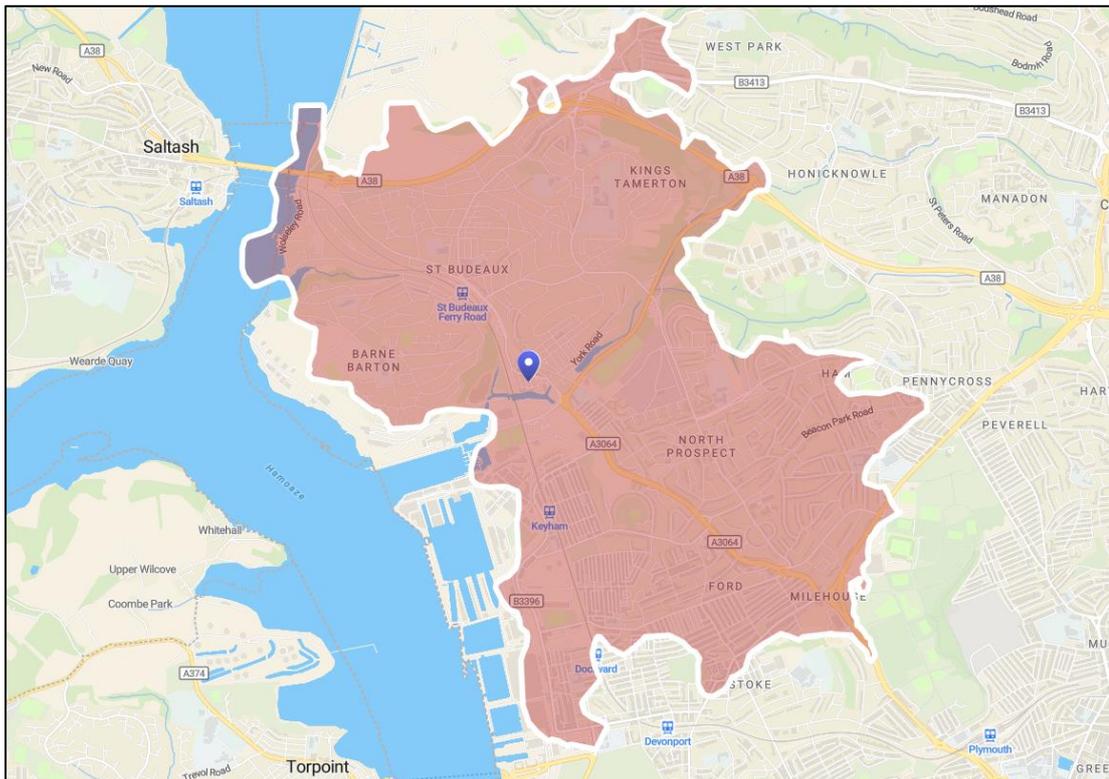


Figure 3: The Sequential Test assessment's 5-minute drive catchment area.

30. On the basis of the above, we consider that the adoption of a five-minute drive time catchment is appropriate for this proposal. We consider that the vast majority of the health and fitness club's members will be drawn from this area.
31. Consequently, the Sequential Test assesses the following 8 no. defined centres:
- St Budeaux district centre (DC) (ref 1)
 - Albert Road local centre (LC) (ref 2)
 - Ham Green LC (ref 3)
 - Milehouse LC (ref 4)
 - North Prospect LC (ref 5)
 - Stoke Village LC (ref 6)
 - Victoria Road LC (ref 7)
 - Wolseley Road LC (ref 8)

32. Should the Council, based on robust reasoning, not consider the assessment area as appropriate, the writer of this report would accept to undertake a further revision of this document based on the agreed appropriate catchment area.

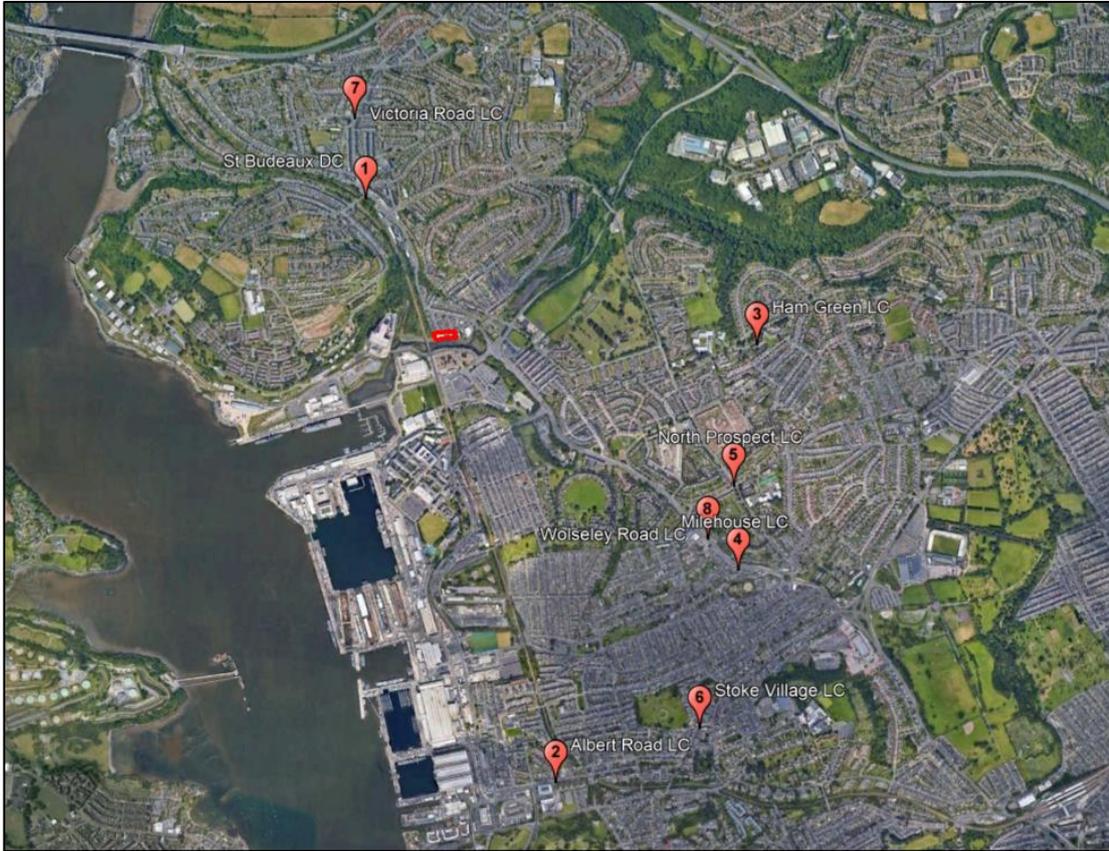


Figure 4: Aerial image showing the site (outlined in red) in context with the surrounding defined centres (identified by place markers).

Site Selection criteria

33. The PPG ‘Ensuring the vitality of town centres’ confirms that the application of the test should be proportionate and appropriate for the given proposal. Paragraph 92 of the NPPF clarifies that ‘*applicants and local planning authorities should demonstrate flexibility on issues such as format and scale, so that opportunities to utilise suitable town centre or edge of centre sites are fully explored.*’

Case Law

34. Still, Lord Glennie’s comments in *Lidl UK BH v Scottish Ministers* [2006]¹ conclude that, in considering whether a site could be suitable or not, the main question remains “*whether the alternative town centre site, in this case the existing Lidl site, is suitable for the proposed development, not whether the proposed development can be altered or reduced so that it can be made to fit into the alternative site.*”

¹ https://www.bailii.org/scot/cases/ScotCS/2006/CSOH_165.html

35. This is further reinforced by the Court Case Tesco (Appellant) v Dundee City Council (Respondent)² ; This Case provides more clarity in relation to the level of flexibility that needs to be applied in identifying the search criteria, where the Court determined, among other things, that a sequential test *“has to be qualified to the extent that the applicant is expected to have prepared his proposals in accordance with the recommended approach: he is, for example, expected to have had regard to the circumstances of the particular town centre, to have given consideration to the scope for accommodating the development in a different form, and to have thoroughly assessed sequentially preferable locations on that footing”*.
36. Indeed, in discussing whether the previous planning provisions contained within PPS4 in relation to the requirement for disaggregation of proposals, the Rushden Lakes Decision³ states at paragraph 2.68 that *“had the Government intended to retain disaggregation as a requirement it would and should have explicitly stated this in the NPPF. It is too large a point to rest on implication. If it had been intended to carry on with the requirement then all that would have been required is the addition of the word ‘disaggregation’ at the end of NPPF”*.
37. Furthermore, the Scotch Corner appeal decision⁴ concludes that the NPPF requires applicants to *“demonstrate flexibility on issues such as format and scale, it does not require the applicant to disaggregate the scheme”*.
38. A subsequent Call-In Inquiry decision⁵ concluded that *“whereas past retail policy and guidance has adopted a disaggregation approach this is not embodied in either the Framework or the PG as was confirmed by the Court of Appeal in Warners Retail. The Secretary of State reached a similar conclusion in his decisions on Rushden Lakes, Scotch Corner and Honiton Road.”*
39. Consequently, when considering the above-mentioned Case Law, and bearing in mind that the planning application is submitted with full details, it is deemed appropriate to consider the site and the proposed development as a whole, including the proposed self and business storage uses, and applying a degree of flexibility, but not disaggregate the proposed development in its constituent parts.

² [LIDL UK GmbH v The Scottish Ministers & Anor \[2006\] ScotCS CSOH_165 \(18 October 2006\) \(bailii.org\)](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/319505/Called-in_decision_-_Rushden_Lakes_Retail_Park_ref_2190175_11_June_2014.pdf)

³ [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/319505/Called-in decision - Rushden Lakes Retail Park ref 2190175 11 June 2014 .pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/573706/16-12-01_DL_IR_Barracks_Bank_3132873.pdf)

⁴ [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/573706/16-12-01_DL_IR_Barracks_Bank_3132873.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/744575/18-10-01_DL_IR_The_Mall_Cribbs_Causeway.pdf)

⁵ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/744575/18-10-01_DL_IR_The_Mall_Cribbs_Causeway.pdf

Criteria

40. The proposed development comprises 1,238 sqm net internal area. For the purposes of undertaking the assessment, an 80% gross to net ratio was used to identify the key figure of 1547.5 sqm gross floorspace.
41. In terms of flexibility to be applied to a site area, the Inspector concluded at paragraph 11 of the appeal decision (ref APP/X3540/W/20/3250557⁶) that *'the standard approach to these matters is to set a range within a certain percentage of the application site, usually 15 or 20% either way'*.
42. As such this report applies a 20% allowance either way of the proposed gross floorspace or site area, thus between 1,238 sqm and 1,857 sqm GIA, and 0.16 ha and 2.4 ha, respectively.
43. Additionally, the proposal relates to a gym and office as well as self and business storage. Therefore, it is likely that a significant portion of clients, visitors or employees will use their private car to access the site and the parking location would need to be relatively close to the site to allow for east loading or unloading. Thus, any site would need to be able to accommodate adequate parking and access arrangements. Furthermore, due to the bespoke requirements of a boxing gym, suitable floor to ceilings height would be required.
44. Lastly, the applicant owns the land and seeks to develop the application site to provide leasehold units for various occupants as end users. As such, only freehold properties are considered.
45. Consequently, the following selection criteria (operational, practical and locational requirements) have been identified for the purposes of undertaking the sequential assessment:
 - Freehold commercial units or land
 - GIA of between 223 sqm and 335 sqm
 - Sites between 0.16 ha and 2.4 ha
 - Suitable floor to ceiling height
 - Site located within or at the edge of the defined centres within the catchment area (5-min drive from the site)
 - Sites capable of accommodating adequate vehicle parking arrangements
 - Good public transport connections

⁶ <https://acp.planninginspectorate.gov.uk/ViewCase.aspx?caseid=3250557>

Sequential Test Assessment

46. This section seeks to assess the results of the sequential test against relevant planning policies identified in the previous section of this document.
47. The sequential assessment was undertaken between 19 and 24 February 2024. The assessment included a search of properties such as retail, leisure, light industrial properties or plots of land. The following national and local estate agencies' online platforms were used to conduct the search for alternative sites:
 - Rightmove (<https://www.rightmove.co.uk/commercial-property-for-sale.html>)
 - OnTheMarket (<https://www.onthemarket.com/to-rent/commercial/>)
 - Realla (<https://www.realla.co.uk/>)
 - Zoopla (<https://www.zoopla.co.uk/for-sale/commercial/>)
48. Additionally, the assessment has analysed potential alternative sites within the Plymouth Brownfield Register⁷.
49. It is worth noting that the assessment has considered duplicate adverts only once for consistency.

Estate Agencies

50. The search revealed that within the assessment area, without applying any specific criteria, only seven properties were found to be located within the catchment area. Of these properties, only three were located within sequentially preferable locations (within or at the edge of a defined centre) (sites nos. 3, 4 and 6). Two of these properties were discounted as being either significantly over or under the required floorspace to accommodate the proposed development even with allowances made for flexibility (sites nos. 3 and 6).
51. The reminder site no. 4 was discounted as its floorspace was insufficient to accommodate the proposal. Furthermore, the property is part of a terrace of residential properties and, therefore, the proposed uses would be incompatible with the surrounding uses due to amenity concerns. Lastly, the property lacked a suitable access or parking arrangements that could satisfactorily provide for the proposal, most notably in relation to the self and business storage units proposed.
52. Please refer to **Appendix 1** for the full details of the sites that have been examined, analysed and discounted when the site criteria were applied, even when a degree of flexibility was applied.

⁷ <https://plymouth.thedata.place/dataset/brownfield-register>

Table 1: Summary of the assessment of Estate Agent's potentially alternative sites.

| Site no. | Address | Floorspace | Site Area (ha) | Suitable parking and access? | Suitable floor to ceiling height? | Public transport accessibility | Location | Sequentially Preferable? |
|----------|--|------------|----------------|------------------------------|-----------------------------------|--------------------------------|------------------|--------------------------|
| 1 | Ferry House Inn, 888 Wolseley Rd Saltash Passage, Plymouth | n/a | n/a | No | No | Poor | Out-of-centre | No |
| 2 | Luxury Bridal Boutique, Keyham, Plymouth | n/a | n/a | No | No | Good | Out-of-centre | No |
| 3 | Stoke Damerel College, Keppel Place, Plymouth | 2,334 | n/a | Yes | Yes | Excellent | Edge-of-centre | No |
| 4 | Albert Road, Stoke, Plymouth | n/a | n/a | No | No | Excellent | Edge-of-centre | No |
| 5 | Land at Pottery Quay, Pottery Road Plymouth, Devon PL1 4FB | n/a | 0.63 | Yes | Yes | Excellent | Out-of-centre | No |
| 6 | 56 Devonport Rd | 52 | n/a | No | No | Excellent | Stoke Village LC | No |
| 7 | Burrington Way, Plymouth PL5 | 93 | n/a | Yes | Yes | Poor | Out-of-centre | No |

53. In summary, the properties have been discounted for the following main reasons:

- **Site no. 1 - Ferry House Inn, 888 Wolseley Rd Saltash Passage:**
 - Poor accessibility by sustainable transport
 - Inadequate vehicle parking arrangements
 - Unsuitable internal layout and floor-to-ceiling height
 - JLP Policy DEV18 restricts changes of use from community facilities
 - Out-of-centre location
- **Site no. 2 - Luxury Bridal Boutique, Keyham**
 - Insufficient floorspace for proposed development
 - Lack of suitable parking arrangements
 - Inadequate internal layout and floor-to-ceiling height
 - Out-of-centre location
- **Stoke Damerel College, Keppel Place**
 - Excessive internal floorspace for proposed development
 - Subject to planning permission for conversion to flats
- **Albert Road, Stoke, Plymouth**
 - Inadequate space for proposed development
 - Incompatibility with neighboring residential properties
 - Unsuitable internal layout and floor-to-ceiling height

- Lack of suitable parking arrangements
- Out-of-centre location
- **Land at Pottery Quay, Pottery Road**
 - No indication of availability for commercial uses
 - Allocation for residential development
 - Out-of-centre location
- **56 Devonport Road**
 - Inadequate space for proposed development
 - Lack of suitable access, parking arrangements, and internal layout
- **Burrington Way**
 - Inadequate space for proposed development
 - Out-of-centre location

54. In summary, the sites were discounted due to multiple factors; many were located in out-of-centre locations, thus not in sequentially preferable locations. Internal floorspace or layout constraints, inadequate parking, and planning restrictions also played a role. Ultimately, the small number of available properties or sites within the catchment area plays a central role in the lack of available sequentially preferable sites that could accommodate the proposed development.

Brownfield Register

55. This assessment has also analysed all sites within the Brownfield Register which includes 78 sites (see **Appendix 2**). Of the 78 sites, only 10 sites satisfied the Brownfield Register first filtering exercise (either being within the catchment area or of a suitable site area). Of these, only one site (ref BR0132a – “Land At Savage Road Plymouth”) satisfied both criteria. However, while within the catchment area and within the site area criterion, the site is located in an out-of-centre location and therefore not in a more sequentially preferable location than the application site.

| Site Reference | Site Address | Hectares | Location | Comments | Sequentially Preferable |
|----------------|--|----------|----------------------------|---|-------------------------|
| BR0030a | Tamar Valley School, Barne Barton | 1.16 | Out-of-centre | Failed the location test | No |
| BR0033a | Former Gas Works site, St Levan Road, Keyham | 0.81 | Edge-of-centre | Failed the site area test | No |
| BR0037a | Bull Point Barracks | 0.68 | Out-of-centre | Failed the location and site area tests | No |
| BR0072a | Beacon Castle Sport & Social Club, Channel Park Avenue | 0.19 | Outside the catchment area | Failed the location test | No |
| BR0107a | 41 North Hill Plymouth | 0.18 | Outside the catchment area | Failed the location test | No |
| BR0118a | Cliffafoord Club Moses Close Plymouth PL6 6JP | 0.18 | Outside the catchment area | Failed the location test | No |
| BR0127a | Stoke Damerel College Keppel Place Plymouth | 0.11 | Edge-of-centre | The site has been discounted under Site no 3. | No |
| BR0128a | 13 Merrivale Road Beacon Park Plymouth | 0.10 | Edge-of-centre | Failed the site area test | No |
| BR0130a | St Helens Walk Plymouth | 0.18 | Outside the catchment area | Failed the location test | No |
| BR0132a | Land At Savage Road | 0.16 | Out-of-centre | Failed the location test | No |

Table 2: Table showing the only brownfield site located within the catchment area.

Findings

56. In summary, the properties were discounted due to factors such as inadequate size, even when a degree of flexibility was applied. Additional reasons for discounting these properties included poor parking and access arrangements, potential amenity issues, lack of suitable internal layout, but mostly for being located in less than sequentially preferable locations when compared to the application site.
57. Therefore, the assessment was unable to find any sequentially preferable alternative sites within the catchment area. This is due to what appears to be a severe lack of available properties or land of suitable area and layout to accommodate the proposal.
58. In contrast, the application site is available now and deliverable within a short timeframe. While the site is located in an out-of-centre location, the site satisfies all the criteria and is considered ideal to accommodate the proposal.
59. In addition, there are bus stops along Wolseley Road, within 70 m, or 2-min walking distance from the site, which provide regular and very frequent bus services (nos. 2, 2a, 10, 11, 12, 21, 21A, 43 and 5) to destinations such as Plymouth city centre, St Stephens, Derriford, Barne Barton, Ernesettle, Plympton, Mount Batten.
60. Therefore, the application site is accessible by public transport or walking from Plymouth city centre, St Budeaux district centre and its train station, and other defined centres, in line with paragraph 92 of the NPPF which 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.”*
61. In summary, the assessment of available and comparable sites demonstrated that the sequential test has been satisfied in compliance with paragraphs 91 and 92 of the NPPF and with JLP policies SPT6 and DEV16.

Conclusion

62. The proposal comprises the change of use to self and commercial storage, external vehicle storage, associated office and ancillary business space, boxing gym and beauty salon (part retrospective) at Former Training Centre, Harbour Avenue, Plymouth.
63. The site is located approx. 420 m from the nearest defined centre of St Budeaux district centre. Consequently, the site is considered as in an 'out of centre' location for planning purposes and therefore the proposal needs to demonstrate that a sequential approach was adopted in identifying the application site.
64. The sequential test assessment demonstrates that, within the catchment area, there are no sequentially preferable suitable or available sites capable of accommodating the proposed development, even when a proportionate degree of flexibility is applied. The main reasons for this include the severe lack of available sites, or suitably sized commercial units or land within the catchment area.
65. Thus, any impact on existing centres would be acceptable and therefore the proposal is in line with the Local Plan and the provisions and guidance within the NPPF and PPG.
66. In light of the Sequential Test having been satisfied, the location of proposed development is considered to be acceptable in this case and is fully compliant with the national planning policy and guidance, including with paragraphs 91 and 92 of the NPPF as well as JLP policies SPT6 and DEV16.

Appendix 1 - Estate Agents

| Site no. | Address | Approx. postcode | Floorspace | Site Area (ha) | Suitable parking and access? | Suitable floor to ceiling height? | Public transport accessibility | Location | Sequentially Preferable? | Comments |
|----------|--|------------------|------------|----------------|------------------------------|-----------------------------------|--------------------------------|----------------|--------------------------|--|
| 1 | Ferry House Inn, 888 Wolseley Rd Saltash Passage, Plymouth | PL5 1LA | n/a | n/a | No | No | Poor | Out-of-centre | No | The property is in a poorly accessible location by sustainable modes of transport. It does not have suitable vehicle parking arrangements. The floor-to-ceiling height as well as the internal layout (split into several rooms) is unsuitable to accommodate the proposed development even when a degree of flexibility is applied. Furthermore, JLP Policy DEV18 restricts changes of use from community facilities, such as pubs, to other uses. Lastly, the site is located in an out-of-centre location, and therefore not in a sequentially preferable location. |
| 2 | Luxury Bridal Boutique, Keyham, Plymouth | PL2 1RB | n/a | n/a | No | No | Good | Out-of-centre | No | While the site area and floorspace of the property are not stated, it is clear from the description and pictures that it is considerably smaller than that required to accommodate the proposed development, even when a degree of flexibility is applied. Furthermore, the property does not include suitable parking arrangements and does not comprise of suitable internal layout or floor-to-ceiling height that could accommodate a boxing gym. Lastly, the property is located in an out-of-centre location and therefore not in a sequentially preferable location. |
| 3 | Stoke Damerel College, Keppel Place, Plymouth | PL2 1BP | 2,334 | n/a | Yes | Yes | Excellent | Edge-of-centre | No | The property comprises an internal floorspace significantly over what is required to accommodate the proposed development even when a degree of flexibility is applied. Furthermore, the property is subject to planning permission (ref 20/01277/FUL) for the conversion of the building to 23 flats with works commenced. |
| 4 | Albert Road, Stoke, Plymouth | PL2 1AW | n/a | n/a | No | No | Excellent | Edge-of-centre | No | While the site area and floor space of the property are not stated, it is clear from the description and pictures that it is considerably smaller than that required to accommodate the proposed development, even when a degree of flexibility is applied. Furthermore, the property is part of a terrace which includes residential properties. Therefore the proposed development is incompatible with the occupiers of the neighbouring residential occupiers, especially in terms of noise emissions. Floor-to-ceiling heights as well as the internal layout do not allow for a viable layout that could accommodate the proposed development. Given the proposed uses, there are no suitable parking arrangements provided within the property or on adjacent roads with seemingly limited parking spaces available on surrounding streets. |

| | | | | | | | | | | |
|---|---|---------|-----|------|-----|-----|-----------|------------------|----|--|
| 5 | Land at Pottery Quay, Pottery Road Plymouth, Devon PL1 4FB | PL1 4FL | n/a | 0.63 | Yes | Yes | Excellent | Out-of-centre | No | The property is described as a large vacant site, and while it mentions previous planning consent for 73 dwellings and commercial space, there's no indication that there are existing commercial units on the site. The site is allocated for residential development. Therefore, it may not meet the requirement for freehold commercial units or land. Lastly, the site is located in an out-of-centre location, and therefore not in a sequentially preferable location. |
| 6 | 56 Devonport Rd | PL3 4DF | 52 | n/a | No | No | Excellent | Stoke Village LC | No | The property is significantly smaller than that required to accommodate the proposed development even when a degree of flexibility is applied. Furthermore, the site does not provide suitable access or parking arrangements nor does it comprise a suitable internal layout, such as floor-to-ceiling heights, to accommodate the proposed boxing gym. |
| 7 | Burrington Way, Plymouth PL5 | PL5 3LZ | 93 | n/a | Yes | Yes | Poor | Out-of-centre | No | The property is significantly smaller than that required to accommodate the proposed development even when a degree of flexibility is applied. Furthermore, the site is located in an out-of-centre location, therefore not within a sequentially preferable location. |

No. URL

- 1 <https://www.rightmove.co.uk/properties/136224635#/?channel=COM> BUY
- 2 <https://www.rightmove.co.uk/properties/143360315#/?channel=COM> BUY
- 3 <https://www.rightmove.co.uk/properties/143509985#/?channel=COM> BUY
- 4 <https://www.rightmove.co.uk/properties/121467365#/?channel=COM> BUY
- 5 <https://www.rightmove.co.uk/properties/144693845#/?channel=COM> BUY
- 6 <https://www.loopnet.co.uk/Listing/56-Devonport-Rd-Plymouth/29095359/>
- 7 <https://www.zoopla.co.uk/for-sale/commercial/details/66401889/>

Appendix 2 - Adjusted Plymouth Brownfield Register

| Site Reference | Site Name Address | Within Assessment Area? | Hectares | Passed the site area and location test? | Planning Status | Min Net Dwellings | Net Dwellings Range To |
|----------------|--|-------------------------|----------|---|-----------------|-------------------|------------------------|
| BR0001a | "Colin Campbell Court" | No | 2.27 | No | not permitted | 300 | 330 |
| BR0002a | "Cornwall Street East, City Centre" | No | 0.99 | No | not permitted | 92 | 102 |
| BR0003a | "Cornwall Street West, City Centre" | No | 0.8 | No | not permitted | 79 | 87 |
| BR0004a | "New George Street West, City Centre" | No | 0.49 | No | not permitted | 30 | 33 |
| BR0005a | "Royal Assurance site, Armada Way, City Cent | No | 0.49 | No | not permitted | 110 | 121 |
| BR0006a | "21 Derrys Cross" | No | 0.6 | No | permitted | 88 | |
| BR0007a | "Civic Centre and Council House site" | No | 1.19 | No | permitted | 144 | |
| BR0008a | "Plymouth Fruit Sales site, Sutton Road, Sutto | No | 0.63 | No | not permitted | 200 | 220 |
| BR0009b | "Sutton Road west, Sutton Harbour" | No | 0.85 | No | not permitted | 180 | 198 |
| BR0010a | "Sugar House, Sutton Harbour" | No | 0.43 | No | permitted | 170 | |
| BR0011a | "Register office, Lockyer Street, The Hoe" | No | 0.27 | No | not permitted | 52 | 58 |
| BR0012a | "Land north of Cliff Road, The Hoe" | No | 0.91 | No | not permitted | 88 | 97 |
| BR0013a | "Millbay waterfront, Millbay Road" | No | 6.41 | No | permitted | 383 | |
| BR0014a | "Bath Street west" | No | 1.19 | No | not permitted | 300 | 330 |
| BR0015a | "Bath Street east" | No | 2.8 | No | not permitted | 316 | 348 |
| BR0015b | "Bath Street east" | No | 0.7 | No | permitted | 7 | |
| BR0016a | "Stonehouse Barracks" | No | 7.93 | No | not permitted | 400 | 440 |
| BR0018a | "Mount Wise, Devonport - Area A" | No | 1.9 | No | not permitted | 145 | 160 |
| BR0020a | "Millfields Trust, 278 Union Street" | No | 0.77 | No | not permitted | 62 | 69 |
| BR0021a | "Broadreach site, Richmond Walk" | No | 0.5 | No | not permitted | 60 | 66 |
| BR0022a | "Derriford commerical centre" | No | 18.7 | No | not permitted | 664 | 731 |
| BR0023a | "Glacis Park, Derriford" | No | 14.88 | No | not permitted | 638 | 702 |
| BR0024a | "Seaton Neighbourhood" | No | 0.75 | No | permitted | 39 | 39 |
| BR0025a | "BT Depot, Tamerton Foliot Road" | No | 2.54 | No | not permitted | 87 | 96 |
| BR0026a | "Saltram Meadow, Plymstock" | No | 50.61 | No | permitted | 1134 | |
| BR0027a | "Former China Clay dryer complex, Coypool" | No | 30.48 | No | not permitted | 400 | 440 |
| BR0028a | "Former nursery site, Haye Road" | No | 0.48 | No | not permitted | 6 | 10 |
| BR0029a | "Pomphlett Industrial Estate" | No | 1.17 | No | not permitted | 44 | 49 |
| BR0030a | "Tamar Valley School, Barne Barton" | Yes | 1.16 | No | not permitted | 44 | 49 |
| BR0031a | "Douglass House, Efford" | No | 0.57 | No | permitted | 2 | 6 |
| BR0032a | "Land at Windsor Road, Compton" | No | 0.66 | No | not permitted | 26 | 29 |
| BR0033a | "Former Gas Works site, St Levan Road, Keyha | Yes | 0.81 | No | not permitted | 57 | 63 |
| BR0035a | "Land at Stuart Road/Victoria Park, Stoke" | No | 0.65 | No | not permitted | 46 | 51 |
| BR0036a | "MDEC, Central Park Avenue, Pennycomequic | No | 0.76 | No | not permitted | 141 | 156 |
| BR0037a | "Bull Point Barracks" | Yes | 0.68 | No | not permitted | 13 | 15 |
| BR0038a | "Seventrees, Baring Street, Greenbank" | No | 0.66 | No | not permitted | 80 | 88 |
| BR0040a | "Land either side of Clittaford Road, Southway | No | 3.1 | No | not permitted | 108 | 119 |
| BR0043a | "Stirling House, Honicknowle Green" | No | 0.37 | No | permitted | 19 | |
| BR0044a | "Woodvale Nurseries, Truro Drive, Whiteleigh" | No | 0.5 | No | not permitted | 31 | 35 |
| BR0045a | "Land north of Clittaford Road, Southway" | No | 0.44 | No | not permitted | 9 | 10 |
| BR0046b | "Whiteleigh Community Centre" | No | 0.31 | No | permitted | 27 | |
| BR0047a | "Chaucer Way school site" | No | 3.84 | No | not permitted | 4 | |
| BR0051a | "Errill Retail Park, Plymouth Road, Plympton" | No | 3.01 | No | not permitted | 60 | 66 |
| BR0053b | "Land off Newnham Road, Colebrook" | No | 1.39 | No | not permitted | 9 | 10 |

| | | | | | | |
|---------|---|-----|-------|-----|--------------|-----|
| BR0057a | "17-19 Mayflower Street" | No | 0.11 | No | permissioned | 162 |
| BR0060a | "Desborough Motors, 15 Desborough Lane" | No | 0.03 | No | permissioned | 12 |
| BR0070a | "Former Tothill Sidings, Desborough Road" | No | 1.38 | No | permissioned | 50 |
| BR0072a | "Beacon Castle Sport & Social Club, Channel R | No | 0.19 | No | permissioned | 1 |
| BR0081a | "Holtwood, Plymbridge Road" | No | 0.36 | No | permissioned | 2 |
| BR0083a | "West Park Primary School, Wanstead Grove" | No | 1.31 | No | permissioned | 6 |
| BR0087a | "Mayflower House, 178 - 184 Armada Way" | No | 0.1 | No | permissioned | 140 |
| BR0090a | "Southway Shopping Centre, Southway Drive, | No | 0.77 | No | permissioned | 7 |
| BR0092a | "16-20 Duke Street, Plymouth, PL1 4EA" | No | 0.1 | No | permissioned | 24 |
| BR0099a | "Land Off Colebrook Road, Plympton, Plymouth | No | 1.21 | No | permissioned | 43 |
| BR0104a | "Bostons Boat Yard, Baylys Road, Plymouth, P | No | 0.52 | No | permissioned | 9 |
| BR0105a | "1 The Moneycentre, 1 Drake Circus, Plymouth | No | 0.34 | No | permissioned | 119 |
| BR0106a | "Harbour Arch Quay, Sutton Harbour, Plymouth | No | 0.04 | No | permissioned | 14 |
| BR0107a | "41 North Hill Plymouth PL4 8EZ" | No | 0.18 | No | permissioned | 41 |
| BR0115a | "Perimeter Building Royal William Yard Plymou | No | 0.39 | No | permission | 24 |
| BR0116a | "Mount Pleasant Hotel, 12 Millbay Road Plymo | No | 0.1 | No | permission | 9 |
| BR0118a | "Clifford Club Moses Close Plymouth PL6 6 | No | 0.18 | No | permission | 13 |
| BR0119a | "Land At East Park Avenue Plymouth PL4 6PF" | No | 0.07 | No | permission | 6 |
| BR0120a | "538 Crownhill Road Plymouth PL5 2HP" | No | 0.04 | No | permission | 5 |
| BR0121a | "2 Cliff Road" | No | 0.05 | No | permission | 9 |
| BR0122a | "33 Sutherland Road Plymouth PL4 6BN" | No | 0.03 | No | permission | 6 |
| BR0124a | "Longreach, Hartley Road Plymouth PL3 5LW" | No | 0.42 | No | permission | 6 |
| BR0125a | "7 - 8 Ford Park Road Plymouth PL4 6QZ" | No | 0.06 | No | permission | 10 |
| BR0126a | "Site Of Former E Block, The Quadrangle, Crai | No | 0.04 | No | permission | 17 |
| BR0127a | "Stoke Damerel College Keppel Place Plymou | Yes | 0.11 | No | permission | 23 |
| BR0128a | "13 Merrivale Road Beacon Park Plymouth PL2 | Yes | 0.1 | No | permission | 13 |
| BR0129a | "Millstones Country Hotel 436 - 438 Tavistock | No | 0.26 | No | permission | 8 |
| BR0130a | "St Helens Walk Plymouth PL5 4HQ" | No | 0.18 | No | permission | 7 |
| BR0131a | "Morley Youth & Community Centre Broadland | No | 0.47 | No | permission | 10 |
| BR0132a | "Land At Savage Road Plymouth" | Yes | 0.16 | Yes | permission | 9 |
| BR0133a | "Raglan Gatehouse, Footpath Between Raglan | No | 0.09 | No | permission | 8 |
| BR0134a | "3 - 4 Bedford Park Villas" | No | 0.038 | No | permission | 10 |
| BR0135a | "Land At St Peters Close" | No | 0.12 | No | permission | 5 |
| BR0136a | "177 - 183 Grenville Road" | No | 0.084 | No | permission | 10 |

Appendix 3 - Brownfield Register Assessment Summary

| Site Reference | Site Address | Hectares | Location | Comments | Sequentially Preferable |
|-----------------------|--|-----------------|----------------------------|---|--------------------------------|
| BR0030a | Tamar Valley School, Barne Barton | 1.16 | Out-of-centre | Failed the location test | No |
| BR0033a | Former Gas Works site, St Levan Road, Keyham | 0.81 | Edge-of-centre | Failed the site area test | No |
| BR0037a | Bull Point Barracks | 0.68 | Out-of-centre | Failed the locaiton and site area tests | No |
| BR0072a | Beacon Castle Sport & Social Club, Channel Park Avenue | 0.19 | Outside the catchment area | Failed the location test | No |
| BR0107a | 41 North Hill Plymouth PL4 8EZ | 0.18 | Outside the catchment area | Failed the location test | No |
| BR0118a | Clifford Club Moses Close Plymouth PL6 6JP | 0.18 | Outside the catchment area | Failed the location test | No |
| BR0127a | Stoke Damarel College Keppel Place Plymouth PL2 1AX | 0.11 | Edge-of-centre | This site has been considered under the Estate Agent (site no. 3) | No |
| BR0128a | 13 Merrivale Road Beacon Park Plymouth PL2 2QG | 0.10 | Edge-of-centre | Failed the site area test | No |
| BR0130a | St Helens Walk Plymouth PL5 4HQ | 0.18 | Outside the catchment area | Failed the location test | No |
| BR0132a | Land At Savage Road Plymouth | 0.16 | Out-of-centre | Failed the location test | No |