



Planning Statement & Sequential Leisure Assessment

In respect of

EXTENSION OF GYM SPACE
THROUGH INSERTION OF NEW
MEZZANINE

UNIT 2
CHURCHILL WAY WEST RETAIL PARK
SALISBURY
SP2 7TS

On behalf of

The Gym Ltd

USP1321

May 2026

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1 INTRODUCTION

- 1.1 This Planning Statement and Sequential Leisure Assessment has been submitted on behalf of The Gym Group Ltd in relation to the installation of a new mezzanine within the current premises as part of the use of the premises as a health and fitness facility. The mezzanine floorspace is proposed to improve the range of facilities on offer and improve the configuration and experience of the health and fitness facility for its users.

- 1.2 The premises was previously occupied by Homesense within Class E(a) use as retail. Planning application ref: PL/2024/09079 was permitted in July 2025 related to the refurbishment of Units 1 and 2, with the amalgamation of Unit 1 and part of Unit 2 to allow Lidl to operate from the new larger unit (Unit 1) and the remaining space to provide a smaller unit (Unit 2). Unit 2 remains vacant, however The Gym Group Ltd are to occupy the unit as a health and fitness operation to bring the accommodation back into active and beneficial use for the local surrounding community.

- 1.3 Both Unit 1 and 2 included accommodation within mezzanines within each unit, however these were removed from the premises as part of their recent refurbishment. This proposal seeks to reinstate a smaller mezzanine of only 232 sq metres back into Unit 2 to provide improved facilities for the gym use.

- 1.4 The lawful use of the premises is Class E. The 2020 Use Class Order confirmed both retail and indoor sport, recreation and fitness uses are within Class E and under Section 55 of the Act the change of the operation of these premises between these uses does therefore not constitute development. A Certificate of Lawfulness application ref: PL/2026/00560 has been approved which confirms that the unit can be used lawfully for indoor sport, recreation and fitness (Class Ed) on this basis and The Gym Group Ltd are to take up occupation of the premises shortly.

- 1.5 The Gym Group are an established gym operator having over 250 similar operations in locations across the UK, including premises in Poole, Bournemouth and four operations in Southampton. The use has a local catchment and is aimed at catering for the surrounding local area, with the majority of users of the facility constituting employees and residents from the surrounding businesses and neighbourhoods.

- 1.6 The Gym Group aims to increase access to health and fitness activities to a wide demographic within local communities to encourage and improve health by providing a low cost and flexible gym membership option. The Gym Group provides a high quality but cheaper option for health and fitness activity, with 24 hour opening hours providing flexibility for its customers. On average 35% of The Gym Group's members have not been to a gym before with The Gym Group attempting to provide its facilities to a much wider market. The proposal will enable expanded space for their fitness and exercise facilities to improve the configuration and quality of the use and meet the needs of its users.

- 1.7 This statement provides a review of the site and surroundings, an overview of the health and fitness market, planning history, planning policy context and planning considerations to assess the proposals in relation to the planning policy framework. This statement should be read in

conjunction with the accompanying application documentation and confirms that the development is in accordance with the relevant national and local planning policies.

2 SITE AND SURROUNDING AREA

- 2.1 The application relates to an existing premises in Class E use. The ground floor is to be occupied and operated by The Gym Group as a health and fitness use within Class E.
- 2.2 The Site forms part of Churchill Way West Retail Park, Salisbury. The retail park is directly north of Churchill Way West (A36) and approximately 650 metres from Salisbury Town Centre. The Site lies within the urban area of Salisbury in an edge of centre location.
- 2.3 The retail park contains 4 units. Unit 4 accommodates Waitrose Supermarket, with Unit 3 occupied by Sports Direct. Units 1 and 2 (Unit 2 being the application site) have been the subject of a recent planning consent (ref: PL/2024/09079) for alterations. Lidl are to occupy Unit 1 and The Gym Group Unit 2.
- 2.4 Whilst the provision of mezzanine accommodation for gym uses is not defined as 'Development' within the Act, Condition 5 of PL/2024/09079 does restricts additional floorspace and therefore a planning application is required for the installation of a mezzanine floor within the unit.
- 2.5 Vehicular and pedestrian access to the retail park is via the A36 to the south and the park is within walking distance of the surrounding residential areas to the east and west, with combined pedestrian and cycle paths available providing access to the City Centre.
- 2.6 The EA Flood Map shows the building to be located is entirely in Flood Zone 2.

3 THE HEALTH AND FITNESS MARKET

- 3.1 According to research carried out by Cushman and Wakefield LLP the health and fitness market in the UK was expected to reach a value of over £5 billion in 2019, with over 10 million members across the sector for the first time and these figures look likely to continue to grow. According to the Leisure Data 'State of the Industry' Report, 15.6% of the UK population are members of private health clubs, up from 7.2% in 2011.

- 3.2 Over the last ten years the sector has witnessed a major structural shift with the development of a new 'low-cost' sector. One of the surprising features of the recent economic down turn is that many consumers viewed their gym membership in the same category as their mobile phone or car; a 'necessity' rather than a 'luxury' and as a result many customers have sought to reduce their membership package rather than cancel their contract altogether and to switch to more budget operators.

- 3.3 Although relatively new to the UK, the low-cost model is actually well established. McFit in Germany and PlanetFitness in the USA are examples where the model has expanded nationally with great success. The concept is based around a no-frills principle where clubs contain a large selection of (usually market leading) equipment with the items which are expensive to operate and maintain, such as swimming pools, saunas or studios not provided as part of the offer. While the exact level of 'extras' differs between operators, operators provide a simple level of service with items such as free towels or cafes excluded.

- 3.4 The nature of The Gym operation seeks to increase participation, removing the barriers to activity and opens up health, fitness and wellbeing to a wider demographic not currently accessing such facilities within the area. The use provides a local, accessible day to day facility which has increased participation within this area and supported improvements in health, fitness and wellbeing.

- 3.5 The COVID-19 pandemic has also bought an increased focus on health, fitness and wellbeing and resulted in an increased interest and demand for such health and fitness facilities in convenient locations to peoples place of work and homes.

4 SITE & PLANNING HISTORY

- 4.1 The property has been in Class E use as part of the retail park historically. The last occupier was a retailer, Homesense, however the unit is currently vacant.
- 4.2 Planning application ref: PL/2024/09079 was permitted in July 2025. The consent related to the refurbishment of Units 1 and 2, with the amalgamation of Unit 1 and part of Unit 2 to allow Lidl Supermarket to operate from the new larger unit (Unit 1) and the remaining space to provide a smaller unit (Unit 2).
- 4.3 The premises previously accommodated a large mezzanine floor, however the approval involved the removal of the majority of the previous mezzanine floorspace within Units 1 and 2, resulting in a reduction in overall floorspace across the two units.
- 4.4 Condition 5 of planning approval PL/2024/09079 restricts additional floorspace being created within Unit 2, and therefore a planning application is required to reinstate a mezzanine within the premises.
- 4.5 A separate Certificate of Lawfulness Application (Ref: PL/2026/00560) has been approved which confirms the lawful use of the existing unit for indoor sport, recreation and fitness and The Gym Group Ltd are to take up occupation of the premises shortly.

5 PROPOSED DEVELOPMENT

- 5.1 The Gym Group are taking over occupation of Unit 2 as a health and fitness use to provide additional leisure uses to the local surrounding community. A Lawful Development Certificate has been submitted to the Council separately to confirm the use of the unit for an indoor sport, recreation and fitness use within Class E is lawful and does not require planning permission.
- 5.2 This application proposes to reinstate a mezzanine floor to the unit providing 232 square metres of floorspace. Whilst the installation of a mezzanine within leisure/fitness uses would not normally required planning permission as it does not constitute 'Development' under the Act, a planning application has been submitted at this time to address part of condition 5 on the 2025 planning consent which restricts additional floorspace. The mezzanine is proposed to provide additional internal space within the existing envelope of the building to optimise the operation of the building and provide improved facilities.
- 5.3 All works are to be undertaken internally, with no external works required to facilitate the installation or operation of the mezzanine.

Operational Parameters

- 5.4 To meet the operational requirements of the use the proposed gym format needs a total floor area of between 900 m² and 1,250m². A large, regular single floor plate is required to accommodate the main gym use including the gym equipment, which needs to be laid out in a specific way. Floor to ceiling heights of a minimum clearance are required to enable the installation and operation of the equipment. Support services such as the office and changing facilities can be located on a mezzanine level.
- 5.5 The Gym Group require a premises which is capable of operating on a 24/7 basis, which is a key component of the operation and format of the use and the offer and service it provides to its members.
- 5.6 The Gym Group must have its own dedicated ground floor entrance with a visible street frontage easily identifiable and accessible for visiting members of the public. This is due to the nature of the use and the opening hours under which the gyms operate. In addition, sharing an access or reception area with the gym may not be preferable for some neighbouring occupants.
- 5.7 Due to the nature of the proposal, none of the components of the proposal (i.e. the gym floorspace, changing rooms and the member and staff areas), can be located in a separate location. Therefore, there is a legitimate need to seek units/sites which can accommodate the proposed use as a whole.
- 5.8 The proposed unit is capable of meeting all the operational parameters of The Gym Group.

6 DEVELOPMENT PLAN

- 6.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires development proposals to be considered in accordance with the statutory Development Plan and other material considerations.
- 6.2 The National Planning Policy Framework (NPPF), updated in 2024, forms the national planning policy guidance document, and is supported by the National Planning Practice Guidance, which is an online resource.
- 6.3 The Development Plan relevant to this location consists of Wiltshire Core Strategy (WCS) adopted in 2015 with saved policies from Salisbury District Local Plan (SDLP) adopted in 2003 and the draft Wiltshire Local Plan (2023).

National Planning Policy Framework (2024)

- 6.4 The NPPF includes a requirement on local planning authorities to plan positively for growth and states that "*Meeting anticipated needs for retail, leisure, office and other main town centre uses over this period are not compromised by limited site availability*". At the heart of the NPPF is a presumption in favour of sustainable development.
- 6.5 Paragraph 8 includes an objective to help build a strong, responsive and competitive economy; supports growth, innovation and improved productivity.
- 6.6 Paragraph 85 states that "*Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future*".
- 6.7 Annex 2 of the NPPF establishes that leisure facilities are a main town centre use. This location was confirmed to be edge of centre in the determination of planning application PL/2024/09079.
- 6.8 The NPPF sets out two key tests that are to be applied when planning town centre uses which are not in an existing town centre and which are not in accordance with an up to date Local Plan: the sequential test and the impact test. Having regard to sequential and impact tests ensures 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 impact on existing town centres arise.
- 6.9 Paragraph 91 states '*Local planning authorities should apply a sequential test to planning applications for main town centre uses which are neither in an existing centre nor in accordance with an up-to-date plan. Main town centre uses should be located in town centres, then in edge of centre locations; and only if suitable sites are not available (or expected to become available within a reasonable period) should out of centre sites be considered. Paragraph 92 states When considering edge of centre and out of centre proposals, preference should be given to accessible sites which are well connected to the town centre. Applicants and local planning authorities should*

demonstrate flexibility on issues such as format and scale, so that opportunities to utilise suitable town centre or edge of centre sites are fully explored."

- 6.10 Paragraph 94 states "*When assessing applications for retail and leisure development outside town centres, which are not in accordance with an up-to-date plan, local planning authorities should require an impact assessment if the development is over a proportionate, locally set floorspace threshold (if there is no locally set threshold, the default threshold is 2,500 sq m). This 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 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 wider retail catchment (as applicable to the scale and nature of the scheme)".*
- 6.11 Paragraph 96 identifies that "*Planning policies and decisions should aim to achieve healthy, inclusive and safe places which: a) promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other; b) are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion; and c) enable and support healthy lifestyles, through both promoting good health and preventing ill-health, especially where this would address identified local health and well-being needs and reduce health inequalities between the most and least deprived communities – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling".*
- 6.12 Paragraph 111a highlights that "*Planning policies should support an appropriate mix of uses across an area, and within larger scale sites, to minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities".*
- 6.13 Paragraph 116 states that "*Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe."*
- 6.14 Paragraph 135 further identifies that "*Planning policies and decisions should ensure that developments promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience".*

National Planning Practice Guidance

- 6.15 Under the Section 'Ensuring the vitality of town centres', Paragraph 011 requires the application of the sequential test to be proportionate and appropriate for the given proposal. Paragraph 012 further states that the implementation of the sequential test should reflect the specific characteristics of the development proposals, and that the use of the sequential test should recognise that certain main town centre uses have particular market and locational requirements which mean that they may only be accommodated in specific locations.

- 6.16 Paragraph 015 (ref ID: 2b-015-20190722) of the NPPG outlines that 'the impact test only applies to proposals exceeding 2,500 sqm gross of floorspace unless a different locally appropriate threshold is set by the local planning authority'.

Salisbury District Local Plan

- 6.17 Saved **Policy S3** relates to development outside of Salisbury City Centre, the policy promotes city and town centre sites for retail and leisure proposals stating:

"City and town centre sites are the preferred locations for retail and leisure development proposals, where suitable sites or buildings suitable for conversion are available, followed by edge of centre sites, district, and local centres and only then out of centre sites in locations that are accessible by public transport."

The application site is an edge of centre site and therefore the above is applicable.

- 6.18 Saved **Policy R1A** relates to indoor and outdoor sports and recreation facilities and states proposals for new facilities will be permitted within or on the edge of a settlement if they accessible by sustainable modes of transport and there are no significant adverse landscape implications.

Wiltshire Core Strategy (2015)

- 6.19 According to the Proposals, the Site is located within the defined Settlement Boundary of Salisbury, which (under **Core Policy 1** (Settlement Framework Boundary)) is defined as Principal Settlement.
- 6.20 **Core Policy 2** relates development in Wiltshire and strives to make use of previously developed land and re-use of previously developed land to deliver regeneration opportunities.
- 6.21 **Core Policy 36 relates** to existing 'Economic Regeneration' and states regeneration of brownfield sites will be supported in Principal Settlements where the proposals help to deliver the overall strategy and/or enhance the vitality and viability of the town centre by introducing a range of active uses to complement the existing town centre.
- 6.22 **Core Policy 38** relates to 'Retail and Leisure' it states all proposals for retail or leisure exceeding 200 sqm gross floorspace, including extension of floorspace must be accompanied by an impact assessment, demonstrating the proposal will not harm the vitality and viability of nearby centres. All proposals also need to comply with the sequential approach set out in national guidance.
- 6.23 **Core Policy 57** relates to 'Ensuring High Quality Design and Place Shaping' and requires a high standard of design in all new developments and making efficient use of land whilst taking into account the local context and surrounding uses.
- 6.24 **Core Policy 57** also requires that development should ensure the impact on the amenities of existing occupants is acceptable
- 6.25 **Core Policy 61** relates to 'Transport and New Development' it states new development should be located in a place where sustainable transport alternatives are available.

- 6.26 **Core Policy 67** relates to 'Flood Risk' and states measures should be in place to reduce the rate of rainwater run-off and improve rainwater infiltration.

Draft Wiltshire Local Plan

- 6.27 **Policy 67** relates to 'Sequential Test and Retail Impact Assessment' outlines that proposals for Main Town Centre Uses on sites which lie outside of the defined Town Centres (as defined on the Policies Map) must be accompanied by a sequential test. All proposals for retail or leisure uses over 200 sqm gross on sites outside of defined town centres are to be accompanied by a retail impact assessment, which will assess the impact of the proposal on public and private sector investment within centres in the catchment area of the proposal; and the impact of the proposal on town centre vitality or viability, including local consumer choice and trade in the town centre and wider area; and a cumulative assessment of the proposal together with committed and recently completed developments, plus developments under construction.

- 6.28 **Policy 68** relates to 'Managing Town Centres' it outlines Salisbury as a principal settlement in the town centre hierarchy for Wiltshire.

Other Material Planning Considerations

- 6.29 In line with the Town and Country Planning Act 1990 and Planning and Compulsory Purchase Act 2004 there is a requirement to also consider the planning application against all other material planning considerations, whilst the interpretation of specific advice and/or weight to be attached to it should consider the judgements made at a local and national level, including legal challenges as appropriate. In terms of the application of the sequential approach and impact test, this has been clarified through Court judgments and Appeal decisions relating to the creation of development for town centre uses on out-of-centre sites.

Rushden Lakes Decision

- 6.30 This is a Secretary of State decision published June 2014 following a Call-In Inquiry principally held July 2013. It was concerned with proposals for new retail and leisure units and ancillary A3 and hotel in an out-of-centre location.
- 6.31 Whilst much of the debate focused upon the proper interpretation of its catchment (and the extent to which this complied with or indeed prejudiced the spatial planning objectives of relevant LPAs), the other key matters were focused upon the Council's contention that the proposal should be disaggregated and could therefore be easily located upon a more central site, and that there was potential that the proposal could impact upon planned investment.
- 6.32 In terms of identifying an area of search for the sequential assessment, it advises that there is clear merit in identifying a core opportunity area which best represents the opportunity to meet the identified need. Within that area of search, candidate sites must be able to accommodate development of sufficient critical mass to meet that planning purpose. In the properly defined area of search the task is to identify sequentially preferable sites that are suitable and available which necessarily includes consideration of deliverability/viability.

- 6.33 The decision clarifies that the NPPF requires developers to identify the purpose of their proposal and to demonstrate reasonable flexibility in terms of format and scale. This plainly excludes reference to the disaggregation of such proposals and also confirms that the test is to ascertain whether the proposed development can be had on a more central site as opposed to a scheme so considerably amended that it would fail to meet the real-world requirements of the applicant.
- 6.34 In terms of the assessment of what is suitable, it advises: "In similar vein, there is nothing in the sequential test as set out in NPPF that states that the concept of "suitable" sites means suitable in terms of the scale of the nearest centre to the site in question and/or its place in the "hierarchy" of centres. The sequential test relates entirely to the application proposal and whether it can be accommodated e.g. on a town centre site. It is also important to be clear that NPPF is entirely related to plan making and it has nothing to do with decision making"
- 6.35 In terms of matters of scale and catchment, the Rushden Lakes decision concluded that whilst the scheme would draw from an extended area and that there would be resultant impacts, there was a deemed opportunity to provide additional facilities that would make the area more self-sufficient and create sustainability benefits in terms of mileage savings and local employment opportunity.
- 6.36 In terms of planned investment, the decision confirms that whilst it is appropriate and necessary to consider the potential for any proposal to impact upon the delivery of planned investment in centres it must firstly be clear that this alternate development is genuinely capable and have realism of delivery in the absence of the new proposal. Thereafter, it is important to establish the extent to which the proposal would seek to compete with the planning purpose of the deemed planned investment opportunity.

Dundee Decision

- 6.37 This decision of the Supreme Court in March 2012 relates to an appeal by Tesco Stores Limited in Scotland, but has relevance to the application of policy in England and Wales. This appeal was lodged in relation to a planning permission granted to Asda and MacDonald Estates in Dundee. Although focusing on the question of deficiency, the case considered the application of the sequential test and the meaning of 'suitable' in relation to need and alternative sites. It was held in the Judgement that 'suitable' means 'suitable for the development proposed by the applicant', subject to the qualification that flexibility and realism must be shown by developers.
- 6.38 Reference was made in the decision to another case (Lidl (UKGmbH) v Scottish Ministers [2006]), in which Lord Glennie had observed, in relation to the sequential approach, that the question to be addressed is whether an alternative site is suitable for the proposed development, not whether it can be altered or reduced to fit an alternative site. In the case under consideration (the Asda store proposal in Dundee), the assessment, had not been confined to sites that could accommodate the development in the precise form in which it had been designed; but had examined sites that could accommodate a smaller development. Hence, it was considered that flexibility had been demonstrated by Asda/MacDonald Estates through the application process.

7 PLANNING APPRAISAL

7.1 The proposal is to reinstate a mezzanine within Unit 2 for use as part of the ground floor operation for health and fitness use (Class Ed). This section provides an assessment of the development against the relevant Development Plan policies, in respect of:

- Principle of additional health and fitness floorspace
- Environment & Amenity
- Accessibility & Transport

Principle of additional health and fitness floorspace

7.1 The premises has previously been used as a Homesense store. The lawful established use of the premises is Use Class E. The 2020 Use Class Order confirms both retail and indoor sport, recreation and fitness uses fall within Class E. A separate Lawful Development Certificate has been submitted to confirm the lawful use of the existing unit for indoor sport, recreation and fitness on this basis and The Gym Group are to take up occupation of the premises.

7.2 The proposal will assist in bringing this vacant unit back into active and beneficial use, and will deliver increased employment generating floorspace which will enhance an existing use and provide a complimentary facility in an accessible edge of centre location close to other nearby services.

7.3 The Unit previously contained a mezzanine floor, and the proposal seeks to reinstate a small mezzanine of 232 square metres back into Unit 2 for gym use associated with the ground floor operation. Whilst the insertion of a mezzanine with gym uses does not generally require planning permission, as it does not constitute 'Development' within the Act, consent is sought in this instance to address the overall floorspace requirements in Condition 5.

7.4 The NPPF includes a requirement on local planning authorities to plan positively for growth and states that "*Meeting anticipated needs for retail, leisure, office and other main town centre uses over this period are not compromised by limited site availability*". At the heart of the NPPF is a presumption in favour of sustainable development.

7.5 **Paragraph 85** of the NPPF states that "*Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future*".

7.6 **Core Policy 2** and **Core Policy 36** of the Wiltshire Core Strategy (WCS) relates to development on previously developed land and strives for the re-use of existing sites and buildings, requiring development to make use of land previously developed to deliver regeneration.

7.7 Whilst the proposal is in an edge of centre location, it relates to a building in an existing established Class E town centre use at ground floor and is proposed to improve the function and

quality of the health and fitness use of the floorspace, increasing the range and availability of the service that the operator is able to provide to the local community.

- 7.8 **Core Policy 38** relates to retail and leisure uses and in line with the NPPF requires such uses to be located within town centre locations first, then edge of centre. Proposals for new main town centre uses are required to meet the sequential test. In addition, proposals for retail or leisure exceeding 200 sqm gross floorspace, including extension of floorspace must be accompanied by an impact assessment, demonstrating the proposal will not harm the vitality and viability of nearby centres.
- 7.9 The Gym has been looking for an appropriate site within Salisbury for some time. The unit meets their operational needs and is within the appropriate catchment area to meet the requirements of the business and fulfil a gap in existing provision. The additional mezzanine floorspace is proposed to improve the range of facilities on offer and improve the configuration and experience of the health and fitness facility for its users.
- 7.10 The addition of a mezzanine within this health and fitness unit will increase the gross internal floorspace by 232 sq m.
- 7.11 The proposal will retain the existing premises, whilst making improved use of space within the building to provide a complimentary and beneficial use for the local community. The use and additional mezzanine accommodation will support the existing retail park, delivering a new use which provides for the day to day needs of the residents and employees in this area. The proposal complies with Draft Local Plan **Policy 31** which supports the flexible reuse of properties and NPPF **Paragraph 111a** which states policies should support an appropriate mix of uses in an area and the NPPF **Paragraph 135** which states planning decisions should ensure development promotes health and wellbeing.
- 7.12 The nature of the proposal and its requirements, together with its inherent relationship with the ground floor operation as a health and fitness operation, mean that it would not be possible to deliver the additional floorspace in an alternative location. Due to the nature of the use, it is not possible to provide the components (i.e. the gym floorspace, changing rooms and the supporting services area) in separate buildings or locations. It is therefore not feasible to provide the additional mezzanine accommodation within a separate building/facility as the use needs to include all components as a whole to operate, whilst a separate facility would not address the key objective of improving the configuration and offer of the health and fitness premises being provided. The fallback scenario is the occupation of the existing floorspace as a gym within Class E on its own, which would not require planning permission and is a significant material consideration in this case. The proposal will not introduce a new Class E use in an edge of centre location, will remove a potential out of centre retail use and will meet the specific business operations of an identified operator to facilitate the optimal reuse of the premises, providing member and health and fitness benefits. This would not be achieved by locating the new floorspace in another location.
- 7.13 Notwithstanding the above, given that the site is currently identified as being on the edge of the centre, a sequential assessment has been undertaken assessing the properties within the City

Centre which have been reviewed as part of the site search undertaken by The Gym Group in identifying this unit. This has reviewed the availability of properties which could accommodate the total floorspace requirement if the operation.

- 7.14 The assessment is therefore based on the requirement that the scale of the format of the proposed gym needs a total floor area of between 900 and 1,250m². A large regular shaped ground floor area is required of at least 600 sqm to accommodate the main gym use including the gym equipment, which needs to be laid out in a specific way. Support services such as the office and changing facilities can be located on a mezzanine or adjacent level. The Gym Group requires car parking spaces, as well as being close to local bus routes to be appropriately accessible for members.
- 7.15 The assessment has been undertaken adopting the principles of the March 2012 Supreme Court Judgement in the case of Tesco Stores Limited –v– Dundee City Council whereby *"it is the proposals for which the developer seeks permission that has to be considered when the question is asked whether no suitable site is available within or on the edge of the town centre"*. Primary consideration therefore should be given to the commercial ability to accommodate the scheme that the developer has applied for and not any other type of scheme.
- 7.16 The gym must have its own dedicated entrance with a visible street frontage easily identifiable and accessible for visiting members of the public. This is due to the nature of the use and the 24/7 opening hours under which the gyms operate. In addition, sharing an access or reception area with the gym may not be preferable for some neighbouring occupants. For instance an office could consider that the leisure use undermines their professional environment, whilst also creating potential security issues. The proximity of the premises to residential dwellings also needs to be considered given the required 24/7 hours of operation.
- 7.17 The Gym Group work on the basis of providing facilities which are accessible and available to those living and working close to the unit. It aims to provide exercise facilities which can be used on a day to day basis, for those looking for the convenience of a health and fitness facility close to their home or place of work as part of a regular routine. The operation does not include facilities such as swimming pools, sports courts, saunas or cafes, which draw people from a wider area and provide a longer duration of visit. The majority of members that use budget type gyms do so as part of linked trips on their way to and from work or as part of using other facilities, or on foot from their place of employment or home, and as such the use serves local areas and populations. Users are unlikely to travel further to budget gym operations as their key selling point is convenience and cost rather than the range and nature of facilities.
- 7.18 A search for available properties was conducted using Zoopla (zoopla.co.uk/to-rent/commercial), LoopNet (www.loopnet.co.uk) and Right Move (www.rightmove.co.uk/commercial-property-to-let) which are well known and established property databases. In addition, representatives of The Gym Group visited the area on a number of occasions to seek to identify appropriate premises for the provision of a health and fitness facility, and local agents were contacted to identify potential sites. Properties in retail, employment and leisure uses were included in the search parameters.

- 7.19 The NPPF and NPPG state that in reviewing alternative sites, careful consideration should be given to suitability, viability and availability. These are defined as follows:
- Availability – whether sites are available now or are likely to become available for development/use within a reasonable period of time (given The Gym has an immediate requirement this has been taken to include any premises currently available or likely to be available and ready for occupation within 6 months).
 - Suitability – with due regard to the requirements to demonstrate flexibility, whether sites are suitable to accommodate the proposal and meet the established operational parameters.
 - Viability – whether there is a reasonable prospect that development will occur on the site at a particular point in time. Again, the importance of demonstrating the viability of alternatives depends in part on the nature of the proposal and the timescale over which the applicant requires it to be delivered.
- 7.20 The sequential assessment set out in Appendix 1, has identified four potential properties that have been identified within Salisbury City Centre that are of an appropriate size and are available for occupation. However, each of these sites do not meet the operational requirements for the proposed health and fitness operation and is not suitable due to the reasons set out in the assessment. Whilst there are a number of smaller units which are vacant and available within the centre these would not provide the minimum floorspace requirements to accommodate the required operation.
- 7.21 Therefore, the sequential assessment, set out in Appendix 1 of this statement, demonstrates that there are no sites which are available, suitable or viable to accommodate the proposed use within the City Centre, and on the basis that the site sits in an edge of centre, and will reutilise an existing Class E unit, it is demonstrated that the site complies with the policies of the adopted and emerging Development Plan and meets the requirements of the sequential test.
- 7.22 In the absence of any available or suitable premises that meet the operational requirements of The Gym Group the mezzanine is proposed to be installed within the application premises to optimise the operation. The proposal will replace an existing town centre Class E use with another which will support the surrounding business uses and compliment the adjacent retail uses in the retail park. It will remove a potential edge of centre retail use. The site is in an accessible location by foot, cycle and public transport and is compliant with the sequential test and requirements of the NPPF. Furthermore, the reuse and refurbishment of this floorspace and provision of an internal mezzanine within the existing building envelop will optimise the accommodation and function of the site to meet the requirements of the proposed occupier and will result in its beneficial and active reuse providing an enhanced facility that will give opportunities to improve the health, fitness and wellbeing for the surrounding local community.
- 7.23 The potential impact of the proposed development needs to be considered against the existing lawful use of the premises and potential reuse of the current building on site without the need for planning permission. The existing premises is in use as a Main Town Centre use and most recently operated as a retail unit. Class E of the Use Class Order includes a range of uses whereby changes between these uses does not constitute development, including health and fitness.

Therefore, the impact of the development needs to be considered in relation to the application proposal for the increase in the mezzanine only.

- 7.24 In order to assess the potential impact of the proposed mezzanine, it is appropriate to understand the proposed development in the context of existing health and fitness provision and the health of the Town, District and Local Centres in the catchment area. There is no methodology for undertaking a quantitative assessment of leisure impact and therefore the assessment provides a qualitative assessment of the potential impact on vitality and viability, which is appropriate and proportionate to the proposed mezzanine given the current lawful use of the unit for Class E, including health and fitness, and the fact that the proposal therefore does not result in any material change of use.
- 7.25 Assessments of impact need to be based on a direct comparison of facilities and whether there will be direct impacts which might have a detrimental effect on the centre as a whole. The operator in this case is The Gym Group and it is evident to see that there is significant growth in the leisure sector, particularly in 'low cost' health and fitness facilities. Chapter 3 of the Planning Statement includes information on the continued growth of the health and fitness sector and budget gyms in the UK. In addition, the proposal provides an operation which attracts new users with The Gym aimed at increasing access to health and fitness activities to a wider demographic to encourage improved health by providing a low cost and flexible option. On average 35% of The Gym's members have not been to a gym before with The Gym attempting to provide its facilities to a much wider market.
- 7.26 Overall, the key test when assessing impact, is whether the proposal will have a significant adverse impact on a centre as a whole. Individual competition between operators is not the primary consideration, albeit the effect of impact on existing units needs to be considered in terms of the wider effects it will have on the function and health of a defined centre. Impact also needs to be assessed against existing, committed and planned public and private investment in a centre or centres within the catchment area, and impact on vitality and viability. Accordingly, the potential impact of the gym on Salisbury City Centre is considered below.
- 7.27 Salisbury City Centre provides multiple functions, including a range of shopping, recreation, leisure, food and drink functions; as well as being a place of work, a hub for visitors and tourists and a residential location. The Wiltshire Retail and Town Centres Study identifies that almost half (49.5%) of the land use of the city centre is in retail use. Three of the four health and fitness facilities in Salisbury identified by the survey as having the greatest market share (60% overall) were identified as being in out of centre locations, whilst the fourth (the former Sports Direct Fitness) has now ceased trading and closed permanently. The study showed that the centres vacancy level was also below the national average, indicating good health overall of the centre, with the study concluding that it is a healthy and attractive centre. A recent visit to Salisbury City Centre confirmed the centre remains primarily characterised by retail units, with good representation from professional services, food and beverage uses and offices.
- 7.28 It is evident that the principal strength and health of the Town Centre is derived from its primary retail, food and beverage, tourism and office functions, which makes up the majority of the commercial uses within the centre.

- 7.29 Health and fitness uses are not a dominant use within the city centre, with limited gym uses within the centre, as noted in the Retail and Town Centres Study. There is no existing representation by national operators in the city centre boundary and limited independent operations, which include only small scale specialist uses including yoga studio (Rafiki Studios) and pilates (Alison Pilates).
- 7.30 Whilst these operations add to the health, attractiveness, mix of uses and vitality and viability of the centre, the centre is not reliant on such uses for its overall health, vitality and viability. These existing facilities will continue to meet demand from those living and working in and around the City Centre for specialist local and accessible health and fitness centres which meet the day to day needs. The proposal will provide a different form and type of health and fitness use than these premises in the city centre and will serve to meet increasing growth for budget health and fitness facilities providing a greater range of individual exercise equipment and facilities, which is not catered for in the City Centre. The proposed additional floorspace created by the mezzanine accommodation within this application will therefore not result in a diversion of trade from existing city centre health and fitness facilities, given the limited increase in floorspace and the different type and function of facility. Furthermore, this would not impact on the core retail, service, tourism and food and beverage functions within the City Centre or impact on the overall health and vitality of the town centre.
- 7.31 Given the nature and make-up of the uses within the centre; and the good health, vitality and viability of the centre; the city centre will continue its role and function in terms of being a main centre for retail and service functions to a wide community. The proposal would not have a significant adverse impact on the vitality and viability of the centre as a whole, and the proposal would not impact on the principal functions which make up the health of the centre in terms of retail and service uses. Salisbury City Centre will continue its role in terms of being the principal centre for retail and service functions to the wider community, and the proposal will not affect the overall function, or vitality and viability of this centre.
- 7.32 The proposal will also not impact on public and private sector investment planned for the City Centre. The Salisbury Central Area Framework (CAF) provides a number of opportunity areas as follows:
- Chequers – identified for residential, art, culture, retail, hotel and food/beverage uses. This area includes the Salt Lane and Brown Street car parks.
 - Fisherton Street – upgrading of the public realm.
 - The Centre – concentrating upon opportunities for new retail provision
 - The Maltings and cultural quarter – opportunities to improve the city centre’s cultural offer and the evening food and drink economy.
 - The Meadows – improvements to the city centre’s connectivity.
 - Churchfields – enhanced employment opportunities.
 - The Station area – new built commercial and hotel uses.

- Cathedral Close – improved connections with the rest of the city centre.
- Castle Street North – new residential accommodation.

- 7.33 It is evident that none of the current plans and future opportunities within the centre are focussed on or anchored by a new health and fitness facility, and the proposed small scale additional floorspace proposed by the mezzanine in this application would not impact on wider funding and investment decisions related to larger regeneration plans for the City. Furthermore, given the primary retail function of the City Centre, the removal of a large scale retail premises from an edge of centre location has the potential to improve the vitality and viability of the centre by removing a competing retail use, and ensuring that new retail uses are focussed to the areas of regeneration and improvement proposed within the City Centre.
- 7.34 The proposed mezzanine to this health and fitness premises will assist in delivering improved health and fitness facilities, providing a use to support the day to day needs of the local population. The proposal will reduce the need to travel for the local community to access facilities and encourage trips to the nearby city centre – increasing opportunities for use of other services and facilities. The proposal removes a retail unit from edge of centre which supports the delivery of retail within the city centre, adding to the vitality and viability of the centre. The addition of a mezzanine provides additional floorspace to the site for health and fitness use, providing an opportunity to improve health, fitness and wellbeing of the local community.
- 7.35 In conclusion, the proposed additional of the mezzanine to the gym will not result in a significant adverse impact on the vitality and viability of the centres in the catchment and will not impact on the ability of these centres to attract appropriate future investment. On this basis the scheme complies with the NPPF and the Development Plan in respect of addressing the sequential assessment and impact test, and the proposed additional floorspace is appropriate in this edge of centre location which supports existing town centre uses.

Environment & Amenity

- 7.36 The proposed extension of the existing use with the installation of the mezzanine floorspace represents sustainable development through the reuse of a vacant property, making use of embodied carbon and optimising the existing building envelop without the need for any external alterations or extensions, and not impacting on the amenity of adjoining occupiers, or residents within the wider area.
- 7.37 The proposal will follow the management and operational controls that will be in place for the ground floor operation as a gym. There will be no changes to access arrangements and no new openings that would allow any noise breakout from the unit. The site is located within a commercial area with no residential uses adjacent.
- 7.38 The site is located in a largely commercial location, with residential properties located in the wider area. The closest, most affected residential receptors are 2 Meadow View and Avon Reach Flats, located approximately 70m and 85m respectively from the building's façade.

- 7.39 As part of the application, acoustician's Air and Acoustic Consultants Limited have been commissioned to assess the potential noise impact of the proposed 24/7 operation of Unit 2 as a gym. An assessment of operational noise associated with gym activity has been conducted in line with the existing acoustic environment. The assessment concludes that activity noise breakout from the gym will be controlled to significantly below the existing background (LA90) noise level at surrounding residential receptors at all times of day and night. The proposed mezzanine will have no material impact on any sensitive receptors in the area.
- 7.40 The report therefore concludes that it is considered that noise breakout from 24/7 operations of the gym use represents a negligible risk of impact where no further mitigation measures would be required.
- 7.41 The fit out of the extended gym area will include the use of flooring material across the gym floor area, which provides sound insulation for equipment and reduces impact sound to ensure noise is contained within the unit. The structure of the mezzanine and proposed noise insulation measures will provide appropriate sound insulation for the areas used for cardio vascular equipment and restrict the transfer of noise into the existing building's structure.
- 7.42 In terms of the operation of the gym facility itself, audio / visual equipment is placed on anti-vibration mounts, with volume limiters on all equipment to restrict sound to an acceptable level. The volume limiter is kept in a secure area of the gym to ensure that this cannot be interfered with. Audio / visual equipment in the gym is limited to a small number of units which are located around the building to avoid hotspots of noise. These are kept to a minimum noise level, enabling members to utilise headphones.
- 7.43 Due to the operational and management controls and mitigation measures the extension of the existing gym within the existing building envelop will maintain the amenity of occupiers within adjacent units, and those in neighbouring buildings. The Gym Group are a considerate and conscientious operator who rely on the local population for a considerable element of their membership and as such take their responsibility to the local environment and surrounding occupiers very seriously to ensure that disturbance does not occur.
- 7.44 The proposal does not require any external works, with no new openings proposed, and no change to the building envelop. As such the proposal will not impact on the surrounding occupiers amenity in terms of loss of light, impact on outlook or loss of privacy.
- 7.45 Overall, the nature of the operation, together with the mitigation and management measures ensure that the additional floorspace will not result in unacceptable impacts on adjoining and surrounding occupiers or the local environment.

Transport & Parking

- 7.46 The unit is in an accessible location by foot and cycle from the surrounding retail units, town centre and the wider business and residential areas. The property can be accessed via the dedicated footway and cycle way immediately to the front of the unit from the town centre and surrounding residential communities, complying with **Core Policy 61** of the Local Plan. Changing, shower and locker facilities are provided within the unit to encourage active travel to

the site. The site is also well connected by public transport, with the nearest bus stop only 250 metres from the unit on Castle Roundabout, a circa. 7 minute walk to the east.

- 7.47 The Gym Group attracts clientele which are usually based locally and are likely to go to the gym on foot or cycling from home or place of work, or as part of utilising other services and facilities within the wider commercial area.
- 7.48 There are adequate car parking spaces within the car park serving the retail park. The shared car park facility will continue to be available for members of The Gym Group and provides adequate car parking to cater for the proposal, which has different peak hours of operation compared to the current and adjacent retail uses.
- 7.49 The proposal to increase the size of the mezzanine is to provide an improved layout and configuration of the equipment and facilities. As such the proposal will not generate increased staffing requirements or result in a significant increase in trips from users to the premises over and above that which the existing floorspace will generate.
- 7.50 The proposal will replace a Class E retail use and will have use of the parking spaces previously occupied by the staff and visitors of that use. Any additional usage and vehicle trips that are associated with the extended gym will be spread more throughout the day than a retail use and given the 24/7 hours of operation. The level of car parking on site remains sufficient to cater for the increase in the size of the gym use and as a result the proposal will not affect the operation and safety of local highways.
- 7.51 The additional floorspace will not result in additional servicing. There is no towel provision on site so no requirement for laundry deliveries. The only regular servicing is by transit sized vans on a weekly basis of vending products, this will be unchanged as a result of the additional floorspace at mezzanine level. Waste production is low due to the nature of the use, with some recycling storage of plastic water bottles and small amounts of admin waste. However, members are encouraged to bring their own water bottles to reduce the requirement for single use plastic bottles, which limits the waste produced and this will be able to be addressed through the existing collections. Therefore, there will be an overall reduction in servicing compared with the former retail use with the removal of the regular deliveries and refuse collection associated with the retail use.
- 7.52 The proposal will not result in a material change in conditions on the local highway and transport network as a result of the addition of the small mezzanine proposed to Unit 2. As such, the proposed use will have no harmful impact in relation to transport and will not result in a severe impact on existing highway capacity or safety, meeting the NPPF and Local Plan policy requirements.

Flood Risk

- 7.53 The proposed mezzanine will not result in an increase in the level of flood risk associated with the use.

- 7.54 The site is located within Flood Zone 2, however the proposal does not include any changes to the building envelope or hardstanding.
- 7.55 The site represents an existing building, the proposed mezzanine does not increase impermeable areas, will not increase the vulnerability to flooding, or the risk of flooding on or off-site. There are no changes to the ground floor, site access and building entrance. On this basis the addition of a mezzanine to the existing building is compliant with the requirements of the Local Plan and NPPF in respects of flood risk.

8 CONCLUSIONS

- 8.1 This planning statement is submitted on behalf of The Gym Group in support of the application to reinstate a small mezzanine within the building as part of the use of the premises as a health and fitness facility. The additional mezzanine floorspace is proposed to improve the range of facilities on offer and improve the configuration and experience of the health and fitness facility for its users. This unit previously contained a mezzanine floor prior to refurbishment and reconfiguration of Units 1 and 2, this proposal includes a proposal to reinstate the mezzanine accommodation into Unit 2 to improve the health and fitness use and facilities available to the local community.
- 8.2 The existing unit is within retail use in Class E, however the former occupier has vacated. The Gym Group are to take over to the operation of the unit as a health and fitness use within Class E. The proposal will assist in making beneficial and active reuse of this vacant floorspace and enable the health and fitness use to provide improved facilities to support the health, fitness and wellbeing of workers and residents in the local area, optimising the use of the premises and generating new employment. The proposal therefore represents sustainable development in this renewal area and will meet the objectives of the NPPF and Local Plan policies.
- 8.3 The proposal to install a mezzanine floor relates to an existing premises and occupation of the ground floor by The Gym Group. It is not feasible to separate out elements of the use onto different sites or premises in different locations. The sequential assessment looked for properties within Salisbury City Centre and demonstrated that there are no available premises within the City Centre that are suitable or viable to accommodate the overall operation and meet the requirements of the proposal. The use will replace an existing main town centre Class E use in an accessible location, remove an edge of centre retail use and will compliment the surrounding business and service uses adjacent, and the town centre adjacent.
- 8.4 The mitigation measures incorporated into the building fit out, together with the operational and management controls, will ensure that the additional mezzanine floorspace will be no unacceptable impacts in terms of noise on adjoining and surrounding occupiers or the local environment.
- 8.5 Overall, the proposed installation of a mezzanine will have a positive impact on the local area. It will support and assist bringing this vacant unit back into beneficial use and will improve the facilities within the existing envelope of the building. The proposals are in line with local planning policies and will provide improved facilities for health and fitness facilities for employees and residents in this area, as well as generating employment and new economic investment. The proposal represents sustainable development, optimising the use of the existing property an providing a use that will generate greater opportunities to improve health and wellbeing. We therefore respectfully request that the Council grant planning permission for the proposed installation of the mezzanine accommodation.

Appendix 1 – Sequential Assessment

Property address	Town Centre	Assessment
Fisherton Mill, 108 Fisherton Street, Salisbury, Wiltshire, SP2 7QY 	Yes	For Sale Gallery/Café/Studios and top floor flat. Whilst the total floorspace available would meet the minimum requirement, due to the site being an old mill, the accommodation is split throughout a number of small rooms, as well as being located over multiple floors. The accommodation available therefore does not provide a single floorplate capable of accommodating the gym use, whilst the limited floor to ceiling heights and floor loadings would not facilitate a gym use. The building does not provide sufficient available space in a configuration required to accommodate the proposed use and does not provide suitable accommodation. The property is therefore not sequentially preferable. As the property is for sale only it is not viable for the proposed occupier. The occupier is an operator and does not hold or have access to the level of finance and funding required to purchase the property freeholds.
Queen Street, Salisbury, 	Yes	Various office units within the building are available however these are located over a number of floors. The accommodation is split over multiple units and floors and does not provide a single floorplate capable of accommodating the gym use, whilst the floor loadings would not facilitate a gym use. The building does not provide sufficient available space in a configuration required to accommodate the proposed use and does not provide suitable accommodation. The property is therefore not sequentially preferable.

Property address	Town Centre	Assessment
36 Blue Boar Row, Salisbury, Wiltshire SP1  1017 sqm	Yes	Former Restaurant/Bar Grade II Listed Building Listed Historic Building. The accommodation available does not provide a single floorplate capable of accommodating the gym use, whilst the limited floor to ceiling heights and floor loadings would not facilitate a gym use. The listed building contains various historic internal features, which would require removal and adaptable to enable a gym use. The building does not provide sufficient available space in a configuration required to accommodate the proposed use and does not provide suitable accommodation. The property is therefore not sequentially preferable.
Warner House, 123 Castle, Salisbury, SP1 3TB 	Yes	Refurbished office space, space available in 7 different units, over 3 floors. The whole building covers 4 floors. The accommodation available is situated in different units positioned across different parts and floors of the building. The property does not provide a single floorplate capable of accommodating the gym use. The building does not provide sufficient available space in a configuration required to accommodate the proposed use and does not provide suitable accommodation. There is also only a shared entrance, which would not provide the required separate access for visiting members of the public to the gym operation and facilitate 24/7 hour use. The property is therefore not sequentially preferable.