

**127a Loverock Road, Stadium Way,
Reading, RG30 1DZ**
Planning Statement

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July 2023

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1. Introduction

1.1.1. This Planning Statement has been prepared by PMV Planning on behalf of Hathaway Opportunity Fund GP Ltd in support of an application seeking full planning permission for temporary change of use of the site to enable its use for open storage for a temporary period (use class B8).

1.1.2. The application is submitted to the Reading Borough Council (LPA) as part of the application submission for the following:

“Temporary change of use to open storage (Use Class B8) for up to 5 years, with associated works”

1.1.3. The Planning Statement assesses the proposed scheme against the adopted development plan and any other material planning considerations.

1.1.4. This Planning Statement should be read in conjunction with other supporting information submitted which comprises;

- Location Plan;
- Block Plan;
- Existing and Proposed site plans;
- Transport Assessment as approved;
- Arboricultural Assessment as approved; and
- Contamination Assessment as approved.

1.1.5. The remainder of the Planning Statement is set out as following:

- **Section 2** describes the development site, site designations and planning history;
- **Section 3** describes the proposed development;
- **Section 4** sets out the relevant planning policy framework
- **Section 5** assesses the proposed development; and
- **Section 6** sets out our summary and conclusions.

2. Site and Surroundings

The Application Site and Surrounding Context

- 2.1.1. The application site is approximately 0.39 ha in size and is located on Stadium Way, within Reading. The site is bounded by the Great Western railway line to the north (running on an embankment), Wigmore Lane to the east, and industrial units to the west and south.
- 2.1.2. The site comprises a series of industrial buildings which utilitarian in nature, designed with a brick construction. To the front of the existing building lies areas of hard surfacing to form car parking for both employees based at the site and operational staff who might be visiting from other locations.
- 2.1.3. The site is located within the Stadium Way Industrial Estate, which plays an important part in meeting employment needs. The overall character of the area is therefore a mix of industry and commercial activity with neighbouring buildings constituting notably different scales, forms and appearances in terms of architectural language.
- 2.1.4. There are residential areas outside of the industrial area, with the closest to the site being the residential properties located south of Wigmore Lane approximately 300m from the application site.
- 2.1.5. The site has good public transport access. Reading station is located within approximately 3.7km of the site and includes the Elizabeth Line providing direct links to central London as well as Great Western Railway trains services providing links across the UK. The Cold Store bus stations are located within 0.48km of the site.
- 2.1.6. The site is not listed and there are no listed buildings in the immediate surrounding area nor is the site located within a conservation area. The site is located within Flood Zone 1 which has the lowest probability of flooding.
- 2.1.7. From a planning perspective, the site is located within the Portman Road Core Employment area and located within an Air Quality Management Area.

Planning History

- 2.1.8. The site has a history of industrial use and the existing use of the site is class B2/B8. The recent planning history of the site relates to the demolition of the existing buildings including the removal of telecoms plant and replacement with new single unit for B1c, B2 and B8 use classes with ancillary offices (LPA ref. 190591). This application was approved on 29 April 2020 and has been implemented.
- 2.1.9. All pre-commencement planning conditions associated with the permission were discharged in relation to demolition, contamination and remediation, Construction Method Statement, Arboricultural Method Statement and Tree Protection Plan, SUDS, Sustainability and Energy.

3. The Proposal

3.1.1. As noted in the introduction, the proposed description of development is as follows:

“Temporary change of use to open storage (Use Class B8) for up to 5 years, with associated works”

3.1.2. Planning permission 190591 has been implemented and all pre-commencement conditions have been discharged. However, the current economic climate presents significant challenges for the construction industry and the immediate delivery of the proposed scheme at Loverock Road.

3.1.3. High inflation rates are driving up the costs of materials and labour and there are significant material shortages. Furthermore, maximum rents are capped by the market and do not justify the high construction costs to complete the development at this time. As such, it is not an appropriate period to build out the new units as approved under planning permission 190591.

3.1.4. To allow for the market to regain stability, this proposal seeks to make the best use of land in a sustainable location and respond to a market requirement for open storage. The application seeks to temporarily change the use of the site to open storage (Use Class B8). This will enable a meanwhile use on the site, to allow the market to become less volatile and ultimately deliver the implemented scheme in the near future. The meanwhile use for B8 storage will enable some revenue to be achieved by the owner, once the site has been cleared.

3.1.5. The application site comprises existing hard surfacing which is all broadly level. No building works are proposed for the current application.

3.1.6. The key components of the proposed development comprise:

- This application seeks to promote the efficient use of underutilised land;
- It will create an operational use, provide new job opportunities, and will maximise the economic contribution made by the site in the short term;
- It will reuse a brownfield site which by definition is a sustainable form of development;
- The use proposed is temporary and will be removed after five years and will therefore not prejudice the development of application ref. 190591;
- It will have no material impacts on trip generation or highway safety; and
- The proposed storage use will have no adverse impacts nearby residential amenity.

3.1.7. Whilst the end user is unknown at this stage, the site will be let as an open storage use and will not be occupied to store any hazardous materials, waste or chemicals on site. Users that have the potential to contaminate or cause chemicals to enter the existing drainage network will be excluded from using the site and this can be secured by way of planning condition.

4. Planning Policy Context

- 4.1.1. In this section, we identify the planning policies that are most relevant to the determination of this planning application and that form the basis for the assessment in section 5.

National Planning Policy Framework

- 4.1.2. The revised National Planning Policy Framework (NPPF) was published on 24 July 2018 and was updated on 19 February 2019 and on 20 July 2021. This sets out the government's planning policies for England and how these are expected to be applied. The national planning guidance (NPPF) provides guidance on how the policies should be applied.
- 4.1.3. Both the NPPF and NPPG are important material considerations in the determination of planning applications. Central to the NPPF is the presumption in favour of sustainable development in paragraph 11. It advises that, for decision-taking, this means approving development proposals that accord with the development plan without delay.
- 4.1.4. At the heart of the NPPF is the presumption in favour of sustainable development and in accordance with paragraph 11, proposals that accord with the development plan should be approved without delay.
- 4.1.5. Paragraph 8 states that achieving sustainable development means the planning system has three overarching objectives, an economic, social and environmental objective. The economic objective seeks to build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity.
- 4.1.6. Paragraph 10 states that, at the heart of the NPPF, is the presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking.
- 4.1.7. Paragraph 81 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.

Statutory Development Plan

- 4.1.8. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 4.1.9. The relevant Development Plan for the site determination of this planning application comprises the Reading Borough Local Plan.
- 4.1.10. The following policies are of most relevance to the planning application
- Policy CC1 Presumption in favour of sustainable development;
 - Policy EN14 Trees, Hedges and Woodland;
 - Policy EN15 Air Quality;
 - Policy EM1 Provision Of Employment;

- Policy EM2: Location of New Employment Development;
- Policy TR3: Access, Traffic and Highway-Related Matters;
- Policy TR5: Car and Cycle Parking And Electric Vehicle Charging;
- Policy EN16: Pollution and Water Resources; and
- Policy EN18: Flooding and Drainage.

4.1.11. The development proposals have been prepared in accordance with the policies outlined above. This statement demonstrates compliance with all relevant aspects of the Development Plan.

5. Planning considerations

- 5.1.1. This section identifies the key planning considerations relating to the scheme and assesses the proposed development in the context of relevant national and local planning policy and other material consideration.

Principle of development

- 5.1.2. The proposed scheme will enable the site to make efficient use of under-utilised land whilst the market recovers and the scheme approved under planning permission 190591 can be built out. The temporary change of use will create jobs, on what would otherwise be an unused brownfield site, thus providing local employment opportunities.
- 5.1.3. Paragraph 81 of the NPPF states that decisions should help create the conditions in which businesses can invest, expand and adapt and that significant weight should be placed on the need to support economic growth and productivity.
- 5.1.4. Local Plan Policy EM1 supports new employment development and Policy EM2 sets out that major employment uses, including industrial and storage and distribution will be located in the A33 corridor or in the Core Employment Area such as the Portman Road Employment Area.
- 5.1.5. Today, the open storage market has grown in prominence and importance over the last five years. COVID-19 has accelerated the need for well-located efficient logistics space to serve the needs of an increasingly online economy. To support this, there has been an increased reliance on logistics facilities and open storage. In response to this, the application seeks to make efficient use of an under-utilised site to create a facility for open storage use.
- 5.1.6. The open storage market is a key driver and facilitator of the logistics sector, which has grown in prominence and importance over the last 5 years.
- 5.1.7. Indeed, COVID-19 and, in part, Brexit has accelerated the need for well-located efficient logistics space to serve the needs of an increasingly online economy. The pandemic in particular demonstrated that industrial and logistics facilities are a key component of the nation's critical infrastructure.
- 5.1.8. To support this, logistics facilities (and facilities such as open storage sites which facilitate the sector) are vital to ensuring the timely delivery of goods across the UK. The increasing reliance on deliveries, HGV parking, and last-mile delivery services means that the ability for warehousing and logistics facilities to process more goods more quickly is of precedence, meeting not just local demand but also servicing national and international interests. Open storage facilities can play a critical role in achieving this.
- 5.1.9. The open storage sector's Gross Value Added (GVA) generated by the logistics sector to the national economy was at a 10-year high in Quarter Four of 2021. This was greater than the pre-pandemic performance and shows a continued upward trend.
- 5.1.10. Through reviewing data collected by Carter Jonas¹ there has been a 315% increase in the last two years of open storage sites. In 2019, a total of 312 acres of open storage sites were

¹ <https://www.carterjonas.co.uk/commercial/research/open-storage-update/mar-2022#:~:text=Demand%20for%20open%20storage%20has,over%20the%20last%20two%20years.>

identified, which increased to a total of 537 acres in 2020 and a total of 1,294 acres in 2021.

- 5.1.11. The scheme would generate new employment in the short term. The derived employment (and GVA) impact of an open storage site as a facilitator for business in other sectors such as transportation, storage and distribution can be expected to be significant. As it is becoming much better known given the strong market and importance, B8 uses have high potential for wider chain and indirect job creation. As such, there are clear economic benefits associated with open storage, and the continuation of open storage on this site will improve the local and national economy and will provide additional local jobs, on an otherwise vacant site.
- 5.1.12. Therefore, the scheme will significantly contribute to Reading's economy and will provide a local economic base in Reading. Therefore, the proposed development fully complies with the NPPF, and Policy EM1 and EM2.

Transport and Parking

- 5.1.13. The NPPF outlines that transport policies have an important role to play in facilitating sustainable development, but also in contributing to wider sustainability and health objectives. In considering developments that generate significant amounts of movements, local authorities should seek to ensure they are located where the need to travel will be minimised, and the use of sustainable transport modes can be maximised.
- 5.1.14. In determining planning applications, the NPPF at paragraph 111 states that development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are "severe".
- 5.1.15. Local Plan Policy TR3 sets out that development will only be permitted where the development would not have a material detrimental impact on the function the transport network, proposals would not be detrimental to the safety of users of the transport network, including pedestrians and cyclists, and that the proposal would not generate regular movement of heavy goods vehicles (HGVs) on unsuitable roads, or on roads without easy access to the Classified Highway Network.
- 5.1.16. A Transport Assessment prepared by Milestone Transport Planning was submitted to support application 190591 and is resubmitted to support this application. This Transport Assessment is still relevant for the purposes of this application. Based on the findings within this Transport Assessment and in the context of the guidelines within paragraph 111 of the NPPF, it is considered that there are no residual cumulative impacts in terms of highway safety on the operational capacity of the surrounding transport network and therefore planning permission should not be refused on transport grounds.
- 5.1.17. Parking standards within Reading Borough Council's (RBC) Revised Parking Standards and Design (2011) are based on a four-zone system whereby the application site falls within Zone 3 which is considered as being the 'Secondary Core Area – with a variety of land uses'. For a 'Storage and Distribution' use the standards state one car parking space per 150sqm.
- 5.1.18. The site will be a cleared site utilised for storage. There is not currently a tenant identified and therefore the operation at the site has not been confirmed. It is anticipated that given the temporary use, a planning condition on parking numbers and layout could be applied to any consent.
- 5.1.19. Given the temporary nature of the proposals, it is not anticipated that the scheme will deliver any cycle spaces.
- 5.1.20. Due to the temporary nature of the application, providing electric vehicle parking spaces is not considered appropriate in this instance.

Noise

- 5.1.21. The existing background noise level is largely dominated by the noise generated by the wider industrial site. The site has a history of being as an industrial use, therefore, there is an existing precedent and in this context the application site should be considered appropriate to continue to operate as a commercial use.
- 5.1.22. The potential noise generating elements of the development such as the manoeuvring of HGVs and unloading/loading of delivery vehicles will not cause significant levels of noise over and above what is to be expected of a light industrial use. The nearest residential properties are located over 300m to the south of the site and are separated by an existing industrial unit and Portman Road.
- 5.1.23. Therefore, there will be no significant noise impacts and the proposals comply with the development plan.

Flooding and drainage

- 5.1.24. Local Plan Policy EN18 sets out that development will be directed to areas at lowest risk of flooding.
- 5.1.25. The application site is located within Flood Zone 1, which has the lowest probability of flooding as it has been assessed as having a less than 1 in 1,000 annual probability of river or sea flooding (<0.1%). In addition, the application site has a very low risk of surface water flooding. Furthermore, the site has a very low risk of sewers and groundwater flooding and there is no risk of infrastructure failing flooding.
- 5.1.26. Following demolition of the existing buildings (as approved under planning permission 190591), the application site will comprise an area of hardstanding and the proposals would not result in any additional impermeable areas being built. The end user is not yet known and as such the resultant site layout has not been fixed at this stage. There has been no recent history of surface water flooding at the site and therefore utilising the existing surfacing of the site is acceptable and will not increase the risk of flooding.
- 5.1.27. Given the temporary nature of the proposed development, implementing SuDS is not considered necessary. The proposed development will not result in an increase in flood risk and therefore, the proposed development complies with Local Plan Policy EN18 and the NPPF.

Contamination

- 5.1.28. The site has a historical industrial use and associated contamination. This has been dealt with in advance of the clearance of the site through the existing planning permission and conditions at the site. Indeed pre-commencement condition 5 of permission ref 190591 required the submission of a Contamination statement, prepared by HESI has removed any concerns of contamination at the site.
- 5.1.29. The proposal does not include any groundworks and therefore no further work on contamination is required in line with Policy EN16.

6. Conclusions

6.1.1. The proposed development seeks approval for:

“Temporary change of use to open storage (Use Class B8) for up to five years, with associated works”

6.1.2. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires proposals for new development to be determined in accordance with the development plan unless material considerations indicate otherwise. The Planning Statement has addressed relevant planning considerations and provided evidence to help determine this application.

6.1.3. To allow for the market to regain stability, the proposal seeks to make the best use of land in a sustainable location and respond to a market requirement for open storage. The application seeks to temporarily change the use of the site to open storage (Use Class B8), and this permission would be implemented following the demolition of the existing buildings on site as approved under planning permission 190591.

6.1.4. The scheme delivers the following the planning benefits:

- This application seeks to promote the efficient use of underutilised land;
- It will create an operational use, provide new job opportunities, and will maximise the economic contribution made by the site in the short term;
- It will reuse a brownfield site which by definition is a sustainable form of development;
- The use proposed is temporary and will be removed after five years and will therefore not prejudice the development of application ref. 190591;
- In the same way, it will have no material impacts on trip generation or highway safety; and
- The proposed storage use will have no adverse impacts nearby residential amenity.

6.1.5. This is a substantial list of planning benefits. In addition, there will be no detrimental impacts associated with the development, and the proposal is entirely appropriate for the site and its surrounding location. The proposal is compliant with both national and all relevant policies of the adopted development plan. As such, the presumption in favour of sustainable development should be applied and the scheme therefore fully justifies the grant of planning permission.