

Our ref: TR/CW/Q100647
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Date: 7th July 2023



Development Management
Reading Borough Council
Civic Offices
Bridge Street
Reading
RG1 2LU

Submitted via Planning Portal (PP-12262630)

Dear Sir / Madam,

Town and Country Planning Act 1990 (as amended)
Proposed Development at Brunel Retail Park, Rose Kiln Lane, Reading, RG2 0HB
On behalf of MCTGF Trustee 1 Limited and MCTGF Trustee 2 Limited as Joint
Trustees for the Mayfair Capital TGF Jersey Property Unit Trust (c/o Mayfair
Capital Investment Management and Westmount Real Estate)

We are instructed by our client, MCTGF Trustee 1 Limited and MCTGF Trustee 2 Limited as Joint Trustees for the Mayfair Capital TGF Jersey Property Unit Trust (c/o Mayfair Capital Investment Management and Westmount Real Estate) ('the Applicant'), to submit the enclosed planning application in relation to Brunel Retail Park, Rose Kiln Lane, Reading, RHG 0HS ('the Site'). Specifically, full planning permission is sought for the following proposed development:

"Amalgamation and change of use of Units 7, 8, 9, 10 and 11 from Class E to Class B8; associated external works including reconfiguration of car park and cycle parking and landscaping works".

The application has been submitted alongside the following documents and drawings in line with Reading Borough Council's ('RBC') validation requirements:

- **Requisite Application Form, duly completed;**
- **Certificate B and Agricultural Holding Certificate;**
- **Community Infrastructure Levy Additional Questions Form, duly completed;**
- **Site Location Plan (dwg. LP01 C);**
- **Transport Statement, prepared by TTP Consulting;**
- **Travel Plan, prepared by TTP Consulting;**

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- Sustainability & Energy Statement, prepared by Envision;
- Tree Survey Report, prepared by Encon Associates;
- Landscaping Scheme, prepared by Encon Associates; and
- Existing and proposed planning drawings, prepared by Mountford Pigott:

Drawing Title	Drawing No.	Scale
Proposed Site Plan	P01 D	1:500 @ A1
Proposed Ground Floor Plan	P02 D	1:200 @ A1
Proposed Elevations	P04 B	1:200 @ A1
Proposed Roof Plan	P05 A	1:200 @ A1
Existing Site Plan	X01 C	1:500 @ A1
Existing Ground Floor Plan	X02 B	1:200 @ A1
Existing First Floor Plan	X03 A	1:200 @ A1
Existing Elevations	X04 A	1:200 @ A1
Existing Roof Plan	X05 A	1:200 @ A1

1 Introduction

Brunel Retail Park ('the Retail Park') is an established retail destination located to the south of Reading Town Centre. The Retail Park measures at 3.6 hectares and comprises 14,755 square metres (gross internal area) of retail floorspace at both ground and mezzanine level, in the form of 13no. units.

The Applicant has been undertaking an ongoing review of future options for this part of the Retail Park. Following interest from self-storage operators, this proposal looks to secure the necessary planning permission to facilitate this land use (Class B8) within combined units 7, 8, 9, 10 and 11. The units are currently vacant – save for Unit 11 which is occupied by Costa Coffee – meaning the application will increase the likelihood of the space being brought back into full economic use.

The application is progressed on this basis.

2 Site & Surrounding Area

A Site Location Plan (dwg. LP01 C) is appended as **Document 1**. The Site forms part of Brunel Retail Park which is an established Retail Park located to the south of Reading Town Centre.



The Site is bound to the north and south by commercial properties. To the east is the remainder of the Retail Park (i.e. Units 1, 2, 3a, 3b, 4, 5 and 6) which is now fully occupied. The River Kennet which runs in a broadly north-south orientation is located to the west of the Site and beyond that is the A33 which provides access to the M4. The closest residential receptors to the Site are located circa. 200 metres to the south west on Greenham Avenue.

The Site measures at 0.65 hectares and currently comprises 4,175 square metres (Gross Internal Area) of retail floorspace at both ground and mezzanine level, across 5 retail units. A schedule of existing floor areas is provided below.

Unit Number	Existing Occupier	Ground Floor Area (GIA) (sqm)	Mezzanine Floor Area (sqm)
7	Vacant	910	n/a
8	Vacant	1885	303
9	Vacant	458	362
10	Vacant	94	n/a
11	Costa	163	n/a
Total		3,510	665
Total Floorspace		4,175	

All of the units at the Retail Park operate under Class E, including retail and café / restaurant.

The Site is accessed via Rose Kiln Lane, via a 4-arm roundabout junction. Access to the service yard to the rear of the Site is taken via a priority-controlled junction on Gillette Way. For the wider Retail Park, there is currently parking for up to approximately 451 vehicles, split each side of the principal access way. There is also designated staff car parking and additional retail external compounds.

According to the Environment Agency, the Site sits within Flood Zone 1 (land least at risk of flooding). The Site is not within a Conservation Area. There are no listed buildings or structures on or adjacent to the Site. There is a Tree Protection Order (TPO) located at the northern boundary of the Site which protects 1 no. tree along the site frontage at on Rose Kiln Lane. The TPO reference is 118/05.

The Site is located adjacent to an Air Quality Management Area (AQMA).

3 Planning History

There is an extensive planning history at the Retail Park which is summarised below.



- **December 1994** – planning permission ref. 94/00442/FD permitted the erection of a non-food retail warehouse (A1) with ancillary service area and car parking for 500 cars.
- **July 2021** – planning permission ref. 201853 permitted the demolition of existing buildings, erection of 2no. buildings for use within Classes E(g)(iii), B2 and B8 along with access and servicing arrangements, car parking, landscaping and associated works. This application permitted the phased implementation of a wholesale redevelopment scheme providing 2 no. industrial units.
- **July 2021** – planning permission ref. 201842 permitted the continued use of Units 1, 2, 3a, 3b, 4, 5 and 6 within Class E following consolidation of the Retail Park. This application permitted amendments to the western retail terrace which was to be retained in the event that only Phase 1 of the industrial scheme (approved under ref. 201853) was implemented.
- **March 2022** – planning permission ref. 220018 permitted external works at Unit 4. This application allowed Home Bargains to occupy Unit 4/5.
- **July 2022** – planning permission ref. 220145 permitted the continued use of Units 4 and 5 within Use Class E(a). This application allowed Home Bargains to occupy Unit 4/5.
- **July 2022** – planning permission ref. 220132 permitted external works at Unit 3a/3b. This application allowed B&M to occupy Unit 3a/3b.
- **September 2022** – planning permission ref. 220110 permitted non-material amendments to Condition 12 and 14 of planning permission 131106 to change the range of goods being sold in Units 3a, 3b and 7. This application allowed B&M to occupy Unit 3a/3b.

There is no other planning history of relevance. A copy of the Decision Notices are enclosed as **Document 2**.

4 Proposed Development

This application proposes the following development:

“Amalgamation and change of use of Units 7, 8, 9, 10 and 11 from Class E to Class B8; associated external works including reconfiguration of car park and cycle parking and landscaping works”.

It is proposed that Units 7, 8, 9, 10 and 11 are to be amalgamated into a single unit to facilitate potential use for self-storage which requires a Class B8 use. A series of external alterations are also proposed, as summarised below.



Northwest (Front) Elevation

- Existing shopfront glazing retained with spandrel infill applied behind entrance doors;
- Installation of 2no. roller shutter doors;
- Existing shopfront entrance and glazing retained with decorative graphics applied; and
- Installation of new single MoE door with side panel to infill.

Southeast (Rear) Elevation

- Installation of new single MoE door with side panel to infill;
- Installation of new PPC aluminium window; and
- Existing double service doors removed and infilled with cladding to match.

East (Side) Elevation

- Installation of new PPC aluminium window; and
- Existing cladding removed and replaced with new shopfront with integrated door and glazed spandrel panels.

Reconfiguration of the existing car and cycle parking is required in order to facilitate the development. The total level of car parking provision at the wider Site will be reduced from 451no. spaces to 414no. spaces. The proposed self-storage unit will have a total of 13no. car parking spaces. The total level of cycle parking provision at the wider Site will be reduced to 38no. spaces and redistributed around the Retail Park. A total of 16 no. cycle spaces are proposed at the front of the unit, in two locations.

The amalgamated unit will be accessed via the existing access arrangement via Rose Kiln Lane. The proposed layout will also facilitate HGV access to the front of the self-storage unit via the car park. Servicing for the remaining retail units at the wider Retail Park will be as per the existing arrangement.

1no. tree at the northern boundary of the Site requires removal to facilitate the proposed development. 7no. additional trees are proposed around the Site, along with shrub planting.

The amalgamated unit has been designed to meet with the BREEAM 'excellent' rating and obtains the requisite credits to achieve the mandatory excellent level under the ENE01 criteria of BREEAM. Furthermore, a total of 153 square metres of PV panels are proposed on the roof which will result in an overall reduction of 42.99% in CO₂ emissions and a 47.87% reduction in primary energy when compared to the existing building baseline.



Further details of the proposed development can be found in the accompanying plans, prepared by Mountford Piggot.

5 Planning Policy Context

A full summary of the overarching planning policy context appears at **Appendix A** at the foot of this letter. The policies cited are referenced in the following section having regard to the key planning issues.

6 Planning Assessment

Principle of Development

This application seeks the change of use of Units 7, 8, 9, 10 and 11 from Class E to Class B8, along with associated external works. This is to meet demand from the self-storage sector.

First, it should be highlighted that the principle of Class B8 on the site has been found acceptable by RBC through the approval of planning permission ref. 201853 in July 2021. This consented the phased redevelopment of the retail park to provide 2no. warehouse units. This precedent is clearly relevant when considering a change of use for Class B8.

The Site itself is not allocated for any specific use and currently comprises part of a wider retail park. The existing retail use is also not protected by planning policy as confirmed by Officer's assessment of 201853.

The Site is located within the defined A33 Corridor. Policy EM2 ('Location of New Employment Development') of the Reading Local Plan (2019) identifies the A33 Corridor as being a focus for office and employment floorspace, alongside Reading Town Centre and the defined Core Employment Areas, providing further support for the proposed Class B8 use

The proposals will create local employment opportunities (during construction and operational phases) and represent a significant investment into the local economy given most of the existing retail floorspace is vacant. The proposals will help to achieve the economic floorspace as set out in Policy EM1 ('Provision of Employment Development') of the Reading Local Plan (2019). This investment in the site will deliver a sustainable economic development which is strongly supported by the NPPF. On this basis, the principle of development should be fully supported.

The development is also acceptable in that it would not result in an additional need for local housing and would not give rise to a need for further housing, in line with the requirements set out in local policy.

In summary, the principle of the proposed development is supported at both local and national planning policy, as confirmed by recent precedent.



Development Management Considerations

Design & Layout

A set of plans have been prepared by Mountford Pigott Architects, which accompany this application. The plans show the proposed design of the amalgamated unit and the materials proposed to be used. The scheme has been designed to maintain the character of the wider Retail Park, whilst meeting the relevant sustainability credentials.

Further detail on the design can be found in the accompanying plans prepared by Mountford Pigott Architects. The plans demonstrate that the proposed development accord with both national and local planning policy, in particular Policy CC2 and CC7 of the Reading Local Plan (2019).

Highways

A Transport Statement ('TS') has been prepared by TTP Consulting.

The TS considers the potential highway implications arising from additional mezzanine which is likely to be required by any self-storage occupier taking the unit. For assessment purposes, it has been assumed that unit will provide up to 6,842 square metres of Class B8 floorspace (i.e. 3,566 square metres at ground floor level as existing and 3,275 square metres at mezzanine level).

The TS demonstrates that the potential change in trips has been estimated using trip rate information from the TRICS database with the exercise demonstrating that there would be fewer vehicle movements. As such, capacity assessments have not been undertaken.

The total level of car parking provision at the Site will be reduced from 37 no. spaces to 13 no. spaces. The TS confirms that the proposed reduction in parking for the wider Site will not affect the availability of parking under normal trading conditions, and the provision for the proposed self-storage unit is deemed appropriate.

The total level of cycle parking provision at the wider Site will be reduced to 38 no. spaces and redistributed throughout the Retail Park. The proposed self-storage unit will have a total of 16 no. spaces. The TS confirms that the overall level of cycle parking is proposed to be adequate for the proposed development, with demand levels monitored through a Travel Plan (TP), which has also been submitted as part of this application.

The TS and TP concludes that the proposals are considered to accord with both National and Local planning policy requirements - particularly Policy TR1, TR3, TR4 and TR5 of the Reading Local Plan (2019). As such, the proposed development is deemed to be acceptable in highways and transport terms.



Trees / Landscaping

A Tree Survey Report has been prepared by Encon Associates and accompanies this planning application. As previously outlined, there is a TPO (ref. 118/05) at the northern boundary of the Site.

The Tree Survey Report confirms that there are 2no. individual trees located in the application boundary and 1 no. tree located just beyond the north-western boundary. T1 is located at the north-western boundary of the Site and is classified as Category A1 (tree of high quality and of particular aboriginal or landscape importance). T1 is currently protected by a TPO (ref. 118/05). T2 is located at the northern boundary of the Site and is categorised as Category B2 (tree of moderate quality). T2 is proposed to be removed to facilitate the proposed development. The trees to be retained will be protected from harm during the construction process by fencing them off from vehicular movements and material storage.

A Landscaping Scheme has been designed by Encon Associates to improve the visual appearance of the street scene and increase the longevity of the existing tree population. The landscaping scheme confirms that 6no. new specimen trees and 1no. semi-mature tree are proposed to be planted around the Site, particularly focused at the northern boundary. Furthermore, it also confirms that there will be hedge and shrub planting around the Site, particularly focused at the northern boundary.

Further details can be found in the documents prepared by Encon Associates. The details provided in these documents demonstrate that the proposed development accords with national and local planning policy, in particular Policy EN14 of the Reading Local Plan (2019).

Sustainability / Energy / BREEAM

A Sustainability and Energy Statement has been prepared by Envision and accompanies this planning application. The Sustainability and Energy Statement outlines how the Applicant has sought to address RBC's sustainability policies.

The Statement outlines that Policy CC2 of the Reading Local Plan (2019) requires all major non-residential developments or conversions to meet the most up-to-date BREEAM 'excellent' standards, where possible. A BREEAM scoping note has been provided as part of the Statement which demonstrates why none of the BREEAM RFO 2014 assessments would be appropriate to this scheme. Furthermore, the proposed development entirely reuses the building and structure with only very limited changes as shown on the scheme plans and this is not considered to warrant an assessment against the BREEAM method.

The Statement also confirms that the reuse of the existing building would typically have a lower life-cycle impact in comparison to redevelopment, from the perspective of embodied carbon, waste minimisation and resource depletion. The principle to fully reuse the building supports Policy CS1.

To further promote sustainable design and construction of the development and to ensure compliance with Policy CC2 of the Reading Local Plan (2019), the following monitoring measures are proposed.



- Requiring the contractor to adopt environmental management principles;
- Employment of a sustainability champion through the further design and build phases;
- Procure what timber is required legally and sustainably, in accordance with a sustainable procurement plan;
- Register the Site with the considerate constructor's scheme;
- Undertake a thermographic survey to assess insulation continuity and repair any significant defects in the existing fabric before handing over to the future operator;
- Conduct a durability review and explore options to protect the building from physical damage;
- Conduct a pre-refurbishment audit to consider what materials can be removed and recycled, with the objective to promote resource efficiency;
- Replace any external lighting with energy efficient lamps which comply with BREEAM ENE03; and
- Implement ecological enhancements.

Furthermore, a total of 153 square metres of PV panels are proposed on the roof which will result in an overall reduction of 42.99% in CO2 emissions and a 47.87% reduction in primary energy when compared to the existing building baseline.

The Sustainability and Energy Statement concludes that the proposed development complies with the requirements outlined in the Reading Local Plan (2019) and the Reading Borough Council Sustainable Design & Construction SPD (2019).

Summary

Overall, the proposed development is in line with the adopted and emerging policy objectives to achieve high quality, employment development. The proposed amalgamation and change of use of Units 7, 8, 9, 10 and 11 is considered to be acceptable in principle. Appropriate mitigation has been recommended where required and will be adhered to as the development progresses.

Other Material Considerations

In addition to the technical issues addressed above, wider material considerations focus on the socio-economic benefits arising from the proposals. The proposed development will generate a total of 46 FTE operational jobs (source: Employment Density Guide 3rd Edition (2015)). It will also re-use an existing building, which in the majority lies vacant in a sustainable location in close proximity to



Reading Town Centre. These economic benefits should be afforded significant weight in the determination of the planning application.

7 Conclusion

We have been instructed to submit a full planning application for the amalgamation and change of use of Units 7, 8, 9, 10 and 11 from Class E to Class B8 and associated external works. The application is being pursued to seek long-term occupation of the predominantly vacant retail units, following interest in the space from self-storage occupiers.

The principle of development is widely supported in local policy terms and through recent precedent found in the Site's history. The design changes whilst modest will create a high-quality self-storage facility that will protect and maintain the character of the area.

All relevant development management considerations have been addressed and policy compliance demonstrated. Planning Conditions can be used to adequately control the development and secure any necessary mitigation.

Consistent with the NPPF, the proposals will result in sustainable development utilising previously developed land in a sustainable location which predominately seeks to address an identified local need. New jobs will also be created along with associated socio-economic benefits. Those benefits should be afforded significant weight.

In conclusion, the application proposals accord with the development plan and in accordance with the NPPF should be approved without delay.

We trust the enclosed is sufficient for you to register this planning application and we look forward to receiving confirmation in due course. If for any reason this is not the case, please contact us immediately.

We will be in contact with the relevant officer once the application is registered. In the meantime, if there is any further information we can provide to assist you with your consideration of this application, please do not hesitate to contact us.

Yours faithfully,

Tim Rainbird
Senior Director



Appendix 1

Planning Policy Framework

Section 38(6) of the Planning and Compulsory Order Act 2004 requires planning applications to be determined in accordance with the Development Plan, unless material considerations indicate otherwise.

In this instance, the Development Plan comprises the Reading Borough Local Plan (2019). This document sets out RBC's planning policies for development up to 2036. Material considerations chiefly comprise the National Planning Policy Framework (NPPF) (2021), the supporting Planning Practice Guidance (PPG) and RBC's Annual Monitoring Report.

Development Plan

Reading Borough Council Local Plan (2019)

The Site is not allocated in Reading Borough Council Local Plan.

Policy CC1 ('Presumption in Favour of Sustainable Development') states that a positive approach to considering proposals will be taken that reflects the presumption in favour of sustainable development contained in the NPPF. It also states that where appropriate, the Council will work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible.

Policy EM1 ('Provision of Employment Development') states that provision will be made for a net increase of 53,000 – 112,000sqm of office floorspace and 148,000sqm of industrial and / or warehouse space in Reading Borough for the period of 2013 to 2036. Development that would exceed the levels of employment development set out in the policy, after existing permissions and allocations are accounted for, will need to either:

- Demonstrate that it will not result in additional need for local housing; or
- Mitigate its impacts on the need for local housing.

Policy EM2 ('Location of New Employment Development') states that major employment development, including industrial and storage and distribution will be located in the A33 corridor or the Core Employment Areas.

Policy CC2 ('Sustainable Design and Construction') states that proposals for new development, including the construction of new buildings and the redevelopment and refurbishment of existing building stock, will be acceptable where the design of the buildings and site layouts use energy, water, minerals and other natural resources appropriately, efficiently and with care and take account of the



effects of climate change. To meet these requirements, all major non-residential developments are required to meet the most up to date BREEAM “excellent” standards, where possible.

The accompanying text to Policy CC2 states that in some cases, developments for industrial and / or warehouse uses may find it more difficult to meet these standards. In these cases, developments are expected to demonstrate that the standard to be achieved is the highest possible for the development and at a minimum meets the BREEAM ‘very good’ standard.

Policy CC7 (‘Design and the Public Realm’) states that all development must be of a high design quality that maintains and enhances the character and appearance of the area of Reading in which it is located. The various components of development form include:

- Layout: urban structure and urban grain;
- Landscape;
- Density and Mix;
- Scale, Height and Massing; and
- Architectural detail and materials.

Policy CC6 (‘Accessibility and the Intensity of Development’) states that the scale and density of development will be related to its level of accessibility by walking, cycling and public transport to a range of services and facilities.

Policy TR1 (‘Achieving the Transport Strategy’) states that planning permission will not be granted for major development proposals unless there is a commitment to implement measures to promote and improve sustainable transport facilities, such as through provision to encourage walking, cycling and the use of public transport; and through agreed travel plans, safe routes to local facilities and services and similar measures.

Policy TR3 (‘Access, Traffic and Highway-Related Matters’) states that in determining proposals involving a new or altered access onto the transport network or the generation of additional trips on the transport network, consideration will be given to the effect of safety, congestion and the environment. In this case, development will only be permitted where:

- (i) Accesses and work to the highway comply with the adopted standards of the Transport Authority;
- (ii) The development would not have a detrimental impact on the functioning of the transport network;



- (iii) The proposals would not be detrimental to the safety of users of the transport network, including pedestrians and cyclists;
- (iv) 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; and
- (v) For non-residential uses, off street servicing would be provided.

Policy TR4 ('Cycle Routes and Facilities') states that development will be expected to make full use of opportunities to improve access for cyclists to, from and within the development and to integrate cycling through the provision of new facilities.

Policy TR5 ('Car and Cycle Parking and Electric Vehicle Charging') states that the development should provide car parking and cycle parking that is appropriate to the accessibility of locations within the Borough to sustainable transport facilities, particularly public transport. It also states that new non-residential development with communal car parks should have 10% of spaces providing an active charging point.

Policy EN14 ('Trees, Hedges and Woodlands') states that individual trees, groups of trees, hedges and woodlands will be protected from damage or removal where they are of importance, and Reading's vegetation cover will be extended. The quality of waterside vegetation will also be maintained or enhanced. Policy EN14 also states that new development should make provision for tree retention and planting within the application site, particularly on the street frontage, to improve the level of tree coverage within the Borough and to maintain and enhance the character and appearance of the area in which the site is located.

Policy CC3 ('Adaption to Climate Change') states that all developments should demonstrate how they have been designed to incorporate measures to adapt to climate change. This includes detail on; opportunities for natural heating and ventilation; thermal mass; use of trees and planting as part of a landscaping scheme to provide shading; the impact on surface water runoff from the development in the design of the drainage system and mitigation and resilient measures for any increases in river flooding levels.

Policy CC4 ('Decentralised Energy') states that any non-residential development of over 1,000 square metres shall consider the inclusion of decentralised energy provision, within the site, unless it can be demonstrated that the scheme is not suitable, feasible or viable for this form of energy provision.

Policy CC5 ('Waste Minimisation and Storage') states that development should demonstrate measures to minimise the generation of waste in the construction, use and life of buildings and promote more sustainable approaches to waste management, including the reuse and recycling of



construction waste and the promotion of layouts and designs that provide adequate, well-designed space to facilitate waste storage, reuse, recycling and composting.

Material Considerations

National Planning Policy Framework

The NPPF is underpinned by a presumption in favour of sustainable development which is embodied within Paragraph 11.

Paragraph 8 sets out the economic objectives to “help build a strong, responsive and competitive economy”.

Paragraph 81 goes on to advise 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”.

Moreover, Paragraph 38 sets out that Local Planning Authorities should:

“...work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible”.

Paragraph 119 relates to the Government’s objective of making effective use of land and states that planning decisions should, *inter alia*, promote and support the development of under-utilised land and buildings.

Planning Practice Guidance

The online PPG was initially published in March 2014 and supports the policies in the NPPF.

Particularly, the PPG puts great emphasis on logistics development. At Paragraph 031 (Reference ID: 2a-031-20190722) it states:

“The logistics industry plays a critical role in enabling an efficient, sustainable and effective supply of goods for consumers and businesses, as well as contributing to local employment opportunities, and has distinct locational requirements that need to be considered in formulating planning policies (separately from those relating to general industrial land). Strategic facilities servicing national or regional markets are likely to require significant amounts of land, good access to strategic transport networks, sufficient power capacity and access to appropriately skilled local labour”.

In terms of design, the PPG states at Paragraph 001 (Reference ID: 26-001-20191001) that the following has to be taken into consideration; context; identity; built form; movement; nature; public spaces; uses; homes and buildings; resources; and lifespan.



An assessment of the proposed development against the above policy framework is provided below.

RBC Annual Monitoring Report (2022)

RBC's Annual Monitoring Report (2022) confirms that the level of B8 floorspace has increased over recent years, with the 2018-19 figure the highest level on record. The report confirms that in recent years however, there has been a levelling off of this trend.