

Planning Statement for

Construction of 1 drive-through restaurant (Use classes E (a,b)) and sui generis hot food take away, car parking, landscaping and access arrangements



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DESCRIPTION OF DEVELOPMENT

Proposed development a Drive-Through restaurant (Use Class E (a,b) and Sui Generis Hot Food Take Away, Car Parking, enhanced landscaping and Access Arrangements

1. INTRODUCTION

- 1.1 This Planning Statement has been prepared for detailed planning application for the construction of a drive through restaurant on Land off Scours Lane in Reading in support of a revised planning application following the withdrawal of previous submission reference 211706
- 1.2 The Site comprises an area of grassland located in the ownership of the applicant company on the southeast side of Scours Lane, close to the junction with Oxford Road. The surrounding area to the north and west is predominantly comprised of industrial and retail units. The area to the south of Oxford Road contains both residential and commercial uses.
- 1.3 The development proposal includes a new access from Scours Lane, and erection of 176sq. m drive through restaurant with a hot food take away facility, landscaping, external seating and 22 car parking spaces. The restaurant will include a small sales area with display units, servery and seating, accommodating approximately 20 covers, back of house space for storing, preparing and producing goods to be sold, and staff facilities. The anticipated split of customers is approximately 20% eat in, 50% drive through and 30% take away.(More detail is provided with regard to the characteristics and benefits of the proposed end use as an appendices to this report)
- 1.4 A pre-application request was made and a formal response received on both planning and highways matters in August 2020. (where the highway related proposals were signed off by the highway authority).
- 1.5 The design will comprise a single storey construction with fenestration to the west and north and the drive through path located to the south of the building. The external works incorporate new pedestrian links to existing foot paths along Oxford Road and a new connection to the industrial park to the north. Landscaping proposals enhanced following the previous application demonstrate the overall benefits the development could offer.
- 1.6 The main planning issues that require addressing in this Planning Statement include the principle of development outside of designated Town Centre or Edge of Centre Location (where a sequential test report has been provided), impact on non-designated open space, flood risk, transport and sustainability.
 - The planning documents which have been submitted in support of this planning application include:
 - Planning Statement

- Planning Application Forms
- Design and Access Statement
- Planning Drawings
- Transport Statement
- Landscaping Plan and Design Statement
- Energy Statement
- Flood Risk Assessment
- Sequential Test
- Air Quality Report
- Odours Report
- Community Statement

1.7 This Planning Statement will address this proposal in relation to relevant planning policy at national, regional and local level and will clearly demonstrate that the proposal complies with the key principles and issues of relevant planning policy.

2 SITE LOCATION and CHARACTERISTICS

- 2.1 The Site comprises undeveloped land within an urban setting adjacent to existing commercial and retail park.
- 2.2 The site comprises an area of grassland located on the Southeast side of Scours Lane, close to the junction with Oxford Road.

3 PLANNING POLICY OVERVIEW

- 3.1 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.
- 3.2 The adopted Development Plan for the site comprises the Reading Borough Local Plan adopted 2019.
- 3.3 Other documents which are also viewed as material considerations with regard to determining this development proposal include the National Planning Policy Framework ('NPPF'), published by Central Government. This was most recently updated in July 2021.

a. National Planning Policy

National Planning Policy Framework ('NPPF') (Feb 2019)

- 3.4 The NPPF was first published in March 2012 with a purpose of simplifying and speeding up the planning process. This document was most recently updated in July 2021.
- 3.5 Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise. The National Planning Policy Framework must be taken into account in preparing the development plan and is a material consideration in planning decisions. Planning policies and decisions must also reflect relevant international obligations and statutory requirements.
- 3.6 The NPPF places '**sustainable development**' at the heart of the planning system with paragraph 7 stating that *'the purpose of the planning system is to contribute to the achievement of sustainable development'*.
- 3.7 The NPPF identifies three objectives to sustainable development that include social, economic and environmental roles. Fundamentally, the Framework considers that each of these roles is inter-dependant and should not be treated in isolation when making planning decisions. The Government is committed to ensuring that the planning system does everything it can to support sustainable economic growth and that planning should operate to encourage and not act as an impediment to sustainable growth.
- 3.8 In addition to the NPPF, the Government has also published National Planning Practice Guidance (NPPG) (Department for Communities and Local Government, 2014 and revised in 2018) This replaces the majority of previous Government planning guidance and complements the NPPF. The new guidance is not intended to provide further policy but instead is meant to help clarify issues relevant to the planning regime.
- 3.9 The NPPF also sets out a range of other policies relating to land use, provision of housing and affordable housing design, transport, sustainability, flood risk and other environmental issues. Where relevant to this proposal these policies/topics are outlined

in Section 6 of this Planning Statement.

b Local Planning Policy

Reading Borough Local Plan 2019

3.10 The Reading Borough Local Plan sets out the vision for the borough and the approach to development up to 2036.

3.11 The Council adopted the new Local Plan in November 2019, with the following policies listed below considered relevant to this planning application:

- a CC2: Sustainable Design and Construction
- b. CC3: Adaptation to Climate Change
- c. CC5: Waste Minimisation and Storage
- d CC6: Accessibility and the Intensity of Development
- e. CC7: Design and the Public Realm
- f. CC8: Safeguarding Amenity
- g. CC9: Securing Infrastructure
- h. EN8: Undesignated Open Space
- i EN12: Biodiversity and the Green Network
- j. EN14: Trees, Hedges and Woodland
- k. EN15: Air Quality
- l EN16: Pollution and Water Resources
- m. EN18: Flooding and Drainage
- n. EM1: Provision of Employment
- o. EM2: Location of New Employment Development
- p. EM3: Loss of Employment Land
- q. RL2: Scale and Location of Retail, Leisure and Culture Development
- r. RL3: Vitality and Viability of Smaller Centres
- s RL5: Impact of Main Town Centre Uses

- t. TR1: Achieving the Transport Strategy
- u. TR3: Access, Traffic and Highway-Related Matters
- v. TR5: Car and Cycle Parking and Electric Vehicle Charging

Supplementary Planning Documents (SPD's)

3.12 SPDs are non-statutory documents that support the delivery of the Local Development Plan. SPDs cover a wide range of issues within the Local Plan and are produced in order to provide detailed guidance on how policies or proposals in development plan documents will be implemented.

3.13 SPDs that have been adopted by the Borough Council and that are considered relevant to this planning application include:

- Revised Parking Standards and Design (2011)
- Sustainable Design and Construction (2019)
- Tree Strategy (2010)

4 PLANNING HISTORY

- 4.1 There is no specifically significant relevant planning history to this specific area of land albeit forms part of our clients landholding in Commercial use in a core employment area, and is ancillary to the prime use.

5. PLANNING DESIGNATIONS and DESCRIPTION OF DEVELOPMENT

- 5.1. The Application Site has is located within an Air Quality Management Area and within a Core Employment Area.
- 5.2. There are presently no buildings on the site. The site is located partly within Flood Zone 1 and partly within Flood Zone 2. The site contains 8 trees, one of which is protected under a tree protection order.
- 5.3. The proposed description of development is "Construction of 1 drive-through restaurant

(Use classes E (a,b) and sui generis hot food take away), car parking, landscaping and access arrangements “

6. CONSIDERATION OF KEY PLANNING ISSUES

- 6.1. Section 6 considers the acceptability of the proposed development against relevant planning policy at all levels and in particular the acceptability of the proposal with regards to land use, design and landscape, transport, sustainability and energy and flood risk.

a) Principle of Land Use

- 6.2. Paragraph 81 of the NPPF recognises that planning policies and 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, 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.’*
- 6.3. The proposal site is located within the core employment area. In accordance with policy EM” of the Local Plan.
- 6.4. Local Plan Policy EM3” Loss of Employment Land states the following;
- “Within the Core Employment Areas, the overall level of employment land should be maintained. Proposals that would result in a loss of such land will not be permitted other than in the exceptional circumstances.”*
- 6.5. The proposal site is located within a core employment area however it does not contain any employment buildings or use at present. Therefore, the proposal would not result to any loss of employment land.
- 6.6. Furthermore, Local Plan Policy EM2: Location of New Employment Development states that;
- “Non-employment uses that would support the area’s economic function may be located in the Core Employment Areas where they do not result in a loss of employment land.”*
- 6.7. The proposal for a drive through restaurant would indeed serve both the existing employees

and visitors to the area and thus support the areas' economic function. Furthermore, it is expected that the development would create circa 25 jobs within the Reading area.

- 6.8. The proposed drive through restaurant would however constitute a retail or Town Centre use outside of Town Centre.

- 6.9. Section 87 of the NPPF states that:

“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.”

- 6.10. Local Plan Policy RL1 Network and Hierarchy of Centres identifies local designated centres.

- 6.11. Local Plan Policy RL2: Scale and Location of Retail, Leisure and Culture Development states the following:

Provision will be made for up to 34,900 sq. m of retail and related facilities in Reading to 2036, together with new leisure facilities.

Retail and main town centre leisure and culture development, where it would mean a net gain of over 2,500 sq. m, will take place in, or as an extension to, the centre of Reading, unless it is on a site allocated for such development. Where a need for additional development has been identified, and no sites are available in or adjoining the centre of Reading, or other defined centres, a sequential approach should be adopted to identifying alternative sites.

All development will comply with the relevant tests for retail, leisure and culture development set out in national policy.

- 6.12. Local Plan Policy RL5: Impact of Main Town Centre Uses states that;

Proposals that include more than 1,000 sq. m (gross) of new or additional floorspace for main town centre uses in an edge-of-centre or out-of-centre location should demonstrate that there will be no significant adverse impact on existing centres. Ensuring that centres within areas of deprivation are not adversely affected is of particular local importance.

- 6.13. The proposed development falls significantly under the 1000 sq. m threshold. However, a Sequential Assessment has been undertaken by Marc Alexander.
- 6.14. The assessment demonstrates that there are no suitable or available sites located within a defined centre, edge of centre, or sequentially preferable out of centre sites capable of accommodating the proposed development, even if a degree of flexibility is applied.
- 6.15. Given the fact that no alternative sites have been identified, the development is of relatively modest quantum, and that the immediate area to the southeast contains a range and variety of retail, commercial and other main town centre uses which the proposed development arguably complement, it is considered appropriate in this location.

b) Design

- 6.16. The NPPF States that:

“The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.”

- 6.17. At a local level, policy CC7: DESIGN AND THE PUBLIC REALM states the following;

“All development must be of 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, including:

- *Layout: urban structure and urban grain;*
- *Landscape;*
- *Density and mix;*
- *Scale: height and massing; and*
- *Architectural detail and materials will be assessed*

To ensure that the development proposed makes a positive contribution to the following urban design objectives:

- *Character - a place with its own identity and sense of place*
- *Continuity and enclosure*
- *Quality of the public realm and provision of green infrastructure and landscaping*
- *Ease of movement and permeability*
- *Legibility - clear image and easy to understand*
- *Adaptability – capable of adaptation over time*
- *Diversity – meets a wide range of needs.*

Developments will also be assessed to ensure that they:

- Respond positively to their local context and create or reinforce local character and distinctiveness, including protecting and enhancing the historic environment of the Borough and providing value to the public realm;*
- Create safe and accessible environments where crime and disorder or fear of crime does not undermine quality of life or community cohesion;*
- Address the needs of all in society and are accessible, usable and easy to understand by them, including providing suitable access to, into and within, its facilities, for all potential users, including disabled people, so that they can use them safely and easily;*
- Are visually attractive as a result of good high quality-built forms and spaces, the inclusion of public art and appropriate materials and landscaping.*

Applications for major developments, or other relevant developments, should be accompanied by a design and access statement that deals with all the above matters. “

6.18. The proposed development has been designed to meet the requirements of a variety of potential occupiers and with particular consideration to the site's constraints. The site layout has been developed to ensure a safe and accessible environment to all. The proposed drive through the building itself is modest in scale with simple modern design which is appropriate in the context of the industrial units at the rear of the site. The location and orientation of the building has been carefully considered to remove any conflict with existing trees and their roots. The site layout caters not only for access and parking but also provides seating outside amongst a landscaped external area, which includes additional trees.

6.19. In terms of protection amenity of adjoining uses, the building's closest to the proposed development are industrial and are not considered to be adversely affected.

6.20. Local Plan Policy CC8: SAFEGUARDING AMENITY states that:

“Development will not cause a detrimental impact in the living environment of existing residential properties or unacceptable living conditions for new residential properties, in terms of:

- Privacy and overlooking;*
- Access to sunlight and daylight;*
- Harm to outlook;*
- Noise and disturbance;*
- Artificial lighting;*

- *Vibration;*
- *Dust and fumes;*
- *Smell;*
- *Crime and safety; or*
- *Wind, where the proposals involve new development of more than 8 storeys.”*

The nearest residential buildings to the proposed development are located some distance away to the south of Oxford Road. As such it is conferred that the development does not pose issues in respect of privacy, overlooking or harm to outlook. The proposed enhanced landscaping may provide improvement to outlook overall.

6.21. Again, given the distance to residential units it is considered unlikely that noise and disturbance is likely.

6.22. Policy CC8 goes on to say that:

“As well as immediate impacts, other aspects to which the policy applies will include matters such as hours of operation of businesses, and effects of traffic movements, particularly of heavy goods vehicles (HGVs). Proposals which would generate regular movements of HGVs in residential roads will not be acceptable.

6.23. The proposed operating hours are 05:30 – 23:00 hrs Monday to Sunday. The number of deliveries per week are expected to be a maximum of 3. The vehicle used for servicing and deliveries is an 18T LGV (Class 2). A maximum of three private waste removals will take place each week. All servicing will take place on the north side of the unit which is furthest away from the nearest residential buildings. Full details can be found in the Transport Statement.

Given the relatively modest quantum of servicing and deliveries which do not generate HGV traffic any likely disturbance is minimised.

6.24. A design and access statement by Urban Edge has been provided with full details. Landscape details have been provided by Quartet Design.

C) Open Space, Landscaping biodiversity and Trees

6.25. Paragraph 98 of the NPPF states that:

Access to a network of high-quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities and can deliver wider benefits for nature and support efforts to address climate change. Planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision. Information gained from the assessments should be used to determine what open space, sport and recreational provision is needed, which plans should then seek to accommodate.

6.26. Local Plan Policy EN8: UNDESIGNATED OPEN SPACE states that:

“There will be a presumption in favour of retention of undesignated open space, which will include allotments. Development should not result in the loss of or jeopardise use and enjoyment of undesignated open space. Development may be permitted where it is clearly demonstrated that replacement open space, of a similar standard and function, can be provided at an accessible location close by, or that improvements to recreational facilities on remaining open space can be provided to a level sufficient to outweigh the loss of the open space. The quality of existing open space should not be eroded by insensitive development on adjoining land.

6.27. The pre-application response from the Council identified the proposal site as an Undesignated Open Space in accordance with this policy. The site is not presently in any significant recreational use which would be displaced as a result of the development. The site comprises a piece of grassed land with a group of trees adjoining a main road and a traffic roundabout. As such its use value as an open space is arguably limited however since the withdrawal of the previous application the appointed landscaping consultants have conceived revisions to the landscaping which are now included in this submission.

6.28. The site is nonetheless located next to a commercial park and the proposal provides significant new landscaping and outdoor seating areas would provide a new usable outdoor area for those who presently work, live and visit in the area.

6.29. Local Plan Policy EN12: BIODIVERSITY AND THE GREEN NETWORK states that:

“New development “New development shall demonstrate how the location and type of green space, landscaping and water features provided within a scheme have been arranged such that they maintain or link into the existing Green Network and contribute to its consolidation. Such features should be designed to maximise the opportunities for enhancing this network. All new development should maximise opportunities to create new assets and links into areas where opportunities are as yet unidentified on the Proposals Map. “

As part of the landscape principles, it is proposed *“that the existing green area associated with the development and boundary with Wigmore Road can provide an opportunity for local environmental improvements by providing drifts wildflower areas and additional tree/hedge planting.*

The revised proposed Landscaping supports this statement as evidenced through the resubmission. The design also integrates bat and bird boxes as well as log piles and hedgehog hotels to further support local wildlife and ecology.

- 6.30. Furthermore, the Landscape statement states that, *“the provision of tree canopy and wildflower areas together with understorey shrub planting will provide wildlife habitat opportunity and encourage biodiversity. This would also provide a net gain of trees and tree canopy.”*
- 6.31. Local Plan Policy EN14: TREES, HEDGES AND WOODLAND states that:
- A tree Survey has been provided as part of this planning application. The survey identifies a total of 9 trees, 8 of which are wilting the application site. Two trees are propped to be removed, one poor quality and one moderate quality tree, to facilitate development. However, the landscape proposals provide significant additional planting, including a total of 36 hedge plants which will be positioned on the site boundary and along road frontages.
- 6.32. Full (revised)landscaping proposals have been provided as part of this planning submission.

Extract Landscape & Environment Statement

The Development Site

- 6.33. The revised landscape proposals have been developed by consideration of the proposed unit and its relationship with the existing tree group together with an appreciation of the contribution of the existing tree group in the public realm.
- 6.34. In considering the position of the unit careful consideration has been given to the potential effect on the existing trees. The unit position has been reviewed and adjusted in several directions specifically to reduce the potential conflict with trees and minimise the removal of trees and to respond to the existing site levels.
- 6.35. The existing trees are of varied quality, age, and condition with limited Arboricultural management over the years. This has resulted in trees with varying forms, structure and canopy of varying age and quality. Within the tree group there are 3 trees with TPO designation which are retained within the scheme.
- 6.36. A landscaping scheme for the site is proposed which will provide for the new planting of 38 woodland tree species (large canopy trees) located with the existing tree group and to the site perimeter thereby giving succession tree planting to the area thereby ensuring the continued trees presence and contribution to the local area. Significant indigenous shrub planting is included in the planting scheme to create an understorey beneath the tree canopies and around the parking area together with hedges planted along the ‘drive through’ edge. Drifts of wildflower areas are also included within the landscape scheme.

Landscape and Environmental Enhancements(Contd)

- 6.37. **Independently of the application site the applicant was in the process of undertaking a review of their site to seek a range of environmental improvements and wellbeing opportunities. A number of these coalesce with the landscape proposals for the application site. It has therefore considered that it is appropriate being these forward and include them within the application content. These environmental enhancements are divided into several principle elements.**

- 6.38. **The provision of tree planting along the Wigmore Lane boundary and Scours Lane with returns into the railway boundary (approximately 80 trees). This will provide a greatly increased green canopy presence whilst providing habitat opportunities. This tree provision would greatly strengthen the 'green link' along Wigmore Lane, Scours Lane, the railway, and connectivity to the Thames corridor.**
- 6.39. **The proposal will provide a significant net gain of trees and tree canopy to this location whilst providing a strong visual presence, improved public realm quality/experience in this location and will assist with local carbon harvesting.**
- 6.40. This approach will provide the opportunity for elements of additional tree planting which would increase the visual contribution and scale of trees at this location whilst contribute positively to the Green Link and Tree Corridor policy. The provision of tree canopy and wildflower areas together with indigenous understorey shrub planting will provide wildlife habitat opportunity and encourage biodiversity. This would also provide a net gain of trees and tree canopy.
- 6.41. The provision of these elements will support and contribute to the objectives within the local authority's Green link and tree corridor policy EN12 + EN14 at this location. This will offer environmental improvement together with greater visual seasonal interest and contribute to the local identity.
- 6.42. These elements will contribute and support the local authority's Green link and Tree Corridor policy initiative in this location and will offer environmental improvement together with greater visual and seasonal interest and contribute to the local public realm.
- 6.43. Species range to include Hornbeam (*Carpinus betulas*), *Tilia Europa* (European lime), *Zelkova serrata*, *Quercus rubur* (Oak), *Prunus avium* (Cherry), *Sorbus* species, *Acer campestre*, *Corylus*.
- 6.44. The tree planting is supported by the inclusion of matching tree species and shrub planting within Greggs development area.
- 6.45. The provision of wildflower drifts is viable in areas and modifications to the mowing regime along Wigmore Lane creating opportunity for pollinating insects/bees to benefit from the habitat created.
- 6.46. Also included within the proposals is a wildlife enhancement to provide wildlife habitat opportunities. These include bird and bat boxes suitably located within the existing trees, and within areas of indigenous shrub planting the provision of log piles and hedgehog hotels. The collective combination of the planting, wildflower areas and habitat elements within the site area will provide a net biodiversity/wildlife gain.
- 6.47. The proposed landscape scheme will provide a significant net gain of trees and tree canopy. The additional tree and shrub planting provided by the scheme will assist in local carbon harvesting, the new trees and shrubs will absorb and use the ground water in this location.
- 6.48. The combination of this planting will provide a strong visual landscape scheme with large tree canopy and understorey shrub planting and will also provide wildlife habitat opportunity

and encourage biodiversity.

- 6.49. These elements will contribute and support the local authority's Green link and Tree Corridor policy initiative in this location and will offer environmental improvement together with greater visual and seasonal interest and contribute to local public realm.

Designated Health and Wellbeing Spaces

- 6.50. There is the opportunity across the industrial area to create a number of locations for sitting and well-being places. The number of spaces created will be subject to dialog with tenants and accessibility together with appropriate locations.
- 6.51. These locations would provide seating and colour planting/textural shrub planting to create a relaxing oasis from the working environment. This will be reinforced by the selection of material and planting selected.

D) Transport and Highways

- 6.52. Paragraph 110 of the NPPF states that:

- a) "In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:*
- b) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;*
- c) safe and suitable access to the site can be achieved for all users;*
- d) the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code 46; and*
- e) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree."*

- 6.53. Paragraph 111 goes on to state 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".

- 6.54. Local Plan Policy TR1: ACHIEVING THE TRANSPORT STRATEGY states that:

"Proposed development should contribute appropriately to meeting the objectives of the most up-to-date Local Transport Plan or any successor document, including sub-strategies, specific projects identified and the local action plans.

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, including schools and parks, and similar measures.

All development proposals should make appropriate provision for works and contributions to ensure an adequate level of accessibility and safety by all modes of transport from all parts of a development, particularly by public transport, walking and cycling, in accordance with any agreed transport assessment submitted as part of the application.”

A Transport Assessment has been provided in support of this planning submission and demonstrated that the above policy requirement has been met by the proposals by offering a genuine modal choice for prospective customers and staff, provide permeable access for pedestrians and cyclists through the site into the existing footway / cycleway infrastructure and provision of 5 bicycle spaces in line with the current adopted parking standards (SPG 2011).

6.55. Local Plan Policy TR3: ACCESS, TRAFFIC AND HIGHWAY RELATED MATTERS states that:

“In determining proposals involving a new or altered access onto the transport network, improvement works to the transport network, the creation of new transport infrastructure or the generation of additional trips on the transport network, consideration will be given to the effect on safety, congestion and the environment.

Development will only be permitted where: -

- i) Accesses and works to the highway comply with the adopted standards of the Transport Authority;*
- ii) The development would not have a material 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, or new dwellings on classified roads, off-street servicing would be provided.*

Proposals involving either the construction of a new site access, or a material increase in the use of an existing site access, directly onto the Classified Highway Network will not be acceptable if they would be likely to result in the encouragement of the use of the network for short local trips or compromise the safe movement and free flow of traffic on the network or the safe use of the road. "

The impacts of the development on the operational and safety characteristics of the surrounding highway and transport networks have been comprehensively assessed in the TS, which concludes that *"there are no residual cumulative impacts in terms of highway safety or the operational capacity of the surrounding road network and therefore planning permission should not be withheld on transport grounds."*

- 6.56. The proposed drive-thru restaurant has the potential to generate 33-43 two-way vehicle trips during weekday AM and PM peak hourly periods rising to some 82-115 two-way vehicle trips during the weekend hourly periods. However very few vehicular trips generated by the proposed development will be wholly 'new', or sole purpose trips.

Local Plan Policy TR5: CAR AND CYCLE PARKING AND ELECTRIC VEHICLE CHARGING states that:

"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.

Development should make the following provision for electric vehicle charging points:

All new houses with dedicated off-street parking should provide charging points;

Within communal car parks for residential or non-residential developments of at least 10 spaces, 10% of spaces should provide an active charging point"

- 6.57. The proposed car park will incorporate 22 car parking spaces which are considered to cater for the expected visitor volume and are within the maximum allowed by the Council's current standards. 5 x active EV charging bays (23%) will also be provided and requirements for motorcycle and disabled parking within the overall provision are met in accordance with the Adopted SPD (2011).
- 6.58. A full Transport Assessment has been provided in support of this planning submission and where it is understood that the Highway Authority have favourably audited the proposals.

E) Flood Risk

- 6.59. Paragraph 159 of the NPPF states that:

“Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.”

- 6.60. The local Plan Policy EN18: FLOODING AND SUSTAINABLE DRAINAGE SYSTEMS states the following:

“Development will be directed to areas at lowest risk of flooding in the first instance, following the sequential and Exceptions Test set out in the NPPF, and taking into account the effects of climate change. It will consider flooding from all sources, including fluvial, surface water, groundwater and sewer flooding. Where development in areas at risk of flooding is necessary, it will not reduce the capacity of the flood plain to store floodwater, impede the flow of floodwater or in any way increase the risks to life and property arising from flooding. Wherever possible, development should be designed to reduce flood risk, both on- and off-site.

All major developments must incorporate sustainable drainage systems (SuDS) as appropriate and in line with the Government’s Technical Standards 64. Smaller schemes are encouraged to incorporate SuDS, where possible. Runoff rates should aim to reflect greenfield conditions and, in any case, must be no greater than the existing conditions of the site. Schemes should ensure that the movement of water through vertical infiltration as well as horizontal run-off does not worsen contamination effects. Wherever possible, SuDS provision should maximise ecological benefits, link into the existing Green Network, incorporate tree planting and landscaping and avoid damage to existing significant trees, including through changes to the site hydrology. All new developments in areas of flood risk should give priority to SuDs.

- 6.61. A floodrisk has been produced by Lanmor in support of this application.
- 6.62. The assessment and the data provided by the EA demonstrates the site is located within Flood Zone 1, the proposed use on site will be for a commercial “less vulnerable” use and is considered as appropriate in Flood Zone 1 and therefore the sequential test to allocate developments to low flood risk areas has been met.
- 6.63. The Assessment concludes that the proposed development is considered suitable for development, as there will be no negative impact on the flood plain, flow paths or flood storage volumes; therefore, we see no reason why the proposal should be refused on the

grounds of flooding.

Sustainability

6.64. According to paragraph 154 of the NPPF:

“New development should be planned for in ways that:

- a) avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through the planning of green infrastructure; and*
- b) can help to reduce greenhouse gas emissions, such as through its location, orientation and design. Any local requirements for the sustainability of buildings should reflect the Government’s policy for national technical standards.”*

Paragraph 155 goes on to state that:

“To help increase the use and supply of renewable and low carbon energy and heat, plans should:

- a) provide a positive strategy for energy from these sources, that maximises the potential for suitable development, while ensuring that adverse impacts are addressed satisfactorily (including cumulative landscape and visual impacts);*
- b) consider identifying suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure their development; and*
- c) identify opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy supply systems and for co- locating potential heat customers and suppliers.”*

6.65. Local Plan 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 buildings and site layouts use energy, water, minerals, materials 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 or conversions to residential are required to meet the most up-to-date BREEAM 'Excellent' standards, where possible;*
- *All minor residential developments or conversions to residential are required to meet the most up to date BREEAM 'Very Good' standard as a minimum;*
- *All non-residential development or conversions to residential should incorporate water conservation measures so that predicted per capita consumption does not exceed the appropriate levels set out in the applicable BREEAM standard. Both residential and non- residential development should include recycling greywater and rainwater harvesting where systems are energy and cost effective.*

- 6.66. An Energy Statement has been prepared in support of this applications. The proposed energy and water saving proposal are summarised as follows:

"It is proposed that the following energy efficiency measures are provided to reduce energy demand for the building before low or zero carbon technologies have been considered:

- *Improved building fabric*
- *Energy efficient lighting.*
- *Lighting Control Systems.*
- *Space heating and domestic hot water provided by waste heat collected from refrigeration systems and supplemented by ASHP.*
- *High Efficiency mechanical ventilation.*
- *Improved services distribution.*

Due consideration has been given to the different renewable technologies available, and a photovoltaic system has been selected to offset electrical energy consumed in the building. With the energy efficiency measures proposed; Air to Water: Air Source Heat Pumps to the domestic areas and heat recovery VRF is the most suitable technology for the site. "

- 6.67. A condition requiring a BREEAM "Very Good" standard as per adopted policy would be acceptable.
- 6.68. Local Plan Policy CC3: ADAPTATION TO CLIMATE CHANGE states the following;

All developments will demonstrate how they have been designed to incorporate measures to adapt to climate change. The following measures shall be incorporated into development:

- Wherever possible, new buildings shall be orientated to maximise the opportunities for both natural heating and ventilation and reducing exposure to wind and other elements;*
- Proposals involving both new and existing buildings shall demonstrate how they have been designed to maximise resistance and resilience to climate change for example by including measures such as solar shading, thermal mass, heating and ventilation of the building and appropriately coloured materials in areas exposed to direct sunlight, green and brown roofs, green walls, etc;*
- Use of trees and other planting, where appropriate as part of a landscape scheme, to provide shading of amenity areas, buildings and streets and to help to connect habitat, designed with native plants that are carefully selected, managed and adaptable to meet the predicted changed climatic conditions; and*
- All development shall minimise the impact of surface water runoff from the development in the design of the drainage system, and where possible incorporate mitigation and resilience measures for any increases in river flooding levels as a result of climate change.*

6.69. The proposed development has been designed to positively contribute to long term objectives of environmental protection and resource management.

I) CIL

6.70. The Council adopted its Community Infrastructure Charging Levy in January 2015. However, the proposed development falls below the 2000 sq. m floor area for changes relating to new retail floor space. Therefore CIL is not chargeable in relation to this development.

7. CONCLUSIONS

7.1. The drive through unit is proposed to be constructed on an area of unused land (which will be enhanced and improved where referenced in this report and but operate to serve the local area, including residents as well as occupiers and users of the adjoining commercial park.

7.2. The design parameters of the proposals respect the existing build environment with regards to building heights, bulk and massing as well as materials and layout. The proposed development provides a well-designed and accessible space and incorporates enhanced landscaping.

7.3. With regards to sustainable transport, the location of the site reflects the requirements of the NPPF and local policy in ensuring any change of use operation will make the fullest

possible use of public transport, walking and cycling opportunities.

- 7.4. The site offers good connections to a comprehensive network of existing pedestrian and cycle infrastructure. In addition bus stops are within short walking distance of the site providing frequent services to a variety of destinations; including Reading town centre and railway station.
- 7.5. All deliveries and servicing will take place on-site, out of hours, in order to minimise conflict with customer parking and pedestrian movements.
- 7.6. The proposal aims to deliver a development that is in accordance with the best practise principles of sustainable development and the scheme has been designed to positively contribute to long term objectives of Environmental Protection and resource management. Energy efficiency and renewable energy options have been considered in the design process.
- 7.7. The FRA concludes that there is no practical reason to preclude development on this site on grounds of flood risk, or be there being insufficient capacity to cater for surface water run off generated from the proposed development.
- 7.8. No issues of concern have arisen from the subsequently prepared Odour and Air Quality reports undertaken
- 7.9. Having regard to all the above, it is felt that the proposal has balanced planning merits taking into consideration the enhanced landscaping proposal and meets key objectives of national and regional planning policy with regards to sustainable development, and as such planning permission should be granted and would be of benefit to all those that work, reside or are travelling through the area.

APPENDIX I

Mr B Kitcherside
Chartplan
Suite 21
High Cedars
20 Wray Park Road
REIGATE
Surrey RH2 0DD

3 February 2022

Dear Barry

**Proposed Greggs Unit, Scours Lane, Tilehurst, Reading
Planning Application LPA Ref: 211706**

Further to our recent discussion, I attach for your attention some additional background information in respect to Greggs and its business operation and its reasoning behind its wish to locate at the application site. I understand this letter is to be forwarded to the Case Officer to support the above application.

The Proposal

This planning application seeks full planning permission for the development of a drive thru Greggs' bakery with inside and outside seating areas, serverly, toilets and back of house areas for food preparation, storage and staff, plus provision of a drive thru lane, car parking including accessible spaces, landscaping and associated works.

Greggs Plc has a requirement for a new bakery in this location to serve workers and visitors to the surrounding Portman Road/Scours Lane/Stadium Way employment/business area and to meet an identified need by the Company within this location in accordance with adopted Policy EM2.

The building will have a total floor area of 176 sqm (GIA) and include a small sales area with display units, serverly and seating, accommodating approximately 20 covers, back of house space for storing, preparing and baking goods to be sold, and staff facilities. Outside an area of hardstanding will accommodate additional seating. Parking for 22 cars is provided including three accessible spaces closest to the building's entrance.

To assist the Council in its determination, I first set out below details of the Applicant and its operations.

Background to the Applicant

The Occupier

With over 2,000 shops, nine centres of excellence and some 20,000 employees who serve millions of customers each week, Greggs is the UK's leading bakery food-on-the-go retailer. The company started



over 80 years ago when a John Gregg started out with the goal to deliver, by bicycle, fresh eggs and yeast to families in Newcastle. 10 years later he opened Greggs of Gosforth on Gosforth High Street, which remains a Greggs to this day.

As confirmed by the Chief Executive *'it is a duty as a modern business to stand for more than just profit'* and in February of this year published *'The Greggs Pledge'* (attached).

Greggs has a proud reputation of giving back and since John Gregg founded the business in 1939, Greggs have always tried to do the right thing by their people, suppliers and communities. 'The Greggs Pledge' is the Company's first full sustainability report and sets out ten things they are doing to make the world a better place by 2025 and beyond.

The Breakfast Club Programme

'The Greggs Pledge' commits to supporting 1,000 schools' Breakfast Clubs by 2025 providing some 70,000 meals each school day. Greggs started the Breakfast Club programme in 1999 because it knew there were children across the country attending school every day without having eaten breakfast. Currently there are over 600 Breakfast Clubs operating across the UK every day. Each school day, these school clubs serve a nutritious breakfast, free of charge, to over 40,000 primary school children making sure they have the energy to concentrate and learn.

Evaluations of Breakfast Club schemes have uncovered the following key benefits:

- Children have improved health and nutrition;
- Children have improved attendance and punctuality;
- Children are able to socialise and make friends;
- Children have better relationships with school staff;
- Parents are less wary of schools and are more likely to attend parents' evenings; and
- Children are able to concentrate better, and results are improved.

The Breakfast Club model, which delivers flexibility to meet the needs of the children, has been highly successful with many schools working with the Foundation for in excess of 20 years.

Putting an End to Food Waste

Greggs are obsessed with freshness and that is key to the business model, but it is a challenge too, making sure there is enough for everyone but avoiding waste at the end of the day. Greggs have focussed on reducing waste in production and in the shops and also putting waste to good use.

Greggs aims to donate as much unsold food to charity as possible, including soup kitchens, food banks and shelters for the homeless and the vulnerable. The amount of unsold food the company has donated to good causes has increased ten-fold over the last five years and the company has ambitious plans to grow this more in the years ahead. At the end of 2019 there were 1,700 organisations regularly collecting unsold food, increasing food donations in comparison to 2018, and Greggs are working to increase this further over the coming years.

Supporting Communities

At the current time Greggs have 13 outlet shops around the UK where day old food products are sold at a significant reduction helping people to spend less on food. These are located in areas where we



know social deprivation is high and over the next four years Greggs intend to increase the number of outlet shops to 50.

The outlet shops were originally introduced to help avoid sending edible food to landfill. We now see that these shops can do even more; we donate a share of all our profits from these shops to the Greggs' Foundation which passes it on to local community groups that are working to address food poverty and associated problems.

Helping Customers to make Healthier Choices

In 2016 Greggs introduced their 'balanced choice' range which is made up of products with good nutritional content and each containing fewer than 400 calories. In 2019 healthier choices (including 'balanced choice') made up 22% of the items on our shelves putting Greggs on track to meet their target of 30% by 2025. It is hoped that this will be achieved through clear information, education and promotions.

Net Zero Carbon

Greggs are committed that by 2025 they will be well on their way to achieving carbon neutrality by using 100% renewable energy across all of their operations. Today 96% of the electricity Greggs use is from renewable sources and therefore carbon neutral. The goal is simple; Greggs want that to be 100% by 2025.

Greggs started this journey by putting photovoltaic solar panels on the roof of nine of their manufacturing sites which have the capacity to generate 2,111 kW every day which is the equivalent to the amount of energy used in 235 typical UK households. Whilst they do not have sufficient roof space to generate enough renewable energy to meet all of their energy needs Greggs have chosen to purchase Green Electricity from the grid which has had the result of reducing the carbon intensity of the business by over two thirds.

Electricity accounts for around 60% of Greggs total energy needs and a further 10% comes from natural gas. Around a quarter of their energy requirements is used to power their vehicles and they are working to provide a greener fleet. Refrigeration gases make up around 6% of Greggs direct carbon footprint and they are looking at ways to reduce this with less leakage and improved maintenance whilst exploring less harmful alternatives.

Greggs also have a number of other carbon reduction projects which include energy saving technologies, helping customers to eat less meat, reduce packaging, sustainable forest management and decreasing the use of palm oil and soya.

Building the Shops of the Future

Greggs are committed that by 2025 25% of their shops will feature elements from their eco shop '*store of the future*' design. In 2020 Greggs built 84 new shops around the country and have refitted an additional 33 which provides Greggs with a great opportunity to tweak their approach and think cleverly about ways to save energy and do their bit to be more environmentally friendly. All new shops include certain things as standard such as putting doors on all their self-select fridges, using LED lighting and where appropriate the use of automatic front doors. Greggs continue to be on the look out for new green technologies which can be incorporated into their shop design.



Using Less Packaging

By 2025 Greggs will use 25% less packaging, by weight, than in 2019 and the only remaining packaging will be made from material that is widely recyclable.

In 2019 Greggs cut 350 tonnes of single use plastic from their operation through substitutions of plastic items with more sustainable materials. Greggs seek to continue this strategy to using, where appropriate, 50% of recycled content in all plastic packaging and ensuring that 100% of the plastic packaging collected by Greggs is recycled.

Embracing Diversity

Greggs are committed to ensuring that by 2025 the workforce will represent the communities which they serve.

Greggs wishes everyone to feel welcome and their employees to be able to be themselves at work, whatever their background, preferences or views. They also want to make sure there are no barriers that might stop anyone from growing a successful career with them. Greggs accept that being a diverse business is critical to their future growth.

Sourcing Sustainably

By 2025 Greggs will have a robust and responsible sourcing strategy in place and will report annually on the progress towards their targets. Six key principles in meeting this commitment include *'we treat our suppliers with respect; we care about how animals are treated; we respect human rights; we support fair trade; we support local businesses and we respect the environment'*.

Protecting Animal Welfare

Greggs are committed to securing and maintaining Tier 1 in the BBFAW Animal Welfare Standard by 2025.

Animal welfare is a priority for Greggs and they want to do the right thing by ethically sourcing which is consistent with their values and nothing less than you would expect from them. Greggs' Farm Animal Welfare Standards, set clear rules that were developed with consideration to the Farm Animal Welfare Committees five freedoms and over the last five years this has been implemented by Greggs with their suppliers.

Greggs' Foundation

Greggs donates one percent of its pre-tax profits to the Greggs Foundation and distributes around £3.0 million to community and charity organisations throughout England, Scotland and Wales. A significant proportion of the Greggs Foundations' impact is also achieved with the generosity of Greggs' employees and customers. The Foundation brings together all of Greggs charitable groups which has a long and rich history. It is managed by an executive team of currently nine members of staff and overseen by a Board of Trustees, with the charitable mission of *'making a difference to people in need in the heart of Greggs' local communities'*.

The Foundation prioritises organisations that support voluntary careers, people with disabilities, homeless people and older people. The Foundation aims to make a difference through the following

programmes; North East Core Fund, Local Communities Urban Rivers Regeneration Fund, Hardship Fund, Breakfast Clubs Programme, Community Holiday Club Programme and Health Programme Grant which share the common goal of improving the quality of life of people in local communities.

The Community Urban Rivers Regeneration Fund provides funds to river trusts to run educational and community based environmental projects based on urban rivers.

The Tackling Health Programme is an interactive project for children which takes a holistic approach to teach children about their own health and well-being and about leading a healthy lifestyle.

The North East Core Fund makes grants to charitable organisations based on the North East of England, who make a difference to people in need. Grants can be up to £45,000 and aims to increase the capacity of organisations to provide quality services. Around £600,000 per year is donated through this programme.

The Hardship Fund provides grants to people in extreme financial need in the North East of England via recognised social organisations such as charities registered with the Charity Commission, housing associations and social services acting on behalf of a family or individuals in need. Grants are made for up to £180 to families and individuals and can be used towards household equipment such as cookers, fridges and washing machines that can make a significant difference to peoples' lives. Around £300,000 is awarded each year to people in need.

The Application

The proposed Greggs bakery will offer the following baked and convenience goods including:-

- Bread;
- Savoury pastries;
- Cakes;
- Sandwiches;
- Soups;
- Salads;
- Pasta;
- Snacks;
- Hot wraps;
- Confectionery;
- Hot and cold drinks; and
- Other ancillary items.

These items will be sold for consumption on or off the premises. The new store will extend to 176 sqm and will comprise a back of house area and a customer area to include an indoor and outdoor seating area allowing customers to 'eat in'. This offer will enable employees within the business area to obtain sustenance and have a change of scene away from their place of work without travelling in their cars.

It is envisaged that a Greggs of this size will generate a net increase of 20 jobs, approximately two full time positions and eighteen part time opportunities. These jobs will be recruited locally. Accordingly, whilst it is considered that this proposal will meet an identified need in the wider area, the proposal will also contribute to the provision of jobs within this business area.

The proposed Greggs bakery is considered to offer a complementary service to the occupiers of the nearby Portman Road/Scours Lane/Stadium Way Employment Area, providing an accessible, attractive and affordable bakery bringing both breakfast and lunching opportunities on site.

The Appropriateness of the Application Site

A justification for the appropriateness of the application site for the development proposed is now set out below. Notwithstanding this, the Council will be aware that a requirement to demonstrate a ‘need’ for the development no longer forms part of Government policy in respect to town centre uses. Whilst there is a number of common sense reasons why the application site is an appropriate location for supporting infrastructure to the Portman Road/Scours Lane/Stadium Way Industrial Estate, it is not the case that the applicant is required to demonstrate to the Council’s satisfaction a ‘need’ for the development in this location.

The application site forms part of a Core Employment Area EM2H (Portman Road). The Portman Road/Scours Lane/Stadium Way Industrial Estate is extensive, containing a significant number of employment uses. The area is allocated as a Core Employment Area in which planning policy seeks to resist the loss of employment space in order to protect the economic and employment base of Reading. As such, Core Employment Areas are the most important employment areas in the Borough. These are defined as *“relatively successful industrial and warehousing areas which are likely to continue to be needed for employment use”* (paragraph 4.3.10 of the adopted Local Plan). The Portman Road/Scours Lane Industrial Estate contains a number of industrial, business and quasi-trade park uses such as Tool Station, Halfords Auto Centres, Wolseley Plumbing and Parts and Access Self-Storage. In addition, there is a significant number of manufacturing and businesses on the industrial estate including Macfarlane Packaging, Universal Commercial Vehicles, as well as many other vehicle related and repair businesses.

It should be recognised that Policy EMP2 (Location of New Employment Development) specifically identifies the need for supporting uses within Core Employment Areas. The policy confirms that *“non-employment uses that would support the area’s economic function mainly located in the Core Employment Areas where they do not result in a loss of employment land”*. As confirmed within the supporting Planning Statement the application proposal does not result in the loss of employment land. As such, there is a policy acceptance and recognition of a ‘need’ within the adopted Local Plan for supporting infrastructure to Core Employment Areas.

It is widely recognised and accepted that for a large employment area of estate to be successful, an appropriate level of supporting infrastructure is required such as food and beverage provision, creche or day nursery facilities etc. The absence of such food and beverage facilities ensures that the estates themselves are less desirable and that workers and visitors to such employment areas then have to travel off site in order to obtain breakfast or lunch provision as required. Such a situation makes the estates themselves less desirable, loses productivity (as workers are travelling longer to and from the estate in order to pick up provisions) and results in additional carbon emissions from unnecessary vehicular trips.

Greggs actively seeks to locate on major employment areas, specifically to meet a individual need for such supporting food and beverage infrastructure which is required to support such an industrial estate. We have secured multiple permissions on industrial estates for Greggs where Local Authorities have accepted this rationale. Owners and tenants of such employment areas have welcomed the benefits accruing from a Greggs locating in close proximity.



The specific characteristics of the application site lend itself to the location of a proposed Greggs drive-thru. In particular, Oxford Road and Scours Lane are busy roads with a high volume of traffic movements which directly serves the adjacent industrial estate. In terms of competing provision, it is considered that the surrounding area is underserved by existing food and beverage provision whilst the Core Employment Area itself is chronically underserved.

As detailed elsewhere in the report, whilst the application results in no loss of employment floorspace, it is anticipated that the Greggs bakery will provide approximately 20 jobs (2 full time and 18 part time positions), which will be sourced from the local area. Accordingly, the proposal will therefore meet a need, not result in the loss of any employment floorspace and will result in a net gain in jobs supporting the wider employment area and the economy of Reading.

I trust you find the enclosed in order, but should you wish to discuss please do not hesitate to contact me at this office.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Julian Sutton', with a long, sweeping flourish extending to the right.

Julian Sutton
JMS Planning & Development
Enc