

Our Ref: 784-B039265

Your Ref: 220392/FUL-69

Ms Beatrice Malama
Reading Borough Council
Planning Department
Civic Offices,
Bridge Street,
Reading, RG1 2LU

May 2022

Dear Ms Malama,

Reading Service Station, 69 London Rd, Reading, RG1 5BW

This letter comprises a Planning and Heritage Statement on behalf of our Clients, the MFG Motor Fuel Group, in support of a planning application submitted by MBH Design Studio Ltd. It should be read in conjunction with the other application documents, including the proposed application drawings.

The application is for 'Removal of the existing jet wash and construction of new single-storey side extension to existing sales building'.

This Planning and Heritage Statement describes the site and surrounding area, sets out the proposal, relevant planning history, relevant national and local planning policies and guidance and assesses the impact of the proposal on nearby heritage assets. It concludes that the application should be approved.

The Site and Surroundings

The site is located within the urban area of Reading. It lies on the corner of London Road and Watlington Steet, with entrances/exits off both. The surrounding uses include houses to the north in Watlington Street; a four storey apartment block to the west (Tyrrel Court); Watlington Street to the east, with a large NHS building beyond and London Road to the south with the Royal Berkshire Hospital complex beyond and the junction of Redlands Road. London Road is a very busy main distributor road within the town.

A number of the neighbouring buildings are listed. The site also lies within the Eldon Square Conservation Area (CA) and is diagonally opposite the Kendrick Road CA. The impact of the development on these assets is considered further in the heritage section below.

The site comprises a BP petrol filling station, with Canopy, pumps and a Londis shop. There is also a jet wash canopy and equipment between the shop and Tyrrel Court. The whole site is hardstanding, with the sales building to the rear, with the pumps between it and London road. There is controlled on-street parking available in Watlington Street and a near-by busy controlled traffic light crossing in front of the Hospital.

The site lies within the main built up urban area of Reading, close to the Town Centre and is a mixed use area. It is all hard surfacing and constitutes previously developed land.

The Proposal

The proposal is for removal of the existing jet wash machinery and canopy, replacing it with a single storey side extension to the existing petrol station sales shop.

This is a minor planning application being an extension of the building between it and the large apartment block to the west. It does not come forward of the existing building line and does not impact on the forecourt operations.

The proposed building will incorporate an external cash point, but otherwise all functions are internal with no additional customer access points being created closer to the neighbouring apartments.

The building will allow for the creation of office space, staff facilities, a new accessible toilet and an expanded internal retail floor area.

Relevant Planning History

The site has been used as a petrol filling station for decades and has formed part of the street scene in this area for a long time. There are seven available planning records associated with the petrol station ranging from applications for signs to different types of extensions and refurbishments.

The last record was for the retention of the parcel locker on site, which was granted on 13th December 2018 (Ref. 181804).

Relevant Planning Policy

The national level of policy is contained within the revised National Planning Policy Framework (NPPF).

The most relevant paragraphs from the NPPF are:

- 8 Achieving sustainable development – Economic, Social and Environmental objectives
- 10/11 Presumption in favour of sustainable development. ‘Approving development proposals that accord with an up-to-date development plan without delay.’
- 38 Encourages Local Planning Authorities to approach decisions in ‘a positive and creative way’.
‘Decision-makers at every level should seek to approve applications for sustainable development where possible.’
- 81/83 Creation of a strong economy and support for businesses wishing to invest, expand and adapt.
- 104 Promotes sustainable transport.
- 126 Achieving well designed places.
- 189 Preservation of heritage assets.
- 194 Assessment of heritage assets and their significance when determining applications.
- 199/208 Consideration of the impact of development on HA.

These paragraphs of the NPPF clearly provide a presumption in favour of the proposed development and support the proposals.

Reading Trafford Local Plan

The Development Plan comprises of:

- Reading Borough Local Plan – adopted Nov 2019;

Relevant Local Plan Policies

CC1 – Presumption in Favour of Sustainable Development

CC2 – Sustainable Design and Construction

CC7 – Design and the Public Realm

EN1 – Protection and Enhancement of the Historic Environment

EN3 – Enhancement of Conservation Areas

EN6 – New Development in a Historic Context

Other Local Policy Documents

CIL – Approved Jan 2015

Sustainable Design and Construction SPD – Dec 2019

The site does not lie within a Neighbourhood Plan Area.

Principle of Acceptability of Development

This application is for a minor commercial side extension. As such it is generally not impacted on by the main strategic policies. The site is, however, within the main urban area where development is acceptable in principle.

The NPPF expects Local Plans to create an environment where existing businesses can invest, expand and adapt under paragraph 81. It states significant weight should be placed on the need to support economic growth and productivity. Paragraph 82 seeks to ensure Councils are flexible enough to accommodate needs not in the local plan and changes in economic circumstances. Paragraph 83 states planning policies and decisions should "...recognise and address the specific locational requirements of different sectors."

The proposed development represents an investment by the petrol station company in the area and will generate new jobs, therefore should be acceptable in principle within an existing business. The business clearly cannot locate to larger premises to help maximise its commercial opportunities being constrained to an on-road presence and the limited areas for such businesses to operate from.

It is considered that a commercial extension within the boundaries of a previously developed brownfield site, to improve the operation of the business is acceptable in principle. The above policy context supports the proposed development subject to no significant adverse impacts on normal development management issues, which are dealt with below.

The replacement of the existing jet wash facility and the associated noise of its operation with a single storey extension is considered a benefit to the amenity of the area. This benefit is a material consideration also in favour of approving the scheme.

Design

The proposal is for an extension to the existing petrol station retail shop.

It is proposed to be of the same height and utilise the same materials as the existing building and will therefore be of the same character and scale to the existing.

The extension is single storey on the space between the main shop and the northern boundary on part of the site with a Perspex type canopy. It will not extend the boundaries of the site. There will also be no overlooking, overshadowing or loss of amenity for the neighbouring residential property as a result of the development.

The adopted Local Plan contains Policy CC7: Design and the Public Realm. This policy lists 7 areas to ensure development makes a positive contribution to urban design objectives for the area:

- Character – as a minor extension to an existing building, the proposal supports this retail element of the area. Maintaining and strengthening its character;
- Continuity and enclosure – it is a size and function appropriate extension within the curtilage of a brownfield site;
- Quality of the public realm – the extension consolidates the existing built form and removes the jet wash canopy from the site. Improving the look of the area;
- Ease of movement and permeability – this will be unaffected by the proposal;
- Legibility – the extension is appropriate to its location and will be understood in-situ;
- Adaptability – the extension will be built to building regulation standards and capable of being used for a number of purposes associated with the business;
- Diversity – as above.

It is considered that the development is a high quality design, at an appropriate scale which will help consolidate the built form on the site. It therefore is in accordance with the development plan policies.

Heritage Statement

As there are identified heritage assets in close proximity to the site a heritage statement is required to accompany the application.

The applicable legislative framework is: The Planning (Listed Buildings and Conservation Areas) Act, 1990 and the Ancient monuments and Archaeological Areas Act (AMAAA), 1979.

Section 66(i) of the Planning (Listed Building and Conservation Areas) Act 1990 imposes a duty to pay special regard to the desirability of preserving or enhancing a listed building or its setting where affected by development.

The revised NPPF provides guidance on the Government's approach to heritage assets, which is expanded upon in the National Planning Policy Guidance (NPPG) stating that Heritage Assets should be, "...conserved in a manner appropriate to their significance." (para 184).

It also states that in determining planning applications Local Planning Authorities (LPA) should require an applicant to consider the significance of any heritage assets affected, noting that, "...the level of detail should

be proportionate to the asset's importance and no more than is sufficient to understand the potential impact of the proposal on their significance." (para 189)

The NPPF sets out criteria in Chapter 16 to guide assessment of both heritage assets and the impact of proposed development on them, stating at para. 193 *"When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. The more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting."*

The test of whether a development is acceptable is set out in paragraphs 193 to 198, based on whether harm is identified and the level of that harm i.e. substantial, less than substantial or no harm. Where there is substantial harm identified the NPPF states, "...local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss."

Where less than substantial harm is identified the public benefits of the development should be weighed against the harm it might cause to the heritage asset involved. If no harm is identified there is no requirement to undertake this specific exercise.

Identified Heritage Assets

The application site lies diagonally opposite the Royal Berkshire Hospital on the northern side of the three lane London Road section of the Reading ring road.

The Hospital lying to the south of the road is a Grade II* listed building. There are three Grade II listed buildings lying west of the Hospital (No.44 The Acacias, Greenbank and 32 to 40 London Road); moving west again there is the Grade II* St David's Hall and then the Grade II block of 16-22 London Road.

On the development site side, to the east of the Petrol Station there lies the Grade II building 71 and 73 London Road, and to the west, but separated from the site by Tyrell Court lies the Grade II* Albion Place.

There are two non-building related listed features nearby: Garden wall to north and east of The Acacias wall to garden of The Acacias (west of the Hospital) and Railings to road from Albion Place to opposite Redlands Road (west of the site). Both listed at Grade II.

The site lies in the south-west corner of the Eldon Square Conservation Area and diagonally opposite the north-east corner of the Kendrick Road Conservation Area.

There are therefore a number of important heritage assets in the vicinity of the proposed development.

Below is an image taken from Historic England's website which shows the listed buildings in context with the site:

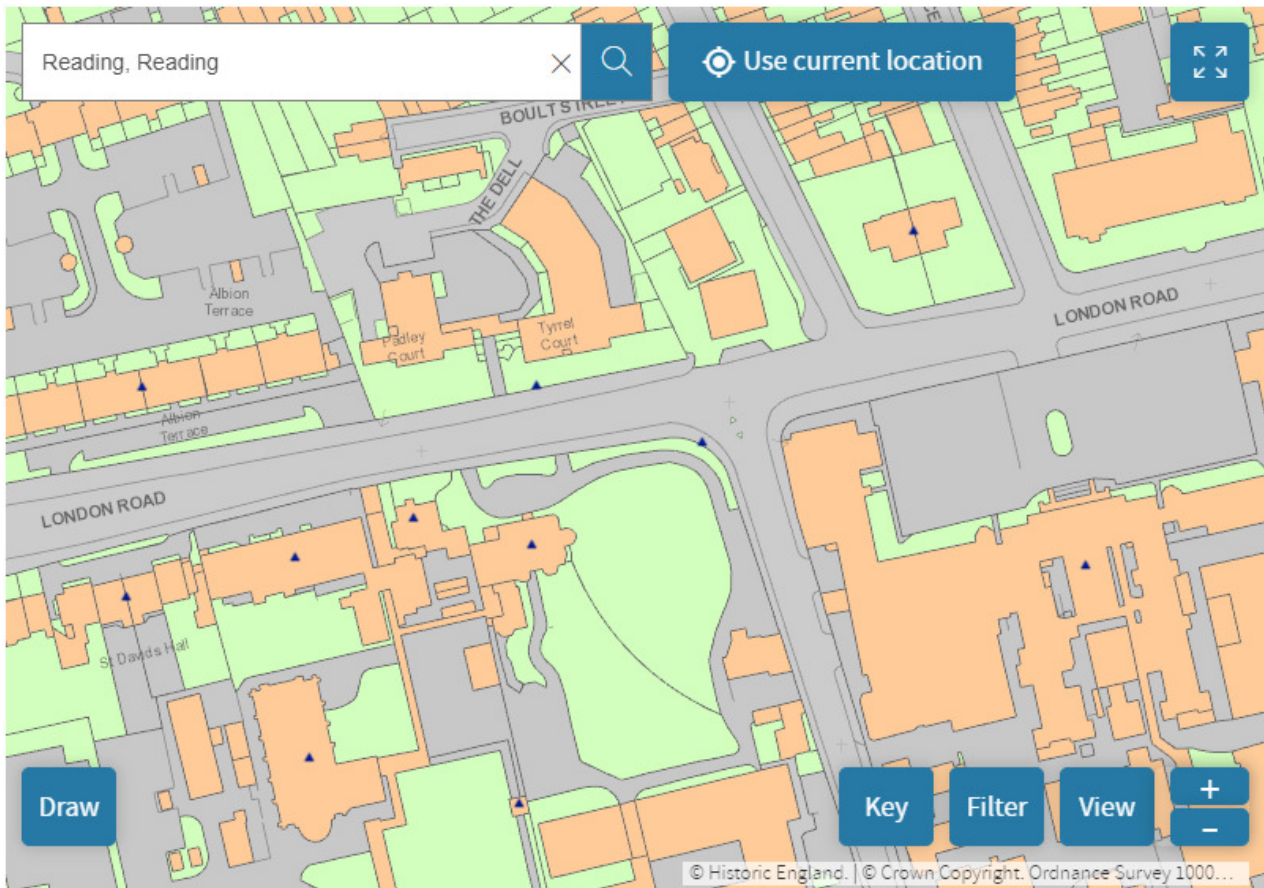


Image taken from Historic England Website

There are numerous other listed structures beyond the build line of those identified and further away, but these do not share a visual relationship with the development site and therefore do not form part of this assessment.

Assessment of Impact on the Significance of the Heritage Assets

The area is clearly one of historic interest, covered by Conservation Areas and with numerous listed buildings.

In terms of the listed buildings, no works are proposed which will physically impact upon any of them or the listed railing and walls. It is therefore consideration of the impact of the proposed works on their setting which is reviewed further below.

In our view no harm arises to the setting of any of the listed buildings in the area which share a visible relationship with the petrol station.

The proposed development does not change the relationship of the existing petrol station with the nearby listed buildings. Nor does it introduce anything new to the area.

The proposal is for an extension in to a 'dark' corner of the site between the current building and the adjoining Tyrell Court. The extension to the building is also proposed for the same use as the existing Petrol Station shop. The extension is subsidiary in size to the existing building and will help rationalise the built form on site.

There is a Conservation Area Appraisal document for Eldon Square. The document does mention the petrol station as being a negative, being considered out of character with the historic street. There is also one for the Kendrick CA but being outside of it the Station is not mentioned.

As indicated above, this is a minor planning application, proposing a small extension to the existing building at the rear of the site. The proposed development does not change the nature of the site within the Conservation Area, so is considered has a neutral impact on its visual character. That said it does remove a noise generating aspect of the site in the jet wash, which is considered to be an enhancement to the Eldon Square CA.

Whilst the Eldon Square CA sees the site as a negative and out of keeping with it, the assessment does not reflect the fact that a three lane major transport route also runs alongside it. The petrol station is sited to serve that route. The CA is a residential area and people have cars, therefore in our view the petrol station is considered appropriately positioned in functional terms.

No harm to either CA is therefore considered to arise as a result of the proposed extension to the existing and lawful commercial operation.

Policy EN1 of the Local Plan states that all proposals "will be expected to protect and where possible enhance the significance of heritage assets and their settings." Also, that "Proposals should seek to avoid harm in the first instance."

In this case no harm has been identified and therefore the significance of the identified heritage assets and their settings have been protected. It is also our view that replacement of the jet canopy by the extension would enhance the setting of the CA.

Heritage Conclusion

The significance of the heritage assets and their setting has been assessed in a proportionate manner to the proposed development.

No harm has been identified to the setting of the listed buildings or character of the Conservation Area.

Consequently, there is no requirement to undertake the heritage balancing exercise identified within the NPPF.

Parking and Highways

There will be no impact on parking or highways as customers will either be on the forecourt, on foot or will be able to park for up to 2 hours in the nearby on-street parking bays.

The limited increase in floor area would in effect be over existing retail space within the confines of the business where the jet wash is currently situated.

The NPPF in para. 111 states that development should only be refused on highway grounds if there would be unacceptable impact on highways safety or residual cumulative impacts would be severe. That is not the case with this minor application and therefore it is considered that the development is acceptable in highways terms.

Trees/Ecology

There are no trees on the site in the location of the proposed development. There are trees on the boundary, but none of any significance near enough to the extension to be impacted upon by it.

Policy EN12 states that on all sites, development should not result in a net loss of biodiversity and geodiversity and should provide a net gain for biodiversity wherever possible.

The site in this area is hard standing with no ecological value. There will therefore be no loss of biodiversity as a result of the proposal.

Given the nature of the site, the fact it operates and is lit 24 hours, 7 days a week means it is not considered a suitable candidate for bats or nesting birds enhancements. There is also no ability to introduce additional shrubs and planting because of the dual entrance, required vehicle movement areas and adjoining public footpaths.

The NPPF and Local Plan policy requirements are therefore considered complied with.

Conclusion

The proposed development is a minor application proposing a side extension to an existing building within a standard petrol station operating area. The station is situated on the side of the Reading ring road and serves the traffic of that road 24/7.

The extension is appropriate in scale and height and will not have a detrimental effect on neighbouring amenity. Rather the proposed removal of the jet wash in order to facilitate the new extension is considered to be an enhancement in both design and noise terms.

The existing site is underutilised. It is previously developed land and the extension is proposed within the confines of its curtilage. The extension is on part of the side already used as part of the Petrol Station sales offer.

The site is within a highly sustainable location for such development on the edge of Reading Town Centre in a mixed use area including residential and hospital opposite.

No harm has been identified to the listed building and Conservation Area heritage assets.

The proposals will, for all the above reasons, have no materially adverse policy or actual impacts in terms of amenity, access and parking.

There is significant policy support for the proposed development which will deliver a positive contribution to the economy and the environment as referred to in this Planning Statement.

We respectfully request that the application therefore be approved.

Yours faithfully,



David Butcher
Associate Director
Tetra Tech Limited.