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WALSINGHAM PLANNING

SPECIALIST PLANNING & DEVELOPMENT CONSULTANTS

Planning Statement (including Flood Risk Assessment)

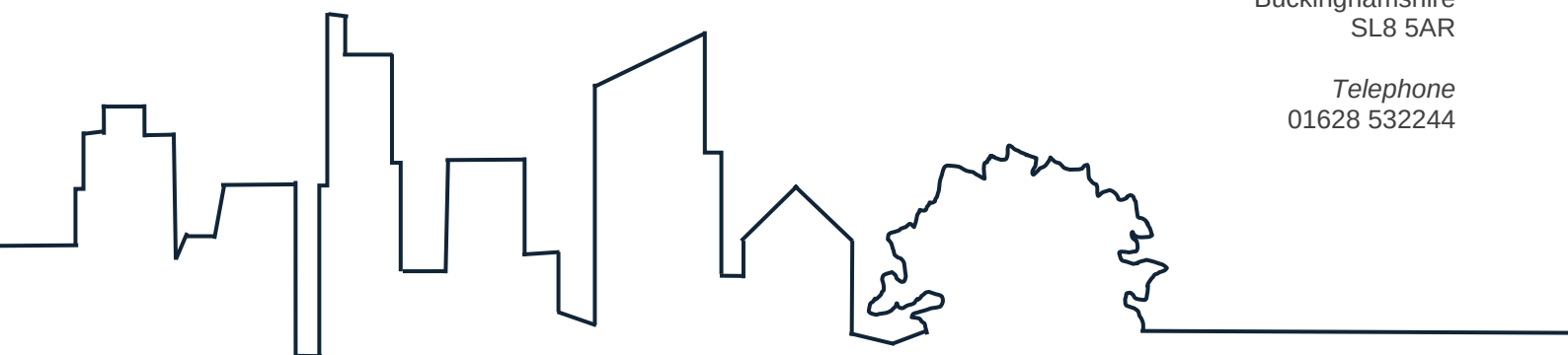
Infiniti Centre, Rose Kiln Lane, Reading RG2 0JZ

February 2020

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1. INTRODUCTION

1.1 Walsingham Planning has been instructed by Hartwell Automotive Group Limited (“Hartwell”) to submit an application for planning permission to Reading Borough Council (“RBC”) for the refurbishment of the existing car showroom including alterations to the front façade and the construction of a decked car park at the rear.

1.2 The description of development is as follows:

“Construction of decked car park at the rear of the showroom building above the existing hard surfaced car park, external alterations to the main showroom building, and associated works.”

1.3 This application is made following a pre-application enquiry meeting with Anthony Scholes of Reading Borough Council held on 16 December 2019. In summary, the response dated 29 January 2020 concluded that the principle of a refurbishing the car showroom and constructing a new decked car park to the rear of the site is likely to be acceptable, however further information would need to accompany any future planning application to demonstrate there would be no adverse impact on trees, ecology, or the adjacent watercourse.

1.4 This report has been prepared following an examination of the site and surroundings, an examination of relevant policy documents, and consideration of various technical assessments relating to the site and the proposals. This report provides the background information on the site and an assessment of the proposals in relation to planning policy and other material considerations.

1.5 This report is set out under the following sections:

- Chapter 2 provides the factual background to the site;
- Chapter 3 sets out the proposals;
- Chapter 4 sets out the relevant planning policy and guidance;
- Chapter 5 discusses the planning issues and considerations; and
- Chapter 6 sets out our conclusions.

Supporting Information

1.6 This Planning Statement should be read in conjunction with the following documents submitted in support of the application:

- Design & Access Statement by HNW
- Drawings by HNW
- Arboricultural Impact Assessment and Arboricultural Method Statement, including Tree Survey and Tree Protection Plan, by John W Platts Chartered Landscape Architects Ltd.
- Transport Statement by Stantec

1.7 The submitted drawings are as follows:

- | | |
|------------------------------------|--|
| • 19030-HNW-ZZ-ZZ-DR-A-1000 Rev P1 | Site location plan |
| • 19030-HNW-ZZ-ZZ-DR-A-1001 Rev P1 | Existing site plan |
| • 19030-HNW-ZZ-ZZ-DR-A-1002 Rev P1 | Existing ground floor plan |
| • 19030-HNW-ZZ-ZZ-DR-A-1003 Rev P0 | Existing first floor plan |
| • 19030-HNW-ZZ-ZZ-DR-A-1004 Rev P0 | Existing roof plan |
| • 19030-HNW-ZZ-ZZ-DR-A-1300 Rev P0 | Existing elevations |
| • 19030-HNW-ZZ-ZZ-DR-A-1350 Rev P0 | Existing sections |
| • 19030-HNW-ZZ-ZZ-DR-A-2101 Rev P4 | Proposed site schematic |
| • 19030-HNW-ZZ-ZZ-DR-A-2210 Rev P5 | Proposed ground floor plan |
| • 19030-HNW-ZZ-ZZ-DR-A-2211 Rev P3 | Proposed first floor plan |
| • 19030-HNW-ZZ-ZZ-DR-A-2212 Rev P1 | Proposed roof plan |
| • 19030-HNW-ZZ-ZZ-DR-A-2300 Rev P2 | Proposed car deck site sections & elevations |
| • 19030-HNW-ZZ-ZZ-DR-A-2310 Rev P3 | Proposed elevations |

- 19030-HNW-ZZ-ZZ-DR-A-2320 Rev P1 Proposed sections

2. FACTUAL BACKGROUND

- 2.1 The site to which this planning application relates is the 'Infiniti' centre on Rose Kiln Lane. Infiniti – part of the Nissan Group – are vacating the site and Hartwell will be taking over. It will be retained as a car dealership providing sales and servicing for cars and light commercial vehicles.



The Infiniti Centre on Rose Kiln Lane, viewed looking east (copyright: Google)

- 2.2 The site is 0.58ha in size and comprises a large car showroom building set back from the main A33 road, with a smaller outbuilding at the rear which houses the valet. The majority of the site is hard surfaced, however at the front is a limited amount of soft landscaping on the road frontage including a number of trees, and at the rear beyond a perimeter fence part of the river bank including some trees lies within the red line boundary.
- 2.3 The building is not listed, and the site does not lie within a Conservation Area. There are no listed buildings or Conservation Areas nearby.



Existing front elevation

- 2.4 The new Reading Local Plan was adopted in November 2019. On the Proposals Map the site lies within an Air Quality Management Area (Policy EN15). At the rear of the site is The River Kennet (and Waterloo Meadows beyond) which is a designated Major Landscape Feature (Policy EN13). The proximity to the river means the site lies within Flood Zone 2, with the river itself adjacent to the site being located within Flood Zone 3. The adjacent River Kennet is also an Area of Identified Biodiversity Interest (Policy EN12). The site is not the subject of any land use allocation.



The location of the site shown on the Proposals Map

- 2.5 Cycle routes run along the A33 and the banks of the Kennet (Policy TR4), and the A33 is designated Classified Highway Network (Policy TR3).
- 2.6 The Design & Access Statement which accompanies the application includes further information about the site and surroundings.

Relevant Planning History

- 2.7 June 2006 – outline planning permission was granted for “*2 no. car dealerships including sales vehicle workshops, offices, storage and plant (Plots A and B) and B8 units with ancillary trade counters (Plot C). (Siting, means of access and landscaping to be considered for Plots A and C, and all matters to be considered for Plot B)*” (ref. 060539).
- 2.8 September 2008 – full details approved for the “*erection of a building for use as a car dealership (sui generis) with associated servicing, workshop, maintenance and preparation areas and valet bay together with parking and access works, boundary treatment, landscaping and associated works*” (ref. 081096).
- 2.9 Also September 2008 – full details approved for the “*erection of a warehouse building for self-storage use (Class B8) together with parking and access works, boundary treatment, landscaping and associated works*” (ref. 080736).

Pre-application enquiry

- 2.10 A pre-application enquiry was submitted to the Council in November 2019 and a meeting held with Anthony Scholes on 16 December 2019, which focused on the principle of constructing a new decked car park and rearranging the existing surface-level parking and storage across the site. The pre-application response concluded:
- *It is considered that the principle of a decked car park to the rear is likely to be deemed acceptable.*
 - *However, without further detailed information considering implications on trees and ecology, there may be insufficient evidence to demonstrate the proposed structure can be located in such proximity to the site boundary and watercourse.*
 - *Any proposed signage should also reflect the commercial nature of the area.*

- 2.11 Accordingly, further information is provided in support of this application in respect of ecology, trees, and the proposed decked car park's relationship with the boundary at the rear of the site. Full details are set out within the accompanying drawings and Design & Access Statement, and are discussed in Chapter 5 of this document.

3. PROPOSED DEVELOPMENT

- 3.1 The operational requirements of the new tenant will necessitate the dealership selling and servicing vans as well as the selling and servicing of cars.
- 3.2 Full planning permission is sought for the construction of a new decked car park at the rear of the showroom, which is necessary in order to maintain a well-stocked showroom and used car display area.
- 3.3 The new car park will be a single deck and will be a simple steel-framed construction. The design and construction of the new raised deck will not require any foundations or penetration of the existing hard-surfacing at the rear of the site, instead the deck will sit on a series of plates which are secured into position and which carry the load.
- 3.4 The new decked car park will accommodate an additional 46 spaces comprised of a mixture of stock parking and staff parking.
- 3.5 Overall, the differences in spaces across the site between the present situation and the proposal is 48 spaces, with spaces are reconfigured across the site. The breakdown as follows:

	Use	Existing	Proposed	Difference
Operational	Sales	9	11 (inc. 1 disabled and 4 EV charging spaces)	2
	Staff	18	19	1
	Servicing	20	20	0
	Sub Total	47	50	3
Display / Storage	Forecourt Display	40	40	0
	Showroom display	6	16	10
	Demonstration	9	9	0
	Stock	24	59	35
	Sub Total	79	124	45
	Total	126	174	48

- 3.6 The application also proposes external changes to the front (west) elevation of the main showroom building. These are aesthetic changes associated with removing Infiniti branding and refreshing the front façade and main entrance to the showroom. The overall height, bulk, massing, footprint, and location of the showroom building will not be altered and will remain as existing.
- 3.7 A full fit-out and refurbishment of the main showroom building is also proposed and is shown on the accompanying drawings, however these internal changes do not require planning permission.
- 3.8 The acceptability of the proposals for which planning permission is sought is discussed in Chapter 5 of this document.

4. PLANNING POLICY

- 4.1 Section 38(6) of the 2004 Planning & Compulsory Purchase Act requires that determination of any planning application must be in accordance with the development plan, unless material considerations indicate otherwise. In this instance for the purposes of determining the application the Development Plan comprises the Reading Local Plan (2019).
- 4.2 Also of relevance is the National Planning Policy Framework (2019) and associated Guidance.
- 4.3 The policies and guidance considered relevant to the determination of the application are set out below.

Reading Local Plan

Principle of Development

- 4.4 Policy CC1 concerns the 'presumption in favour of sustainable development' as contained in the NPPF. It confirms how *"applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise. Planning applications that accord with the policies in the development plan (including, where relevant, with policies in neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise."*

Design

- 4.5 Policy CC7 'design and the public realm' requires *"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 policy goes on to set out design criteria against which proposals will be assessed.
- 4.6 With regards to the adjacent river Kennet, Policy EN11 'waterspaces' states:

"Reading's waterspaces will be protected and enhanced, so that they can continue to contribute to local and regional biodiversity and ecology, flood mitigation, local character, heritage and visual amenity, the provision of accessible leisure and recreational opportunities and, where appropriate, navigation. There will be no adverse impact on the functions and setting of any watercourse and its associated corridor."

Where development in the vicinity of watercourses is acceptable, it will:-

- *Provide appropriate, attractive uses and buildings that enhance the relationship of buildings, spaces and routes to the watercourse, including through creating or enhancing views of the watercourse, and create a high quality public realm;*
- *Make positive contributions to the distinct character, appearance, historic significance, landscape and amenity of the watercourses;*
- *Provide a strengthened role for watercourses as important landscape features, wildlife corridors, historic features and recreation opportunities;*
- *Wherever practical and consistent with its biodiversity role, provide good, level access to and along the waterside for all those who want to use it;*
- *Be set at least ten metres back from the watercourse wherever practicable and appropriate to protect its biodiversity significance;*
- *Improve the quality of watercourse environment through protecting and enhancing habitats and ensuring that habitat creation is balanced with access and urban uses; and*
- *Pursue opportunities for deculverting of watercourses.”*

Highways, transport, and parking

4.7 Policy TR3 ‘access, traffic, and highway-related matters’ states:

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:

- *Accesses and works to the highway comply with the adopted standards of the Transport Authority*
- *The development would not have a material detrimental impact on the functioning of the transport network*
- *The proposals would not be detrimental to the safety of users of the transport network, including pedestrians and cyclists*

- *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*
- *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."

Air Quality

- 4.8 Policy EN15 states how *"development should have regard to the need to improve air quality and reduce the effects of poor air quality"* and that *"development that would detrimentally affect air quality will not be permitted unless the effect is to be mitigated"*.

Trees and Biodiversity

- 4.9 Policy EN12 'biodiversity and the green network' states:

"The identified Green Network, the key elements of which are shown on the Proposals Map, shall be maintained, protected, consolidated, extended and enhanced. Permission will not be granted for development that negatively affects the sites with identified interest or fragments the overall network."

- 4.10 The River Kennet adjacent to the application site is an area with identified biodiversity interest.
- 4.11 Policy EN12 continues, stating 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."*
- 4.12 Trees and hedges are dealt with by Policy EN14, which states:

"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 be maintained or enhanced."

New development shall make provision for tree retention and planting within the application site, particularly on the street frontage, or off-site in appropriate situations,

to improve the level of tree coverage within the Borough, to maintain and enhance the character and appearance of the area in which a site is located, to provide for biodiversity and to contribute to measures to reduce carbon and adapt to climate change. Measures must be in place to ensure that these trees are adequately maintained.”

Flooding and Drainage

- 4.13 Policy EN18 ‘flooding and sustainable drainage systems’ states:

“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.”

National Planning Policy Framework

- 4.14 The National Planning Policy Framework (February 2019) sets out the Government’s intention for the planning system.

Principle of development

- 4.15 At the heart of the NPPF is a presumption in favour of sustainable development (paragraph 11) which for decision-taking means that development proposals that accord with the development plan should be approved without delay.
- 4.16 Paragraph 118 states that planning policies and decisions should *“give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs”*.

Highways, Transport, and Parking

- 4.17 Para.102 sets out how *“transport issues should be considered from the earliest stages of plan-making and development proposals, so that the potential impacts of development on transport networks can be addressed” and “the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account.”*
- 4.18 Paragraph 109 continues, stating:
- “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.”*

Design

- 4.19 Chapter 12 seeks to achieve well-designed places, and para.124 states how *“the creation of high quality 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.”*
- 4.20 Para.127 states that *“planning policies and decisions should ensure that developments:*
- a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development*
 - b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;*
 - c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);*
 - d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;*
 - e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and*
 - f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.”*
- 4.21 Finally, para.130 states:
- “Permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions, taking into account any local design standards or style guides in plans or supplementary planning documents. Conversely, where the design of a development accords with clear expectations in plan policies, design should not be used by the decision-maker as a valid reason to object to development.”*
-

4.22 The application of the policies and guidance set out above is discussed in the next chapter.

5. PLANNING CONSIDERATIONS

5.1 This section of the Planning Statement assesses the development proposals against national and local planning policy and other relevant material planning considerations and considers each main aspect of the proposed development, namely:

- Principle of Development
- Design and Appearance
- Highways, Transport, and Parking
- Air Quality
- Trees and Ecology
- Flooding and Drainage

Principle of development

5.2 The existing Sui Generis car dealership use is retained on the site. The existing building is re-used and repurposed, and the existing areas of parking and vehicle hardstanding area at the front and rear are retained.

5.3 The National Planning Policy Framework (NPPF) promotes sustainable development and places substantial weight on re-using sustainably located land and buildings. The proposed development is by its very nature sustainable, maximising the opportunity of an already developed brownfield site and making efficient use of the land. It will allow the business to thrive, and will ensure it continues to be a source of employment in the Borough.

The proposal is in accordance with the NPPF and specifically the Presumption in Favour of Sustainable Development and Paragraph 118, and Policy CC1 of the Local Plan.

Design & Appearance

- 5.4 The application proposes alterations to the front façade of the showroom building fronting the A33 as well as the construction of a new decked car park at the rear.
- 5.5 The decked car park is a simple structure in terms of its construction and final appearance. The nature of its construction results in extremely limited interference with the ground whereby no significant engineering works or foundations are necessary, instead the steel-framed structure sits on metal plates which are in turn secured to the ground.
- 5.6 The decked car park is located at the rear of the main building and will be largely obscured from views from the public realm by the buildings fronting the A33 from the west and the mature trees and vegetation from the east. The site is not in a conservation area and there are no listed buildings located nearby. In any event, the decked car park is sited on an existing hard-surfaced car park. There is not considered to be an adverse visual impact on the environment, in accordance with Policy CC7.
- 5.7 Turning to the alterations to the main showroom building, the height, bulk, and massing will remain as existing. There are some limited alterations to the front façade, however these will be read in the context of the existing building and frontage of similar buildings in this location. The building will be refreshed with a new front entrance to the building, repaired externally, and refurbished internally. These are all positive – albeit minor – changes.
- 5.8 The final design of new signage will be the subject of a separate advertisement consent application.

By optimising the potential of the site without detriment to local views of amenity, the proposal is in accordance with Policy CC7 'Design and the Public Realm', and paragraphs 124, 127 and 130 of the NPPF.

Highways, Transport and Parking

- 5.9 The new decked car park at the rear will allow for an additional 46 spaces to be provided on the top level. However, these are not parking spaces in the conventional sense for use by visiting members of the public, they are for vehicle stock storage and for staff parking. The need for the additional space is a requirement to maintain a well-stocked showroom and used car display area, which includes selling and repairing cars as well as light commercial vehicles.

5.10 The nature of the additional parking means that these spaces will not give rise to additional trip generation but instead simply provides additional storage for vehicles at the site. Indeed, they will give rise to fewer trips by vehicle transporters as additional parking/storage on site means fewer deliveries.

5.11 A Transport Statement prepared by Stantec accompanies this application, which considers the existing situation on site and compares this to the situation on site once the new decked car park has been built and the refurbished showroom reopened. The existing and proposed situation is as follows:

	Use	Existing	Proposed	Difference
Operational	Sales	9	11 (inc. 1 disabled and 4 EV charging spaces)	2
	Staff	18	19	1
	Servicing	20	20	0
	Sub Total	47	50	3
Display / Storage	Forecourt Display	40	40	0
	Showroom display	6	16	10
	Demonstration	9	9	0
	Stock	24	59	35
	Sub Total	79	124	45
	Total	126	174	48

5.12 Policy TR3 'access, traffic, and highway-related matters' states that "*in determining proposals involving 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;*

This is not relevant to the proposal. No new or amended access is proposed, the current arrangement is retained and used as existing.

- ii. *The development would not have a material detrimental impact on the functioning of the transport network;*

The Transport Statement confirms that the reconfiguration of the showroom sales and servicing areas will generate a negligible change in trips during peak hours and have an imperceptible impact on the local highway network.

- iii. *The proposals would not be detrimental to the safety of users of the transport network, including pedestrians and cyclists;*

Likewise, the Transport Statement confirms how users of the network would not be adversely impacted by the proposals due to the negligible change in trip generation.

- 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*

The site benefits from good access onto the main road network, and the existing access arrangement is not being changed. The operation is not expected to give rise to significant levels of HGV traffic, just occasional stock deliveries.

Indeed, the provision of additional storage on site through the construction of the decked car park will require fewer deliveries of vehicles as more stock can be kept on site. This is a benefit.

- v. *For non-residential uses, or new dwellings on classified roads, off-street servicing would be provided.*

The layout of the parking spaces on the front forecourt allow for an articulated vehicle transporter to safely manoeuvre within the site.

- 5.13 As described above, this is not a new car park in the conventional sense providing additional spaces to visiting members of the public and resulting in increased traffic or trip generation; but rather it is simply additional storage space for vehicle stock and for staff parking.

- 5.14 The small increase in staff parking – including 5 spaces provided on the new upper deck – is required due to the number of employees rising from 22 to 30. Whilst the trip generation from

this increase is likely to be imperceptible – noting the potential for sustainable means of travel to and from the site – the employment of additional staff is an important economic benefit.

- 5.15 The proposal will not result in an observable increase in traffic movements or trip generation, and the Classified Highway Network will not be adversely affected by the decked car park and refurbished car showroom. Indeed, the provision of extra storage on site will reduce the need for deliveries made by vehicle transporters.
- 5.16 This is in accordance with Paragraph 109 of the NPPF which states that the test is 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.”* The impact of the development on the road network will be imperceptible; it will certainly not be severe.

Due to the nature of how the decked car park will be used it has been confirmed that there will be no impact on highway safety or residual cumulative impact on the road network, in accordance with Paragraph 109 of the NPPF and Policy TR3 of the Local Plan.

Air Quality

- 5.17 The site lies within a designated Air Quality Management Area and Policy EN15 states how development should have regard to the need to improve air quality and reduce the effects of poor air quality.
- 5.18 As discussed above, the proposed decked car park is not to serve visiting members of the public. Although the new car park deck accommodates an additional 46 spaces, these are for stock parking and workshop parking which would not give rise to the levels of air pollution a typical car park might be expected to.
- 5.19 In any event, with regards to the criteria of Policy EN15, the proposal – either on its own or when combined with the cumulative effects of other developments already permitted – is not considered to worsen air quality given the context of the existing use and how the decked car park will be used.
- 5.20 The pre-application enquiry with RBC has confirmed that an Air Quality Assessment is not required in this instance, due to the nature of the proposals.

- 5.21 The location of the development allows sustainable travel choices for staff. The site is well-located for bus routes including the construction of a new bus lane, and is well-located for access to the local cycle network.

Accordingly, the decked car park is in accordance with Local Plan Policy EN15. Furthermore, the pre-application enquiry has confirmed that an Air Quality Assessment is not required.

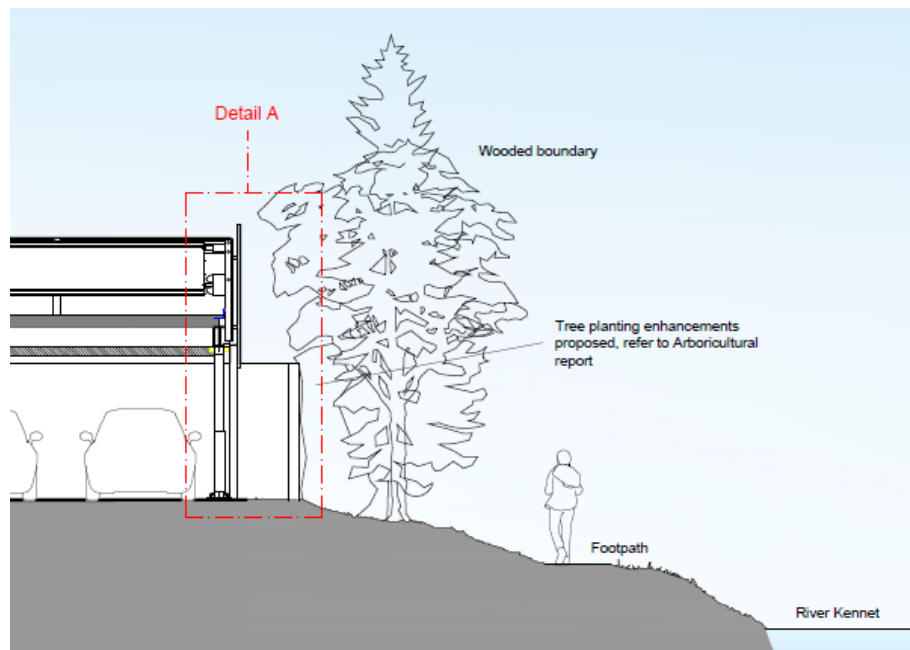
Trees and Ecology

- 5.22 The pre-application enquiry response requested additional information be provided in respect of trees and ecology, specifically to show the proposed relationship between the decked car park and the existing trees and the watercourse beyond.
- 5.23 Accordingly, submitted alongside this application is a site plan and section drawing showing the decked car park in relation to the trees on the eastern boundary and the river Kennet beyond, and details of mitigation measures and enhancements at this part of the site in relation to trees and ecology.

Ecology

- 5.24 The site lies immediately adjacent to the River Kennet, a designated Area of Identified Biodiversity Interest. There are a number of trees within the site on the Rose Kiln Lane frontage.
- 5.25 Policy EN12 'Biodiversity and the Green Network' states that *"permission will not be granted for development that negatively affects the sites with identified interest or fragments the overall network"*.
- 5.26 The application proposes to replace one hard surfaced area with another, albeit it will be elevated by 2850mm. There is already a high fence and a series of streetlights on this eastern boundary of the site. The proposal will not result in the removal of any trees or habitats on the eastern boundary (the identified area of biodiversity interest), the part of the site beyond the fence adjacent to the River Kennet will remain untouched by the proposals.
- 5.27 The drawings show the current lighting situation at this part of the site and the limited changes required in order to accommodate the decked car park. On the upper deck the new lighting will be low level, mounted on a screen below the height of the barrier and facing away from the eastern boundary. This will ensure any light spill is minimised, is low level, and is directed away from trees/habitats/the river beyond.

- 5.28 It is also proposed to install a screen to both the upper and lower deck in order to deflect and reduce vehicle emissions on the eastern boundary. Again, and as discussed in detail above, this isn't a car park in the conventional sense and will not give rise to the level of vehicle movements (and therefore noise and emissions) like a 'traditional' car park might be expected to. This part of the site is primarily for the storage of vehicles.
- 5.29 Nevertheless, a screen mounted to the eastern elevation of the new car park deck and added to the ground level car park will provide protection and mitigation from noise, exhaust fumes, and headlights.



- 5.30 These measures combined will ensure the new decked car park will not adversely affect the adjacent Area of Identified Biodiversity Interest in accordance with Policy EN12.
- 5.31 With regards to ecological enhancements, the existing context is a hard-surfaced site used for storing vehicles and this context means it is difficult to provide ecological enhancements beyond maintaining the current situation and ensuring there is no adverse impact as per the measures described above.
- 5.32 However, the part of the application site beyond the eastern fence along the banks of the Kennet provides some opportunity to provide habitats and ecological enhancements. Three bird boxes are proposed mounted to existing trees, and a 'bug hotel' will be constructed within the wooded margin. These enhancements to the Area of Identified Biodiversity Interest is in accordance with Policy EN12.

River Kennet

- 5.33 Turning to the river itself, for the same reasons as discussed above, the development will be in accordance with Policy EN11 'waterspaces'. The decked car park at the rear is simply replacing one area of hard surfacing with another, within the boundaries of the existing site and away from the river. The site is already characterised by vehicles, hardstanding areas, fencing, and lighting, and the decked car park will not be a worsening of this situation. The mature trees on the eastern boundary will continue to provide screening from the car park and the vehicle showroom beyond, one of a number of 'big box' buildings along this part of the A33.
- 5.34 It again needs to be re-emphasised how the primary purpose of the car park deck is for vehicle storage; cars will be parked up and only moved to the showroom or forecourt when needed. This is not a car park for customers of a shopping centre (for example) which would expect regular intensive use, but rather vehicles will be stored here. There will not be excessive vehicle movements and the associated dust, noise and emissions one would expect from a "conventional" car park.

Trees

- 5.35 Similarly, in accordance with Policy EN14 'Trees Hedges and Woodlands', the existing trees on the banks of the river will not be adversely affected by the proposed decked car park. The existing trees on the road frontage will be retained.
- 5.36 Existing trees lie near to the site boundary on the north and east of the site, including the overhanging of the crowns of some of the larger trees. The accompanying Tree Survey and Arboricultural Method Statement confirms how the adjacent trees to the east will be protected during the construction phase and operation of the car park deck in accordance with Policy EN14.
- 5.37 It should also be emphasised how the entire car park deck is pulled away from the eastern boundary of the site. It does not sit flush with the existing fence but is set back from the tree line to ensure the new deck (and vehicles parked on it) doesn't interfere with the crowns of these trees. This is shown in the diagram on the previous page.
- 5.38 The car park itself will not require any foundations or penetration of the existing slab, therefore there is no opportunity for the development to impact on the root systems of these existing trees.
- 5.39 A Tree Survey and an Arboricultural Method Statement prepared by John W Platts Chartered Landscape Architects Ltd. confirms:

- The arboricultural survey and associated drawings respond to the requirements of the British Standard BS 5837:2012 Trees in relation to design, demolition and construction.
- Trees and scrub vegetation including existing habitats is not affected on the eastern boundary with the river.
- There are three trees on the northern boundary just off-site – one of which is dead – which require removal to facilitate the construction of the deck. Replacement trees are proposed in the same area, albeit a slightly different location pulled back away from the car park deck.

The nature of the proposals – a simple lightweight car park deck constructed 2.8m above an existing car park wholly within the existing site– will ensure there will be no adverse impact on trees, biodiversity, or the adjacent river in accordance with Policies EN11, EN12, and EN14.

Flooding and Drainage

- 5.40 The site is located within Flood Zone 2. A car showroom including a decked car park is not a vulnerable use, and the existing buildings and use on the site is retained.
- 5.41 The proposal is categorised as a “minor development” by the National Planning Practice Guidance (in this case “alterations: development that does not increase the size of buildings e.g. alterations to external appearance”). The Guidance states that minor developments are unlikely to raise significant flood risk issues unless:
- they would have an adverse effect on a watercourse, floodplain or its flood defences;
 - they would impede access to flood defence and management facilities, or;
 - where the cumulative impact of such developments would have a significant effect on local flood storage capacity or flood flows.
- 5.42 The site is already hard surfaced, and the proposed development will not increase the risk of flooding elsewhere. The posts and footings of the decked car park are not a ‘building’ in the conventional sense and will not reduce the volume of the flood plain or increase flooding elsewhere, nor will it impede the flow of water. The proposal is retaining the existing hard surfacing and characteristics of the site, and constructing a new hard surface one storey higher.

It is maintaining the existing situation at the site, and is therefore considered acceptable given the existing site context.

- 5.43 There is no opportunity for the development to have an adverse effect on a watercourse or a floodplain, it will not impede access to flood defence facilities, and it will not have any effect on local flood storage capacity or flows.
- 5.44 A car showroom use is not a vulnerable use, and this use is retained and continued at the site. There is no basement level to the building or to the car park, and egress/escape from the ground floor is easily possible through one of the many entrances/exits throughout the building. A first-floor level within the main building and to the car park deck provide an alternative means of refuge.
- 5.45 The proposed development does not represent a risk to either customers or staff working at the site, nor will it increase the risk to residents elsewhere.
- 5.46 Environment Agency 'Product 4' flood level data can be provided to the Council if required.

The proposal is in accordance with Policy EN18 'Flooding and Sustainable Drainage Systems'.

6. SUMMARY AND CONCLUSIONS

- 6.1 Full planning permission is sought for the construction of a car park deck above an existing hard surfaced car park at the rear of the Infiniti dealership on Rose Kiln Lane, Reading. Alterations to the front elevation of the main showroom building are also proposed.
- 6.2 The proposal represents maximising the use of this brownfield previously developed site and is sustainable development in accordance with the provisions of the NPPF.
- 6.3 With regards to the impact on the highway network, Stantec confirm how the main change as a result of the proposal is to accommodate greater storage of vehicles on the site. Car transporters will continue to deliver the vehicles outside of peak hours, therefore the additional vehicle storage will not increase peak hour vehicle movements. The reconfiguration of the showroom sales and servicing areas will generate a negligible change in trips during peak hours and have an imperceptible impact on the local highway network, therefore the proposals are in accordance with Policy TR3 and paragraph 109 of the NPPF.
- 6.4 For the same reasons, there will be no detrimental impact on air quality.
- 6.5 The car park is largely hidden from view, situated behind the series of much larger buildings on this part of the frontage and screened by the mature vegetation lining the banks of the River Kennet. The proposal will be neutral in terms of its impact on the river, its ecological impact, and on trees. It will not necessitate the removal or alteration of any existing trees on the eastern boundary; on the northern boundary it will necessitate the removal of 3 recently planted trees which will be replaced.
- 6.6 In terms of ecological habitats whilst the nature of the proposal only allows for an extremely limited level of ecological enhancements these are provided in the form of bird boxes and an insect hotel. Therefore on the sensitive eastern boundary part of the site existing trees are retained and protected in accordance with the tree protection plan and ecological enhancements are provided beyond the car park (but within the red line site boundary) along the banks of the Kennet on the eastern boundary of the site.
- 6.7 The placing of a number of metal posts (to support the car park deck above) is a *de minimis* impact in terms of the flood plain and the risk of increasing flooding elsewhere, and the rates of run off at the site will remain as existing.

- 6.8 The proposal will retain the land and buildings in employment use and allow for a new business operation at the site, employing 30 full-time staff and contributing to Reading's economy.
- 6.9 For all the above reasons, it is considered the proposal accords with the policies and objectives of the Development Plan and the National Planning Policy Framework, and it is respectfully requested that planning permission is granted.