

PLANNING STATEMENT

PROPOSED CHANGE OF USE

FROM OFFICE BUILDING

(USE CLASS B1)

TO

NEW POLICE BASE

(USE CLASS SUI GENERIS)

AT ATLANTIC HOUSE

IMPERIAL WAY, RG2 0TD

**THAMES VALLEY
POLICE**



1. INTRODUCTION

- 1.1 This Planning Statement is in support of a planning application to deliver a new Police Base for Thames Valley Police (TVP) in Reading. The new Base will largely replace the existing Police Station in the Town Centre and be the location for the majority of staff and services currently provided in the Police Station and which provide the officers, staff and services for the Reading Local Police Area (LPA). By way of information a new dedicated “town-centre” facility is to be provided separately from this application and that facility will retain the visible presence in the town, a base for the dedicated town-centre neighbourhood team and the public interface (front counter) for members of the public to engage directly with TVP.
- 1.2 This application simply seeks permission for a Change of Use, no physical works are proposed. The existing building was most recently occupied as an Office by Regus and therefore considered to fall into category B1 of the Town and Country Planning (Use Classes) Order 1987 (as amended).
- 1.3 Traditionally a Police Base/Station falls to be determined within Use Class *Sui Generis*, hence the requirement for this “change of use” application.
- 1.4 This Planning Statement should be read in conjunction with the “Design and Access Statement” submitted as part of this application along with the accompanying plans.

2. BACKGROUND

- 2.1 TVP has been seeking to locate a replacement new Police Station for a number of years. The existing Police Station at Castle Street, in the Town Centre, is no longer considered fit for purpose for modern policing requirements, it is too large and has substantial on-going maintenance issues that requires a level of significant financial investment that is considered unviable.
- 2.2 TVP's strategic approach to delivering policing in Reading has been to seek a location for a new Police Base, outside of the Town Centre, but still within Reading Borough and to continue to provide a separate, dedicated presence in the Town Centre that will retain a visible presence as well as incorporating a front counter (for members of the public) and a base for the dedicated "Town Centre" teams to operate out of.
- 2.3 This application seeks to secure the location of the larger Police Base that will provide the vast majority of space and facilities for the Reading LPA. TVP are seeking to secure the dedicated Town Centre presence to sit alongside this but until this is delivered TVP will continue to operate their Town Centre team out of the current Police Station and retain the existing front counter provision until a permanent solution is found. This will ensure no loss of service provision for Reading.

3. SITE & SURROUNDINGS

- 3.1 The building, that is the subject of this planning application, sits within a well-established employment area approximately 3 miles south of the Town Centre. The surrounding area is made up of a wide variety of other commercial uses including other office buildings, trade counters, storage and distribution units, car showrooms, industrial buildings and food and drink establishments
- 3.2 It should be noted that a site opposite is currently being redeveloped for a mixed use scheme of commercial development and 175 residential units, this strategic site, known as Worton Grange, appears to be nearing completion.
- 3.3 The application site is a late 1980s Office building comprising 4707 GIA (3579 NIA) sqm of floor space. It is one of a pair (Pacific House being the other) that are accessed via Worton Drive but front onto Imperial Way. The two buildings are self-contained but share vehicular access and parking arrangements.
- 3.4 A total of 93 car parking spaces are provided immediately adjacent to the two buildings (at surface level) and a further 324 car parking spaces are provided via a decked (two level) car park that sits to the rear of the buildings. Commensurate levels of additional disabled car parking and cycle parking/storage are also provided. Details of TVP's parking provision is set out later in this statement.

4. PROPOSED USE

4.1 The Police Base will provide accommodation for the vast majority of staff and officers that serve the Reading LPA and are currently based at Reading Police Station in Castle Street. For clarification the following services/items will **not** be provided at this site;

- There will be no cells or custody provision.
- There will be no front counter or public interface for members of the public.
- There will be no workshop and/or fuel tanks.
- There will be no telecoms mast or aerials.

4.2 In total it is anticipated that 313 people will be employed at the new base, broken down broadly as follows;

TABLE 1 – BREAKDOWN OF EMPLOYEES

STAFF TYPE	TOTAL
Patrol Officers	145
Investigative Officers	109
Fixed/office based Staff	59
	313

4.3 153 dedicated car-parking spaces for TVP are to be provided on site, these will be a mixture of 25 ground level spaces immediately adjacent to the building and 128 parking spaces on the upper floor of the rear split level car park. A large proportion of these spaces (50-60) will be required to provide dedicated parking for operational vehicles.

- 4.4 Given the nature of the use of the building it will be a 24 hours a day, 7 days a week operation. That said the actual “activity” on site will largely be concentrated within more typical employment hours 08:00 – 22:00, with some residual use outside of these hours.
- 4.5 As stated above there will be no public interface, a front counter presence is to be retained in the Town Centre, within the current Police Station initially and then as part of the dedicated “Town Centre” replacement. Therefore any visitors to the building will be on the basis of appointment only, not footfall and therefore arrangements for parking can be carefully managed.

5. PLANNING ASSESSMENT

The Principle of the Use

- 5.1 The application site sits within a well-established employment area in Reading. Reading Borough Council's **Core Strategy (adopted 2008)** makes it clear that existing employment areas should be the location for the concentration of "*employment generating development*" (CS10) and that generally such sites should be retained for employment uses (CS11).
- 5.2 The **Sites and Detailed Policies Document 2012 (amended 2015)**, which forms part of the Council's Local Development Framework, identifies the application site as part of a wider "Core Employment Area", as originally identified as part of the Council's Core Strategy, identified as site SA12c (Land South of Basingstoke Road).
- 5.3 The accompanying reasoning behind the designation is set out at paragraph 15.2.4, this states;

"These designations are necessary to allow the employment policies in the Core Strategy to be applied, and to ensure that Reading has a flexible and responsive supply of employment land. In order to identify the sites that should be designated as Core Employment Areas, a thorough assessment of all employment areas in Reading was carried out, using a methodology set out in national guidance. The sites identified above were those that will make the greatest contribution to a sustainable economy and society over the coming years. This assessment is available separately."

- 5.4 There is clear recognition that whilst the Core Employment Areas are fundamental to maintaining and providing a supply of employment land, this needs to be balanced against a need to be "*flexible and responsive*"

in terms of the nature of the supply of land. It should also be noted that neither The Core Strategy or the Sites and Detailed Policies Document specify, within the terms of the Use Classes Order, what constitutes “employment” development. In fact it should be noted that paragraph 5.16 of the Core Strategy states;

“In order to ensure a healthy and balanced local economy, we need to make sure that a variety of size and types of employment premises are available, which may include those uses outside the B1-8 use classes for which employment areas are the only possible location.”

- 5.5 The proposed use falls into the category of “*Sui Generis*”, by definition therefore the actual use itself should be determined on its individual merits as to whether it is an appropriate use in this particular location.
- 5.6 The reality is that the Police Base will employ 313 people in total, this level of employment is commensurate to a number of “traditional” employment uses, including the property’s existing use as a B1 office. The use of the building as a Police Base will predominantly be the equivalent to a traditional office use. As stated above there are no custody facilities or any form of front counter proposed as part of this change of use, hours of operation will be akin to normal business hours.
- 5.7 When officers are not out on patrol they will be based in an office environment and those officers who are not deployed and the remaining members of support staff will be based at workstations in a traditional office environment.
- 5.8 The most recent “Employment Density Guidance”, issued in 2015 by the (then) Homes and Communities Agency, identifies typical/average employment generation per sqm of floor space throughout the UK. What is evident is that the employment generation per sqm from the proposed Police Base is comparable to a more “traditional” B1 office use.

TABLE 2 – EMPLOYMENT DENSITIES COMPARISON**AS PROPOSED BY THIS APPLICATION**

Use Class	Sub Category	Sub Sector	Density	Notes
Sui Generis	Police Base	-	11	NIA

IN ACCORDANCE WITH HCA EMPLOYMENT DENSITY GUIDE 3RD EDITION – NOV 2015

Use Class	Sub Category	Sub Sector	Density	Notes
B1a Offices	General Office	Corporate	13	NIA
		Professional Services	12	NIA
		Public Sector	12	NIA
		TMT	11	NIA
		Finances	10	NIA
	Call Centres		8	

5.9 The application would result in an employment density of 1 employee per 11sqm (NIA). This is evidently in keeping with and comparable to employment densities generated by more traditional employment uses including the previous use of the building. Therefore the key test of Policies CS10 and CS11 of the Core Strategy would be met by this planning application in that the use would maintain and indeed generate a significant level of employment, at least comparable to existing and acceptable alternative uses.

Amenity Issues

5.10 The application is solely for a change of use, no physical alterations to the building or within the site are proposed. Any additional impact on the area will just be linked to the use of the building.

5.11 As has been established the building is part of a much wider mixed-use employment area predominantly made up of other commercial uses ranging from offices and light industrial units to warehousing and retail type uses. The actual use of the building will be akin to an office type use,

operational officers will by and large use the building as a start and finish point for their shift patterns but during their hours of work will largely be deployed within the Reading LPA. Those not deployed will be working within an office environment in the traditional sense of the word.

- 5.12 Concerns that operational vehicles may exit the application site with Blue Lights and sirens are acknowledged, however the reality is that the vast majority of these response and operational vehicles will be already deployed and patrolling within Reading. The Police model of response is not to wait at a central base to be deployed (in the same way that the Fire Service operates), we would instead remain visible on patrol in our local communities and then respond as required to incidents. Therefore the actual use of the building, being in line with a B1 use, will not give rise to issues of noise, nuisance and disturbance within the area.
- 5.13 It is acknowledged that there is an emerging housing development being built opposite the application site (albeit on the other side of Imperial Way). The residential element (175 units) forms part of a large mixed use residential/commercial development approved under reference 151944 in April 2016 with a number of residential units fronting onto Imperial Way. However those units that do front onto Imperial Way, and therefore closest to our application site are subject to a specific condition requiring enhanced glazing to augment acoustic screening from Imperial Way. Further investigation demonstrates that under planning application reference 162044 a scheme for the discharge of the relevant condition was approved, specifying that those windows potentially affected would have enhanced "Type A" glazing with an improved specification incorporating a 10mm acoustically laminated pane. Therefore on the rare occasion that there would be potential disturbance from Blue Light response vehicles this would be mitigated against by the significantly enhanced glazing being utilised on the properties currently under construction.

Traffic and Transport

- 5.14 The building has 153 associated car parking spaces with it, the vast majority of which are to be located on the upper deck of the car park to the rear of the application site. A lease agreement is in place that will secure/allocate these parking spaces for TVP, whilst also ensuring that occupiers of the neighbouring office building have their spaces allocated also.
- 5.15 Of the 153 spaces approximately 50-60 will be utilised by operational vehicles, with the remaining parking spaces to be used for staff and (when required) visitors. The application site is within a highly sustainable location with a bus stop less than 150 metres away. This provides regular public transport links to the Town Centre and surrounding residential areas.
- 5.16 In addition to this, cycle network R1 provides direct, safe and convenient cycle access to the site also. Furthermore there is a large Park and Ride facility at Madejski Stadium which is 0.8 miles from the site, well within a comfortable and level walking distance from the application site.
- 5.16 As a responsible employer TVP will seek to encourage and incentivise employees to use sustainable methods of transport to the site, it should be noted that staff parking at the current Police Station is extremely limited, therefore staff and officers are familiar with the need to use alternative modes of transport to get to work. TVP will however provide facilities for cycle storage and shower/changing facilities as well as looking to promote car sharing.
- 5.17 The reality is that this proposed change of use will not have any material impact on the levels of traffic movements to and from the site that the current occupation/use of the building generates. It is considered that the

scheme will not adversely impact the flow of traffic or indeed the increase any risk of highway safety for users of the network.

Other considerations

- 5.18 TVP have been seeking to secure a suitable replacement for their current Police Station for some time, a number of options have been explored but have proved to be either impractical or not viable. Securing Atlantic House and delivering the new Police Base at this location will retain TVP's presence in Reading which, when coupled with the Town Centre replacement facility, will maintain the delivery of Policing for the local community in an efficient and effective manner.
- 5.19 The relocation to Atlantic House site will also (in due course) release the current Police Station site in the Town Centre. The site forms part of the Council's identified "Minster Quarter", this site, predominantly made up of Reading Borough Council's former Civic Offices site, The Market area, Broad Street Mall and the Police Station site have been identified as an area for future redevelopment and regeneration, a specific SPD was adopted in December 2018. In permitting this application for a change of use then this in turn will enable the future release of the current Police Station site to contribute towards the wider regeneration objectives identified by the Council in the Minster Quarter SPD.
- 5.20 There are therefore, wider implications associated with this application around regeneration, redevelopment and place-making that need to be considered as part of the determination of this proposal.

6. CONCLUSIONS

- 6.1 This modest proposal will deliver a modern, fit for purpose new Police Base in Reading. The change of use will not have any adverse material impact on the site and surrounding area.
- 6.2 To all intents and purposes the proposed use of the current B1 Office building by TVP will replicate an Office-type use. It has been demonstrated that the levels of employment generated by TVP are comparable to an Office use and that the type of activity associated with a “*sui generis*” Police Base would not appear out of keeping with a more traditional employment generating use.
- 6.3 The impact, of the proposed use, on neighbouring units, including the residential units currently being constructed opposite, has been demonstrated to be negligible. The hours of operation, whilst 24/7, will principally sit within “normal” employment hours and any visitors to the building will certainly be within traditional office hours.
- 6.4 It has been demonstrated that the neighbouring residential buildings are currently being constructed with enhanced acoustic glazing thus further minimising any potential risk of noise and nuisance from the proposed use. The impact of blue light and sirens will also be negligible as those vehicles responding to emergency calls will by and large already be on patrol within Reading, unlike, say the Fire Service, TVP response vehicles do not wait at the base before being deployed they are already visible and on patrol.
- 6.5 The proposed use will employ a total of 313 officers and staff at any one time, this equates to approximately 11 employees per sqm of floor space, comparable with a more “traditional” employment use. Therefore the overarching objective to retain such a site for employment use in line with

Policies CS10 and CS11 of the Adopted Reading Core Strategy remain intact.

- 6.6 The application will help TVP achieve a long desired requirement to provide a “fit for purpose” Police Base for Reading. The provision of this facility, along with the “Town Centre” office, will safeguard and maintain a front line visible service for the local community for many years to come.
- 6.7 Furthermore the delivery of the new Police Base will have a significant spin-off in releasing the current Police Station site in the Town Centre and providing an opportunity to facilitate the redevelopment of this strategically important area.