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Reading Borough Council,
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Reading,
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06/12/2017

Dear Sir/Madam,

APPLICATION FOR THE CHANGE OF USE AT 111-113 BROUGHTON CLOSE, READING

PLANNING PORTAL REF: PP-06571788

On behalf of our client South Central Ambulance Service, we have the pleasure of submitting a full planning application for a change of use online via the planning portal.

The proposed change of use is from Use Class B8 (*Storage and Distribution*) and Use Class B1c (*Light Industrial*) to allow Use Class Sui Generis (*Passenger Transport Service Hub*) at Units 111-113 Broughton Close, Reading.

The completed application forms are being submitted online along with this supporting letter and the following plans and drawings:

- Location Plan - (1:1250 @A4)
- Site Plan – (1:500 @A4)
- Layout and Elevations (1:200 @A4)
- Brochure
- CIL Form

In addition to the above, we would be grateful if you would consider the following content of this letter, the purpose of which is to assist the local planning authority in the determination of the application. In particular, this letter provides additional details in respect of the proposed change of use and aims to demonstrate that the proposals are appropriate and that they are supported by a range of economic and other planning policy requirements and objectives.

Site and Surroundings

The application site is Units 111-113 Broughton Close, Reading which is located 1 mile west of Reading town centre. The site is easily accessible via Loverock Road with access to Junction 11 of the M4 motorway provided by the A33. The site comprises a modern refurbished industrial/warehouse unit comprising 11,574 sq. ft. (1,075.22 sq. m) and a service yard and informal parking area. The overall site extends to 0.2 hectares.

Immediately north of Loverock Road is the Great Western Main Line railway line, beyond which is farmland and open countryside. The surrounding uses to the south, east and west are predominantly a combination of industrial/warehouse uses and residential properties. The nearest residential properties are located circa 150 metres south at Westbrook Road.

Proposed Development

The proposed development can be described as follows:

“A full planning application for the change of use from Use Class B8 (storage and distribution) and B1c (light industry) to allow Use Class Sui Generis (Passenger Transport Service Hub)”.

The Sui Generis classification is required for the building to allow a new occupier, South Central Ambulance Service to operate a passenger transport service from the premises.

The entire site will be retained in its current form and no external alterations or other works that require planning permission are proposed. The site will be operational from 05:00 to 00:00.

The South-Central Ambulance Service provides two types of services for patients, which can be divided into a renal service and a non-renal service. There are 6 shifts per day for renal services, and 5 shifts per day for non-renal services.

Shifts are staggered throughout the day with the first renal shift commencing at 05:00 and the last shift finishing at 00:00. The first non-renal shift starts at 06:00 and the last shift finished at 22:00. Furthermore, once a driver has left site to start their shift, they do not return until the end of their shift. Due to the nature of the shifts and operation of the site, there would only be a small number of employees at site at any one time.

The application is necessary to allow the relocation of the service from its current premises in which it shares with two other services that will also be relocating elsewhere. The current premises is approximately 600 metres away on the site of the former Battle Hospital, Portman Road.

Considering the relocation distance is minimal, the overall impacts of the proposals are considered to be negligible. It is understood that traffic movements to and from the Passenger Transport Service Hub will generally be similar to the movements associated with the current operation at Portman Road.

A range of social and economic benefits arising from this new occupier are set out in a later part of this letter.

Planning History

The planning history for the site, according to Reading Borough Council’s online records is limited to the application in the table below:

APPLICATION REF	DESCRIPTION	STATUS
170158	Side extension to form third unit comprising light industrial/ storage use (Class B1c/B8)	Approved April 2017

Development Plan and Other Material Considerations

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

In this instance, the relevant Development Plan for the area comprises the Core Strategy which was adopted in January 2008 and altered in January 2015. Reading Borough Council are undergoing the publication of a new Local Plan which is expected to be submitted for examination in Spring 2018, with adoption likely to be early 2019.

Paragraph 216 of the NPPF allows for decision makers to give weight to relevant policies in emerging plans depending on the stage of preparation of the emerging plan, the extent to which there are unresolved objections to relevant policies and the degree of consistency of the relevant policies in the emerging plan to the policies in the NPPF.

In addition to the adopted Local Plan, the National Planning Policy Framework (NPPF, 2012) will also be material to the determination of the proposals.

Core Strategy (altered 2015)

Paragraph 5.3 of the Core Strategy states how employment development within Reading should provide, *“modern flexible business space that fulfils up-to-the-minute demands”*.

As defined by the adopted Policies Map, Loverock Road is located within a Core Employment Area. In accordance with Policy CS11, the overall level of employment land should be maintained. Paragraph 5.14 of the Core Strategy sets out how a loss of employment land for other uses may be acceptable, depending on whether the land is still needed for employment purposes.

Policy CS12: Maintaining a Variety of Premises, sets out how a range of types and sizes of units should be present in the Borough, and proposals should maintain or enhance this range. The Policy also sets out how redevelopment of older industrial units for more flexible employment premises will be acceptable.

The National Planning Policy Framework (2012)

The National Planning Policy Framework (NPPF) was adopted in March 2012. At the heart of the NPPF is the ‘presumption in favour of sustainable development’, which for decision-making, according to paragraph 14 means approving development proposals that accord with the development plan without delay.

Paragraph 17 sets out the 12 core land-use planning principles which includes, amongst other things the need to, *“proactively drive and support sustainable economic development to deliver the homes, businesses and industrial units, infrastructure and thriving local places that the country need. Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area ...”*.

NPPF paragraphs 18 – 22 emphasise that the Government is committed to ensuring that the planning system does everything it can to support sustainable economic growth and that, in turn, this

needs local planning authorities (i.e. decision makers) to act proactively to meet the development needs of business and support an economy fit for the 21st century.

Paragraph 21 of the NPPF specifically sets out how local planning authorities should support existing business sectors, "taking account of whether they are expanding or contracting and, where possible, identify and plan for new or emerging sectors likely to locate in their area".

Assessment of Issues and Benefits

South Central Ambulance Service are relocating their passenger transport operations from Portman Road, which will retain / deliver a range of social and economic benefits to the immediate area, including:

- Approval of the proposed change of use will allow the occupation of a vacant unit within an Industrial Estate, designated as a Core Employment Area, by an employment generating occupier;
- The relocation of the South-Central Ambulance Service to Broughton Close will ensure a critical service for patients can continue to operate in the area, ensuring the retention of important social and health benefits in the area; and
- Retention of an existing business/service within the Borough, including 46 full-time equivalent staff.

The proposals are entirely appropriate for the Core Employment Area and will deliver the objectives of the Core Strategy policy to maintain the area's in employment use. More widely, the proposals will support the delivery of national planning policies, including those focussed on ensuring the provision of the businesses and industrial units and infrastructure that the country needs.

In addition to these economic and wider social / health benefits, the nature of the proposals and its surrounding uses will mean that the development will be entirely appropriate and acceptable in terms of any local impacts such as in relation to highways and other local amenity considerations.

Further Comments

A cheque for the application fee of £385.00 will be posted to you under separate cover. We look forward to hearing from you in due course with confirmation that the application has been validated. If you require any further information or have any queries in relation to this application, then please do not hesitate to contact me.

Yours sincerely,



RICHARD BROWN
DIRECTOR

FOR AND ON BEHALF OF CBRE LTD.