

Our Ref: 17351/MM/jc
Your Ref: PP-06580753
Email: mmills@firstplan.co.uk
Date: 04 December 2017

Planning department
Reading Borough Council
Civic Offices,
Bridge Street,
Reading,
RG1 2LU

Dear Sirs,

**RETROSPECTIVE PLANNING APPLICATION FOR INSTALLATION OF PLANT EXTRACT AND
EXTERNAL ALTERATIONS
UNIT 57, MILFORD ROAD, READING, RG1 8LJ**

We are instructed by our client, Roofoods Ltd (operating as 'Deliveroo Ltd'), to submit the enclosed planning application at the above site.

This application has been submitted via the Planning Portal under reference PP-06580753.

The following documents are submitted in support of this application:

- Completed Application Forms including Certificate B;
- The following plans:
 - Site Location and Block Plan (ref: 2017-065-106A)
 - Existing Floor Plan (ref: 2017-065-100A)
 - Existing Elevations (ref: 2017-065-101A)
 - Existing Roof Plan (ref: 2017-065-102A)
 - Proposed Floor Plan (ref: 2017-065-103A)
 - Proposed Elevations (ref: 2017-065-104A)
 - Proposed Roof Plan (ref: 2017-065-105A)
- Noise report prepared by Noise Solutions Ltd (ref: 86810) dated 16th November 2017;
- Odour maintenance plan by Chapman Ventilation; and
- Sirius kitchen ventilation canopy brochure.

The requisite application fee of £385 has been paid via planning portal.

Site and Surrounding Area

The site comprises an industrial warehouse building located within the Milford Road Trading Estate to the north of Reading Town Centre. The site comprises a mid terrace unit within a terrace of similar industrial units accessed from a private road off the western side Milford Road. The exact location is identified upon the enclosed site location plan ref: 2017-065-106A.

The site is bounded by industrial units to the east and west and accessed via a private access road leading from the western side of Milford Road. To the south is a similar access road leading to another terrace of industrial units within the estate: No's 21-41a.

Within the surrounding area, the site is predominantly commercial / industrial in nature as associated with the trading estate. There are as such no residential properties or other sensitive uses within the vicinity of the site which may be impacted by the application proposal.

Relevant Planning History

There is no planning history associated with the application site (unit no. 57) as identified on the local authorities online planning search function.

However, the application site comprises part of the well-established Milford Road Trading Estate and as such numerous applications have been submitted relating to various industrial and business uses. Two examples of relevance are below:

Unit 43-45

- Application ref: 11/01788/FUL. Planning permission was sought for change of use of part of the existing unit (Use Class B1a) to a Sui Generis Use. The accompanying officers report also confirms that the remainder of the unit comprises a B8 use.

Unit 41a

- Application ref: 911026. Change of use from light industrial to vehicle maintenance workshops together with associated taxi office. Approved 23rd December 1991.

As such, there is an established precedent of industrial / warehousing development in this location and given that no further records have been identified on the Council's website for the application site itself, it is therefore considered that the lawful use is within an industrial B class use.

On this basis, notwithstanding which part of Use Class B the application sites is associated with, as the proposed size of building is below 500m², planning permission would not be required to change the use to B1c (as required by Deliveroo Ltd for the commercial kitchen function) as it is allowed under permitted development rights (Part 3, Class I). Thus, the principle use as a commercial kitchen is acceptable. This application is simply required for installation of plant associated with commercial kitchen use.

Application Proposals

As a result, this application solely seeks planning permission for external extract equipment to retain the use of this building as a commercial kitchen. The application proposals are detailed on the architectural drawings, prepared by LBF Architects.

The application is for *'Retention of external plant comprising 3no. extract ducts, 1no. extract vent, 2no. boiler extract flues, 1no. air supply louvre, 3no. air condenser units and external alterations comprising installation of an access door and bike racks'*.

The amendments have been fully detailed on the enclosed planning drawings. However, a brief description of the works has been set out below.

The external works principally comprise:

- Front Elevation:
 - Painting of roller shutters and replacement of existing door with new high security door.
 - Installation of bike racks.
- Rear Elevation:

- Removal of existing central window and installation of new access door, timber window and air supply louvre.
- Form openings for extract ducting, flues and condenser unit pipework.

In respect to plant, this has as far as practically possible been fully integrated into the design of the building with the majority of the equipment routed and located internally. The external equipment is limited to 3no. extract ducts, 3no. air condensers and openings for boiler flues pipework, an air intake louvre all discretely located across the front and rear elevations, both of which face further industrial premises.

Planning policy considerations

The Statutory Development Plan comprises the Reading Core Strategy 2008 (Alterations January 2015) and Sites and Detailed Policies Development Plan Document 2012 (Alterations January 2015). The Council is also underway preparing a new local plan for which consultation is currently ongoing in respect of the 'Pre-Submission Draft Local Plan' document.

The National Planning Policy Framework (NPPF) (2012) and National Planning Practice Guidance (Online, 2017) are also material considerations.

The adopted proposals map identifies that the site is situated within the Richfield Avenue Core Employment Area (Policy SA12). This policy actively encourages class B1 (including B1c), B2 and B8 uses. The site is not situated within a conservation area and there are no nearby listed buildings within close vicinity.

The NPPF

The NPPF provides overarching planning policy guidance for development across England. It states that at the heart of the planning system there is a 'presumption in favour of sustainable development'. Paragraph 17 provides the core principles, the third of which requires planning to proactively drive and support sustainable economic development to deliver the business and industrial units, infrastructure and thriving local places that the country needs. Paragraph 18 goes on to require economic growth in order to create jobs and prosperity.

Paragraph 21 sets out that planning policy should not over-burden businesses, and paragraphs 186 and 187 go on to explain that local planning authorities should approach decision-taking in a positive way.

Local Policy

Within the Core Strategy policy CS34 sets out the need for sustainability in development and ensure that development will only be permitted where it would not be damaging to the environment through air, land, noise or light pollution. Policy DM4 reiterates this policy and confirms that development will only be permitted where it does not lead to a significant detrimental to the living environment in terms of noise and disturbance, lighting, vibration, dust, fumes and smell.

Policy DM19 also refers specifically to air quality and requires development that would affect air quality to mitigate against any potential detrimental effects.

Policy CS7 requires proposals to use the characteristics of the locality to help inform the layout, scale, height, massing, architectural detail and materiality of proposals.

In terms of flood risk, policy CS35 seeks to ensure development that is located within areas of high flood risk is not permitted where it would reduce the storage capacity of the flood plain, impede flows or increase the risks to life and property.

Objective 2 of the Core Strategy also aims to maintain good access to employment opportunities. In this regard, policy SA12 designates the Core Employment Areas including that of Richfield Avenue and policy CS11 sets out the Council's requirement for the overall level of employment land to be maintained.

Planning Considerations

Principle of the use

The application proposal comprises the necessary plant equipment required for Deliveroo to operate from this industrial building as a commercial kitchen and minor external works. The building is located in an established industrial location and therefore the use of the site, which is facilitated by the plant equipment proposed under this application, is entirely consistent with the character of the surrounding area and its existing use. For this reason, the principle of the development is in accordance with guidance contained within the NPPF, the London Plan and local planning policy CS11.

Impact of the proposals on surrounding residential amenity

The bulk of the equipment used is routed and located internally within the building. This system is bespoke and has given careful consideration to the demands of the commercial kitchen operation, the nature of the cooking and the location of the site. It will appropriately deal with noise, fumes and heat emanating from the cooking process, together with a strict maintenance programme in line with manufacturers recommendations.

It is a material consideration that the unit is located within an established trading estate and industrial area for which industrial B-Class uses are protected. It is also relevant that the closest residential properties are located approximately 45m from the site to the north at Cardiff Road and separated from view by further industrial premises.

Notwithstanding the above, the air capture and containment system to be installed within the building, as on all Deliveroo sites, is designed specifically to prevent the spread of cooking fumes and heat. It works by emitting a low-volume directed supply of air inside the hood to create a negative pressure along the front lower edge of the canopy. This pressure change guides the rising thermal current into the canopy and towards high-efficiency grease filters. These filters have efficiency levels up to 94.6% and therefore ensure that grease and odour is contained on site, and disposed in a sustainable way. In addition, as the external extract ducts will vent above roof level, the filtered extract air will be quickly and cleanly dispersed from site.

The proposed extract has therefore been appropriately designed, sited and specified to comprehensively treat and extract air emanating from the cooking process. This system will also be properly maintained to ensure that surrounding residential amenity is protected throughout the course of the operation (please see maintenance document attached).

Additionally, in terms of noise, an environmental noise survey was undertaken to establish the typical background sound levels in relation to the nearest noise sensitive receptors to the proposed plant during the quietest times at which the plant will operate to ensure no impact on these proposals. The Noise Impact Assessment provides the following conclusion:

"The predictions demonstrate that cumulative noise from the proposed plant should be acceptable to the local authority at all nearby receptors and all times, inclusive of suitable atmospheric-side attenuators fitted to the fresh air supply and kitchen extract systems..."

...Therefore, noise from the proposals should not be a reason for refusal of planning permission"

The proposal is therefore considered to be acceptable in accordance with amenity policies CS34 and DM4 and should therefore be acceptable in terms of amenity considerations.

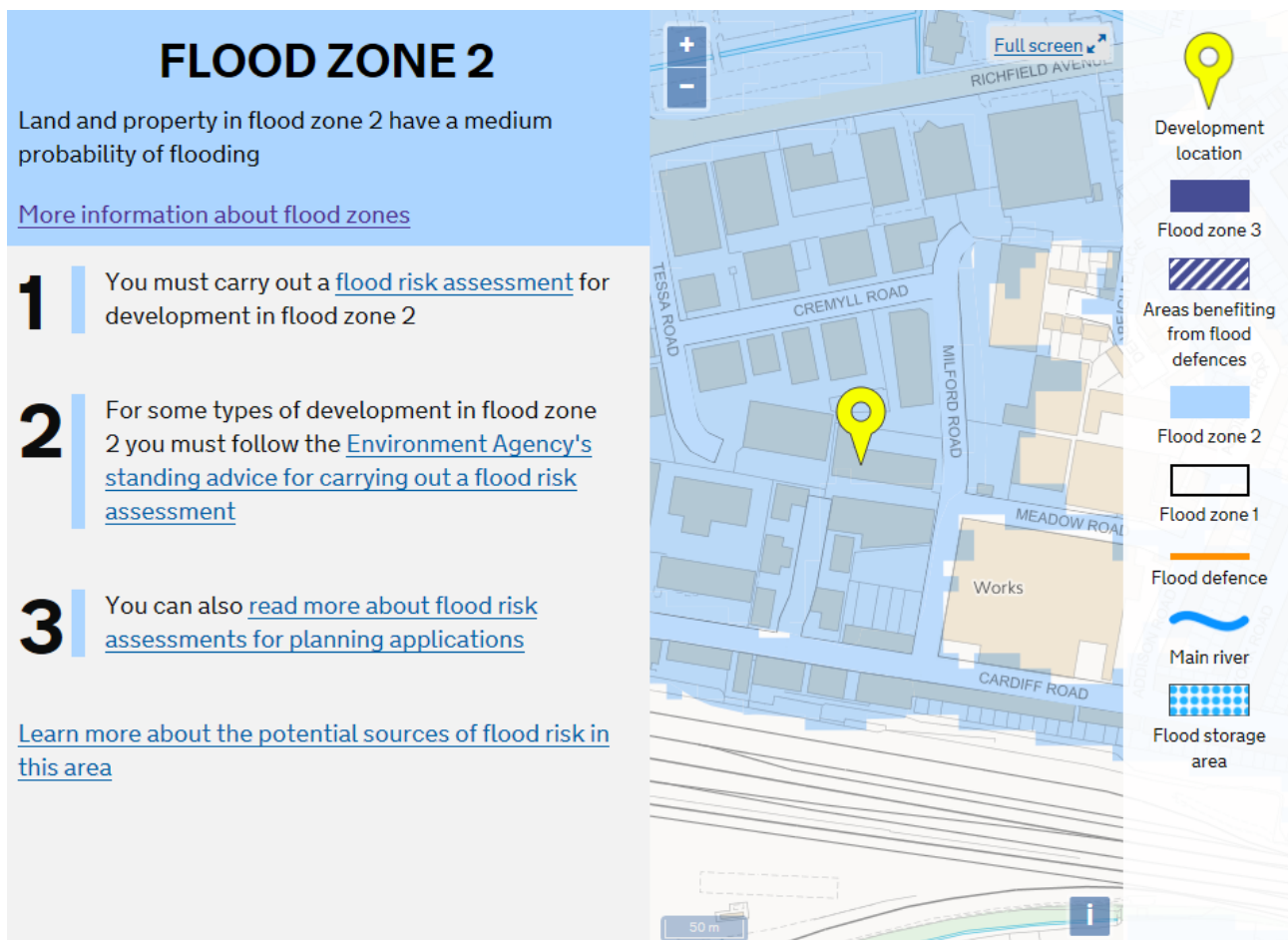
Impact on the character and appearance of the building

The application site is a well-contained industrial building within the established Milford Road Industrial Estate. The plant and external works are therefore entirely in keeping with the industrial character of the application building and its immediate context.

It is therefore clear that the application proposals will not negatively impact on the character or appearance of the host building, and are entirely consistent with the industrial area. Design implications should not therefore warrant refusal of this application.

Flood Risk

The Governments Online Flood Map for Planning service identifies that the application site falls within Flood Zone 2. An extract of this plan is inset below.



Flood Zone 2 includes land assessed as having a medium probability of flooding i.e. "Land having a 1 in 100 or greater annual probability of river flooding; or Land having a 1 in 200 or greater annual probability of sea flooding".

The site is currently occupied by a single storey terraced industrial building located approximately 500m to the south of the River Thames and there are no known surface water flooding problems on the site.

The proposals are limited to the installation of plant equipment, minor external works and installation of bike racks. The proposals will not result in any increased hard landscaping at this site nor increase the quantum of development or introduce any additional sensitive uses. As a result, there will be no increase in water volume or surface water runoff in or immediately surrounding the application site. The impact of the proposals on flooding or flood risks will therefore be negligible. In this context, the application should be considered acceptable in terms of policy CS35.

Conclusions

The principle of having plant equipment on the building is entirely acceptable, given the industrial use of the building and wider area.

The applicant has nonetheless commissioned a high performance, bespoke, extraction system designed specifically for this site by its plant engineers, which has given careful consideration to the demands of the commercial kitchen operation, nature of the cooking and the location of the site. This includes highly-specialised plant equipment which will appropriately deal with noise, fumes and heat emanating from the cooking process, together with a strict maintenance programme in line with manufacturers recommendations. The application proposals therefore safeguard amenity of surrounding occupiers, notwithstanding the highly insensitive context, and are consistent with national and local planning guidance.

In addition, the external works, included that of the plant, are consistent with the character, external appearance and location of the application building within the trading estate. The proposal is also acceptable in flood risk terms.

In the light of the above, the application proposals are consistent with all of the relevant planning policies and guidance at both national and local level. This application should therefore be considered acceptable by the Council.

I trust that you have sufficient information in order to validate the application, however, should you have any queries then do not hesitate to contact me. Otherwise, I look forward to discussing the application proposals with you in due course.

Yours sincerely,



Director

Enc.