

Planning Statement

Former Mazda car dealership, 26 Portman
Road, Reading, RG30 1EA

The Door Store Ltd

January 2016

Turley

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Client

The Door Store Ltd

LPA Reference

Reading Borough Council

January 2016

1. Introduction

- 1.1 This Planning Statement has been prepared by **Turley** to accompany a full planning application for a “Change of use of building from car service, parts, distribution and sales (sui generis) to warehouse with ancillary trade counter (Class B8), to include external changes and advertisements” at **Former Mazda car dealership, 26 Portman Road, Reading**.
- 1.2 The current planning use is “car service, parts, distribution and sales” (sui generis), confirmed by application ref 891336 (see planning history). This included the carrying out of MOT’s. For the purposes of this statement, this will be shortened to “car dealership”.
- 1.3 In addition to this Planning Statement the following documents also accompany the application and provide the information necessary to describe, assess and determine the proposals.
- **Site Location (Red Line) Plan**
 - **Design & Access Statement**
 - **Economics Statement**
 - **Transport Statement**
- 1.4 This Planning Statement is structured as follows:
- Description of the Site and Context (*Section 2*);
 - A summary of the Planning Policy Context (*Section 3*);
 - Planning Assessment (*Section 4*); and
 - Summary and Conclusions (*Section 5*).

2. The Site and Context

Site and Surroundings

- 2.1 The application site measures 0.46ha in area comprising the former car dealership and garage building, and associated at grade car park, shared access road and a small strip of land wedged between Loverock Road and the rail line.
- 2.2 The wider area takes the form of an Industrial & Retail Park and is identified as a “Core Employment Area” under RBC’s Core Strategy SA12h: Portman Rd. The surrounding buildings are mainly detached warehouse type structures, which vary in size and design. The building is effectively 2 storey in height, with the majority of the accommodation at ground floor level and a small office mezzanine at first floor level.
- 2.3 The buildings primary frontage addresses Portman Road and contains a number of large windows which were used to display cars and acted as a show window. The secondary frontage faces onto the at grade car park. It is this secondary frontage which provides access to the building.
- 2.4 Portman Road does not provide direct vehicle access to the premises within the wider Industrial and Retail estate. This is instead provided by Loverock Road, which runs parallel to Portman Road and several roads which connect the two. Loverock Road is in essence the main service road for the wider estate, providing vehicle access for cars and delivery vehicles to the majority of premises. The car park which serves the subject building is accessed from Loverock Road.
- 2.5 The variety of uses and businesses is reflected in the variation of signage design, which is assessed in greater detail in the Design & Access Statement.

Relevant Planning History & Background

Planning Applications

- 2.6 The site has the following relevant planning history:

Ref 900948 - Change of use from retail warehouse to light industrial (B1) and of storage – Application Permitted - 04/04/1991

Ref 891366 – Change of use from retail warehouse to car service, parts, distribution & sales – Application Permitted – 21/09/1989

Other relevant planning history

- 2.7 **Church of God Worldwide Mission, The Deliverance Centre, 12 Portman Rd, Reading, RG30 1EA – ref 141334** – Permanent change of use of the second floor from office to church & community use (class D1) - (Re-submission of planning application 140438) - Application Permitted - 18 December 2014.

- 2.8 This application permitted the loss of an employment use within the same Core Employment Area (proposed site also within SA12h Portman Road Core Employment Area). The following is taken from the Officer's report:

"Core Strategy Policies CS10 and CS11 aim to focus employment uses within Core Employment Areas and stipulate that the loss of employment land should not be allowed unless, amongst other things, the continued use of the site for employment uses is unviable and/or the need for alternative uses is stronger than the need to retain the employment land. Policy CS31 states that proposals for new, extended or improved community facilities will be acceptable.

Notwithstanding the aims of Policies CS10 and CS11, the previous permissions on this site have meant that less than a third of the overall floorspace is in an authorised use for B1 offices. In light of this fact and when considering the community benefits associated with the proposal and the applicant's claim that the second floor is no longer viable as office space, the proposed loss of this site as employment land is considered acceptable."

Therefore whilst not strictly relevant to this scheme, there is notable local precedent of non-employment uses being granted in the Core Employment Area.

Pre-Application Advice

- 2.9 The application proposals were developed in light of a pre-application response (dated 12/08/15). The pre-application report considered a very similar scheme to that proposed. The key points raised in relation to the principal of development were:

"An application for a 'Class B8 use with ancillary trade counter' would be likely to be acceptable whereas an application for a 'retail warehouse' would not be supported in this location"

"The existing car showroom occupied around 25% of the car dealership. This would suggest that it may be appropriate to increase the showroom area up to this limit whilst maintaining an employment use"

"Important that the nature of the use remained as B8 with an ancillary retail character as this would not just depend on the amount of floorspace, but also the nature of day to day activities"

- 2.10 The difference between a "retail warehouse" and a "Class B8 use with ancillary trade counter" is acknowledged, and Section 4 of this report explores the classification of the Door Store business in greater detail and clarifies what is proposed.
- 2.11 It should be noted that reference to the previous car dealership occupying around 25% is incorrect. This figure was based on an approximation from previous floorplans of the site. A full building survey provides a more exact figure of 30.3%.

3. Planning Policy Context

Development Plan

- 3.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that proposals be determined in accordance with the development plan unless material considerations indicate otherwise. Material considerations include relevant policies in the National Planning Policy framework (NPPF) - among them the 'presumption in favour of sustainable development'.
- 3.2 The application will need to be assessed against the following policies:

National Policy

National Planning Policy Framework

- 3.3 The **NPPF** was published on the **27th March 2012** and sets out the Government's planning policies for England and how these are expected to be applied.
- 3.4 At the heart of the **NPPF** is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking. Sustainable development includes three elements – economic, social and environmental.
- 3.5 Further clarification is provided through the core planning principles set out at paragraph 17 of the NPPF, which importantly includes the following requirement that planning should:

“Proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth”

- 3.6 Paragraph 19 of the NPPF goes onto state:

“The Government is committed to ensuring that the planning system does everything it can to support sustainable economic growth. Planning should operate to encourage and not act as an impediment to sustainable growth. Therefore significant weight should be placed on the need to support economic growth through the planning system.”

- 3.7 Paragraph 22 of the NPPF states:

“Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed. Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities” (our emphasis).”

National Planning Policy Guidance

- 3.8 The **National Planning Practice Guidance** (NPPG) supports the **NPPF** and provides guidance on the consideration and determination of planning applications, and various other technical and procedural matters, supporting the overall implementation of the policy contained within the **NPPF**.

Local Policy

Reading Borough Local Development Framework – Adopted Core Strategy (2008)

- 3.9 **Policy CS4 (Accessibility and the Intensity of Development)** states that the scale and density of development within the Borough will be related to its level of accessibility by walking, cycling and public transport to a range of services and facilities. Sites will be assessed in terms of their level of accessibility to a defined district or local centre with a good range of facilities by pedestrian routes, and to a bus stop served by a strategic bus service.

- 3.10 **Policy CS11 (Use of Employment Land for Alternative Uses) is quoted in full:**

Within the Core Employment Areas, the overall level of employment land should be maintained. Proposals that would result in a loss of such land will not be permitted.

In other areas, the following criteria will be considered when assessing proposals which would result in a loss of employment land:

i) Is access by a choice of means of transport, including access to the strategic road network, poor, and likely to remain poor?

(ii) Is the continued use of the site for employment, including the potential for redevelopment for employment uses, viable?

(iii) Is there a surplus of a similar size and type of accommodation in Reading?

(iv) Would continued employment use of the site detrimentally affect the amenity and character of a residential area?

(v) Is the need for alternative uses stronger than the need for the retention of employment land?

(vi) Would the proposal result in a piecemeal loss of employment land where there is potential for a more comprehensive scheme?

- 3.11 **Policy CS12 (Maintaining a Variety of Premises)** states that a range of types and sizes of units should be present in the Borough, and proposals should maintain or enhance this range. In particular, the overall level of start-up and grow-on space should be maintained and, where possible, increased, and any loss of small units should be offset by new provision.

- 3.12 **Policy CS20 (Implementation of the Reading Transport Strategy)** states that planning permission will not be granted unless the proposed development contributes appropriately to the provision of a balanced transport network as outlined in the Reading Transport Strategy.
- 3.13 **Policy CS22 (Transport Assessments)** states that planning permission will not be granted unless development proposals make appropriate provision for works and contributions to ensure an adequate level of accessibility and safety by all modes of transport from all parts of a development, particularly by public transport, walking and cycling, in accordance with an agreed transport assessment submitted as part of the application.
- 3.14 **Policy CS24 (Car / Cycle Parking)** states that maximum car parking standards and cycle parking requirements will be applied in relation to the accessibility of locations within the Borough to sustainable transport facilities, particularly public transport.
- 3.15 **Policy CS25 (Sequential Approach)** states that major (defined as more than 2,500m²) retail and main town centre leisure and culture development will take place in, or as an extension to, the centre of Reading. Where a need for additional development has been identified, and no sites are available in or adjoining the centre of Reading, a sequential approach should be adopted to identifying alternative sites.
- 3.16 **Policy CS26 (Town Centre Uses)** requires that development for main town centre uses in or adjoining the defined centres should be of an appropriate scale.
- 3.17 **Policy CS35 (Flooding)** states that planning permission will not be permitted for development in an area identified as being at high risk of flooding, where development would 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.

Sites and Detailed Policies Document (2012) (Altered 2015)

- 3.18 **Policy SD1 (Presumption in Favour of Sustainable Development)** states that a positive approach to considering development proposals will be taken that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. Where appropriate, the Council will work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.
- 3.19 **Policy DM1 (Adaptation to Climate Change)** states that all developments will demonstrate how they have been designed to incorporate measures to adapt to climate change.
- 3.20 **Policy DM4 (Safeguarding Amenity)** states that development will not cause a significant detrimental impact to the living environment of existing or new residential properties.
- 3.21 **Policy DM12 (Access, Traffic and Highway Related Matters)** states that 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.

- 3.22 **Policy DM19 (Air Quality)** states that development should have regard to the need to improve air quality and reduce the effects of poor air quality.
- 3.23 **Policy DM22 (Advertisements)** states that advertisements will respect the building or structure on which they are located and/or their surroundings and setting in terms of size, location, design, materials, colour, noise, lettering, amount and type of text, illumination and luminance, and will not have a detrimental effect on public safety. The cumulative impact of adverts will be taken into account, and a proliferation of advertisements that detrimentally affects visual or aural amenity or public safety will not be acceptable.
- 3.24 **Policy SA12 (Core Employment Areas)** designates thirteen areas, as shown on the Proposals Map, are defined as Core Employment Areas. Of relevance to this site is SA12h: Portman Road.

Reading Borough Council Supplementary Planning Documents

- 3.25 **Revised Parking Standards and Design SPD (2011)** sets out the parking and design standards for the Borough.
- 3.26 **Sustainable Design and Construction SPD (2011)** brings together relevant national guidance. It provides practical advice on the forms of sustainable design and construction plus waste minimisation that will meet policy requirements. Given the application seeks consent for the change of use of the site much of the requirements of the SPD are not applicable however regard has been had to its overall aspirations.
- 3.27 The site is within an area defined as a Core Employment Area in the Reading Borough Core Strategy (January 2008). Policy CS11 advises that *“within the Core Employment Areas, the overall level of employment land should be maintained. Proposals that would result in a loss of such land will not be permitted.”* The supporting text to the policy continues to state:
- “the Core Employment Areas provide space that is required to ensure that the Reading economy is balanced and that those activities which support higher value businesses are in close proximity. As a result, an overall loss of employment land in these core areas would risk undermining the local economy, and should not be permitted.”*
- 3.28 In addition, policy CS12 continues that a range of types and sizes of units should be present in the Borough, and proposals should maintain or enhance this range. Paragraph 5.16 of the supporting text also details *“Development in the Core Employment Areas that reduces the range of sites and space available will not be permitted”*. Paragraph 15.2.5 of the supporting text to policy SA12 reiterates that there is a *“general presumption against loss of employment land in these [Core Employment] areas”*.

- 3.29 The precise extent of the Core Employment Area is defined through Policy SA12 of the Site Allocations and Development Management Policies DPD. The site is located within SA12h Portman Road Core Employment Area.

4. Planning Assessment

4.1 Proposed change of use

Core Employment Area

- 4.2 The site is within an area defined as a Core Employment Area in the Reading Borough Core Strategy (January 2008). Policy CS11 advises that “within the Core Employment Areas, the overall level of employment land should be maintained. Proposals that would result in a loss of such land will not be permitted.” The supporting text to the policy continues to state:

“the Core Employment Areas provide space that is required to ensure that the Reading economy is balanced and that those activities which support higher value businesses are in close proximity. As a result, an overall loss of employment land in these core areas would risk undermining the local economy, and should not be permitted.”

- 4.3 In addition, policy CS12 continues that a range of types and sizes of units should be present in the Borough, and proposals should maintain or enhance this range. Paragraph 5.16 of the supporting text also details “Development in the Core Employment Areas that reduces the range of sites and space available will not be permitted”. Paragraph 15.2.5 of the supporting text to policy SA12 reiterates that there is a “general presumption against loss of employment land in these [Core Employment] areas”.
- 4.4 The precise extent of the Core Employment Area is defined through Policy SA12 of the Site Allocations and Development Management Policies DPD. The site is located within SA12h Portman Road Core Employment Area.
- 4.5 The Core Employment Area designation means that there is a policy presumption against the loss of employment uses. The proposed use is warehouse (Class B8), which falls within the definition of “employment space” within the Reading BC Employment Land Review (2006). As the proposed use falls within the definition of an employment use, **there will be no loss of employment land.**

Background

- 4.6 This planning application proposes a “Change of use of building to warehouse with ancillary trade counter (Class B8)”.
- 4.7 The total gross internal area of the building is 1918 square metres. By way of background, the unit has been vacant for approximately 2 years (confirmed by Haslam’s letter dated 22/12/15). Prior to this, the authorised use was “car service, parts, distribution and sales” (sui generis).
- 4.8 Regarding the previous use, the floorspace split was as follows;

Servicing & MOT – 1097 square metres;

Sales – 581 square metres;

Offices – 160 square metres; and,

Ancillary – 80 square metres

- 4.9 The sales element (i.e. car showroom) occupied **approximately 30.3% of the floorspace in the previous use.**

- 4.10 Regarding the proposed use, the floorspace split will be as follows;

Warehouse – 855 square metres;

Sales – 542 square metres;

- 4.11 The sales element will therefore occupy **29% of the floorspace.**

- 4.12 Notwithstanding the fact that the unit has been vacant, for the purposes of this application the starting position is that 30.3% retail is deemed ancillary.

Trade counter

- 4.13 The conclusion that there will be no loss of employment land is based on the fact that a trade counter does not constitute a separate retail use. In other words, it is ancillary to the principle warehouse use.

- 4.14 The pre application response (12/08/15) highlighted that “it would be important that the nature of the use remained as B8 with an ancillary retail character as this would not just depend on the amount of floorspace but also the nature of day-to-day activities”.

- 4.15 We consider that the retail component is ancillary based firstly on the floorspace proportion and based secondly on the nature of the use.

- 4.16 We would firstly state that in relation to proposed sales floorspace we would argue that the use is ancillary. This planning application proposes a “Change of use of building to warehouse with ancillary trade counter (Class B8)”.

- 4.17 In relation to floorspace, the proposed retail element will occupy 29% of the floorspace. Referring back to the previous use of the site (car dealership), this actually equates to a smaller proportion of sales space (i.e. compared to 30.3%). Given this fallback position, the proposed retail element should be considered to be ancillary.

- 4.18 In relation to the nature of the use, we would argue that the retail component is inextricably interlinked with the warehouse use, and does not represent an independent retail use.

- 4.19 Both issues are explored in greater detail below, where case law relating to the classification of trade counters is provided. This confirms that the trade counter should be viewed as ancillary.

Case studies and precedent

- 4.20 In Brighton & Hove, an enforcement notice required the cessation of use of a light industrial building in Brighton for warehousing use with a trade counter (ref. APP/Q1445/C/01/1080128, dated 18/06/2002). This can be viewed in **Appendix 1**. The Council refused the retrospective planning application because the scheme included sales space, in a location outside of the town centre. The issues are therefore very similar to this application.
- 4.21 The appeal was allowed by the inspector who concluded that the sales component was an ancillary rather than primary use. The location outside of the town centre was therefore irrelevant. He concluded that “it is by no means unusual for properties involved in the distribution of goods to include a trade counter, where those in that particular trade or members of the public can call personally and buy what they need (paragraph 9)”
- 4.22 He noted that “whilst members of the public could visit the premises to buy goods, the sales area was not so extensive as to be regarded as an independent retail use”. Whilst the floorspace proportions are not given, we would argue that the sales area in our scheme is not so extensive as to be regarded as an independent retail use. This conclusion is reinforced by the nature of the proposed use (i.e. day-to-day activities considered below).
- 4.23 The overlap between the goods proposed to be sold at 26 Portman Road and Reading District/Local Centres is considered to be extremely limited. This is because of the nature of the bulky goods sold. For example, the Door Store wish to place doors, wooden flooring and complete staircases in situ. These products are displayed as part of larger built units (i.e. door placed within a mock wall) for the benefit of tradespeople and customers. The nature of the products means that they need to be displayed fully in this way. This is why Door Store have a minimum functional requirement for 6,000sqft (557sqm) of display space. It is unusual for tradespeople/customers to leave the store with purchased products in the way a “retail warehouse” would operate, given the bulky nature of goods and the fact that goods need to be installed by a joiner (who would also handle delivery). Therefore the proportion of on-site retail sales is low, pointing to the ancillary nature of the sales use.
- 4.24 An appeal decision in Eastleigh (APP/W1715/C/06/2027362, dated 30/07/07) considered a similar use, and the inspector found that the retail component (trade counter) was inextricably linked to a Class B8 use. This can be viewed in **appendix 2**. He concluded that the retail and storage elements of the use were so interlinked that they could not be disaggregated (paragraph 40). We would argue that the retail and storage elements of this scheme are similarly interlinked.
- 4.25 Given the specific circumstances of the proposals, it is argued that a “retail warehouse” is not proposed in this case, rather “a warehouse with ancillary trade counter”.
- 4.26 Door Store acknowledges that if the trade element ceases to be ancillary, then a change of use will have occurred and a separate planning application will be required.

Summary regarding employment land

4.27 In summary, there is considered to be no loss of employment land (in accordance with policy CS11) and linked to this, the variety of employment stock would not be depleted (in accordance with policy CS12). This is because the proposed retail component is considered to be ancillary to the primary warehouse use, due to the low percentage of floorspace required for sales and the nature of the use (i.e. proportion of on-site sales is low). The proposals are in accordance with the Development Plan and we therefore urge the Council to approve this application.

4.28 Without prejudice to the above, if the Council do not consider that the proposed use fits within the definition of an employment use, we would wish to make the following points:

- There is notable local precedent of non-employment uses being granted in the Core Employment Area (e.g. 12 Portman Rd, Reading – ref 141334).
- There are question marks over whether the building presently falls within the definition of an “employment use”, as the site has been vacant for a period of two years to date. As such the site is currently fulfilling no employment function with no clear prospects of returning to its former use, given the lack of interest in the site.
- The Economic Statement submitted as part of the planning application states that the proposals will support 31.5 FTE jobs. Given the proposed floorspace, the Employment Densities Guide 2nd Edition (2010) advises that a B8 use of the whole unit could be generating 26 FTE jobs on average (1 full time employee for every 70m² of floorspace), The level of job generation proposed will be in excess of this average (and clearly exceeding the existing situation given its vacancy). In addition it should also be noted that construction sector jobs associated with the refurbishment and refitting of buildings will total 24 FTE.
- The Economic Statement also emphasises other benefits to the local economy, for example through the generation of additional business rate revenue which can be retained locally. It is estimated that the proposed development will generate approximately £51,000 in business rate revenue per annum, of which at least 50% or £25,500 could be retained by Reading Borough Council each year until 2020 and 100% (£51,000) per annum thereafter.

4.29 Operational development

4.30 Introduction

4.31 This planning application proposes the following external changes to facilitate the change of use:

- a) Existing cladding to flank elevations refurbished
- b) Existing cladding to gable elevations removed and replaced with new metal cladding, colour 04 E 53 (BS 4800/5252 Colour System)

- c) Existing glazing replaced to southern elevation.
- d) 2no. new glazing panels introduced to southern elevation.
- e) New customer entrance doors and glazing to northern elevation.
- f) Existing canopy and roller shutter removed from northern elevation.
- g) New roller shutter service door to northern elevation.
- h) New fascia signage to northern & southern elevation
- i) Roof covering containing asbestos removed and replaced with metal roofing system (including roof lights)
- j) New dedicated delivery access formed from Loverock Road
- k) Car park divided between customer car park and service yard.

4.32 Given the nature and minor scale of the above changes, none are considered to be harmful to the character of the area. The external appearance of the building will be wholly in-keeping with its commercial setting.

4.33 The only change which warrants further analysis is the proposed new fascia signage to northern & southern elevation, which is considered below.

4.34 Advertisements

4.35 A key component of the change of use will be the amended fascia signage to the northern & southern elevation.

4.36 Consideration has been made to Policy DM22 (Advertisements) of the Sites and Detailed Policies SPD (Adopted 2012).

4.37 The signage proposed includes:

- 2 x Door Store main fascia (north and south elevation)
- 1 x Entrance signage above entrance doors (north elevation)
- 2 x Corner signage (south elevation)

4.38 Please note that there is extant permission for totem signage, however totem signage is not proposed as part of this scheme.

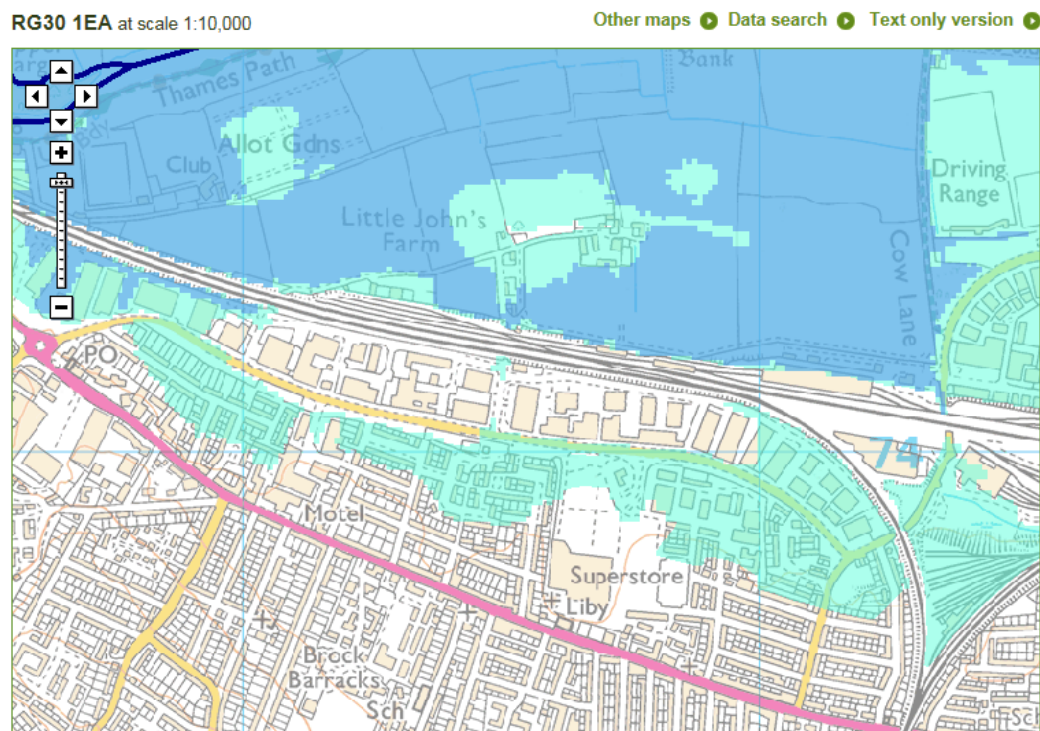
4.39 The general thrust of advertisement policy is to take into account the needs of advertisers while also protecting visual amenity and ensuring safety to pedestrians and motorists.

4.40 Policy DM22 states that advertisements should respect the building or structure on which they are located and/or their surroundings and setting in terms of size, location, design, materials, colour, noise, lettering, amount and type of text, illumination and luminance, and will not have a detrimental effect on public safety.

- 4.41 The Design & Access Statement provides a detailed analysis of the surrounding area and the design response. Signage is discussed in detail in paragraph 2.16 and section 3.5.
- 4.42 The character of the area is commercial, where such signage is commonplace. The Design & Access Statement concludes that the proposed signage reflects the size of those currently existing in the immediate area.
- 4.43 Despite the commercial setting, the applicants have been mindful to limit the visual impact of the proposed fascia signage wherever possible. For example, instead of illuminating the entire fascia, only the lettering will be backlit creating a more sensitive form of development.
- 4.44 The proposed signage is therefore considered to respond successfully to the commercial character of the area.

Flood Risk

- 4.45 The site is located outside of Flood Zone 2 & 3 according to the Environment Agency's flood map (December 2015).



EA flood map dated December 2015

- 4.46 The application is for a change of use and no floorspace is to be created. The hardstanding car park will be retained as existing. As such, the proposals will have no impact on flood risk or drainage.

Highways, transport and parking

- 4.47 The application is accompanied by a Transport Statement prepared by Motion. The Transport Statement demonstrates that the site benefits from access to a good network of pedestrian and cycleway links, which connect to the public transport network that serves the local and regional area (i.e. within 500 metres of bus stops on the Oxford Road, cycleway which provides access to the town centre to front of property). On that basis, it is considered that the site is located to provide a real choice of travel modes to and from the site.
- 4.48 The parking provision on-site conforms with the requirements of Reading Borough Councils Supplementary Planning Document "Revised Parking Standards and Design" and the proposals include the provision of an on-site delivery area enable large vehicles to undertake deliveries off the public highway.
- 4.49 It has been shown that the proposals are will not have a material impact upon the local highway network as the vehicle trip daily generations indicates that the warehouse / trade counter will generate less trips than the existing car dealership use (with servicing and MOT facilities).
- 4.50 On the basis of the above, it is concluded that the proposals accord with national and local transport related policies and as such there is no reasons why the proposals should be resisted on traffic and transportation grounds.

5. Summary and Conclusions

- 5.1 This Planning Statement has been prepared by **Turley** to accompany a full planning application for a “Change of use of building from car service, parts, distribution and sales (sui generis) to warehouse with ancillary trade counter (Class B8), to include external changes and advertisements” at **Former Mazda car dealership, 26 Portman Road, Reading**.
- 5.2 In addition to this Planning Statement the following documents also accompany the application and provide the information necessary to describe, assess and determine the proposals.
- **Site Location (Red Line) Plan**
 - **Design & Access Statement**
 - **Economics Statement**
 - **Transport Statement**
- 5.3 In summary, there is considered to be no loss of employment land (in accordance with policy CS11) and linked to this, the variety of employment stock would not be depleted (in accordance with policy CS12). This is because the proposed retail component is considered to be ancillary to the primary warehouse use, due to the low percentage of floorspace required for sales and the nature of the use (i.e. proportion of on-site sales is low).
- 5.4 The Economic Statement highlights the benefits of the scheme in terms of jobs (proposals will support 31.5 FTE jobs) and the generation of additional business rate revenue which can be retained locally (proposals will generate approximately £51,000 in business rate revenue per annum).
- 5.1 In terms of the proposed external changes, given the nature and minor scale of the above changes none are considered to be harmful to the character of the area. The external appearance of the building will be wholly in-keeping with its commercial setting. Advertisements have been designed sensitivity within the context of the site.
- 5.2 In terms of highways, transport and parking, it is concluded that the proposals accord with national and local transport related policies and as such there is no reasons why the proposals should be resisted on traffic and transportation grounds.
- 5.3 The proposals are therefore in full accordance with the Development Plan and we therefore urge the Council to approve this application.

Appendix 1

Appendix 2