

Planning Department
Reading Borough Council
Civic Offices
Bridge Street
Reading
RG1 2LU

Date: 19 March 2025

Our ref: 69831/01/DL/ERo/33440854v7

Dear Sir/Madam

Units 2, 3 and 4, Riverview Estate, Cardiff Road – Change of use from Class B8 to a Flexible Use comprising Class B8 and, Class E(g)(ii) and (iii)

On behalf of our client BBC Pension Trust Limited (c/o CBRE Investment Management), we are pleased to submit an application to Reading Borough Council (RBC) for the following proposed change of use at Units 2, 3 and 4, Riverview Estate, Cardiff Road (the 'Site'). The description of development is as follows:

“Change of use of Units 2, 3, and 4 from Storage and Distribution (Class B8) to a flexible use of Class B8, Research & Development (Class E(g)(ii)), and Light Industrial (Class E(g)(iii))”

The application has been submitted via the Planning Portal (ref. PP-13713049) and the requisite planning application fee of £578.00¹ (plus £70.00 Planning Portal administration fee) has been paid.

Application submission

The following documents accompany this covering letter and application submission:

- 1 Completed application form, prepared by Lichfields;
- 2 Application Drawings (for approval), prepared by Helem and Partners - as listed in Annex 1;
- 3 Transport Assessment, prepared by Evoke;
- 4 Travel Plan Statement, prepared by Evoke; and
- 5 Flood Risk Assessment Statement, prepared by Lichfields.

¹ Full planning application for other material change of use of a building or land.

Site and Context

The Site is located on the corner of Cardiff Road and Richfield Avenue, in the western part of the Riverview Industrial Estate and northwest of Reading town centre. Whilst the entire building comprises four self-contained units, this application relates only to Units 2, 3 and 4. These are currently vacant but previously were let to one tenant, TP Link, for use as a storage and distribution warehouse (Class B8). Unit 1, which adjoins the application site to the west, is occupied by Edmunson Electrical, an electronics retailer (also Class B8). To the south of the building is an existing car park and the primary access to the Site is via Cardiff Road, which runs along the southern edge of the Riverview Estate.

The area immediately surrounding the Site consists of industrial and warehouse units ranging from two to three storeys. Beyond this, the Great Western Railway line lies approximately 60 metres to the south, while Riverview Academy and Riverview Leisure Centre Park are situated approximately 500 metres to the north. The Site is located approximately 600 metres south of the River Thames and to the west, there is an area of open floodplain. It falls within Flood Zone 2, indicating a medium probability of flooding.

Background

The Site is located in the heart of an area with a long, vibrant, and successful history of manufacturing, with occupiers having included those in the aviation, printing, perforated metal sheeting, electro-chemical and extractor fan industries. However, many of these long standing have had to relocate from Reading due to a lack of buildings, especially those that benefit from a lawful Class E and Class B8 use.

Historically, occupiers were more inclined to enter into long-term leases, which made it practical to submit a change of use planning application tailored to the specific operational requirements of each tenant. However, the increasing demand for shorter leases has resulted in a higher turnover of tenants. To mitigate the need for frequent change of use applications with each new occupant, the client is seeking greater flexibility, enabling them to accommodate a range of prospective tenants requiring either Class B8 or Class E use.

As such the application seeks consent for the change of use of the Site from Class B8 to a flexible use of Class B8 with Class E(g)(ii)), and Class E(g)(iii). This is to support the ongoing commercial marketing programme to help ensure the units do not remain vacant for an extended period.

Planning History

A review of the planning history for the Site on RBC online planning register has identified the following relevant planning application at the Site:

- **81/TP/741:** *Demolition and erection of new warehouses* – Approved 25th September 1981.
- **82/TP/5:** *Demolition of existing retail unit. Erection of a building for Class III (Lt Ind.) Class IV (Gen Ind.) and Class X (Warehousing) uses, with parking and ancillary service areas* – Approved 28th April 1982.
- **82/TP/552:** *Erection of a building for Class X warehouse and/ or Class III or IV industrial use, capable of sub-division into up to four individual units together with ancillary office, parking and service forecourt areas* – Approved 18th October 1982.

- **PL/11/0919 (11/01217/FUL):** *Application for the installation of new post, gates and 2.4m Paladin fences along east side of unit; installation of external plant on east elevation and addition of new windows, door and louvres on all elevations; and amendments to parking to include 2 disabled bays* – Approved 14th October 2011.

Proposed change of use

This application seeks permission for the change of use of the three separate units - Units 2, 3 and 4 from Storage and Distribution (Class B8) to a flexible use of Class B8, Research & Development (Class E(g)(ii)), and Light Industrial (Class E(g)(iii)). As they are currently vacant the exact use of the units by future occupiers, alongside the associated commercial activities and processes, are unknown at this stage. However, in addition to traditional B8 occupiers, Class E(g)(ii) and (iii) occupiers are likely to include those in the electronics, aerospace, satellite, food preparation and vehicle repair industries. The proposals are not seeking consent for office use under Class E(g)(ii).

There are no physical changes proposed to the building externally. The total Gross External Area (GEA) of all three units combined is 2,379 sq.m. Units 2 and 3 each have a GEA of 713 sq.m., while Unit 4 is slightly larger, with a GEA of 953 sq.m. It is anticipated that each unit will be leased individually.

The proposals will utilise the existing access to the south from Cardiff Road involves retaining the existing parking spaces and arrangements, however, to accommodate new cycle parking and disabled provision, the proposals will result in the loss of five spaces. As such, the proposals involve a total of 49 parking spaces allocated to Units 2, 3 and 4 in total, with three proposed to be provided as disabled spaces and four equipped with Electric Vehicle Charging (EVC) infrastructure. A secure cycle parking unit for 6 spaces is proposed to be provided the south-eastern corner of the Site.

All delivery and servicing vehicles will be accommodated on-site, with the existing arrangements currently accommodating articulated HGVs and no changes are proposed to the internal layout. All waste will be stored communally in a similar place to the existing store (in the south-western corner of the site), with waste collected by a private contractor.

Planning Policy Context

The National Planning Policy Framework (NPPF) was most recently updated on 12th December 2024 and sets out the Government's planning policies for England and how these should be applied. The NPPF is a material consideration in the determination of planning applications.

The NPPF promotes economic development and Paragraph 85 states that planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity.

The adopted statutory Development Plan for RBC relevant to the site and proposals comprises the adopted Reading Local Plan (RLP) (November 2019) and contains planning policies to manage development in Reading up to 2036. The following policies are considered most relevant to the proposals:

- EM2: Location of New Employment Development

- CC6: Accessibility and the Intensity of Development
- CC7: Design and the Public Realm
- CC8: Safeguarding Amenity
- CC9: Securing Infrastructure
- EN12: Biodiversity and the Green Network
- EN15: Air Quality
- EN18: Flooding and Sustainable Drainage Systems
- TR1: Achieving the Transport Strategy
- TR3: Access, Traffic and Highway-related Matters
- TR5: Car and Cycle Parking and Electric Vehicle Charging

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

Alongside the NPPF there are a range of National Planning Practice Guidance (PPGs) and Supplementary Planning Documents (SPDs) that comprise material considerations in planning decisions. The following supplementary document are considered of relevance:

- Community Infrastructure Levy Charging Schedule (January 2015)
- Revised Parking Standards and Design Supplementary Planning Document (adopted 2011)

There are no neighbourhood plans that include the site.

RBC are undertaking a review of the adopted Local Plan and identified the need to update 45 out of the 90 policies. Subsequently, as part of this Local Plan Partial Update (LPPU) RBC undertook a consultation on the Pre-Submission version of the Reading Local Plan (Partial Update) (Regulation 19) from 26th November to 18th December 2024.

Once the plan is submitted for examination and as it progresses, the draft policies will gain more weight when it comes to decision making for planning applications (NPPF Paragraph 49a). At this stage we have assessed the proposals against the policies within the adopted Local Plan.

Principle of Development

The RLP identifies the Site and the wider area to the south of Richfield Avenue as a Core Employment Area (CEA) (Policy EM2g: Location of New Employment Development). This outlines that development for employment uses, including industrial, storage and distribution will be permitted.

Policy EM3 (Loss of employment land) sets out that within a CEA the overall level of employment land should be maintained. In the context of this policy 'Employment land' is land primarily in B1, B2 (now Class E) or B8 use for which an employment area is the only realistic location. The proposals are, therefore, consistent with the employment policies of the RLP. Additionally, expanding the permitted planning uses at the site will contribute to the creation of core employment opportunities in this area,

enhancing the catchment of prospective future tenants and ensuring vacant units can be successfully leased.

Policy CC8 requires proposed developments to avoid causing a detrimental impact on the living environment of existing residential properties and other aspects of amenity, such as privacy and overlooking, access to sunlight and daylight and any overbearing effects of a development. Since the Site is located on a industrial estate in a CEA, with no residential dwellings in close proximity it is not considered to have a detrimental effect on residential amenity. Furthermore, given the surrounding business operations and uses that are characteristic in the CEA and in the immediate vicinity of the Site, it is considered that the proposed use of the Site is acceptable in this location. It therefore complies with the other criteria for industrial activities required to be considered by Policy CC8 such as noise and disturbance, vibration, dust and fumes, smell and artificial lighting.

Another requirement of Policy CC8 is the impacts associated with other aspects of the scheme, such as hours of operation of businesses, and effects of traffic movements, particularly of heavy goods vehicles (HGVs). The accompanying Transport Statement, discussed below, demonstrates that the existing arrangements currently suitably accommodate articulated HGVs and *“therefore would continue to accommodate all potential vehicles generated by the proposed flexible land uses”* (paragraph 3.3.1). The proposals do not include any physical development and therefore would cause an unacceptable impact on the surrounding area in terms of amenity.

Transport

A Transport Statement, prepared by Evoke, accompanies this change of use planning application as per the validation requirements. This outlines the existing and proposed trip generation associated with the site. The TRICS database (Version 7.11.4) has been interrogated to determine the likely trip generation of the proposed development and demonstrates it will have no detrimental impact on the existing highway network.

The analysis in the Transport Statement (paragraph 5.1.7) concludes that *“the proposed development is anticipated to result in a minor increase in vehicle trips in the AM peak period and a decrease in vehicle trips in the PM peak period and over the daily period, when compared to the existing site. As such, the proposed development will have a benefit on the local highway network, through reducing the number of vehicle trips on the network in the PM peak hour period and over the daily period, with a negligible impact in the AM peak period.”* It therefore concludes that *“any potential increase during the peak hours is not anticipated to result in a severe residual impact in accordance with the NPPF.”*

The proposed floor area (approximately 2,379 sq.m) doesn't meet the requirements for a Travel Plan, as per RBC's guidance. Therefore, a Travel Plan Statement (TPS) has been produced to accompany the planning application. This statement forms a proportionate response and identifies no formal travel plan targets or monitoring but will be limited to the dissemination of travel information to future employees. In essence it has been prepared to ensure that site users are encouraged to use and have access to sustainable infrastructure that will allow them to make sustainable travel choices to and from the site.

Parking

The Transport Statement sets out how the provision of 49 spaces is an overprovision compared to RBC's adopted parking standards and the provision is in accordance with the existing parking on-site, whilst ensuring that all potential demand generated by the various land uses can be accommodated within the site. The provision of three disabled parking spaces and 6 EVC spaces is considered compliant with local guidance and suitable to accommodate future demand. Furthermore, the provision of 6 cycle parking spaces is considered suitable in line with RBC's cycle parking standards for the relevant uses. Since no changes are proposed to the internal layout, the arrangements are considered suitable to accommodate all vehicles anticipated at the proposed development.

Air Quality

The site is situated within an Air Quality Management Area (Policy EN15) however, the proposed change of use is not expected to result in a significant increase in air quality impacts.

Although Riverview Academy is located approximately 500 metres to the north, the site is not in close proximity to residential dwellings and is positioned within one of Reading's primary industrial and warehouse estates. Additionally, the existing road infrastructure is already in place, and the transport assessment confirms that the proposed change of use under Class E(g)(ii) and (iii) would only lead to a slight increase in trip generation which would give rise to an intensification of air quality emissions.

Flood Risk

In line with the provisions of the National Planning Policy Framework ("NPPF") (December 2024) (para 176), the proposed change of use is exempt from the Sequential and Exception Tests. However, a site-specific Flood Risk Assessment should still be provided for all development in Flood Zone 2 (Footnote 63). Therefore, a Flood Risk Assessment Statement, prepared by Lichfields, accompanies this planning application, focussing on the relevant planning policy implications.

The Site is located within Richfield Avenue CEA accordance with Policy EM2(g) of the Reading Local Plan (RLP). The entirety of the CEA falls within Flood Zone 2 and the proposed use of the units – by their very nature – are appropriately located within this area. The Council notes in the supporting text for Policy EN18 of the RLP that a sequential test has been carried out for the strategic allocations (including CEA's) and that *"there is no need for this to be repeated unless the proposed use and/or flood risk vulnerability classification would differ from the allocation"* (Paragraph 4.2.98).

By virtue of there being no physical changes to the building and the use remaining in the same vulnerability classification the proposals will not increase the level of flood risk to surrounding properties. As set out in the accompanying FRS, the proposed development complies with Policy EN18 of the RLP and the NPPF as the units will be safe from all forms of flooding. It is, therefore, acceptable in flood risk terms.

Biodiversity Net Gain

In accordance with Policy EN12, the proposals do not result in a net loss of biodiversity, as the proposals for the change of use do not affect external land, biodiversity or existing habitats. No external

alterations are proposed and therefore, no habitat with biodiversity value, and no priority or linear habitats were identified within the site boundary.

As set out within Government's Planning Practice Guidance (PPG) (Paragraph: 004 Reference ID: 74-004-20240214), the following development is exempt from Biodiversity Net Gain (BNG):

"A development that does not impact a priority habitat and impacts less than:

- 25 square metres (5m by 5m) of on-site habitat*
- 5 metres of on-site linear habitats such as hedgerows*

A development 'impacts' a habitat if it decreases the biodiversity value."

In accordance with this exemption, the development does not impact a priority habitat and impacts less than 25 sqm of on-site habitat and 5 metres of on-site linear habitats such as hedgerows. It is thus considered that the development is exempt from the mandatory 10% biodiversity net gain requirement as set out under the Town and Country Planning Act 1990 as it is below the stated threshold.

Therefore, the development qualifies for the de minimis exemption for mandatory biodiversity net gain in line with Regulation 4 of The Biodiversity Gain Requirements (Exemptions) Regulations 2024. As a result, a Biodiversity Assessment and associated metric is not submitted with the application.

Conclusion

This Cover Letter provides an assessment of the proposed change of use against relevant planning policy at the national and local level. The accompanying technical plans and documents demonstrate that the proposed change of use would not have a detrimental impact on amenity, transport and highways, flood risk and air quality.

The Site is situated within the Richfield Avenue CEA, where the principle of Use Class B8, Class E(g)(ii) and (iii) is considered wholly acceptable in this location. Expanding the permitted planning uses at the Site will presents the opportunity to enhance employment activities in the CEA by enhancing the catchment of prospective future tenants.

Should you require any additional information or have any questions, please do not hesitate to contact me or my colleague Nuala Wheatley.

Yours faithfully



Ellie Roe
Planner

Annex 1: Planning Application Drawings

- 1 Location Plan - JHP RS412-001;
- 2 Block Plan - JHP RS412-002;
- 3 Existing Ground Floor Plan– JHP RS412-003;
- 4 Existing First Floor Plan – JHP RS412-004;
- 5 Existing Roof Plan – JHP RS412-005
- 6 Existing Elevations – JHP RS412-006;
- 7 Proposed Ground Floor Plan – JHP RS412-009; and
- 8 Proposed First Floor Plan – JHP RS412-010.