

Planning and Building Control
Reading Borough Council
Civic Offices
Bridge Street
Reading
RG1 2LU

Our ref: JCH/EGI/MH/U0027061

Your ref: PP-13696403

Date: 20th March 2025

Dear Sir / Madam

Town and Country Planning Act 1990 (as amended)
Suite A, Pacific House, Imperial Way, Reading, RG2 0TD.
Application for Full Planning Permission

I write on behalf of our client, DVSA Limited, to submit an application for full planning permission in respect of a change of use of Suite A from Office to Sui Generis to allow the Driver and Vehicle Standards Agency (the 'DVSA') to operate a new driving test centre at Pacific House, Imperial Way, Reading, RG2 0TD.

Accordingly, planning permission is sought for the following:

“Change of use of Suite A from Office (Class E) to a Driving Test Centre (Sui Generis)”

The Site

Pacific House is prominently located to the south of Reading town centre, within the established business area of Worton Grange. Junction 11 of the M4 Motorway is less than half a mile away, providing excellent access to the national motorway network. Reading mainline station is 2.5 miles from the building via the A33 which provides a direct route to the town centre and to the M3 at Junction 6.

The site is bounded by Napier Road to the north, and Imperial Way to the south. The Meadway is located directly east of the site, whilst Basingstoke Road (A33) is located to the west of the site. Basingstoke Road is a key road that connects the area to the M4 motorway (Junction 11). The strategic road network is discussed in more detail within the Transport Statement.

The site is also located within close proximity to a number of driving test routes within the area.

Planning History

There is limited relevant planning history for Pacific House and is as follows:

Reference	Description	Decision	Date
PL/12/1438	Installation of replacement entrance vestibule	Approved	13/11/2012
PL/12/1439	Installation of 3 x illuminated totem signs and 1 x illuminated fascia sign	Approved	07/09/2012
PL/23/1120	New Enhanced Replacement Security Access Doors To Switchroom. New Electrical Cable Termination Enclosure.	Approved	24/08/2023
PL/98/0939	Diesel Generator Enclosure	Unclear	25/09/1998

The Proposal

Background

The DVSA is an executive agency of the UK Department for Transport and are responsible for carrying out theory and practical driving tests for all types of motor vehicles.

The DVSA and learner drivers in the UK are currently facing significant challenges related to booking driving tests. Several factors have contributed to the shortage in bookings, including a combination of resource constraints, geographic distribution, and the lasting impact of the COVID-19 pandemic.

It is estimated that around one million tests were missed because of the pandemic, which has subsequently caused a backlog in driving tests due to temporary test centre closures, limited availability, and increased safety restrictions. Even though these restrictions have eased, the backlog of learners still waiting to take their test is significant.

In addition, in 2023 (up to the end of May) the DVSA received around 800,000 new bookings for driving tests which showed a 7% increase in demand for driving tests when compared to pre-pandemic levels.

The backlog of driving tests, coupled with increased demand, has subsequently meant that there has been a continued post-pandemic surge in people seeking to complete their driving tests.

However, at present there are insufficient test slots to meet the demand. As a result, learners are often left unable to find an available test for months in advance and are resorting to booking tests in areas of the UK miles away from their home to secure a test date.

The DVSA is therefore actively and urgently working to invest in new test centres to address the backlog and growing demand for driving tests, with a particular focus on areas where there is high demand or where current test centres are oversubscribed.

The Proposal

The DVSA has identified Suite A within Pacific House in Reading as an appropriate location for a new driving test centre.

As such, this application seeks a change of use if Suite A from Office (Class E) to a Driving Test Centre (Sui Generis) to allow the DVSA to use the floorspace for this use.

The facility at this site is required by DVSA to meet the local need for car (Cat B) driving tests and the government's objective to reduce driving test waiting times. The site is on an established test route and provide appropriate internal space and car parking.

The driving tests will start and finish on the site and will consist of a health and safety compliance check before the candidates leave the site to carry out the tests on pre-delegated routes on the local road network, returning just under an hour later. It is expected, due to the nature of the site and the tests to be undertaken, that candidates will arrive by private vehicle.

Tests will predominantly run seven days a week, with the first test starting at 08:00 and the final test concluding around 16:15.

Tests slots are 57 minutes, where the driving element typically lasts approximately 30-40 mins. As such, there are not likely to be any movements relating to the proposed use after 16:15.

A total of 6 no. staff will be based on the site at present (5 examiners and 1 manager), who will operate from the site on any given testing day. Each examiner will conduct up to seven tests per day, meaning the minimum number of driving tests able to be taken from the centre per day would be 35. Whilst there will only be 6 members of staff based at the site to begin with, the DVSA would like to have the capacity for up to 13 members of staff (12 examiners and 1 manager).

The total floorspace related to this change of use is 155 sqm.

For the avoidance of doubt, there are no external changes required to the building in association with DVSA's use of the site.

Planning Policy Context

Section 38(6) of the Planning & Compulsory Purchase Act 2004 requires that proposals be determined in accordance with the Development Plan unless material considerations indicated otherwise.

The statutory development plan for the purposes of this application is the Reading Borough Local Plan, which was adopted in November 2019.

The site has the following planning policy designations:

- Core Employment Area (CEA) (EM2c: South of Basingstoke Road)

Whilst not forming part of the Statutory Development Plan, the following documents remain important material considerations.

- National Planning Policy Framework (NPPF) (2024); and
- National Planning Practice Guidance (NPPG) (as amended).

Planning Policy Considerations

Land Use

Part (d) of paragraph 125 of the NPPF (2024) states that planning policies and decisions should promote and support the development of under-utilised land and buildings, especially if available sites could be used more effectively.

Paragraph 128 of the NPPF advises that local planning authorities should also take a positive approach to applications for alternative uses of land which is currently developed but not allocated for a specific purpose in plans, where this would help to meet identified development needs.

Paragraph 101 of the NPPF (2024) states that 'significant weight should be placed on the importance of new, expanded or upgraded public service infrastructure when considering proposals for development'.

Local Plan Policy EM3 states that, within the Core Employment Areas (CEA), the overall level of employment land should be maintained. Proposals that would result in a loss of such land will not be permitted other than in the exceptional circumstances.

EM3 adds that, where, in exceptional circumstances, it can be demonstrated that a site in a CEA has no long-term prospect of employment use, a related alternative commercial use or a use which complements the employment use of the area may be considered that would not result in a significant reduction in jobs.

Supporting Paragraph 4.3.12 advises that there is a need for a certain degree of flexibility with existing employment land to allow an appropriate balance of uses to develop in the right locations. For this reason, it is not appropriate to simply apply a blanket protection to all existing employment areas.

Paragraph 4.3.13 outlines that Policy EM3 recognises that on some exceptional sites within the CEA, there may not be any long-term prospect of re-use or redevelopment for employment, and in these cases it is preferable for a site to be used for an alternative commercial use that complements the area than for it to be vacant in the long-term.

Paragraph 4.3.14 states that a loss of employment land for other uses may be acceptable, depending on whether the land is still needed for employment purposes. Each application will need to be assessed on its merits, and the matters to be considered are set out in (i) to (vi) which should inform a balanced decision, not be used as a checklist where every item is fulfilled. Proposals should demonstrate how these factors justify the release of employment land. The matters are as follows:

- i) proximity to the strategic road network, particularly for storage and distribution, access by public transport, foot and cycle, future transport infrastructure provision;
- ii) ownership constraints, prevailing market conditions including vacancy levels, response to marketing of site for employment use, physical constraints of site such as topography, other constraints such as utilities provision;
- iii) balancing supply and long-term demand, allowing for a degree of vacancy necessary in a healthy market;
- iv) effects on neighbouring uses of noise, pollution and air quality, intensity of activity;
- v) need for additional housing, community facilities and other uses; and
- vi) likelihood of development resulting in 'islands' of other uses in employment areas, whether a better environment would be created through a more comprehensive development.

Policy OU1 relates to new and existing community facilities. This states that proposals for new, extended or improved community facilities will be acceptable. The policy highlights that new community facilities should be located in areas of high accessibility, such as transport corridors or within close proximity of public transport nodes.

It is acknowledged that a driving test centre would be a Sui Generis use and is therefore not technically considered employment floorspace. However, in line with Part (v) of Policy EM3, it is considered that the urgent need for another driving test centre in Reading is stronger than the need for the retention of a small quantum of employment floorspace in this particular case. Moreover, the introduction of a driving test centre at the site would bring the floorspace back into active use, through a use that would still generate the employment of examiners and admin staff.

With respect to Part (ii) of Policy EM3, it should also be noted that Suite A at Pacific House is currently vacant and has been so for the last two years. This demonstrates that this existing employment floorspace is surplus to requirements and would not propose a detrimental loss of office space in the borough. As such, the floorspace would benefit from being repurposed to address an urgent need faced by both Reading residents and meet a central Government objective.

Moreover, the surrounding area is commercial in nature and the proposed use is therefore not considered to have any adverse impacts on the area.

In addition, the repurposing of existing vacant office floorspace to provide a new driving test centre in this location will also deliver a community facility that will help to ensure that the demand for driving tests within the community can be better accommodated. As outlined in the Transport Statement, the site also has good accessibility and is within close proximity to a number of bus, rail, walking and cycling routes, and is also close to the local highway network. It is therefore considered that the proposal accords with Policy OU1.

Transport

Local Plan Policy TR1 advises that all development proposals should make appropriate provision for works 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 any agreed transport assessment submitted as part of the application.

Local Plan Policy TR3 states that development will only be permitted where the development would not have a material detrimental impact on the functioning of the transport network or would not be detrimental to the safety of users of the transport network, including pedestrians and cyclists.

Local Plan Policy TR5 outlines that development should provide car parking and cycle parking that is appropriate to the accessibility of locations within the Borough to sustainable transport facilities, particularly public transport.

In general, testing centres play an important role in maintaining highway safety because the efficient and timely provision of driving tests help to ensure a good standard of driver behaviour and, therefore, contribute to general highway safety.

A Transport Statement has been prepared by Hydrock (now Stantec) and is submitted alongside this application.

The Transport Statement highlights, in line with Local Plan Policy TR1, that the site can be accessed via bus, rail, walking and cycling or via the local highway network, emphasising that the site is easily accessible by a range of transport methods.

Access will remain as per the existing arrangement. Vehicles will be able to enter the site from one of the two accesses from the western part of Worton Drive, pass either to the front or rear of Pacific House and Atlantic House, before exiting onto the eastern part of Worton Drive.

In terms of parking provisions, 10 existing spaces will be allocated and available for use at the site as well as an additional five spaces which are being leased by the DVSA at the Holiday Inn close by to the site, which has been reached via an agreement. These off-site spaces will be reserved for staff which will make the majority of on-site spaces next to the site available to driving test customers. Due to the proposed use of the site (a driving test centre), it is considered that the quantum of parking proposed is appropriate given the nature of the proposal and therefore accords with Policy TR5.

Trip generation analysis for the proposed development has also been undertaken. The accompanying Transport Statement concludes that during the highway network peak hours, it is anticipated that the proposed development would result in 15 two-way trips being generated in the AM peak hour (08:00-09:00) and none in the PM peak hour (17:00-18:00). This level of traffic generation is unlikely to result in a material impact on the operation of the local highway network. The change of use to a driving test centre with five examiners will mean that the existing office trips will be no longer travelling to the site and therefore when these are discounted, the net change in vehicle trips is 13 additional vehicle trips during the AM peak hour and a reduction of four vehicle trips during the PM peak hour.

Overall, and in accordance with Policy TR3, the Transport Statement concludes that this level of traffic generation is unlikely to result in a material impact on the operation of the local highway network.

Summary and Conclusions

The DVSA are currently facing significant challenges related to booking driving tests and, at present, the demand to book tests disproportionately outweighs the quantum of tests available. The DVSA is therefore actively and urgently working to invest in new test centres to address the growing demand for driving tests, with a particular focus on areas where there is particularly high demand or where current test centres are oversubscribed.

Reading has been identified as an area where there is particularly high demand and as such, Pacific House has been identified as an appropriate site to deliver a new test centre.

This application therefore seeks to change the use of Suite A of Pacific House from Office (Class E) to a Driving Test Centre (Sui Generis).

The proposed use, whilst not considered an 'employment use' would help to repurpose Suite A to address an urgent need and bring the floorspace back into active use. Moreover, it has been demonstrated through this cover letter how the factors outlined under Policy EM3 justify the release of employment land to bring forward a new driving test centre.

As a result, it is considered that the proposal accords with planning policy and should be approved.

Application Enclosures

Accordingly, in support of this application, along with this letter, we enclose the following documents:

- Completed Application Form; prepared by Newmark;
- This Covering Letter, prepared by Newmark;
- Site Location Plan, prepared by Spacio;
- Block Plan, prepared by Spacio;
- Existing and Proposed Layout Plans, prepared by Spacio; and
- Transport Statement, prepared by Hydrock (now Stantec).

The requisite fee has been paid online concurrent to the submission of this application.

We trust that we have provided all of the material required for the purposes of validation and therefore awaiting confirmation of the registration and validation of this application shortly. In the meantime, should you have any queries regarding this application please contact Julia Chowings (07919 111 299), Erin Gillard (0203 486 3722) or Megan Hearn (07385 558 952) of this office.

Yours faithfully



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