

DELEGATED APPLICATION REPORT

SITE ADDRESS: 2 Norman Place, Reading, RG1 8DA

APPLICATION NUMBER: PL/24/1725

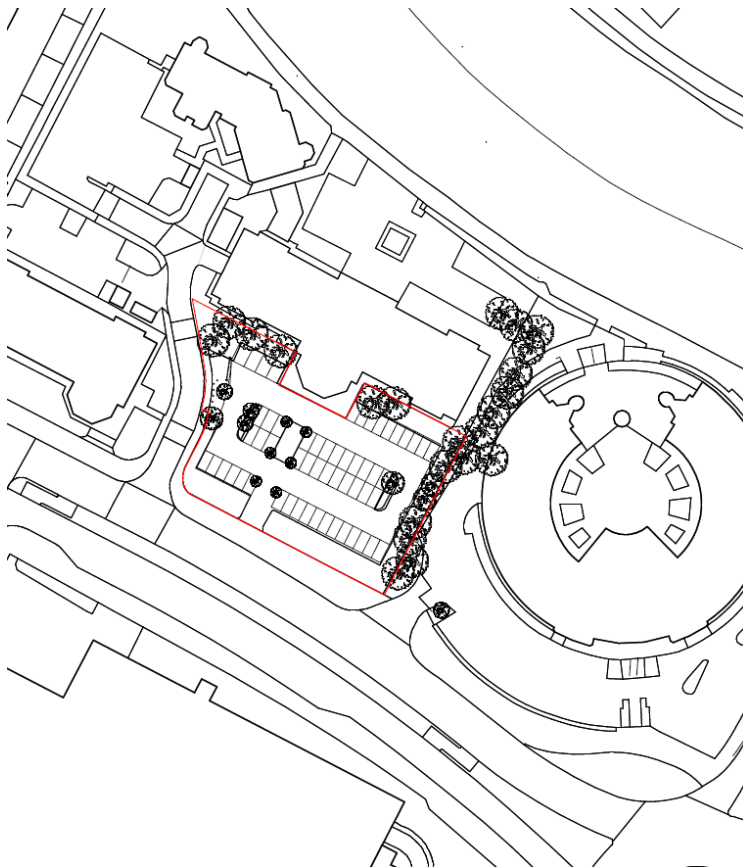
PROPOSAL: Retrospective change of use of existing car park associated with the former office premises to public car park (Sui Generis) for a temporary period of three years

DETERMINATION DATE: 24/03/2025

CASE OFFICER: Jonathan Markwell

1. Site Description and Surrounding Area

- 1.1 The application site comprises the car park associated with the vacant office building at 2 Norman Place. The red line boundary is solely within the car park area, is broadly rectangular in shape (as shown below) and 0.23ha in size (as per the submitted application form).



Above: Location Plan by applicant

- 1.2 The site currently contains 56 car parking spaces, with access from Norman Place and associated on-site trees, greenery and lighting. In the southern part of the site it is understood that there is an existing culvert which runs across the site following the line of Vestern Road, which is to the south of the site.
- 1.3 To the north of the red line boundary is an unoccupied four-storey office building, beyond which is the Thames Path, the River Thames and Christchurch Meadows green space. To the east is the basement and 5-storey Clearwater Court (occupied by Thames

Water), with staff parking to the south. Beyond this is Reading Bridge and the 10-storey Reading Bridge House office building. To the south is the busy Vastern Road, part of the town's Inner Distribution Road (IDR). Beyond this is a multi-storey car park, which leads towards the northern entrance of Reading Station. To the west, beyond Norman Place, are the 3-storey office Sovereign House, which includes parking to the north. To the north of this is the 4-storey Thames Court residential building. At present, Norman Place provides an important pedestrian / cycle route between Caversham and Reading Station, following the opening of Christchurch Bridge in 2015. This is anticipated to evolve in time, as the permitted and now under construction redevelopment of the 55 Vastern Road site (see relevant history below) includes a more direct connection from Christchurch Bridge towards and from Reading Station.



Above: Site Photographs 11/10/2024.

- 1.4 The site is not specifically allocated within the 2019 adopted Reading Local Plan. As per the local plan, the site is however within:

- Reading Central Area (Policies CR1-10)
- Air Quality Management Area (Policy EN15)
- Central Core (Policy CR1)
- Office Core (Policy CR1)
- Flood Zone 1, 2 and 3 (Policy EN18)

- 1.5 It is however acknowledged that the wider site, also including the office building and space up to the Thames Path, is identified within the Local Plan Partial Update, which was subject to consultation in November and December 2024, as a possible other site for development in Central Reading, as follows:

CR14v 2 NORMAN PLACE

Development for residential.

Development should:

- ***Contribute to enhanced bus priority on Vastern Road exiting the northern station interchange;***
- ***Contribute towards an extension and bifurcation of the BUZZ18 bus route, with an increase in daytime, evening and weekend frequency;***
- ***Include tree planting on the Vastern Road frontage to enhance the treed corridor;***
- ***Avoid a detrimental impact on, and where possible enhance, the biodiversity value of the River Thames, and set buildings back at least ten metres from the top of the bank of the river;***
- ***Address flood risk issues, including avoiding development in the part of the site within Flood Zone 3 insofar as is possible;***
- ***Address air quality impacts on residential use;***
- ***Address any contamination on site; and***
- ***Take account of the potential impact on water and wastewater infrastructure in conjunction with Thames Water, and make provision for upgrades where required.***

Site size: 0.55 ha

130-190 dwellings

- 1.6 At this point in time, only a very low level of weight is afforded to the Local Plan Partial Update policy, given the relatively early stage of preparation of the plan.
- 1.7 Beyond the red-line application site boundary, the following nearby characteristics (all based on the adopted local plan policy) are also of relevance:
- Norman Place is a specified cycle route (Policy TR4). Within the Reading Local Cycle and Walking Infrastructure Plan (LCWIP) Norman Place is part of a strategic cycle route.
 - Vastern Road is a specified cycle route (Policy TR4). Within the LCWIP Vastern Road is part of an orbital cycle route.

- Vastern Road is part of the classified highway network (Policy TR3) and part of the proposed Mass Rapid Transit route at this point (Policy TR2).
- The site is between two 'Treed corridors' (Vastern Road and the River Thames) as per the Reading Tree Strategy, and hence is a high priority area for tree retention and planting, with a green buffer also expected on the riverside for any redevelopment of this site.

- 1.8 It is also relevant to note from the outset that the site is located outside of any Central Reading Major Opportunity Area (Policies CR11-13) and outside of any area of potential for tall buildings (Policy CR10).



Site photograph looking north from the multi-storey car park roof to the south (20/02/2024)

2. Proposal

- 2.1 Planning permission is sought for the change of use of the existing car park associated with the vacant office premises to a public car park (Sui Generis), for a temporary period of three years. The application is sought on a temporary basis as the applicant has explained that this is sought whilst a separate application for the redevelopment of the site is determined and prior to any implementation of any future wider planning permission (see relevant history section below). Furthermore, the application is sought retrospectively, with the application form specifying that the change of use has been operating since 01/08/2024.
- 2.2 Prior to the registration of the application, some additional details / clarifications were provided by the applicant:

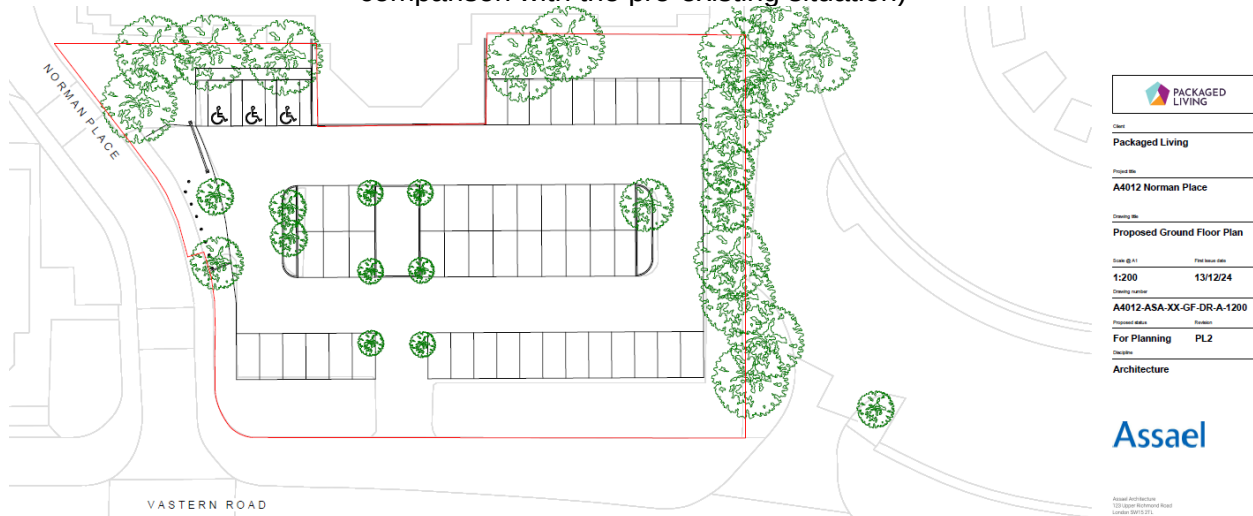
- The temporary nature of the proposals means that there are no physical changes to the site in terms of new barrier structures, relining of car parking spaces, changes to access/egress, removal or addition of landscaping or formalising of the site through permanent signage.
- Should the applicant be able to commence construction works in relation to the redevelopment proposals at an earlier stage, the car park use will be ceased at that point.
- The site has 56 car parking spaces. These are all standard bays, as per existing. There are no marked accessible or parent/child car parking spaces. There is no provision made for cycles or motorbikes.
- There are no electric vehicle charging facilities to be provided, this relating to the temporary nature of the car parking to be provided on site.
- Parking tariffs are: 1 hour - £1.00, 3 hours - £2.00, 6 hours - £4.50, 24 hours - £9.00. The minimum period of stay is 1 hour. The car park is accessible 24/7 with payment being made via online payment apps. The payment apps used on the site are RingGo, Paybyphone and ECPparkbuddy.
- Details of security measures in place in relation to vehicles and access in and around the red line boundary: The site has one vehicle entrance / exit and two pedestrian exits / entrance areas. The site is fitted with an ANPR system which picks up vehicle registrations as they enter and exit the car park. Euro Car Parks do not operate CCTV cameras.

2.3 During the course of the application, some amended information and a revised site plan was submitted by the applicant:

- On 05/02/2025 the agent advised that the car park tariffs were changing from 11/02/2025 to have separate rates Monday – Friday and Saturday – Sundays, as follows: Monday to Friday - 1 hour - £1.20, 3 hours - £3.00, 6 hours - £5.50, 24 hours - £10.50. Saturdays to Sundays - 1 hour - £1.00, 3 hours - £2.00, 6 hours - £4.50, 24 hours - £9.00. Accordingly, in comparison with the tariffs referenced at the outset of the application at paragraph 2.2 above, there has been an increase in charge on weekdays, ranging from a 20p increase (1 hour from £1 to £1.20) to a £1.50 increase (24 hours from £9 to £10.50).
- On 14/03/2025 the agent submitted a revised site plan, detailing a revised proposed layout of parking spaces. In short, this included provision of 3 accessible parking spaces, which reduced the overall number of parking spaces at the site from 56 to 55. This plan was submitted to initially respond to observations from RBC Transport.
- On 24/03/2025 the agent confirmed via email that the accessible parking spaces had not yet been installed at the site and that a response in respect of comments fed in from the Designing Out Crime Officer were in the process of being prepared, but were not yet in a position to be submitted for consideration.



Existing (above) and Proposed, as revised on 14/03/2025 (below) floor / site plans (the only external change is the provision of 3 accessible parking spaces, resulting in one fewer space in comparison with the pre-existing situation)



- 2.5 On the basis of the above a further unaccompanied officer site visit took place on 24/03/2025. This confirmed that the accessible parking bays had not yet been installed (4 cars were parked in this area). It was also witnessed that 10 spaces had been cordoned off (in the north-east corner of the site – appearing to be in connection with internal works within the building). Furthermore, it appeared that vehicles were parking outside of designated spaces at the site (e.g. two cars between trees/bollards close to the site entrance and a car in the pedestrian access point in the southern part of the site).



Officer site photographs on 24/03/2025

2.6 Plans and documents considered

- A4012-ASA-XX-GF-DR-A-1100 Rev PL1 - Site Location Plan
- A4012-ASA-XX-GF-DR-A-1101 Rev PL1 – Existing Ground Floor Plan
- A4012-ASA-XX-GF-DR-A-1150 Rev PL1 – Proposed Block Plan
- ~~- A4012-ASA-XX-GF-DR-A-1200 Rev PL1 – Proposed Ground Floor Plan (Superseded 14/03/2025)~~
As all received on 24/12/2024
- Flood Risk Assessment (FRA) Letter Report 2 Norman Place – Proposed Car Park Change of Use Technical Note Ref TN003 by Stantec
- Letter by Opus Works Group Limited – Retrospective change of use of existing car park associated with former office use to public car park, 2 Norman Place, Reading, RG1 8DA dated 27/01/2025
- Norman Place Occupancy Data dated 01/10/2024 – 21/01/2025 (3 pages)
- Application form
- CIL form
As all received on 27/01/2025
- A4012-ASA-XX-GF-DR-A-1200 Rev PL2 – Proposed Ground Floor Plan
As received 14/03/2025
- Email from Opus Works Group Limited ‘2 Norman Place - Car Park, ref: PL/24/1725’, dated and received 05/02/2025
- Email from Opus Works Group Limited ‘Re: FW: 2 Norman Place - Car Park, ref: PL/24/1725’, dated and received 24/03/2025

2.7 Community Infrastructure Levy (CIL) – A CIL form has been submitted with the application, which indicate that the proposals will not be CIL liable. This is confirmed to be the case, owing to the nature of the proposals.

3. Relevant Planning History

Solely the red line boundary of the application site

3.1 None.

Wider site also including land to the north (office building and up to the Thames Path)

- 3.2 PL/94/0792 (FUL) - 1 No. 4 storey office block and 1 No. 3 storey office block and 1 residential block consisting of 32 flats. Granted 18/10/1995. Please note that this would appear to be the original permission relating to both the application site and Sovereign House / Thames Court.
- 3.3 PL/00/0025 (ADV) - Erection of high level individual letter signage applied to illuminated domed perspex domes. Advertisement Consent Granted 08/05/2000.
- 3.4 PL/14/1903 (FUL) - Erection of 1.5m high railings and automated gates adjacent to Norman Place. Granted Planning Permission 18/02/2015.

- 3.5 PL/15/1572 (FUL) - Erection of two bicycle shelters to provide 12 additional secure bicycle stands. Granted Planning Permission 04/11/2015.
- 3.6 PL/24/0828 (SCO) - Request for a Screening Opinion under Regulation 6 of The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 for the demolition of the Covea Insurance building and the construction of up to 300 build-to-rent residential dwellings within buildings up to 11 storeys with commercial use on the ground floor; approximately 30 car parking spaces; access from Norman Place; and associated infrastructure. A negative screening opinion, advising that the proposed development is not EIA development was issued on 29/08/2024.
- 3.7 PL/24/0958 - Demolition of existing office and substation buildings and residential-led site redevelopment within 1-11 storey buildings comprising residential (Class C3) and ground floor commercial uses (Class E), together with various associated works including replacement pedestrian and vehicle access routes, car/cycle parking, hard and soft landscaping and a public open space adjacent to the river. Current application under consideration.

4. CONSULTATION AND PUBLICITY

4.1 RBC Transport (Highways Authority)

- 4.1.1 This application is for a retrospective change of use of existing car park associated with the former office premises to a public car park. This application is submitted to provide a temporary use for the site (for a period of three years) whilst the plans for the redevelopment of the site is determined. There are no physical changes to the site and the application is to allow for re-use of the car park area for public parking.
- 4.1.2 The site has 56 car parking spaces. The applicant has confirmed that these are all standard bays, as per existing, with no electric vehicle charging facilities due to the temporary nature of the car parking to be provided on site. There are no marked accessible or parent/child car parking spaces. There is no provision made for cycles or motorbikes.
- 4.1.3 There is currently no adopted Parking Policy Strategy, however, the Interim Parking Policy (2011) Interim Parking Policy - January 2011 (reading.gov.uk) provides some guidance for off-street parking numbers in the town centre. Our parking standards reflect the need for a mixture of long and short term parking facilities in the town centre. We have set a limit for the maximum amount of public spaces allowed, however, we do not have a minimum requirement. The Interim Parking Policy states that the maximum number of public parking spaces in the town centre should be 8500, including on-street parking, and be at least 70% short stay/shoppers/leisure parking.
- 4.1.4 Across the seven town centre car parks (including the Oracle Riverside, Oracle Holybrook, Broad Street Mall, Chatham Place Q Park, Queens Road, Hill Meadow and Kings Meadow car parks) there is a combined parking provision of approximately 4,669 spaces.
- 4.1.5 Given that the Station redevelopment resulted in the loss of public parking spaces, the temporary provision of 56 parking spaces proposed with this application is not going to exceed the maximum levels. We also have the Broad Street Mall and Oracle

applications for residential developments which would further reduce the public parking spaces if approved.

- 4.1.6 The temporary car park will provide tariffs for short stay parking, however, it is anticipated that the car park will typically accommodate longer stay users given the location adjacent to the rail station. As the car parking area was formerly associated with the office premises which would of typically generated peak hour vehicular movements, it is considered that the proposed vehicular trips associated with the temporary car park would be similar to that of the previous office use.
- 4.1.7 The Highway Authority do not have any objections to the granting of a temporary public car park for a maximum period of 3 years as the change of use would not have a material impact on the traffic in the vicinity of the site. However, it is requested that the site provides designated accessible parking bays within the site to comply with the Council's adopted Parking Standards and Design SPD. 3 no. accessible parking spaces should be provided within the site to meet the required provision. I am happy to deal with this by condition or by amended plan.

Condition

Within 4 weeks of the date this application is permitted, a plan showing how 3 (three) accessible parking spaces can satisfactorily be provided on site is submitted to and been approved in writing by the Local Planning Authority. The vehicle parking spaces shall be provided in full accordance with the approved details within 4 weeks of the details being approved by the Local Planning Authority and shall thereafter kept free of obstruction and retained in accordance with the approved details and shall remain available for the parking of vehicles at all times.

REASON: These details are required due to insufficient information being contained within this submission and in order to ensure that the development is provided with adequate parking facilities to meet the needs of future users in accordance with Policy TR3 and TR5 of the Reading Local Plan 2019.

4.2 **Designing Out Crime Officer (DOCO) at Thames Valley Police**

- 4.2.1 The DOCO has reviewed the submitted documents and crime statistics for the area and the following comments are provided to ensure the application meets the requirements of;
- The National Planning Policy Framework 2024 paragraph 96(b); which states that Planning policies and decisions should aim to achieve healthy, inclusive and safe places which are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion...
 - The National Planning Policy Framework 2024, paragraph 135(f) which states that "Planning policies and decisions should ensure that developments create places that are safe, inclusive and accessible... and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience".
- 4.2.2 It is appreciated that the car park is proposed for a temporary period until the site is redeveloped. However, it is noted that the car park is proposed to be accessible 24/7

and I have significant concerns with regards to the safety and security of proposed users of the car park without the inclusion of appropriate security measures.

- 4.2.3 The absence of natural surveillance of the site, particularly in the evening/at night, means that formal surveillance should be provided. CCTV is not a universal solution to security problems. However, it can help deter crime and criminal behaviour, assist with the identification of offenders, promote personal safety, and provide reassurance for users of the car park.
- 4.2.4 The provision of CCTV should be informed by an Operational Requirements Study. This should assess the specific requirements of the CCTV system for the site. It should include detailed plans as to what the role of each camera is, their location, camera type and specification and how the system will be managed/monitored.
- 4.2.5 The CCTV operational requirements study and implementation of the CCTV system could potentially be a planning condition if planning permission is proposed to be granted. However, the CCTV system will need to be considered in relation to the lighting for the site.
- 4.2.6 It is noted that there are existing lighting columns covering the car park. However no detail has been provided with regards to lux levels or site coverage.
- 4.2.7 The lighting of the car park should meet the general standards of BS 5489-1:2020 and ensure that the entire parking area is well lit. Bollard lighting is not an appropriate lighting method, and should be avoided. Not only can they be damaged by reversing vehicles, more critically they do not provide sufficient light at the right height to aid facial recognition and reduce the fear of crime. It also does not deter crime and antisocial behaviour. Lighting details should be provided within the application.
- 4.2.8 The above comments are made on behalf of Thames Valley Police and relate to designing out crime only.
- 4.3 Public Consultation – Two site notices were erected on 31/01/2025, expiring on 21/02/2025. No responses have been received.

5. Equality Act 2010:

- 5.1 In determining this application the Council is required to have regard to its obligations under the Equality Act 2010. However, there is no indication or evidence (including from consultation on the application) that the protected groups identified by the Act have or will have different needs, experiences, issues and priorities in relation to this particular planning application. Therefore in terms of the key equalities protected characteristics it is considered there would be no significant adverse impacts as a result of the development.

6. Relevant Planning Policy and Guidance

- 6.1 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’. However, the NPPF does not change the

statutory status of the development plan as the starting point for decision making (NPPF paragraph 12). In this case the development plan consists of the Reading Borough Local Plan 2019.

6.2 In this regard, the NPPF states that due weight should be given to the adopted policies of the Local Plan 2019 according to their degree of consistency with the NPPF (the closer the policies in the plan to the policies in the NPPF, the greater the weight that may be given).

6.3 Accordingly, the National Planning Policy Framework and the following development plan policies and supplementary planning guidance are relevant:

6.4 National Policy and Guidance

National Planning Policy Framework 2024

2. Achieving sustainable development

4. Decision-making

6. Building a strong, competitive economy

7. Ensuring the vitality of town centres

8. Promoting healthy and safe communities

9. Promoting sustainable transport

11. Making effective use of land

14. Meeting the challenge of climate change, flooding and coastal change

National Planning Practice Guidance (2014 onwards) (PPG)

6.5 Reading Borough Local Plan 2019

CC1 Presumption in Favour of Sustainable Development

CC3 Adaption to Climate Change

CC7 Design and the Public Realm

CC8 Safeguarding Amenity

EN12 Biodiversity and the Green Network

EN14 Trees, Hedges and Woodlands

EN18 Flooding and Sustainable Drainage Systems

EM3 Loss of Employment Land

TR1 Achieving the Transport Strategy

TR3 Access, Traffic and Highway-Related Matters

TR5 Car and Cycle Parking and Electric Vehicle Charging

RL1 Network and Hierarchy of Centres

RL2 Scale and Location of Retail, Leisure and Culture Development

CR1: Definition of Central Reading

CR2: Design in Central Reading

CR4: Leisure, Culture and Tourism in Central Reading

6.6 Supplementary Planning Documents

Revised Parking Standards and Design Supplementary Planning Document (2011)

6.7 Other relevant documentation

Reading Borough Local Plan Pre-Submission Draft Partial Update, November 2024

Reading Borough Council Tree Strategy (March 2021)

Reading Biodiversity Action Plan (March 2021)

Reading Borough Council Strategic Flood Risk Assessment by PBA Ref 27560/4002
(June 2017)

Reading Local Cycle and Walking Infrastructure Plan 2020-2030 (LCWIP) (Reading Borough Council, in partnership with Wokingham Borough Council and West Berkshire Council, March 2020)

6.8 Local Plan Update

- 6.9 The current version of the Local Plan (adopted in November 2019) turned five years old on Tuesday 5th November 2024. The Local Plan was reviewed in March 2023 and around half of the policies in the plan are considered still up to date. However, the rest need to be considered for updating to reflect changing circumstances and national policy. A consultation version of the draft updated version of the Local Plan was published on 6th November 2024.
- 6.10 Although there is a five-year period for carrying out a review of a plan after it is adopted, nothing in the NPPF or elsewhere says that policies automatically become “out of date” when they are five years old. It is a matter of planning judgement rather than legal fact whether a plan or policies within it are out-of-date. This will depend on whether they have been overtaken by things that have happened since the plan was adopted, either on the ground or through changes in national policy, for example.
- 6.11 Officer advice in respect of the Local Plan policies pertinent to these applications listed above is that they remain in accordance with national policy and that the objectives of those policies remains very similar in the draft updated Local Plan. Therefore, they can continue to be afforded weight in the determination of this planning application and are not considered to be ‘out of date’.

7. APPRAISAL

- 7.1 The main considerations are:

- Land use principles
- Transport matters
- Amenity
- Flood Risk
- Other matters

Land use principles

- 7.2 Strictly speaking, the proposals would result in the temporary loss of employment land, with the existing use being Class B1 (car parking spaces ancillary to the office use at the adjacent building). Policy EM3 provides a set of matters (i to vi) to be considered when assessing proposals which would result in a loss of employment land. The supporting text clarifies that these matters “*should inform a balanced decision, not be used as a checklist where every item is fulfilled*”. In this particular case, the context of this being a) an application for temporary permission, b) the wider site being subject to a separately on-going redevelopment application and c) the wider site being subject to a possible future site allocation for residential uses (albeit this is at an early stage and not adopted – as explained earlier in this report), are particularly pertinent. Whilst it is acknowledged that a number of the matters referenced in EM3i-vi are not met (e.g. accessibility and

piecemeal loss), in the context of the vacancy of the land and it being subject to a current redevelopment proposal, in overall terms, as per EM3v, the need for alternative uses is arguably stronger than the need for the retention of employment land. Hence, a balanced decision is reached that the loss of the existing use is accepted, strictly on the 3 year temporary basis the application is sought.

- 7.3 It is also relevant to note that the acceptance of the loss of the existing employment land is not considered to compromise the separate consideration of the same matter as part of on-going application PL/24/0958, which will be judged on its own merits.
- 7.4 With the temporary loss of the existing use considered to be established, the next consideration is the principle of the proposed use, with the provision of a public car park being a Sui Generis use. Whilst car parks are not specifically referenced as a 'town centre' use, it is undeniable that the provision of car parking spaces is necessary to help facilitate the various functions of the town centre, such as retail, leisure, culture and tourism uses. As such, the proposed use in this regard is considered to comply with Policies CR1, CR3, TR5, RL1 and RL2.
- 7.5 In addition, it is also relevant to note that the proposals will be temporary, with a temporary car park being considered to be a fairly typical 'meanwhile use' on a site subject to a currently ongoing major redevelopment application (see relevant history section above). This context also counts in favour of the proposals. Furthermore, the proposals are simply 'change in use' only (aside from the provision of 3 accessible spaces, as introduced during the course of the application following RBC Transport comments), with the parking spaces already present at the site, albeit prior to the submission of this application they were ancillary to the office use, rather than being a public parking area as now proposed. This is also considered to count in favour of the proposed use. When each of these factors are combined, in overall terms the provision of a car park for a temporary 3 year period is considered to be suitable in land use principle terms.
- 7.6 To ensure that the permission occurs for only a temporary time period, as has specifically been proposed by the applicant, this is recommended to be secured via condition. This is to prevent this being a permanent change of use, which mindful of the above, would need to be separately considered.

Transport matters

- 7.7 In support of the proposals, the applicant has submitted a range of details to confirm the exact nature of the use, as per section 2 above. The proposals have been carefully considered by the Highway Authority (see section 4.1 above), who are satisfied with the proposals (as discussed at section 4.1 above) subject to a condition to secure 3 accessible parking spaces at the site. This was communicated with the agent during the course of the application, who has submitted a revised plan to illustrate 3 accessible parking spaces (reducing the total number of spaces from 56 to 55). It was discussed with the agent whether it would be possible to implement the 3 accessible spaces in practice at the site too, but this has not been possible within the timescales of the determination of the application. Accordingly, a condition will be necessary to secure the implementation of the accessible parking spaces within 4 weeks of the decision, in the context of the remainder of the proposal being retrospective in nature. The agent was

made aware of this and in agreement with this approach. The proposals are therefore considered appropriate from a transport perspective, subject to this condition.

Amenity

- 7.8 As per the consultation response from the Designing Out Crime Officer at Thames Valley Police, as per section 4.2 above, there are some concerns raised regarding the safety and security of proposed users of the car park without the inclusion of appropriate security measures. Accordingly, a security strategy is required to be secured, with this having a particular focus on CCTV and lighting. This is considered necessary to protect the amenity of users of the car park and the general area from the on-going use. This feedback was provided to the agent at any early stage of the determination period, with view to details being submitted/assessed at application stage, with view to a compliance condition being secured. However, the agent has not provided any substantial response for submission (whilst acknowledging the requirement and this being prepared by the applicant). In the circumstances, it is therefore necessary to secure a security strategy in full via condition. In the context of the proposals being sought retrospectively, it is considered reasonable for the proposed strategy to be submitted within 4 weeks of the decision notice, with the subsequently approved measures to be implemented within a further 4 weeks of those measures being approved. The agent has been made aware of these timescales from the outset and has raised no issues with the intended approach.
- 7.9 The officer site visit on 24/03/2025 witnessed that vehicles were parking at the site outside of the marked spaces, potentially resulting in the site being used for more than the 55 spaces applied for. This has the potential to cause amenity issues in terms of safe access and security, as well as the application not being assessed on this basis from a highways perspective. In the circumstances, it is considered reasonable and necessary to limit the number of vehicles parking at the site to a maximum of 55, which aligns with the number of parking bays marked on the proposed plan.
- 7.10 Subject to these conditions, the proposals are not envisaged to raise any other amenity impacts and are considered acceptable in this regard.

Flood Risk

- 7.11 Given parts of the site are within flood zone 3, a FRA has been submitted with the application. This follows the EA standing advice and considers the impact of the development from various different types of flood risk. The FRA concludes that *“As the proposals involve no changes to ground level or modification of the existing formalised surface water drainage arrangements, there will be no detrimental impact on flood risk and the proposals comply with national and local planning policy”*. Within the context of the nature of the proposals, such a conclusion is agreed by officers, who are content that the applicant has sufficiently demonstrated that the proposals are in compliance with Policy EN18, without the need for any mitigation measures to be put in place for the proposed public car park use.

Other matters

- 7.12 The proposals are not considered to impact on the separate on-going assessment of the current application at the wider site (see relevant history section above), which will be considered on its own merits.

8. CONCLUSION

- 8.1 On the basis of the above, it is considered that the application can be supported, to grant retrospective permission for the change of use of existing car park associated with the former office premises to a public car park (Sui Generis), for a temporary period of three years. This is subject to the following conditions.

1. Temporary permission – 3 years only

The use of the land as a public car park hereby approved shall cease and the site shall be restored to its former condition as an ancillary car park for the permitted office use on or before 24th March 2028.

REASON: The type of use is not one that the Local Planning Authority is prepared to approve in this location other than for a limited period, having regard to the nature of the use. Permission is only given because of the nature of the existing wider site (being subject to a separate current redevelopment proposal) and this being an appropriate meanwhile use, in accordance with Policies EM3, CR1, CR3, TR5, RL1 and RL2 of the Reading Borough Local Plan 2019.

2. Accessible parking spaces to be carried out in accordance with the approved plan within 4 weeks of the decision notice

Within 4 (four) weeks of the date this application is permitted, the 3 (three) accessible parking spaces shown on approved plan A4012-ASA-XX-GF-DR-A-1200 Rev PL2 – Proposed Ground Floor Plan, as received 14/03/2025 shall be provided in full accordance with the approved details. Thereafter, the accessible parking spaces shall be kept free of obstruction and retained in accordance with the approved details and shall remain available for the parking of vehicles at all times for the lifetime of this permission.

REASON: In order to ensure that the development is provided with adequate parking facilities to meet the needs of future users, in accordance with Policies TR3 and TR5 of the Reading Borough Local Plan 2019.

3. Maximum of 55 vehicles parked at the site at any one time

The public car park hereby approved shall include vehicle parking for a maximum of 55 vehicles at any one time, in accordance with the layout shown on approved plan A4012-ASA-XX-GF-DR-A-1200 Rev PL2 – Proposed Ground Floor Plan, as received 14/03/2025.

REASON: To adhere to the terms in which the application has been presented and assessed and to prevent the over occupation of the car park without the impacts having first been assessed by the Local Planning Authority, in accordance with Policies CC8, CC2, TR3 and TR5 of the Reading Borough Local Plan 2019.

4. Security Strategy

Within 4 (four) weeks of the date this application is permitted, a site security strategy shall be submitted in writing to the Local Planning Authority for approval. The site security strategy shall as a minimum include a formal surveillance strategy, with the possible provision of CCTV informed by an operational requirements study, and external lighting details. The subsequently

approved measures by the Local Planning Authority, as contained within the Site Security Strategy, shall be implemented in full within 4 (four) weeks of being approved and shall be permanently retained and maintained thereafter for the lifetime of this permission.

REASON: To safeguard the amenities of the adjoining premises and the area generally, in accordance with Policies CC7, CC8 and CR2 of the Reading Borough Local Plan 2019.

Informatives:

1. As per comments from the Designing Out Crime Officer at Thames Valley Police, it is clarified that any operational requirements study referenced in condition 4 shall include detailed plans as to what the role of each CCTV camera is, their location, camera type and specification and how the system will be managed/monitored. Furthermore, CCTV shall be informed by the lighting at the site. Lighting of the car park should meet the general standards of BS 5489-1:2020 and ensure that the entire parking area is well lit. Bollard lighting is not an appropriate lighting method, and should be avoided.
2. In reaching this decision, the Local Planning Authority has taken into consideration the following information:
 - A4012-ASA-XX-GF-DR-A-1100 Rev PL1 - Site Location Plan
 - A4012-ASA-XX-GF-DR-A-1101 Rev PL1 – Existing Ground Floor Plan
 - A4012-ASA-XX-GF-DR-A-1150 Rev PL1 – Proposed Block Plan
As all received on 24/12/2024
 - Flood Risk Assessment (FRA) Letter Report 2 Norman Place – Proposed Car Park Change of Use Technical Note Ref TN003 by Stantec
 - Letter by Opus Works Group Limited – Retrospective change of use of existing car park associated with former office use to public car park, 2 Norman Place, Reading, RG1 8DA dated 27/01/2025
 - Norman Place Occupancy Data dated 01/10/2024 – 21/01/2025 (3 pages)
 - Application form
 - CIL form
As all received on 27/01/2025
 - A4012-ASA-XX-GF-DR-A-1200 Rev PL2 – Proposed Ground Floor Plan
As received 14/03/2025
 - Email from Opus Works Group Limited ‘2 Norman Place - Car Park, ref: PL/24/1725’, dated and received 05/02/2025
 - Email from Opus Works Group Limited ‘Re: FW: 2 Norman Place - Car Park, ref: PL/24/1725’, dated and received 24/03/2025
3. The Local Planning Authority has worked positively and proactively with the applicant to resolve relevant matters to allow permission to be granted within the prescribed target timescale for the decision to be issued.