



ELG Planning

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Reading Borough Council
Civic Offices
Bridge Street
Reading
RG1 2LU

12 March 2026

Dear Sir / Madam

RE: APPLICATION FOR A LAWFUL DEVELOPMENT CERTIFICATE FOR THE PROPOSED USE OF A CAR SERVICING CENTRE AND BODYSHOP, VEHICLE DELIVERY HUB, AND ANCILLARY CAR SHOWROOM AT UNIT 1, READING INTERNATIONAL BUSINESS PARK, READING, RG2 6DA

This covering letter is submitted in support of an application for a lawful development certificate (LDC) for the proposed use of a car service centre and bodyshop, vehicle 'delivery hub', and ancillary car showroom at Unit 1 of Reading International Business Park, Reading. The application comprises:

- Application Form;
- 1000/C02 - Existing Floor Plan - Warehouse;
- 1005/C01 – Existing Floor Plans – Office;
- PL-1.10 - Proposed Ground Floor Plan; and
- PL-1.11 – Proposed First Floor Plan.

The main purpose of this letter is to demonstrate that the proposed use of the building by our client – Tesla – is lawful in the context of the Town and Country (Use Classes) Order 1987 (as amended) and can be accommodated under the existing/lawful use of the site/building.

Site Location & Planning History

The site is located within a predominantly industrial area at the southern edge of Reading and forms part of the Reading International Business Park. The site is located some 500m north-west off Junction 11, M4.



Planning permission was granted in April 2021 (LPA ref PL/19/2054) for '*Redevelopment to provide 15,080 sqm (GEA) of class B1(c), B2 or B8 floor space in four buildings, with associated*

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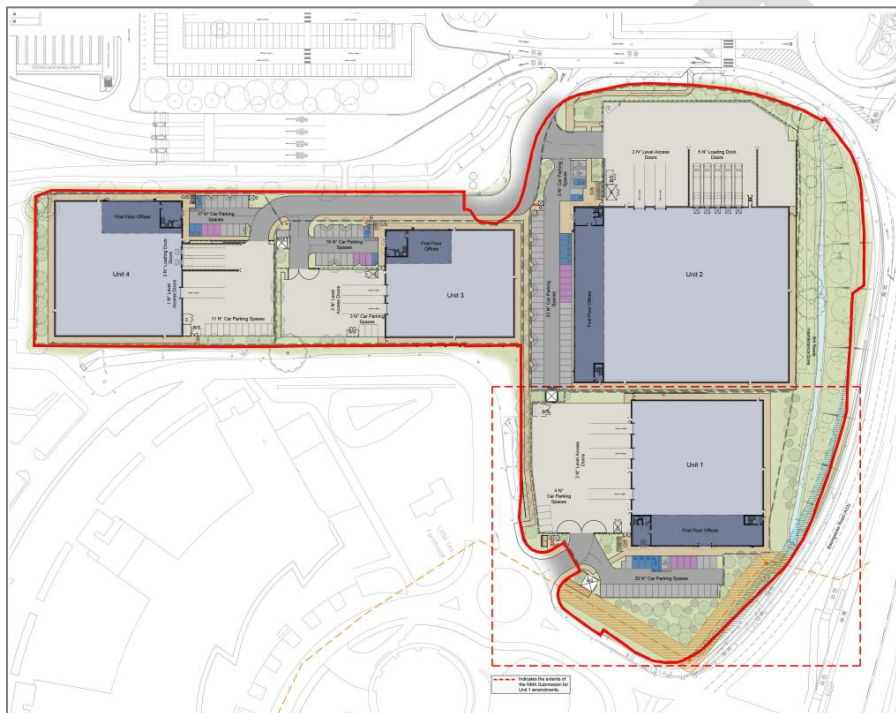
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external yards, car and cycle parking, landscaping, and all related and ancillary works (amended)'.

Development has now lawfully commenced in accordance with the approved plans and following discharge of the relevant pre-commencement conditions under subsequent planning applications as detailed below.

This proposal relates solely to Unit 1, which extends to approximately 3,278 sqm¹ of gross internal floor area (GIFA). A car parking area is located next to the unit providing a total of 36 car parking spaces, along with a service area adjacent to the southern elevation (note the plan below is orientated with north to the east).



Planning History

PL/19/2054 – Redevelopment to provide 15,080 sqm (GEA) of class B1(c), B2 or B8 floor space in four buildings, with associated external yards, car and cycle parking, landscaping, and all related and ancillary works (amended) (Approved 14/04/2021)

PL/21/0704 – Application for approval of details reserved by conditions 3, 4, 5, 12, 14, 15, 16, 21, 31, 32, 33 and part discharge (construction period) of condition 34 of application 192054 (Discharged 01/12/2022)

PL/21/0859 – Non-Material Amendment to application 192054 to amend the wording of Condition 18 to allow for the Interim BREEAM Certificate to be submitted to and approved

¹ Figure taken from the approved proposed site plan for application ref: PL/25/1529.

by the local planning authority no later than 6 months after commencement of development (Approved 26/07/2021)

PL/21/1313 – *Application for approval of details reserved by condition 7 (Trees) of application 192054 (Discharged 04/02/2022)*

PL/21/2085 – *Application for approval of details reserved by condition 9 of application 192054 (Discharged 21/11/2022)*

PL/22/0496 – *Non-Material Amendment to amend the wording of Condition 9 of planning permission 192054, to provide for the additional word 'target' minimum 8-metre wide buffer zone (Approved 09/09/2022)*

PL/25/0889/NMA – *Minor amendment of condition 2 of planning permission PL/19/2054 for amendments to locations of parking spaces, cycle shelter, transformer and substation, and new cycle/pedestrian route and pv and other minor external works (Approved 01/08/2025)*

PL/25/1450/NMA – *Non-material amendment of condition 2 of planning permission PL/19/2054 including amendments to car parks, transformer locations, minor external alterations and yards (amended) (Approved 11/11/25)*

PL/25/1529 – *Application under S96A of the Town and Country Planning Act 1990 (as amended) for a Non-Material Amendment to PL/19/2054 (as amended by PL/21/0859 and PL/22/0496). Including changes to car park, bin store relocation and changes to access points for Unit 1 (Approved 05.12.2025)*

PL/26/0017 – *Minor amendment to planning permission 192054 to amend the wording of condition 19 – Final BREEAM to change the submission trigger (amended) (Approved 09/02/2026)*

Proposed Use

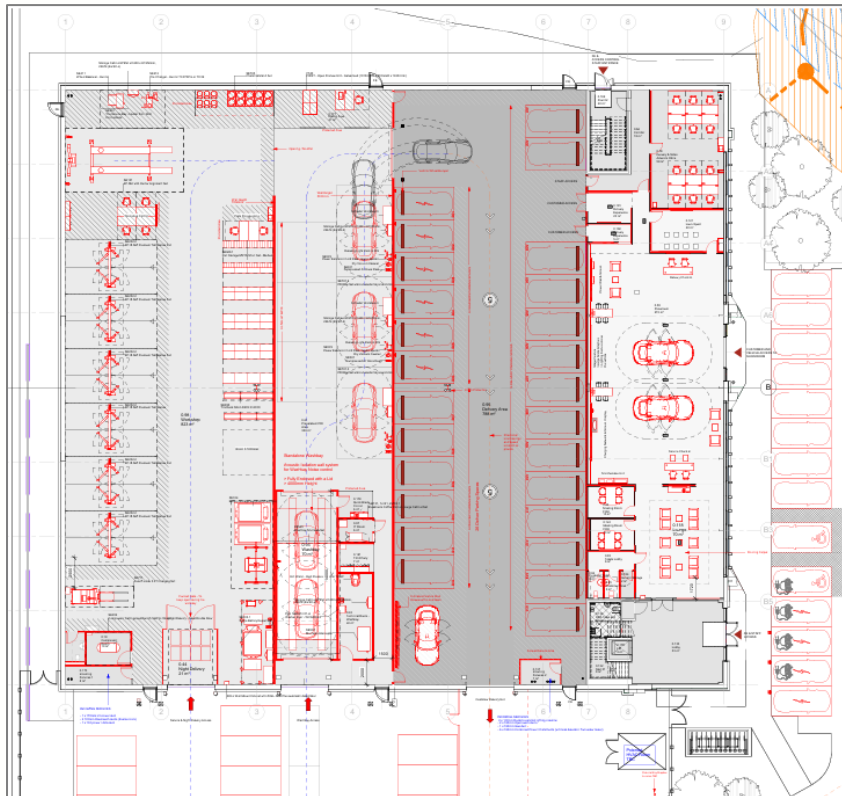
As noted above, our client intends to use Unit 1 as a car servicing centre and bodyshop, vehicle delivery 'hub', and ancillary car showroom.

The car servicing/bodyshop space will be used for the servicing, maintenance and general repair work to vehicles. This falls under use Class B2, which is supported by the original planning permission.

The vehicle 'delivery hub' would occupy the central section of the building and primarily involves the storage and distribution of cars. The cars are primarily purchased elsewhere (e.g. on-line) and collected from the site by customers. This falls under Use Class B8, which is also supported by the original permission. This view is shared by other local planning authorities when considering the use of vehicle 'delivery hubs' in buildings that have permission for B8 use.



A small/ancillary area within the building will also be utilised as a car ‘showroom’ for 2 Tesla models. Whilst the servicing centre and bodyshop and car ‘delivery hub’ occupy the vast majority of the internal floor area and form the primary use of the unit (and underlying reason for its location within the Business Park), the showroom provides an opportunity – primarily for existing visiting Tesla customers – to view new Tesla models whilst making use of the servicing centre/bodyshop (so not distinct uses/activities). The showroom would extend to approximately 219 sq m GIFA, which amounts to circa 6.8% of the overall GIFA (3,241 sq m).



Left: Proposed Ground Floor Plan

Planning Assessment

The lawful use of the approved development is B1(c), B2 or B8 as defined on the relevant decision notice (LPA ref. PL/19/2054) and the use of for car servicing and bodyshop and vehicle delivery hub clearly falls within Use Class B2 and B8 so consistent with the existing/lawful use of the site. It is our view that the car showroom element of the proposal should be considered ancillary to the primary use, and therefore, does not constitute a material change of use beyond the approved use.

This assessment is based on the very modest associated floor area, which amounts to only 6.6% of the overall GIFA unit and because the showroom is both physically and functionally related to the lawful use of the building. It is also envisaged that the proportion of parking and customer visits associated with the showroom element will be comparative to the percentage of floorspace.

The car showroom will only display 2 Tesla vehicles, primarily aimed at existing customers already visiting the site. The showroom is not designed primarily to attract new customers given the location within the heart of a business park and would not operate independently of the primary use. The showroom is thus not functionally or visually separate from the service centre/bodyshop and vehicle delivery hub, and represents a modest/subsidiary component to the main use both in terms of floor area and commercial activity.

The same assessment/conclusion has been made by several local planning authorities for similar proposals elsewhere. Further details of these have been provided below.

Trafford Council

Trafford Council confirmed in December 2023 that a car showroom occupying 7% of the floorspace of a commercial unit at Ocean Business Centre (Altrincham) constituted an ancillary element to the main B2 use and granted planning permission (LPA Ref: 111146/VAR/2) on that basis. This requirement was referenced in condition 2 of the approved scheme, which states:

“No more than 7% of the total floorspace in Unit 2 and none of the floorspace in Unit 1 shall be used as a car showroom.”

Reason: To ensure that the car showroom element remains ancillary to the main uses as an increase in the scale of this use may result in a detrimental effect on the area and the restriction to the use proposed will enable the Local Planning Authority to consider any further change on its merits, having regard to Policies L4 and L7 of the Trafford Core Strategy.”

In the Trafford example, the original description of development was,

‘Erection of two units (Use Class B2 and B8 with ancillary Use Class E(g) floorspace), with the provision of associated infrastructure including service yards, car parking, cycle and waste storage, landscaping and new access point off George Richards Way following demolition of the existing structures.’

Solihull Council

Solihull Council likewise issued an LDC (LPA Ref: PL/2023/00383/CLOPUD) confirming that a car showroom occupying 9% of the overall floor area would not represent a material change of use constituting development and therefore, would not require the benefit of planning permission. In approving the application, the officer report included the following extract:

‘There is no question that a car servicing centre is a general industrial use falling within Class B2 and, as such, would be in conformity with the lawful use of the planning unit. The main issue in this case is whether the ‘car showroom’ use is ‘ancillary’ to the primary use of the land and building. In determining whether a use is ancillary or not, the scale of the use may be relevant but is not determinative. In this case, it is clear from the



*submitted documents that the **car showroom element would be relatively small in scale when compared to the primary use of the building and land. Furthermore, the submitted documents demonstrate that the uses are physically and functionally related to one another, so there would be no material change in the overall character of the use of the building or land from that of the primary use.** For these reasons, the car showroom would not go beyond a use ancillary to the primary general industrial use and would not therefore constitute an MCU.'*

In the Solihull example, the original description of development was,

'Erection of three warehouse buildings 117,000 sq. ft. (equivalent to 10,870 sq. m), with ancillary office development (Use Class B1(a-c), B2, B8) with associated parking, cycle storage, servicing yards, circulation, lighting, landscaping, access road, access points off the access road and all other details required by Condition 3 relating to the reserved matters of layout, scale, appearance and landscaping pursuant to planning permission reference PL/2016/00863/MAOOT.'

Milton Keynes Council

A pre-application enquiry was submitted to Milton Keynes Council to establish whether an industrial unit that was under construction could be occupied by Tesla as car servicing centre with ancillary car showroom. In providing their response, the Council formed the view that the showroom was ancillary as set out in an extract from their response below,

In this instance of the proposed use, it is noted that this is described as a sui generis use. When assessing the extent of the uses proposed, however, it is considered that the proposed servicing element would be of a B2 use. In respect of the showroom element, this is considered to be an ancillary element associated with the wider unit, with a small area of the unit being designated for showroom purposes, with this element of the site unable to operate separately from the car servicing element. This assessment is formed from the submitted plans, however, a full assessment on the functionality of this element would be made upon the submission of detailed proposed plans part of any planning application.

In the Milton Keynes example, the original description of development was,

'Demolition of existing buildings, land reprofiling and development of 3 no. Class B8 storage and distribution units with associated access, servicing, parking and landscaping detail.'

Cherwell District Council

The client looked to establish that a proposed car servicing centre with ancillary showroom was able to benefit from an existing permission for employment use, or whether any form of planning application was required.

In determining an application for an LDC (LPA Ref: 23/00017/CLUP), the LPA formed the view that the showroom element was ancillary, as set out in the extract from the officer's report below:



“With regard to the other uses proposed in the building, the proposed showroom would be used for the purposes of exhibiting vehicles. The floor area given over to this function is 5.5% of the total floorspace of the unit and additional information provided indicates that all vehicle sales would take place online and not on site.

Members of the public would be attending the service centre to drop off and collect vehicles, including courtesy cars, and therefore if others were attending to view or test drive a car, Officers do not consider this would be significantly different in character to the service function. When this is taken into account with the small area given over to this function and the absence of on site sales, Officers consider that the proposed vehicle display area would likely be ancillary to the vehicle service centre.”

City of Wolverhampton Council

The Council approved an LDC on the basis that an existing employment unit that had permission for B1c, B2 and B8 uses and was able to lawfully accommodate a car servicing centre and bodyshop with ancillary car showroom.

Prior to submitting the application, pre-application discussions had taken place with the case officer and they confirmed that,

“There is a potential future occupier who is looking to use the relatively small area of unit 2 (as shown on the submitted plans) for showroom, product / vehicle display and storage area. This would be ancillary to the main use of the building and therefore the scheme would not require a variation of the planning permission uses as the planning use category would remain B1c, B2 and B8.”

In the Wolverhampton example, the original description of development was,

‘Development of the site for two industrial / warehouse units with B1c, B2 and B8 uses with ancillary offices, service yards, car parking and soft landscaping areas.’

Conclusion

For the reasons noted above, we consider that the same assessment of the proposed use of the building/site should be made in this instance, namely that the proposed use of Unit 1 by Tesla, comprising a car service centre and bodyshop, vehicle ‘delivery hub’, and ancillary car showroom, is consistent with the approved B1, B2 and B8 uses and does not constitute a material change of use requiring planning permission.

We respectfully request that a LDC is issued at your earliest opportunity to confirm the lawfulness of the proposed use.

Please do not hesitate to contact me should you have any queries.



Yours faithfully,

Tim Davis MRTPI
Senior Planner

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