



Build Studios, London, SE1 7FR
Mobile: 07568 115449
Email: neve@jmsplanning.com

Development Management
Wokingham Borough Council
Civic Offices
Shute End
Wokingham
RG40 1BN

14th March 2025

Dear Sir/Madam

Re: S73 Planning Application to Vary Condition 3 Attached to Planning Permission 222416 Approved on 6 January 2023 to Allow Extended Hours for the Jet Wash Bays at the Site of Three Mile Cross Service Station, Basingstoke Road, Reading, RG7 1BA.

We are instructed by Fraser's Retail Limited to submit an application to "Vary Condition 3 Attached to planning permission 222416 approved on 6 January 2023 to allow extended hours for the jet wash bays" at the site of Three Mile Cross Service Station, Basingstoke Road, Reading, RG7 1BA.

Condition 3 currently states that:

"Hours of operation - The jet washers hereby permitted shall not operate other than between the hours of 7:00am to 19:00pm Mondays to Saturdays and 08:00am to 19:00pm on Sundays and Bank Holidays, and shall not operate at any other time unless otherwise first agreed in writing by the Local Planning Authority.

Reason: To protect the occupants of nearby residential properties from noise. Relevant Policy: Core Strategy Policies CPI & CP3 and MDD Local Plan Policy CC06."

This application has been submitted via the Planning Portal (Ref: PP-13854553) with a supporting Noise Impact Assessment Report and it would be appreciated if you could take into account the contents of this letter in consideration of the application.

Site and Surroundings

The application site is an operational petrol filling station located on Basingstoke Road, within Three Mile Cross Settlement, incorporating a sales building and forecourt with jet wash facilities to the rear (west) of the site. Parking is provided at the front of the sales building and to the south corner of the site, including EV charging and air and water bays. A grade II listed building (Highway Cottage) is situated to the south and east of the site. Residential dwellings are located to the north, south and west.

The Proposal

The proposal seeks the variation of Condition 3 to extend the operating hours for the existing jet wash facilities on site as proposed in the reworded Condition 3 below (old text struck out and new text shown in bold):

*“Hours of operation - The jet washers hereby permitted shall not operate other than between the hours of 7:00am to ~~19:00pm~~ **22:00pm** Mondays to Saturdays and 08:00am to ~~19:00pm~~ **22:00pm** on Sundays and Bank Holidays, and shall not operate at any other time unless otherwise first agreed in writing by the Local Planning Authority.*

Reason: To protect the occupants of nearby residential properties from noise. Relevant Policy: Core Strategy Policies CPI & CP3 and MDD Local Plan Policy CC06.”

As the economy, working patterns and life style choices have changed over recent years, there has been a rise in the 24-hour economy and motorists and residents expect to have access to services and facilities on a 24-hour basis whilst 24-hour operation of the jet washers is not proposed extended hours are sought. This application seeks to respond to motorists' expectations and seek to ensure their needs are met as far as possible.

The application has been supported by a Noise Impact Assessment prepared by ES Acoustics which assesses the proposal in the context of the background noise levels and the anticipated additional noise generated by the operation of the jet wash bays operating until 22:00pm Monday to Friday.

It states that in all cases, the calculated Rating Level would not exceed the background sound level at the receptor façades. Predictions of Rating Level ranged from equal to background to -3 dB below background noise levels. When considering the calculated Rating Levels vs the background sound level, and the context in which the sound occurs, it has been concluded that noise emissions from the jet wash bays during the proposed extended operating hours would have a low likelihood of adverse impact in accordance with BS 4142:2014+A1:2019. Accordingly, it is considered the above proposed hours are acceptable in terms of noise.

Planning History

The relevant planning history has been reviewed using the Council's website and the most relevant application is Ref: 222416 which granted permission for *"Full application for the proposed erection of 1no jet wash bay, modification to existing jet wash bays, erection of 1no single storey plant room, and new jet wash covered enclosures following demolition of existing jet wash dividing screens."* This permission was implemented and the site operates under the conditions of this permission, including Condition 3, as detailed above.

Condition 6 (details of acoustic fence) of application 222416 was discharged on 13th April 2023 with the reference 230503. The other conditions are compliance based.

Since the approval of the above applications, another application has been granted, however this does not relate to the jet wash bays. The application description is *" Full application for proposed works to the petrol filling station consisting of the installation of 4 no. electric vehicle charging bays supported by two chargers, plus associated equipment and alterations to hardstanding"* and it was granted 14 July 2023 (Ref: 231258).

The planning history shows that the site, like all service stations, must continue evolving to meet the changing needs of motorists.

Policy Background

The National Planning Policy Framework (NPPF) published in December 2024 sets out the Government's planning policies for England. In respect of noise, the NPPF states that the planning system should contribute to enhancing the natural and local environment by preventing both new and existing developments from contributing to an acceptable risk from, or being adversely affected by, unacceptable levels of noise pollution.

Paragraph 198 requires that planning policies and decisions should ensure that new development is appropriate for its location taking into account the likely effects of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. The policy encourages consideration of mitigation and reducing potential adverse impacts so as to ensure that noise does not give rise to significant adverse effects on health and the quality of life.

The Development Plan for Wokingham comprises the Core Strategy (2010), Management Development Delivery (MDD) Local Plan (2014), Central and Eastern Berkshire Joint Minerals and Waste Plan (2023) and Neighbourhood Development Plans. On the Proposals Map, the site is unallocated but does fall under the 'Local Shops' area in relation to retail centres, as well as a 'modest development location'.

The site is also within the following zones/areas, albeit this is of very limited relevance to this proposal:

- Thames Basin Heath SPA Mitigation Zone
- Major Nuclear Site Consultation Zone
- Aerodrome Safeguarding: Heathrow Consultation Zone
- EA Groundwater Consultation Zone
- Great Crested Newt Impact Risk Zone
- SSSI Impact Risk Zone
- Potentially Contaminated Land Consultation Zone

The relevant policies for this proposal are CP1 (Sustainable Development) and CP3 (General Principles for Development) of the Core Strategy and CC06 (Noise) of the MDD Local Plan. However, the key policy is CC06. Specifically, the policy requires proposals to demonstrate how they have addressed noise impacts to protect noise sensitive receptors (both existing and proposed) from noise impacts. This is the key matter in relation to this application.

Planning Discussion

The application proposal has been submitted with a thorough Noise Impact Assessment Report which confirms that the proposed extended opening hours of the jet washers as detailed above – 07:00am to 22:00pm Monday to Saturdays and 08:00am to 22:00pm on Sundays and Bank Holidays – will have a low impact on the most affected residents and the proposal is likely to have a low likelihood of adverse impact in accordance with BS 4142:2014+A1:2019.

This supporting evidence is a key consideration in the determination of the application and confirms that the proposal will have no adverse impact on the adjoining residents and therefore the proposal accords with Policies CP1, CP3 and CC06 of the Local Development Plan and the objectives set out in the NPPF.

Based on the above, it is respectfully requested Condition 3 be amended as proposed above. It is proposed that the remaining conditions be kept as existing.

Should you have any queries regarding the above or any other matter relating to this application, please contact me on neve@jmsplanning.com or 07568 115449.

Yours faithfully

N. Thomson

Neve Thomson
JMS Planning & Development

Encs.